

<b>Family Name</b>	Carroll-Mcardle
<b>Given Name</b>	Robert
<b>Person ID</b>	1287592
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Family Name</b>	Carroll-Mcardle
<b>Given Name</b>	Robert
<b>Person ID</b>	1287592
<b>Title</b>	JPA 1.2: Simister and Bowlee (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>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>1) National Planning Policy Framework greenbelt protection :</p> <ul style="list-style-type: none"> <li>-Developing on this green belt site will create an urban sprawl contrary to National Planning Policy Framework greenbelt protection clauses - para 137 and para 138 a,b,c, and e.</li> <li>-To prove that exceptional circumstances to justify alteration to greenbelt boundaries exist, the NPPF requires evidence that all other reasonable options to meet identified need have been considered (NPPF para 141). This must include maximising use of brownfield and underutilised sites and maximising density. The case for exceptional circumstances to release this site for development has not been made given the lack of suitable assessment of reasonable alternatives.</li> <li>-This proposed allocation will result in the loss of approximately 74 hectares of Green Belt which currently performs strongly in relation to checking the unrestricted sprawl of large built-up areas and in preventing neighbouring towns from merging. The loss of this land from the Green Belt will therefore clearly result in harm which has not been justified.</li> </ul> <p>2) Statement of Community Involvement - failure to comply with statement:</p> <ul style="list-style-type: none"> <li>-At all stages of the plan put forward, Bury Council have failed to comply with their Statement of Community Involvement.</li> <li>-There has been no notification to residents of the initial call for sites.</li> <li>-The amount spent on making residents aware of the plan is disproportionately small ( only £100 ) in comparison to the effect it will have upon them.</li> <li>-Bury Council have given residents misleading statements or misinformation rather than a presentation of the facts e.g., residents only being told of plans for their specific ward, with no broader borough wide picture, thus giving the impression that the impact is less than it is.</li> </ul>

-There has been a failure to engage with various groups due to over reliance on the use of social media and technology that has adversely and disproportionately affected older people. This is against the SCI 2.4 & 4.17.

-Consultations have been inaccessible in terms of language and terminology used and have been a deterrent to becoming involved in the planning process as they have been wordy, long winded, and intrusive, thus producing an irrelevant response rate.

### 3) Flawed Assessments :

-Site wildlife, flood risk and other surveys have been carried out by consultancies on behalf of and paid for by developers rather than entirely independent wildlife organisations or the Department of the Environment so must be considered potentially biased, not thorough or independent.

-The Housing Need Assessment was carried out by Arc4, who have a partnership with Greater Manchester Housing Partnership, an organisation of housing associations, including Six Town Housing in Bury. The assessment cannot therefore be seen as impartial.

### 4) Environmental pollution Impacts :

-Simister and Bowlee currently have illegal air quality readings due to the motorways (M60, M62 and M66) surrounding the site. With the introduction of a 1.2 million square metres of industrial estate and 1550 new homes this will undoubtedly increase already illegal levels of carbon emissions. The local authority has a duty of care for all residents and should consider all intelligence particularly when it could jeopardise the health and wellbeing of local residents which it therefore fails to do.

-Point 17 Page 233 of the PfE states we will "incorporate appropriate noise and air quality mitigation measures and high-quality landscaping along the M60 motorway corridors and local road network if required within the allocation." However, Highways England have already tried this through the Barrier erecting study and it failed, providing no reduction in pollution.

### 5) Information used in planning :

-The PfE indicates in Para 1.63 point 2 that the most up to date information be used in plan making, therefore the most recent "Bury's Housing Development Needs Assessment 2020" must be taken into consideration: <https://www.bury.gov.uk/index.aspx?articleid=15866>

### 6) Site Selection :

-Little information has been given about why other more suitable sites were rejected, or what alternatives were considered. Bury Council selected sites at a series of informal meetings with no list of attendees or minutes available. This site choice cannot be justified as the most appropriate when no reasonable alternatives appear to have been tested or were ruled out too early or not considered despite other areas having similar if not more appropriate criteria.

-The Simister and Bowlee allocation only meets 4 out of 10 of the broad objectives within Section 3 of the PfE plan: Objectives 1,3,5 and 6, all of which could be satisfied by any number of sites in the area.

-According to the Greater Manchester Green Belt assessment the Simister and Bowlee site makes a strong or weak to moderate contribution to the purpose of the greenbelt.

-However, I believe the Simister and Bowlee site has been assessed incorrectly as all these contributions should be strong or strong to moderate considering the definitions taken from the GM Green Belt Assessment document. The landscape mitigation proposals will not address fundamental concerns.

-There is no consensus that biodiversity net gain can be achieved at this site, given the extent of loss to existing vegetation and greenspace - that

includes habitats of protected species on the site, wetlands, woodland, grassland, etc., which have not been adequately considered and will all be damaged and could be lost as a result of this scheme.

-The lack of selection criteria met and the harm that will be caused by the release of the Simister and Bowlee greenbelt are evidence of the lack of justification for the selection of this site.

-The majority of the site is located within flood zone 1 with existing watercourses within the allocation boundary and ponds which could pose a risk. With a large increase in hard surfacing, there is a serious risk that the site could result in flooding on adjacent sites as well as localised floods due to increased surface water runoff. Paragraph 12.2 of the Topic Paper supports these concerns and draws attention to potential issues on groundwater flooding.

-The viability of this site is noted to have been calculated with a 25% contribution towards affordable housing in Bury and at 7.5% of GDV in Rochdale. However, because the PfE Plan does not specify the conditions for delivering affordable housing throughout the Plan, it is uncertain whether these figures are based on correct and reasonable assumptions.

#### 7) Housing and Infrastructure :

-The Topic Paper supporting this allocation states in paragraph 11.1 that extensive infrastructure investment, including a wide range of public transportation enhancements, is required to ensure its implementation.

-In paragraph 11.2, it is confirmed that this development will have a major influence on both the strategic and local road networks, both in isolation and in combination with other neighbouring allocations.

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

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

-Bury Council have consistently failed to meet housing delivery targets. The plan relies heavily on the cooperation of property developers. There is no indication of how they will be made to keep up with targets and what sanctions will apply if they don't. So, the plan cannot be considered to be effective and fails the effectiveness test for Soundness.

-There is insufficient confidence in the accuracy of the predictions in the current uncertain economic climate to justify Green Belt loss at the start of the plan.

-PfE para 1.42 states: "The majority of development between 2021 and 2037 (the "plan period") will be on land within the urban area, most of which is brownfield land" PfE favours a brownfield first policy wherever possible as does National Policy. Bury Council have informed the public in Bury that they will implement a brownfield first policy. When questioned at a council meeting on 9/9/21 the Leader of the Council Eammon O'Brien clarified this statement by saying that for anything the council themselves build they would adopt a brownfield first policy but claimed that the council have no control over the actions of private developers. In reality they do, as they could limit the release of green belt sites in accordance with National Policy NPPF 134 part e.

#### 8) Greenbelt boundary changes :

Places for Everyone Representation 2021

	<p>-As part of the overall plan Bury have modified green belt boundaries and allocations in such a way to make it appear that less Greenbelt is being sacrificed.</p> <p>-The loss of the Simister and Bowlee site greenbelt has been partially offset by creating extensive but unusable greenbelt in other areas without justifying exceptional circumstances. This is not in accordance with National Policy.</p>
<p><b>Redacted modification</b> <b>- 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>Address the issues above as would be suggested by the issues themselves and within existing government policies and legislation.</p>