| Family Name  | Brooks  |
|--|---|
| Given Name   | Janet   |
| Person ID  | 1287295   |
| Title  | Stakeholder Submission  |
| Туре   | Web   |
| Family Name  | Brooks  |
| Given Name   | Janet   |
| Person ID  | 1287295   |
| Title  | Our Vision  |
| Туре   | Web   |
| Soundness - Positively prepared?   | Unsound   |
| Soundness - Justified?   | Unsound   |
| Soundness - Consistent with national policy?   | Unsound   |
| Soundness - Effective?   | Unsound   |
| Compliance - Legally<br>compliant?   | No  |
| Compliance - In<br>accordance with the<br>Duty to Cooperate?   | No  |
| Redacted reasons -<br>Please give us details<br>of why you consider the<br>consultation point not<br>to be legally compliant,<br>is unsound or fails to<br>comply with the duty to<br>co-operate. Please be<br>as precise as possible.                           | The consultation was not carried out correctly. The plan uses out of date<br>information and does not take into account the effects of Brexit or the<br>pandemic on changing working practices or changes in population.<br>The idea of "brownfield development first"is a myth and planning laws cannot<br>enforce this policy.<br>Developers will cherry pick greenfield sites and build starched four and five<br>bed houses that won"t relate to the needs in the area but make them the<br>most profit.  |
| Redacted modification<br>- Please set out the<br>modification(s) you<br>consider necessary to<br>make this section of the<br>plan legally compliant<br>and sound, in respect<br>of any legal compliance<br>or soundness matters<br>you have identified<br>above. | jobs to the areas need to be backed up by a strong research that ensures<br>it is sited in the correct area and most importantly that it is needed. I suggest<br>an examination is made of the Kingsway development at Kingsway in<br>Rochdale which was hailed as one of these business development areas<br>with ended up giving over large areas of the site to housing and found great<br>difficulty attracting funding for infrastructure (even during EU funding<br>availability) and is still not full and more and more of the sites that were<br>supposed to be for high quality skilled works have been given over to<br>warehouses for mail order and supply companies. The high quality jobs<br>never materialised. |
| Family Name  | Brooks  |
| Given Name   | Janet   |
| Person ID  | 1287295   |

Places for Everyone Representation 2021

| Title  | Our Strategic Objectives   |
|--|--|
| Туре   | Web  |
| Our strategic objectives   | 1. Meet our housing need   |
| - Considering the<br>information provided for  | 2. Create neighbourhoods of choice   |
|  | 3. Ensure a thriving and productive economy in the districts involved  |
| our strategic objectives, please tick which of   | 5. Reduce inequalities and improve prosperity  |
| these objectives your  | 6. Promote the sustainable movement of people, goods and information   |
| written comment refers   | 7. Ensure that districts involved are more resilient and carbon neutral  |
| to:  | 8. Improve the quality of our natural environment and access to green spaces   |
|  | 9. Ensure access to physical and social infrastructure   |
|  | 10. Promote the health and wellbeing of communities  |
| Soundness - Positively prepared?   | Unsound  |
| Soundness - Justified?   | NA   |
| Soundness - Consistent with national policy?   | NA   |
| Soundness - Effective?   | NA   |
| Compliance - Legally<br>compliant?   | No   |
| Compliance - In<br>accordance with the<br>Duty to Cooperate?   | No   |
| Redacted reasons -   | Ineffective consultation.  |
| Please give us details   | Poorly prepared plans not taking into account up to date data.   |
| of why you consider the<br>consultation point not<br>to be legally compliant,  | Not taking into account changes in working practices and the impact on demand for office/industry.   |
| is unsound or fails to comply with the duty to   | Proposing link roads in areas that are already gridlocked that will not alleviate the situation.   |
| co-operate. Please be as precise as possible.  | Increase air pollution due to housing proposed not adjacent to proposed industrial areas so more travel will be required.  |
|  | Removing green spaces from areas that are already heavily populated making access to countryside reduced.  |
|  | Displacing wildlife and destruction of the green belt including areas of special scientific interest.  |
|  | Not having control over the type of properties required as it will be developer and profit led.  |
|  | Does not introduce high standards of house building/insulation and green energy in proposed housing.   |
|  | Needs to concentrate on bringing empty properties beck into use and create incentives to encourage people to move from large underused housing to more suitable smaller easily managed housing especially for the ageing population we have. |
| Redacted modification<br>- Please set out the<br>modification(s) you<br>consider necessary to<br>make this section of the<br>plan legally compliant<br>and sound, in respect | Consultation needs to be more inclusive.   |

| of any legal compliance<br>or soundness matters<br>you have identified<br>above.   |   |
|--|---|
| Family Name  | Brooks  |
| Given Name   | Janet   |
| Person ID  | 1287295   |
| Title  | JP-Strat 7 North East Growth Corridor   |
| Туре   | Web   |
| Soundness - Positively prepared?   | Unsound   |
| Soundness - Justified?   | Unsound   |
| Soundness - Consistent with national policy?   | Unsound   |
| Soundness - Effective?   | Unsound   |
| Compliance - Legally compliant?  | No  |
| Compliance - In<br>accordance with the<br>Duty to Cooperate?   | No  |
| Redacted reasons -<br>Please give us details   | Poor consultation carried out. Remote site from proposed housing so increase in travel needed.  |
| of why you consider the<br>consultation point not<br>to be legally compliant,<br>is unsound or fails to<br>comply with the duty to<br>co-operate. Please be<br>as precise as possible.   | No evidence of proposed type of jobs that would be created. No detailed<br>assessment of current availability of employment land and extrapolation to<br>need future needs. Out of date information used.<br>No account taken<br>Of both the effects of Brexit and Covid 19.      |
| Redacted modification<br>- Please set out the<br>modification(s) you<br>consider necessary to<br>make this section of the<br>plan legally compliant<br>and sound, in respect<br>of any legal compliance<br>or soundness matters<br>you have identified<br>above. | A full studying using up to date information and trends needs to be carried<br>out including demand study and assessment of current availability.<br>Building again on green fields just because they are adjacent to current<br>industrial areas does not mean this a good idea. |
| Family Name  | Brooks  |
| Given Name   | Janet   |
| Person ID  | 1287295   |
| Title  | JP-S 1 Sustainable Development  |
| Туре   | Web   |
| Soundness - Positively prepared?   | Unsound   |
| Soundness - Justified?   | Unsound   |
| Soundness - Consistent with national policy?   | Unsound   |

| Soundness - Effective?   |  |
|--|--|
| Compliance - Legally compliant?  | No   |
| Compliance - In<br>accordance with the<br>Duty to Cooperate?   | No   |
| Redacted reasons -<br>Please give us details<br>of why you consider the<br>consultation point not<br>to be legally compliant,<br>is unsound or fails to<br>comply with the duty to<br>co-operate. Please be<br>as precise as possible.                           | Ineffective consultation carried out. Does not need the needs of the present<br>whilst protecting the future.<br>Destruction of green belt can"t be reversed and this wildlife and flora will be<br>forever lost if these plans are carried out.   |
| Redacted modification<br>- Please set out the<br>modification(s) you<br>consider necessary to<br>make this section of the<br>plan legally compliant<br>and sound, in respect<br>of any legal compliance<br>or soundness matters<br>you have identified<br>above. | Remove all green belt areas from the plan. Use up to date information for<br>forward planning.<br>The housing targets are not compulsory and some areas will not be able to<br>need the demand. Accept this. Protect the existing green spaces as a legacy<br>for future generations.<br>Create housing that meets demand not developers profit margins. |
| Family Name  | Brooks   |
| Given Name   | Janet  |
| Person ID  | 1287295  |
| Title  | JP-S 2 Carbon and Energy   |
| Туре   | Web  |
| Soundness - Positively prepared?   | Unsound  |
| Soundness - Justified?   | Unsound  |
| Soundness - Consistent with national policy?   | Unsound  |
| Soundness - Effective?   | Unsound  |
| Compliance - Legally<br>compliant?   | No   |
| Compliance - In<br>accordance with the<br>Duty to Cooperate?   | No   |
| Redacted reasons -<br>Please give us details<br>of why you consider the<br>consultation point not<br>to be legally compliant,<br>is unsound or fails to<br>comply with the duty to<br>co-operate. Please be<br>as precise as possible.                           | Ineffective consultation carried out.<br>No strict standards for eco friendly developments.<br>Destruction of greenbelt. Destruction of trees and wildlife. Brownfield first<br>development cannot be legally enforced.  |

| Redacted modification<br>- Please set out the<br>modification(s) you<br>consider necessary to<br>make this section of the<br>plan legally compliant<br>and sound, in respect<br>of any legal compliance<br>or soundness matters<br>you have identified<br>above. | Demand high eco standards for any proposed housing. Meet the need for<br>low cost energy efficient housing including social housing and starter homes.   |
|--|--|
| Family Name  | Brooks   |
| Given Name   | Janet  |
| Person ID  | 1287295  |
| Title  | JP-S 4 Resilience  |
| Туре   | Web  |
| Soundness - Positively prepared?   | Unsound  |
| Soundness - Justified?   | Unsound  |
| Soundness - Consistent with national policy?   | Unsound  |
| Soundness - Effective?   | Unsound  |
| Compliance - Legally compliant?  | No   |
| Compliance - In<br>accordance with the<br>Duty to Cooperate?   | No   |
| Redacted reasons -<br>Please give us details<br>of why you consider the<br>consultation point not<br>to be legally compliant,<br>is unsound or fails to<br>comply with the duty to<br>co-operate. Please be<br>as precise as possible.                           | Ineffective consultation carried out. Flood plains used for development. Poor<br>planning for mitigation of flood waters during high rainfall. Development on<br>green areas that act as a natural sink for water to reduce flooding.  |
| Redacted modification<br>- Please set out the<br>modification(s) you<br>consider necessary to<br>make this section of the<br>plan legally compliant<br>and sound, in respect<br>of any legal compliance<br>or soundness matters<br>you have identified<br>above. | Don't build on flood plains.<br>Don't build on green belt areas.<br>Locality knowledge is vital and don't rely on consultants reports.<br>Assess the real costs of this mass development including drainage/sewage<br>treatment and utilities infrastructures and who will be footing this bill? |
| Family Name  | Brooks   |
| Given Name   | Janet  |
| Person ID  | 1287295  |
| Title  | JP-S 5 Flood Risk and Water Environment  |

## Places for Everyone Representation 2021

| Туре   | Web   |
|--|---|
| Soundness - Positively prepared?                             | Unsound   |
| Soundness - Justified?                                       | Unsound   |
| Soundness - Consistent with national policy?                 | Unsound   |
| Soundness - Effective?                                       | Unsound   |
| Compliance - Legally<br>compliant?                           | No  |
| Compliance - In<br>accordance with the<br>Duty to Cooperate? | No  |
| Redacted reasons -   | Ineffective consultation carried out.   |
| Please give us details<br>of why you consider the            | Lots of proposed building on flood plains.  |
| consultation point not                                       | No plans for improved drainage in areas that already flood.   |
| to be legally compliant, is unsound or fails to              | Consultants don"t always know best.   |
| comply with the duty to                                      |   |
| co-operate. Please be  |   |
| as precise as possible.                                      |   |
| Redacted modification<br>- Please set out the                | Don't build on flood belt.  |
| modification(s) you  | Build resilience into plans for housing on brownfield sites. Allow for the effects of increased climate change. |
| consider necessary to  | or moreased climate change.   |
| make this section of the plan legally compliant              |   |
| and sound, in respect  |   |
| of any legal compliance<br>or soundness matters              |   |
| you have identified  |   |
| above.   |   |
| Family Name  | Brooks  |
| Given Name   | Janet   |
| Person ID  | 1287295   |
| Title  | JP-S 6 Clean Air  |
| Туре   | Web   |
| Soundness - Positively prepared?                             | Unsound   |
| Soundness - Justified?                                       | Unsound   |
| Soundness - Consistent with national policy?                 | Unsound   |
| Soundness - Effective?                                       | Unsound   |
| Compliance - Legally compliant?                              | No  |
| Compliance - In  | No  |
| accordance with the<br>Duty to Cooperate?                    |   |
| Redacted reasons -<br>Please give us details                 | Consultation incorrectly carried out.   |

| of why you consider the<br>consultation point not<br>to be legally compliant,<br>is unsound or fails to<br>comply with the duty to<br>co-operate. Please be<br>as precise as possible.   | Roads are already highly congested and providing link roads from one area of standing traffic to another will not improve air quality in areas.  |
|--|--|
| Redacted modification<br>- Please set out the<br>modification(s) you<br>consider necessary to<br>make this section of the<br>plan legally compliant<br>and sound, in respect<br>of any legal compliance<br>or soundness matters<br>you have identified<br>above. | Do not build on green belt land.<br>Look at existing roads and bottlenecks as part of the overall improvements<br>in the areas.<br>Funding needs to be fully identified for all areas of the plans as vital parts<br>could be left out and this could have ramifications for any improvements. |
| Family Name  | Brooks   |
| Given Name   | Janet  |
| Person ID  | 1287295  |
| Title  | JPA 7: Elton Reservoir Area  |
| Туре   | Web  |
| Soundness - Positively prepared?   | Unsound  |
| Soundness - Justified?   | Unsound  |
| Soundness - Consistent with national policy?   | Unsound  |
| Soundness - Effective?   | Unsound  |
| Compliance - Legally compliant?  | No   |
| Compliance - In<br>accordance with the<br>Duty to Cooperate?   | No   |
| Redacted reasons -   | Ineffective consultation carried out.  |
| Please give us details<br>of why you consider the  | The easy option of greenbelt land was identified as prime housing land.  |
| consultation point not to be legally compliant,  | In an area of high deprivation the proposals remove the green lungs of the area.   |
| is unsound or fails to<br>comply with the duty to  | Building on brownfield sites first cannot be legally enforced.   |
| co-operate. Please be  | Outdated information was used for the preparation of this plan.  |
| as precise as possible.  | No account has been taken of the effect of Brexit and Covid 19 on changes<br>in population and working practices. These need studying and taking into<br>account.  |
| Redacted modification  | Proper consultation required.  |
| <ul> <li>Please set out the<br/>modification(s) you</li> </ul>   | Use up to date population figures.   |
| consider necessary to<br>make this section of the  | Consider the effects of Brexit and Covid 19 on population and working practices.   |
| plan legally compliant<br>and sound, in respect<br>of any legal compliance<br>or soundness matters   | Look at specific demand in the areas proposed and plans housing that meets this need, not a sea of 4/5 bed detached properties on greenbelt. Look at population demographics and plan housing to meed the future needs of the demographic.   |

## Places for Everyone Representation 2021

| you have identified   | Look at ways to encourage developers to build on brownfield sites.   |
|---|--|
| above.  | Look at innovative ways to build more social housing and low rent properties<br>and real low cost properties that allow people to get into the property ladder.  |
| Family Name   | Brooks   |
| Given Name  | Janet  |
| Person ID   | 1287295  |
| Title   | JPA 9: Walshaw   |
| Туре  | Web  |
| Soundness - Positively prepared?  | Unsound  |
| Soundness - Justified?  | Unsound  |
| Soundness - Consistent with national policy?  | Unsound  |
| Soundness - Effective?  | Unsound  |
| Compliance - Legally<br>compliant?  | No   |
| Compliance - In<br>accordance with the<br>Duty to Cooperate?  | No   |
| Family Name   | Brooks   |
| Given Name  | Janet  |
| Person ID   | 1287295  |
| Title   | JP-D1 Infrastructure Implementation  |
| Туре  | Web  |
| Soundness - Positively prepared?  | Unsound  |
| Soundness - Justified?  | Unsound  |
| Soundness - Consistent with national policy?  | Unsound  |
| Soundness - Effective?  | Unsound  |
| Compliance - Legally<br>compliant?  | No   |
| Compliance - In<br>accordance with the<br>Duty to Cooperate?  | No   |
| Redacted reasons -<br>Please give us details<br>of why you consider the   | Up to date information must be used and the effect of Brexit and Covid 10 needs to be taken into consideration and those changes in population and working practices taken into account.   |
| consultation point not<br>to be legally compliant,<br>is unsound or fails to<br>comply with the duty to<br>co-operate. Please be<br>as precise as possible. | Proper consultation must be carried out - remember there are still a large proportion of the population that do not use or have access to the internet or computers.   |
| Redacted modification<br>- Please set out the<br>modification(s) you<br>consider necessary to   | Use up to date information for all projections.<br>Fill empty properties especially in the city centre. Build affordable housing<br>that is actually affordable and more social housing. Stop the right to buy to<br>preserve current stocks of social rented. |

| make this section of the<br>plan legally compliant<br>and sound, in respect<br>of any legal compliance<br>or soundness matters<br>you have identified<br>above. | Convert retail and office space into accommodation and preserve our greenbelt land. |
|---|---|
| Family Name   | Brooks  |
| Given Name  | Janet   |
| Person ID   | 1287295   |
| Title   | Other Comments  |
| Туре  | Web   |
| Soundness - Positively prepared?  | Unsound   |
| Soundness - Justified?  | Unsound   |
| Soundness - Consistent with national policy?  | Unsound   |
| Soundness - Effective?  | Unsound   |
| Compliance - Legally compliant?   | No  |
| Compliance - In<br>accordance with the<br>Duty to Cooperate?  | No  |
| Family Name   | Brooks  |
| Given Name  | Janet   |
| Person ID   | 1287295   |
| Title   | Other Comments  |
| Туре  | Web   |
| Soundness - Positively prepared?  | Unsound   |
| Soundness - Justified?  | Unsound   |
| Soundness - Consistent with national policy?  | Unsound   |
| Soundness - Effective?  | Unsound   |
| Compliance - Legally<br>compliant?  | No  |
| Compliance - In<br>accordance with the<br>Duty to Cooperate?  | No  |