

<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	Our Vision
<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>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>I believe the plan that the 9 districts propose to submit to the SoS does not present a realistic strategy for the GM area given that Stockport MBC has withdrawn from the process, yet the draft PfE still relies on the same background data, assumptions and aspirations for housing population, economic and employment growth including the proposals to release large areas of green belt in the north of the conurbation.</p> <p>The plan fails to take account of economic, political, social and cultural trends and issues that will impact on the use of land and resources, employment and housing in the GM area over the Plan period and beyond. Some of these are the result of the pandemic, and the urgent need to address climate change and include: the reduction in demand for office and retail space (which could be repurposed for housing and other employment space), the need to reduce the demand and use of private cars, protection of the natural environment and open space. The population figures used in the Plan are aspirational and therefore likely to be higher than the actual resultant growth in the 9 districts but more focus should be on the fact that most population growth going forward will be in the over 75s which will not translate into the need for the level and type of land release proposed. If we are to create the sort of sustainable communities that the draft PfE aspires to then a plan that looks at these issues with a better understanding about how they will translate into the demand and use of land and property is needed. National and international policies look increasingly to economies that will reduce the growth in consumption and move to more circular economic model that are carbon neutral and protects the environment. A plan, whose population forecasts, demand for employment space, housing and infrastructure proposals are based on an economic model rooted in globalisation, unsustainable growth and consumerism fails in particular to meet the climate and environment policies of the PfE itself and of national policies</p>

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	<p>The objections to the draft GMSF were extensive but particularly in the case of the Bury proposals appear to have been dismissed almost completely as the PfE plan is virtually identical in respect of these proposals. I have found it impossible to find out a full summary of the objections and the reasons they were dismissed despite an exhaustive search on the online portal. The only reference I have been able to find is a report to GMCA on the 27.9.2019 reporting on the consultations to the GMSF (but with no other details).</p> <p>I don't believe that the draft PfE has been prepared with sufficient cognisance to interested parties within the GM area, particularly to objectors or to other local authorities - particularly Stockport</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>I don't believe that a strategic land use plan can be prepared for the GM area that excludes the Stockport area, particularly given the fact that Stockport is an area of economic growth and high housing demand compared to other parts of the conurbation. A plan that incorporates Stockport should be put in place that addresses the concerns of that Borough. Instead the remaining authorities have ploughed on with what is little more than a re-hash of the draft GMSF (excluding Stockport) whilst ignoring completely many of the concerns</p> <p>Much of the data upon which the PfE is based goes back to before 2014. It is also pre-Brexit, the climate emergency, the pandemic and to a time when globalisation as an economic model looked to be unchallenged throughout the World. PfE is a plan for the past - not the future and this needs to be addressed if a strategic land use plan that can be delivered and address the issues that will impact the area over the next 20 years</p>
<p><b>Family Name</b></p>	Boyle
<p><b>Given Name</b></p>	Gillian
<p><b>Person ID</b></p>	1286714
<p><b>Title</b></p>	Our Strategic Objectives
<p><b>Type</b></p>	Web
<p><b>Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:</b></p>	<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>
<p><b>Soundness - Positively prepared?</b></p>	Unsound
<p><b>Soundness - Justified?</b></p>	NA
<p><b>Soundness - Consistent with national policy?</b></p>	NA
<p><b>Soundness - Effective?</b></p>	NA
<p><b>Compliance - Legally compliant?</b></p>	NA
<p><b>Compliance - In accordance with the Duty to Cooperate?</b></p>	No

<p><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>	<p>The strategic objectives within the plan fails to take account of economic, political, social and cultural trends and issues that will impact on the use of land and resources, employment and housing in the GM area over the Plan period and beyond, including the reduction in demand for office and retail space (which could be repurposed for housing and other employment space), the need to reduce the demand and use of private cars, protection of the natural environment and open space. The population figures used in the Plan are aspirational and therefore likely to be higher than the actual resultant growth in the 9 districts and there should be more focus on the fact that household growth will be in the over 65"s and particularly the over 75s which will not translate into the need for the level and type of land release proposed. If we are to create the sort of sustainable communities that the draft PfE aspires to then strategically objectives that looks at these issues with a better understanding about how they will translate into the demand and use of land and property is needed. National and international policies look increasingly to economies that will reduce the growth in consumption and move to more circular economic model that are carbon neutral and protects the environment. The strategic objectives have emerged from the Plan"s vision that I believe to be fundamentally flawed and the policies and land use proposals in the Plan will therefore fail to meet these objectives</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>Sound and deliverable strategic objectives come from a sound and deliverable strategic plan and if this is to be produced for the GM area then it must include Stockport. The GMSF needs to be reviewed to incorporate the concerns of that Borough. The strategic objectives of the plan also need to be based on more up to date data and it must address the issues that will impact on the area's economic, social and physical capital</p> <p>Much of the data upon which the PfE and its strategic objectives go back to before 2014. It is also pre-Brexit, the climate emergency, the pandemic and to a time when globalisation as an economic model looked to be unchallenged throughout the World.</p>
<p><b>Family Name</b></p>	<p>Boyle</p>
<p><b>Given Name</b></p>	<p>Gillian</p>
<p><b>Person ID</b></p>	<p>1286714</p>
<p><b>Title</b></p>	<p>Our Spatial Strategy</p>
<p><b>Type</b></p>	<p>Web</p>
<p><b>Soundness - Positively prepared?</b></p>	<p>Unsound</p>
<p><b>Soundness - Justified?</b></p>	<p>Unsound</p>
<p><b>Soundness - Consistent with national policy?</b></p>	<p>Unsound</p>
<p><b>Soundness - Effective?</b></p>	<p>Unsound</p>
<p><b>Compliance - Legally compliant?</b></p>	<p>No</p>
<p><b>Compliance - In accordance with the Duty to Cooperate?</b></p>	<p>No</p>
<p><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>	<p>I believe the Plan is strategically unsound. It is based on assumptions of population growth that are not guaranteed and unlikely to take place, particularly in the north of the conurbation, where most of the development proposals are located. Population growth is likely to be concentrated in the south (including Stockport, which is excluded from this Plan) and the City Centre. Most of the population growth is likely to come in the 65+ age group, which will not translate into employment requirements</p>

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<b>co-operate. Please be as precise as possible.</b>	The spatial strategy bases its land proposals on aspirational employment growth well above any likely growth, given population growth will be dominated by the over 65+ groups. It then uses this aspirational employment growth to support large greenfield land releases on the crude translation of this employment growth to floorspace and then to ha of land to be released.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	The development proposals should be based on actual and anticipated demand for space in the sectors likely to generate growth. Some of these sectors have little or no requirement for the release of additional land (so called 'landless growth'). The Plan takes no account of the changes resulting from reduced demand for retail and office space and the land that this will free up for employment and housing
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-Strat 1 Core Growth Area
<b>Type</b>	Web
<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>	I have no objections to the land use policies for the Regional centre based on Manchester City Centre and Central Salford although am not sure that the policies for Port Salford are realistic
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-Strat 6 Northern Areas
<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>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant,</b>	The scale of land releases for employment proposed in the northern area will fail to create the high value jobs that the PfE claim and thereby justify the loss of green belt open land. The loss of this green belt land, the impact on the natural environment and will blight the surrounding communities is not justified by the scale of development proposed and is not justified by

<p><b>is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	<p>likely demand over the plan period (and beyond). The likely employment created in this area will be for warehousing and logistics that have a very low employment density and are lower paid and low skilled. The area is poorly served by public transport and will negatively impact on policies to protect the environment, improve the quality of life for people in the north of the area and will undermine policies on climate change. The policy also depends on the implementation of extensive infrastructure for which there is no identified funding. The proposals will further undermine the attractiveness of these areas as a place to live, particularly the quality of life which is a key reason why the northern parts of the conurbation are less popular for growth industries and their employees. The housing proposals are not justified on the basis of need within the area. The housing is poorly served by public transport and local facilities and contrary to policies on the development of housing in sustainable locations.</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>The housing allocations on green belt land should be removed from the Plan. The employment land releases proposed should be massively scaled back and reflect more reasonably actual demand and the need for any development to be sustainable, carbon neutral, deliverable and fundable</p>
<p><b>Family Name</b></p>	<p>Boyle</p>
<p><b>Given Name</b></p>	<p>Gillian</p>
<p><b>Person ID</b></p>	<p>1286714</p>
<p><b>Title</b></p>	<p>JP-Strat 7 North East Growth Corridor</p>
<p><b>Type</b></p>	<p>Web</p>
<p><b>Soundness - Positively prepared?</b></p>	<p>Unsound</p>
<p><b>Soundness - Justified?</b></p>	<p>Unsound</p>
<p><b>Soundness - Consistent with national policy?</b></p>	<p>Unsound</p>
<p><b>Soundness - Effective?</b></p>	<p>Unsound</p>
<p><b>Compliance - Legally compliant?</b></p>	<p>No</p>
<p><b>Compliance - In accordance with the Duty to Cooperate?</b></p>	<p>No</p>
<p><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>	<p>The scale of land releases for employment proposed in the M62 North East Corridor will fail to create the high value jobs that the PfE claim and thereby justify the loss of green belt open land. The loss of this green belt land, the impact on the natural environment and will blight the surrounding communities is not justified by the scale of development proposed and is not justified by likely demand over the plan period (and beyond). The likely employment created in this area will be for warehousing and logistics that have a very low employment density and are lower paid and low skilled. The area is poorly served by public transport and will negatively impact on policies to protect the environment, improve the quality of life for people in the north of the area and will undermine policies on climate change. The policy also depends on the implementation of extensive infrastructure for which there is no identified funding. The proposals will further undermine the</p>



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	<p>attractiveness of these areas as a place to live, particularly the quality of life which is a key reason why the northern parts of the conurbation are less popular for growth industries and their employees. The housing proposals are not justified on the basis of need within the area. The housing is poorly served by public transport and local facilities and contrary to policies on the development of housing in sustainable locations.</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>The housing allocations on green belt land should be removed from the Plan. The employment land releases proposed should be massively scaled back and reflect more reasonably actual demand and the need for any development to be sustainable, carbon neutral, deliverable and fundable</p>
<p><b>Family Name</b></p>	Boyle
<p><b>Given Name</b></p>	Gillian
<p><b>Person ID</b></p>	1286714
<p><b>Title</b></p>	JP-S 1 Sustainable Development
<p><b>Type</b></p>	Web
<p><b>Soundness - Positively prepared?</b></p>	Unsound
<p><b>Soundness - Justified?</b></p>	Unsound
<p><b>Soundness - Consistent with national policy?</b></p>	Unsound
<p><b>Soundness - Effective?</b></p>	Unsound
<p><b>Compliance - Legally compliant?</b></p>	No
<p><b>Compliance - In accordance with the Duty to Cooperate?</b></p>	No
<p><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>	<p>Many of the proposals within the Plan will undermine the aims of this policy. In particular the proposals for green belt land release (especially the Northern Gateway proposals), housing allocations on green belt land such as adjacent to Elton Reservoir and Walshaw in Bury</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>Green Belt land release for employment and housing allocations, especially in the Bury area, which faces the largest release of green belt land - despite being the smallest Borough are not sustainable</p> <p>More focus should be given to the use of unused or under-occupied land and property, particularly the redevelopment or re-use of land used for retail (including the large car parks surrounding these properties) and offices</p>

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<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-S 2 Carbon and Energy
<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>	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>	Many of the proposals within the Plan will undermine the aims of this policy. In particular the proposals for green belt land release (especially the Northern Gateway proposals), housing allocations on green belt land such as adjacent to Elton Reservoir and Walshaw in Bury
<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>	Green Belt land release for employment and housing allocations, especially in the Bury area, which faces the largest release of green belt land - despite being the smallest Borough are not sustainable More focus should be given to the use of unused or under-occupied land and property, particularly the redevelopment or re-use of land used for retail (including the large car parks surrounding these properties) and offices
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-S 4 Resilience
<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

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<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>	Many of the proposals within the Plan will undermine the aims of this policy. In particular the proposals for green belt land release (especially the Northern Gateway proposals), housing allocations on green belt land such as adjacent to Elton Reservoir and Walshaw in Bury
<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>	Green Belt land release for employment and housing allocations, especially in the Bury area, which faces the largest release of green belt land - despite being the smallest Borough are not sustainable  More focus should be given to the use of unused or under-occupied land and property, particularly the redevelopment or re-use of land used for retail (including the large car parks surrounding these properties) and offices
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-S 5 Flood Risk and Water Environment
<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>	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>	Many of the proposals within the Plan will undermine the aims of this policy. In particular the proposals for green belt land release (especially the Northern Gateway proposals), housing allocations on green belt land such as adjacent to Elton Reservoir and Walshaw in Bury
<b>Redacted modification - Please set out the modification(s) you consider necessary to</b>	Green Belt land release for employment and housing allocations, especially in the Bury area, which faces the largest release of green belt land - despite being the smallest Borough are not sustainable



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<b>make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	More focus should be given to the use of unused or under-occupied land and property, particularly the redevelopment or re-use of land used for retail (including the large car parks surrounding these properties) and offices
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-S 6 Clean Air
<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>	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>	Many of the proposals within the Plan will undermine the aims of this policy. In particular the proposals for green belt land release (especially the Northern Gateway proposals), housing allocations on green belt land such as adjacent to Elton Reservoir and Walshaw in Bury. These developments will be car / vehicular based with poor public transport connectivity
<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>	Green Belt land release for employment and housing allocations, especially in the Bury area, which faces the largest release of green belt land - despite being the smallest Borough are not sustainable  More focus should be given to the use of unused or under-occupied land and property, particularly the redevelopment or re-use of land used for retail (including the large car parks surrounding these properties) and offices that will be less reliant on private transport and generate fewer vehicular trips
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-S 7 Resource Efficiency
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound

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<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>	Many of the proposals within the Plan will undermine the aims of this policy. In particular the proposals for green belt land release (especially the Northern Gateway proposals), housing allocations on green belt land such as adjacent to Elton Reservoir and Walshaw in Bury. These developments will be car / vehicular based with poor public transport connectivity, requiring unnecessary infrastructure and the destruction of natural capital
<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>	Green Belt land release for employment and housing allocations, especially in the Bury area, which faces the largest release of green belt land - despite being the smallest Borough are not sustainable More focus should be given to the use of unused or under-occupied land and property, particularly the redevelopment or re-use of land used for retail (including the large car parks surrounding these properties) and offices that will be less reliant on private transport and generate fewer vehicular trips
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-J 1 Supporting Long Term Economic Growth
<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>	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</b>	A significant element of this policy relates to large greenbelt land releases, particularly at the Northern Gateway which proposes to release a massive area of greenbelt and open land for primarily warehousing. It will result in the loss of valuable open space and greenbelt land in an unsustainable location. Scant regard has been paid to the potential impact of these proposals on the local community over many years, firstly from blight, and

<b>comply with the duty to co-operate. Please be as precise as possible.</b>	from disruption and degradation of the surrounding area if development takes place. There is far too much land proposed for development in a single location. Not only is this very harmful to the communities in the south of Bury and Rochdale but the benefits to the surrounding communities and region as a whole will be minimal. Development in the greenbelt areas will be in warehousing and logistics which generate few jobs per m2 of space and are often low paid. Given that the Plan acknowledges some of the greenbelt proposals will come forward after the Plan period then there is no justification for the release of the scale of Green Belt land at this time. Most new jobs will be created in the knowledge based and service sectors which will want to locate within the Regional Centre and core urban areas.
<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>	A review of existing and potential brownfield employment sites to accommodate growth in sectors likely to grow over the Plan period together with the type of space they require (e.g. land or existing buildings). This should also consider how the reduction in demand for office space caused by more home-working and retail space can be repurposed or redeveloped to provide employment space.
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-J 2 Employment Sites and Premises
<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>	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>	A significant element of this policy relates to large greenbelt land releases, particularly at the Northern Gateway which proposes to release a massive area of greenbelt and open land for primarily warehousing. It will result in the loss of valuable open space and greenbelt land in an unsustainable location. Scant regard has been paid to the potential impact of these proposals on the local community over many years, firstly from blight, and from disruption and degradation of the surrounding area if development takes place. There is far too much land proposed for development in a single location. Not only is this very harmful to the communities in the south of Bury and Rochdale but the benefits to the surrounding communities and region as a whole will be minimal. Development in the greenbelt areas will be in warehousing and logistics which generate few jobs per m2 of space and are often low paid. Given that the Plan acknowledges some of the greenbelt proposals will come forward after the Plan period then there is no justification for the release of the scale of Green Belt land at this time. Most new jobs

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	will be created in the knowledge based and service sectors which will want to locate within the Regional Centre and core urban areas.
<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>	A review of existing and potential brownfield employment sites to accommodate growth in sectors likely to grow over the Plan period together with the type of space they require (e.g. land or existing buildings). This should also consider how the reduction in demand for office space caused by more home-working and retail space can be repurposed or redeveloped to provide employment space.
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-J 4 Industry and Warehousing Development
<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>	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>	A significant element of this policy relates to large greenbelt land releases particularly at the Northern Gateway where it will result in the loss of valuable open space and greenbelt land in an unsustainable location. Scant regard has been paid to the potential impact of these proposals on the local community over many years, firstly from blight, and from disruption and degradation of the surrounding area if development takes place. There is far too much land proposed for development in a single location. Not only is this very harmful to the communities in the south of Bury and Rochdale but the benefits to the surrounding communities and region as a whole will be minimal. The Plan acknowledges that some of the greenbelt proposals will come forward after the Plan period and this is almost certain in the proposed Northern Gateway area given the scale of land release and the infrastructure required to deliver the level of development proposed. The level of development within the Northern Gateway area is well above that required during the plan period and given the demonstrable harm it will bring to the surrounding communities and to policies within this Plan, the scale of green belt land release is not justified
<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</b>	A review of existing and potential brownfield employment sites to accommodate realistic growth in warehousing and manufacturing Plan period together with the type of space they require (e.g. land or existing buildings). This should also consider how the reduction in demand for office space caused by more home-working and retail space can be repurposed or redeveloped to provide suitable space

<b>of any legal compliance or soundness matters you have identified above.</b>	
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-H 1 Scale Distribution and Phasing of New Housing Development
<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>	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>	The policy proposes land supply figures at over 10,300 pa for the GM area, which is well above the long term level of completions in the area. It then uses these figures to justify the large scale release of greenbelt and open land (irrespective of the demonstrable harm to greenbelt policy and the needs of the surrounding communities). Furthermore the release of large areas of greenbelt and open land within the same locality (such as in Bury) will not result in a short term contribution to the housing targets as it will be impossible for the local markets to absorb the level of housing other than over a very long term period. Also, several of the allocations are dependent upon very expensive infrastructure works if they are to be delivered and meet the ambitious climate and environmental policies within the plan. This will further impact delivery
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	The Plan should review the housing supply figures so that they better reflect long term completions and the need to protect green belt and open land from development. Greenbelt and open land should only be considered for release if it is clear it will not cause demonstrable harm to the green belt or to valued open land and if the LA cannot satisfy its 5 year housing land supply. Beyond the 5 year period there should be more focus on the re-use of brownfield land and particularly former retail areas (incl their car parks) office sites and other uses to provide land for new housing. Much of the population growth within the GM area over the Plan period (and with it household growth) will come from the over 75s and the housing policies in the Plan need to reflect the specific housing needs of this group
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-H 2 Affordability of New Housing
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound

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<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>	There is no clear link between the release of land for housing and the provision of affordable housing. Whilst overall demand from household growth is a factor, housing affordability is more to do with political choices, economic and fiscal choices. These include policies that have been content to maintain housing as an attractive investment option, local planning policies (such as the willingness of LA's to demand affordable housing from developers), the sale of existing social housing, land speculation, as well as fiscal policies. Unless these factors are properly addressed there will be a large minority of GM residents who cannot afford a home
<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>	Much stronger policies are needed to require developers to ensure that a proportion of their homes are affordable and to address speculation (which drives up land costs and impacts on the price of housing)
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-H 3 Type Size and Design of New Housing
<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>	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</b>	The release of green belt and open land in peripheral areas, poorly served by public transport will not meet the needs of many groups referred to in the policy.



<b>comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	The removal of the allocations on green belt and open land and more focus on the design of new housing wherever it is located
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-H 4 Density of New Housing
<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>	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>	I do not support the designation of minimum density standards as it is likely to result in even smaller and less attractive housing and lead to uniformity and lack of choice. It will mean that families who require larger houses with gardens will not have the choice of new housing in accessible locations and these areas will become more dominated by younger (and more transient) groups, the elderly and in all likelihood, poorer families who will end up in the less spacious and less attractive housing developed in these neighbourhoods
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	The rigid minimum density table should be abandoned and policies on housing density developed that pay more cognisance to local housing needs, the need to provide balance in the local housing market and on larger sites the development of a mix of housing types (e.g. flats, terraced / town houses and detached properties) on a single site to create more attractive and balanced development
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian

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<b>Person ID</b>	1286714
<b>Title</b>	JP-G 1 Valuing Important Landscapes
<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>	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>	The majority of green and open areas within the GM area have value to the local communities that surround them and also in the value they have in providing separation of settlements, areas for nature, to moderate flood risk, absorb pollution and as green lungs. This policy is an attempt to undermine the value of certain areas so that their release can be justified for unnecessary development
<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>	A review of the policy so that it incorporates a much wider definition of value including the value of that land in the context of the surrounding community
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-G 2 Green Infrastructure Network
<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>	No

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<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	The proposals for green infrastructure will be undermined by green belt land releases, particularly around Elton Reservoir and the much used leisure route along the Bury Bolton Canal and north of Bury TC including Walshaw. This route is a natural link within other routes within the Croal Irwell Valley, which provide a green link from the edge of the conurbation (in Salford) up to the north of Bury and Bolton. The proposed greenbelt land releases at Elton Reservoir and Walshaw will sever this incredibly important green infrastructure
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	The release of large amounts of green belt, particularly in areas such as Elton Reservoir & Walshaw needs to be removed or massively scaled back
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-G 3 River Valleys and Waterways
<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>	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>	The proposals for waterways will be undermined by green belt land releases, particularly around Elton Reservoir and the much used leisure route along the Bury Bolton Canal and north of Bury TC including Walshaw. This route is a natural link within other routes within the Croal Irwell Valley, which provide a green link from the edge of the conurbation (in Salford) up to the north of Bury and Bolton. The proposed greenbelt land releases at Elton Reservoir and Walshaw will sever this incredibly important green infrastructure which is focussed around the Croal & Irwell rivers and Bolton Bury canal
<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</b>	The release of large amounts of green belt, particularly in areas such as Elton Reservoir & Walshaw needs to be removed or massively scaled back

<b>or soundness matters you have identified above.</b>	
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-G 4 Lowland Wetlands and Mosslands
<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>	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>	The proposals for wetlands will be undermined by green belt land releases, particularly around Elton Reservoir and in the Carrington area. The proposed greenbelt land releases in these areas will destroy these valuable areas of natural capital
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	The release of large amounts of green belt, particularly in areas such as Elton Reservoir need to be removed or massively scaled back
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-G 9 A Net Enhancement of Biodiversity and Geodiversity
<b>Type</b>	Web
<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>	Much of the area around Elton Reservoir (including the reservoir itself) is a designated wildlife site. The scale of proposed development in this area will destroy this valuable area of natural capital that will be impossible to mitigate within the local area

<b>co-operate. Please be as precise as possible.</b>	
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	The release of large amounts of green belt, particularly in areas such as Elton Reservoir need to be removed or massively scaled back
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-G 10 Green Belt
<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>	NA
<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>	The policy proposes the release of a large amount of greenfield land within parts of the GM area, particularly within the southern area of Bury and Rochdale area. Within the southern part of Bury this is almost 40% of its greenbelt, which is totally unacceptable for one area. It will completely undermine the purpose of greenbelt in this area, result in the coalescence of settlements and destroy much valued open space
<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>	A deletion of the green belt land releases on the scale proposed, particularly in the Bury area
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714

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<b>Title</b>	JP-P1 Sustainable Places
<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>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	A sustainable places policy within a Plan that proposes the release of large amounts of greenbelt and open land, particularly in the Bury area is flawed. The restrictive proposals contained in the policy on housing density will undermine a policy on sustainable places
<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>	If a sustainable places policy is to be effective then the Plan strategy and many of its policies need to be comprehensively reviewed and significant changes made
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-P2 Heritage
<b>Type</b>	Web
<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>	Policies on heritage within a Plan that aims to provide housing and employment space well above actual demand is likely to harm existing heritage assets
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the</b>	If a deliverable heritage policy is to be effective then the Plan strategy and many of its policies need to be comprehensively reviewed and significant changes made



<b>plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-P3 Cultural Facilities
<b>Type</b>	Web
<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 more of a wish list rather than a policy for culture. What is it actually proposing and how will it be delivered?
<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>	A complete review of this policy
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-P5 Education Skills and Knowledge
<b>Type</b>	Web
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	The policy is too general and again, more of a wish list. What is it actually proposing and how will it be delivered?
<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</b>	A review of the policy to produce something that a land use plan can deliver or influence

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<b>or soundness matters you have identified above.</b>	
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-P6 Health
<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>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	The policy is rather general and specific enough about what it is proposing and how the Plan will deliver or help to deliver
<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>	A review of the policy to provide something that will be more useful in ensuring development and the use of land and property meet the aims of the policy
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-P7 Sport and Recreation
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound

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<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	The proposed release of greenbelt and open land for development particularly in the Bury area will impact on the ability of people to access land within these areas (including footpaths and tow paths) and benefit from their open aspect in using them for sport and recreation
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	The deletion of policies that propose the large scale release of greenbelt and open land for development (particularly in the Bury area)
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JP-C1 An Integrated Network
<b>Type</b>	Web
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	The release of large areas of greenbelt and open land, particularly in the Bury area is not consistent with the creation of sustainable locations. The development proposed in the Northern Gateway area and the housing proposals on greenbelt and open land will be car based and unattainable
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	The deletion of policies that propose the large scale release of greenbelt and open land for development (particularly in the Bury area)
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian

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<b>Person ID</b>	1286714
<b>Title</b>	JP-C5 Walking and Cycling Network
<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>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	The release of large amounts of greenbelt and open land, particularly in the Bury area is not consistent with improving cycle and walking routes as it will impact on existing well used and loved paths and towpaths in areas proposed for development
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	The deletion of policies that propose the large scale release of greenbelt and open land for development (particularly in the Bury area)
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	JPA 1.1 Heywood / Pilsworth (Northern Gateway)
<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>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No

<p><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>	<p>The scale of development contained in this proposal is unacceptable. It will cause demonstrable harm to the green belt and in particular to the separation this area provides between Heywood and Bury south. The proposals are dependent on infrastructure proposals that undermine the climate and environmental proposals of the Plan if they were delivered. There is no guarantee that the proposed infrastructure proposals will be delivered however as funding has not been identified or committed.</p> <p>The level of employment space proposed is not needed in terms of demand within the Plan period or the foreseeable future. Furthermore the claim that this land release is required to improve prosperity in the northern part of the conurbation to create high quality jobs is not realistic. Any jobs created here are most likely to be in warehousing and logistics. These sectors deliver low employment densities and most of the jobs are low skilled. Also the scale of development proposed and the uncertainty over funding for the infrastructure proposals mean that the level of employment generation within the Plan period will be extremely low and comprise mostly low skilled jobs. It is likely that the only employment space delivered within the Plan period will be small areas adjoining Pilsworth Industrial estate. There is no justification on the grounds of need or job creation for the release of such a large area of greenfield land in this location. Given the demonstrable harm that this land release would have on the green belt and the surrounding communities the scale of land release here is not required.</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>The policy and the proposed land release should be deleted and replaced with a much more scaled back and deliverable proposal</p>
<p><b>Family Name</b></p>	<p>Boyle</p>
<p><b>Given Name</b></p>	<p>Gillian</p>
<p><b>Person ID</b></p>	<p>1286714</p>
<p><b>Title</b></p>	<p>JPA 1.2: Simister and Bowlee (Northern Gateway)</p>
<p><b>Type</b></p>	<p>Web</p>
<p><b>Soundness - Positively prepared?</b></p>	<p>Unsound</p>
<p><b>Soundness - Justified?</b></p>	<p>Unsound</p>
<p><b>Soundness - Consistent with national policy?</b></p>	<p>Unsound</p>
<p><b>Soundness - Effective?</b></p>	<p>Unsound</p>
<p><b>Compliance - Legally compliant?</b></p>	<p>No</p>
<p><b>Compliance - In accordance with the Duty to Cooperate?</b></p>	<p>No</p>
<p><b>Redacted reasons - Please give us details of why you consider the consultation point not</b></p>	<p>This proposal would remove large areas of greenbelt and open land greatly valued by local people. The location is peripheral to the conurbation and very poorly served by public transport or local amenities. It will result in car based and isolated development. The infrastructure proposals and particularly</p>

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<p><b>to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	<p>the for public transport are unviable and it is difficult to see how they could ever be delivered. The proposals will result in blight in the surrounding area as the absorption housing rates in the local area, even under the most optimistic scenarios do not require this level of housing release. The justification that this land release is required to support housing need within the Bury area is therefore not sustainable. Furthermore a significant proportion of population growth (and housing need) over the Plan period will be in the over 65"s. These groups will want housing in highly accessible locations close to local amenities, which this proposal does not provide</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>The proposal should be deleted and a fresh assessment of where it may be appropriate to release small areas of land for housing, that will not impact on surrounding communities, maintains the openness of this area and is readily deliverable within the Plan period</p>
<p><b>Family Name</b></p>	<p>Boyle</p>
<p><b>Given Name</b></p>	<p>Gillian</p>
<p><b>Person ID</b></p>	<p>1286714</p>
<p><b>Title</b></p>	<p>JPA 2: Stakehill</p>
<p><b>Type</b></p>	<p>Web</p>
<p><b>Soundness - Positively prepared?</b></p>	<p>Unsound</p>
<p><b>Soundness - Justified?</b></p>	<p>Unsound</p>
<p><b>Soundness - Consistent with national policy?</b></p>	<p>Unsound</p>
<p><b>Soundness - Effective?</b></p>	<p>Unsound</p>
<p><b>Compliance - Legally compliant?</b></p>	<p>No</p>
<p><b>Compliance - In accordance with the Duty to Cooperate?</b></p>	<p>No</p>
<p><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>	<p>The scale of development here is unacceptable. It will cause demonstrable harm to the green belt and in particular to the separation this area provides between Rochdale and Middleton and destroy large areas of open land greatly valued by local people. The proposals will harm the setting of Tandle Hill Park and routes around the leisure corridor of Rochdale Canal.</p> <p>The level of employment space proposed is not needed in terms of demand within the Plan period or the foreseeable future. Furthermore the claim that this land release is required to improve prosperity in the northern part of the conurbation to create high quality jobs is not realistic. Any jobs created here are most likely to be in warehousing and logistics. These sectors deliver low employment densities and most of the jobs are low skilled. There is no justification on the grounds of need or job creation for the release of such a large area of greenfield land in this location.</p> <p>The level of housing proposed in this location is not required and will not be delivered within the Plan period, given absorption housing rates in the local area - even under the most optimistic scenarios. Furthermore a significant proportion of population growth (and housing need) over the Plan period will</p>



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	<p>be in the over 65's. These groups will want housing in highly accessible locations close to local amenities, which this proposal does not provide.</p> <p>Given the demonstrable harm that this land release would have on the green belt and the surrounding communities the scale of land release for both employment and housing use is not required. The location is peripheral to the conurbation and very poorly served by public transport or local amenities. It will result in car based and isolated development. The infrastructure proposals particularly the for public transport are unviable and it is difficult to see how they could ever be delivered.</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>The policy and the proposed land release should be deleted and replaced with a much more scaled back and deliverable proposal</p>
<p><b>Family Name</b></p>	<p>Boyle</p>
<p><b>Given Name</b></p>	<p>Gillian</p>
<p><b>Person ID</b></p>	<p>1286714</p>
<p><b>Title</b></p>	<p>JPA 7: Elton Reservoir Area</p>
<p><b>Type</b></p>	<p>Web</p>
<p><b>Soundness - Positively prepared?</b></p>	<p>Unsound</p>
<p><b>Soundness - Justified?</b></p>	<p>Unsound</p>
<p><b>Soundness - Consistent with national policy?</b></p>	<p>Unsound</p>
<p><b>Soundness - Effective?</b></p>	<p>Unsound</p>
<p><b>Compliance - Legally compliant?</b></p>	<p>No</p>
<p><b>Compliance - In accordance with the Duty to Cooperate?</b></p>	<p>No</p>
<p><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>	<p>This proposal would destroy an incredibly valuable area of green belt and open land within a heavily built up area, undermining the green wedge that reaches from the edge of the City centre in Salford to the outer edges of the conurbation. It will destroy the integrity of the only real area of open land between Bury and Radcliffe. The accessibility of large areas of open land to urban dwellers in this area cannot be under-estimated and it's loss will further undermine the attractiveness of the northern area (not just those areas immediately surrounding the proposed land release). This proposal will impact negatively on the use of the Bury / Bolton canal and the leisure routes and paths within this area and destroy the experience that urban dwellers can experience in this area which is so close to the heavily built up surrounding areas.</p> <p>The location is peripheral to the conurbation and very poorly served by public transport or local amenities. It will result in car based and isolated development. The infrastructure proposals and particularly the for public transport are unviable and it is difficult to see how they could ever be delivered. The proposals will result in blight in the surrounding area as the</p>

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	<p>absorption housing rates in the local area, even under the most optimistic scenarios do not require this level of housing release and it is likely to be well beyond the Plan period the this level of housing would be delivered, particularly given the other large proposed housing releases within the southern area of Bury MBC.. The justification that this land release is required to support housing need within the Bury area is therefore not sustainable. Furthermore a significant proportion of population growth (and housing need) over the Plan period will be in the over 65"s. These groups will want housing in highly accessible locations close to local amenities, which this proposal does not provide</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>The proposal should be deleted and a fresh assessment of where it may be appropriate to release a small area of land for housing, that will not impact on the surrounding community and maintains the openness of this area</p>
<p><b>Family Name</b></p>	<p>Boyle</p>
<p><b>Given Name</b></p>	<p>Gillian</p>
<p><b>Person ID</b></p>	<p>1286714</p>
<p><b>Title</b></p>	<p>JPA 9: Walshaw</p>
<p><b>Type</b></p>	<p>Web</p>
<p><b>Soundness - Positively prepared?</b></p>	<p>Unsound</p>
<p><b>Soundness - Justified?</b></p>	<p>Unsound</p>
<p><b>Soundness - Consistent with national policy?</b></p>	<p>Unsound</p>
<p><b>Soundness - Effective?</b></p>	<p>Unsound</p>
<p><b>Compliance - Legally compliant?</b></p>	<p>No</p>
<p><b>Compliance - In accordance with the Duty to Cooperate?</b></p>	<p>No</p>
<p><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>	<p>This proposal would destroy a valuable area of green belt and open land greatly valued by the local community and undermine the separation between Walshaw and Tottington.</p> <p>The location is peripheral to the conurbation and very poorly served by public transport or local amenities. It will result in car based and isolated development. The proposals will result in blight in the surrounding area as the absorption housing rates in the local area, even under the most optimistic scenarios do not require this level of housing release and it is likely to be well beyond the Plan period the this level of housing would be delivered, particularly given the other large proposed housing releases within the southern area of Bury MBC. The justification that this land release is required to support housing need within the Bury area is therefore not sustainable. Furthermore a significant proportion of population growth (and housing need) over the Plan period will be in the over 65"s. These groups will want housing in highly accessible locations close to local amenities, which this proposal does not provide</p>

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<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	The proposal should be deleted and a fresh assessment of where it may be appropriate to release a small area of land for housing, that will not impact on the surrounding community and maintains the openness of this area
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	Other Comments
<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>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	Other Comments
<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>	No
<b>Family Name</b>	Boyle
<b>Given Name</b>	Gillian
<b>Person ID</b>	1286714
<b>Title</b>	Other Comments

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<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>	No