

Places for Everyone Representation 2021

Family Name	Dann
Given Name	Anthony
Person ID	1285737
Title	Stakeholder Submission
Type	Web
Family Name	Dann
Given Name	Anthony
Person ID	1285737
Title	Our Strategic Objectives
Type	Web
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	<p>2. Create neighbourhoods of choice</p> <p>7. Ensure that districts involved are more resilient and carbon neutral</p> <p>8. Improve the quality of our natural environment and access to green spaces</p>
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.	<p>I live in Standish and the village has been overdeveloped with housing and a serious reduction in greenspace and subsequent impact on fauna and flora. The original village was a ribbon development with a cross roads in the centre of the village. The roads can no longer cope with the volume of traffic and continuous house building is contributing to this. The level of pollution from idling engines causes me nausea ,coughing and retching during peak times when I walk into the centre. The schools, dentists and doctors are all over subscribed and further housing is in the pipeline. This is fast becoming a very undesirable place to live. I find myself now driving to go for a walk in a greenspace, whereas I use to just walk from my house. In addition, the lack of maintenance on public footpaths is appalling, especially in winter months where they are not fit for purpose, flooded and over grown, which doesn't encourage a healthy community.</p>
Family Name	Dann
Given Name	Anthony
Person ID	1285737
Title	JP-S 6 Clean Air
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA

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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.	My apologies, I can only comment as an elderly member of the public, that doesn't fully understand the issues. From a personal perspective, the over development is impacting on my health due to the congested road network running through Standish. If I walk along any of the four rounds that lead into the traffic lights in the centre of the former village during rush hour, the amount of fumes impacts on my breathing and causes me to retch and cough. The road infrastructure doesn't seem to feature in any forward planning by the council and the cross roads at the centre cannot cope with the volume of traffic. The recent build of nearly 2000 houses on the few remaining green spaces has a double detriment of impacting on carbon levels, with fewer trees and more carbon emissions. Enough is enough, if there are more houses being built, I will have to move for health reasons, as it is, I daren't walk along the roads that lead into the centre during rush hour.
Family Name	Dann
Given Name	Anthony
Person ID	1285737
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Type	Web
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.	All the houses in Standish seem to have been built with the aim of maximising council revenue and not looking at the social needs of the community, predominantly three, four and five bedroom executive homes occupying mainly green spaces. the Council don't seem to have planned or assessed the impact of all this development on the infrastructure including health services, schools, traffic managements, etc. There seems little provision of affordable houses for young people that want to continue to live in Standish.
Family Name	Dann
Given Name	Anthony
Person ID	1285737
Title	JP-H 3 Type Size and Design of New Housing
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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	In Standish, all the houses seem to be executive style with limited provision for those on low income streams that are local people.

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co-operate. Please be as precise as possible.	
Family Name	Dann
Given Name	Anthony
Person ID	1285737
Title	JP-H 4 Density of New Housing
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	Standish was originally a small mining community that developed along the narrow streets in the village. The number of houses that have been built in recent years and currently being planned is having a serious negative impact on the health and well being of residents in the former village. There are far too many houses spreading out into the fields and woods that once surrounded the village, which means you now have to drive to a green space if you want a pleasant walk, which doesn't involve going through housing estates. To get to the public footpaths I have to walk along at least one or more of the main roads, which I can't do during rush hour because the petrol and diesel fumes are detrimental to my health. If on average with the nearly two thousand new builds, assuming on average two cars per household , the another four thousand cars adding to the problem. Needless to say we have a primary school on one of the roads where we have idling engines.
Family Name	Dann
Given Name	Anthony
Person ID	1285737
Title	JP-G 1 Valuing Important Landscapes
Type	Web
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.	I can only comment on what I have seen first hand with the draining and building on local ponds in green spaces where I use to walk, so I assume the policy that Wigan Council follow in the past and present is about to change. My favourite pond which was full of newts, damsel flies, bull rushes no longer exists and a large detached house sits on the site. I assume the policy will continue to over develop Standish and make it one of the least desirable places to live as congestion, lack of access to services and pollution levels continue to rise.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant	Save our few remaining green spaces and prevent further housing development.

and sound, in respect of any legal compliance or soundness matters you have identified above.	
Family Name	Dann
Given Name	Anthony
Person ID	1285737
Title	JP-G 2 Green Infrastructure Network
Type	Web
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.	Its too late for me personally, the council have built on most of the green spaces I use to frequent, and the few remaining, I don't think will be with us for much longer. I just feel that there is no proper consultation for people like me who don't fully understand what is being proposed or , like my elderly neighbour who is denied access because she is not IT literate. She is devastated by the over development in our former village and the impact it has had on her , especially trying to get appoints at the local GP surgery.
Family Name	Dann
Given Name	Anthony
Person ID	1285737
Title	JP-G 3 River Valleys and Waterways
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	All I can comment on is that the developers in the areas I walk in have let sand and cement flow into the streams and blocked drains and lifted the water levels so as to cause flooding and public footpaths that are not s accessible as they were prior to the housing development. The council don't seem to monitor this, likewise a large percentage of the trees that have been planted by the developers are dead! Just seems to be a lip service and no real commitment. I did report this to a local councillor, but still waiting for a response. I am also concerned about potential flooding with the number of houses and roads on the Douglas valley side of Standish.
Family Name	Dann
Given Name	Anthony
Person ID	1285737
Title	JP-G 6 Urban Green Space
Type	Web

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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.	I can only comment on the few green spaces that have been left by developers as part of the new builds around Standish. They don't seem to be monitored by the Council, so for example on one of the small green spaces on the Grove Lane development, a number of trees were planted, of which a percentage did not survive and no one has replaced them.
Family Name	Dann
Given Name	Anthony
Person ID	1285737
Title	JP-G 7 Trees and Woodland
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	<p>The disproportionate number of trees that have been destroyed in relation to the very few that have been planted seems very tokenistic. i find it sad that the Buzzards that were nesting in one of the green spaces are no longer there as they have lost there habitat. Ironically the trees are still there, but I assume they moved on as the grounds in which they hunted are now a big housing estate.</p> <p>I don't understand why the Council are letting developers destroy all our green spaces, when there are so many brownfield sites around the borough that could be developed, I assume that money wil no doubt be the root of it!</p>
Family Name	Dann
Given Name	Anthony
Person ID	1285737
Title	JP-G 8 Standards for Greener Places
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA

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Compliance - In accordance with the Duty to Cooperate?	NA
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.	I don't see any standards for the protection of green spaces for Standish, it comes too late, especially for those of us who have lived in and around the former village for more than forty years. The loss of green spaces continues at an alarming rate and I have no faith or confidence in this consultation, the council or the developers. No body listens, there is no desire to talk to ordinary people and get to the heart of the matter in a clear and concise way. It appears the Council knows better and will tailor consultations to get their desired outcomes. They ignore how people feel and don't give feedback as to why decisions have been made. Democracy in Wigan is a joke, I just do not have any confidence in the Council or the consultation processes.
Family Name	Dann
Given Name	Anthony
Person ID	1285737
Title	JP-G 9 A Net Enhancement of Biodiversity and Geodiversity
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	All I can see is the destruction of habitats in Standish, with the sad loss of ponds, woodland, meadows etc for the development of houses. A few token trees and small areas of grass in the middle of the development hardly contributes for the extent of the loss. Too late for our area!
Family Name	Dann
Given Name	Anthony
Person ID	1285737
Title	JP-G 10 Green Belt
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA

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Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	Wigan Council and the Government keep building on former green belt, so there is no point, as you ignore what should be land protected from development. Just build more houses wherever you want and don't bother with this farce and pretence. The Council will just continue in the same vein and build what it wants where it wants to generate income to the detriment of its residents and their well being and nature itself.
Family Name	Dann
Given Name	Anthony
Person ID	1285737
Title	JP-G 11 Safeguarded Land
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	You can't safeguard land, we have seen this repeatedly around Standish, where the constant building on what was thought to be protected land has gone on. I just do not have any confidence in this process or any land that is ear marked as a green space being just that.
Family Name	Dann
Given Name	Anthony
Person ID	1285737
Title	JPA 34 M6 Junction 25
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA

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Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Family Name	Dann
Given Name	Anthony
Person ID	1285737
Title	Other Comments
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA

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Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	Stakeholder Submission
Type	Web
Include files	PFE1287212_SOSWalshaw.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSSimister.pdf
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	Our Vision
Type	Web
Include files	PFE1287212_SOSSimister.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	The vision for Greater Manchester has been desktop planned without proper engagement and consultation from the very beginning. Any consultations that have taken place have been a deterrent asking far too many intrusive questions of residents to put them off completing the consultations have been designed in such a way that they are difficult to respond to for residents with limited I.T skills or digital access. Local councils have not properly published the plan to ensure a place for everyone plan is communicated to everyone. The plan should have been developed by the residents for the residents to address our actual housing requirements over the long term. The above demonstrates a clear lack of community involvement which goes against the spirit of the constitution and makes the preparation of this plan unsound.
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.	- It is questionable whether PfE and the GMSF can effectively be treated as the same document. This must be decided in court before 'Places for Everyone' can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant (in accordance with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if it was established. If there is any substantial difference in scope between the GMSF and PfE it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states 'The difference between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a significant number of places for everyone plan have seen some form of change.' So, is 'not insignificant' the same as 'substantial'?

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	is not legal. This can only be established by a proper judicial review. So until proven plan must be considered illegal and not put to Government.
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	Our Strategic Objectives
Type	Web
Include files	PFE1287212_SOSWalshaw.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSSimister.pdf
Soundness - Positively prepared?	NA
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>-The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>-There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid</p> <p>-There are no partners or industries identified for employment provision. Major partners for employment provision should be identified.</p> <p>-There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local publicity. Public consultations should be repeated, providing clear, understandable information and materials designed to encourage rather than discourage public input.</p> <p>-The site selection process has been opaque with no explanation as to why some sites "were excluded from the plan." https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with the public should be held and minutes should be published. The rationale for the selection/rejection of sites should be available including considered alternatives.</p> <p>-Several of the authorities involved have consistently failed to meet housing delivery targets. A plan must be deliverable. The plan relies on the cooperation of property developers and should include an indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on delivery. Clear delivery plans for infrastructure should be included.</p> <p>-PfE shows removal of greenbelt protection for some areas and creation of greenbelts. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this.</p> <p>-In addition to PfE each authority needs to come up with its own local plan. No details of when these plans will be available.</p> <p>-There are no details of how Duty to Cooperate will be achieved. Following their withdrawal from the plan will effectively become a neighbouring borough. However, it is not acceptable to limit</p>

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	<p>boroughs to Stockport since each of the authorities in the plan is also neighbouring to outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn Wigan neighbours St Helens and Trafford neighbours Cheshire area.</p> <p>-A change in the methodology for Manchester City Council was resulted in a 35% uplift in Manchester City Council area. The revised Local Housing Need methodology states that this is to be met within the district and not redistributed (see Places for Everyone Joint Consultation documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021) This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.</p>
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.	This plan needs to go back to Regulation 18 of the Town and Country planning act as it was prepared with proper public engagement and consultation.
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	Our Spatial Strategy
Type	Web
Include files	PFE1287212_SOSSimister.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	GMCA made the decision to move a poorly prepared plan forward to the publication of the Town and Country planning Act even though major changes have been made to the plan since the end of consultation. For example Stockport withdrew from what was the GMSF and Manchester City Council has had a 35% uplift applied to their housing targets to be met within that specific area. As a result of the plan has changed significantly and therefore requires going back to proper consultation with the residents of Greater Manchester directly affected to comment further.
Redacted modification - Please set out the	As above the plan needs to go back to proper consultation with the residents of Greater Manchester

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.	
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JP-Strat 1 Core Growth Area
Type	Web
Include files	PFE1287212_SOSWalshaw.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSSimister.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JP-Strat 2 City Centre
Type	Web
Include files	PFE1287212_SOSSimister.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No

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Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JP-Strat 3 The Quays
Type	Web
Include files	PFE1287212_SOSWalshaw.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSSimister.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JP-Strat 4 Port Salford
Type	Web
Include files	PFE1287212_SOSSimister.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JP-Strat 5 Inner Areas
Type	Web
Include files	PFE1287212_SOSWalshaw.pdf

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	PFE1287212_SOSElton.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSSimister.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JP-Strat 6 Northern Areas
Type	Web
Include files	PFE1287212_SOSSimister.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JP-Strat 7 North East Growth Corridor
Type	Web
Include files	PFE1287212_SOSWalshaw.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSSimister.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound

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Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JP-Strat 8 Wigan Bolton Growth Corridor
Type	Web
Include files	PFE1287212_SOSSimister.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JP-Strat 9 Southern Areas
Type	Web
Include files	PFE1287212_SOSWalshaw.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSSimister.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

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Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JP-Strat 10 Manchester Airport
Type	Web
Include files	PFE1287212_SOSSimister.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JP-Strat 11 New Carrington
Type	Web
Include files	PFE1287212_SOSWalshaw.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSSimister.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JP-Strat 12 Main Town Centres

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Type	Web
Include files	PFE1287212_SOSSimister.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JP-Strat 13 Strategic Green Infrastructure
Type	Web
Include files	PFE1287212_SOSWalshaw.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSSimister.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JP-Strat 14 A Sustainable and Integrated Transport Network
Type	Web
Include files	PFE1287212_SOSSimister.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound

Places for Everyone Representation 2021

Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JPA 1.1 Heywood / Pilsworth (Northern Gateway)
Type	Web
Include files	PFE1287212_SOSWalshaw.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSSimister.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JPA 1.2: Simister and Bowlee (Northern Gateway)
Type	Web
Include files	PFE1287212_SOSSimister.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

<p>Compliance - In accordance with the Duty to Cooperate?</p> <p>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.</p>	<p>No</p> <p>Failure to comply with Statement of Community Involvement</p> <p>Bury Council have failed to comply with their Statement of Community Involvement S Community Involvement (bury.gov.uk) at all stages of the creation of the plan. There was no consultation with residents of the initial call for sites and the amount spent on making residents aware of the plan was disproportionately small (£100 as per the response to a Freedom of Information request) to the effect it will have upon them. There has been a deliberate campaign of misinformation and misleading statements to promote and "sell" the Plan to residents, rather than a presentation of facts e.g., residents only being told of the plans for their specific ward, and not being told the bigger picture across the borough, thus giving the impression that the impact is less than it is. There has been an over reliance on residents finding things out for themselves on social media and thus a failure to engage with various groups due to over reliance on the use of social media technology. There has been no access to public internet, e.g., in libraries, during Covid-19 which has adversely and disproportionately affected older people and those from deprived backgrounds. This is against the SCI 2.4 & 4.17. Countrywide, Covid restrictions are now lifted but restrictions remain in place in Bury's Statement of Community Involvement (SCI para 1.7). Consultation has been inaccessible in terms of language and terminology used and have been a deterrent to participation in the planning process as they have been wordy, long winded, and intrusive leading to an irrelevant response rate.</p> <p>National Planning Policy Framework greenbelt protection clauses</p> <p>The purpose of the NPPF greenbelt protection is to prevent urban sprawl. Developing a greenbelt site will create an urban sprawl contrary to NPPF para 137 and para 138 a,b,c, and d.</p> <p>This proposed allocation will result in the loss of approximately 74 hectares of Green Belt. Green Belt currently performs strongly in relation to checking the unrestricted sprawl of urban areas and in preventing neighbouring towns from merging. The loss of this land from Green Belt will therefore clearly result in harm which has not been justified. The case for exception to release this site for development has simply not been made given the lack of suitable alternative sites of reasonable alternatives.</p> <p>To prove that exceptional circumstances to justify alteration to greenbelt boundaries exist requires evidence that all other reasonable options to meet identified need have been exhausted (NPPF para 141). This must include maximising use of brownfield and underutilised sites to increase density.</p> <p>Assessments</p> <p>There has been a failure to conduct thorough and independent ecological assessments. The assessments carried out have been done on behalf of developers and are therefore not independent. Flood risk and other surveys have been carried out by consultancies on behalf of and for developers rather than entirely independent wildlife organisations or the Department of Environment, Food and Rural Affairs so must be considered potentially biased.</p> <p>The Housing Need Assessment was carried out by Arc4, who were supposed to carry out an independent survey of housing need. However, they have a partnership with Greater Manchester Housing Partnership, an organisation of housing associations, including Six Town Housing in Bury. This assessment was therefore not impartial.</p> <p>Climate change policy and carbon neutral policy</p> <p>Simister and Bowlee currently have illegal air quality readings due to the motorways (M66) surrounding the site. Bury Council have confirmed by email that they are not responsible for the Strategic Road Networks (motorways) and this is Highways England. However, the local authority has a duty of care for all residents and should consider all intelligence particularly when it relates to the health and wellbeing of local residents.</p> <p>Highways England provided the readings through a freedom of information request and the readings on the Strategic Road Networks around Simister and Bowlee in 2015/2016 were:</p> <ul style="list-style-type: none"> - 75% at illegal limit -15% at legal limit -10% not full year readings
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Places for Everyone Representation 2021

	<p>With the introduction of a 1.2 million square metres of industrial and 1550 homes this increase already illegal levels of carbon emissions even further.</p> <p>Point 17 Page 233 of the PfE states we will "incorporate appropriate noise and air quality measures and high-quality landscaping along the M60 motorway corridors and local roads required within the allocation."</p> <p>Highways England have already tried this through the Barrier erecting study and it failed and after results were provided and it was confirmed there was no reduction in pollution.</p> <p>Up to date information</p> <p>The PfE indicates in Para 1.63 point 2 that the most up to date information be used in the plan so being the most recent Bury's Housing Development Needs Assessment 2020 must be given consideration: https://www.bury.gov.uk/index.aspx?articleid=15866</p>
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Removal of JPA 1.2 Simister and Bowlee from the plan
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JPA 2: Stakehill
Type	Web
Include files	PFE1287212_SOSWalshaw.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSSimister.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JPA 7: Elton Reservoir Area
Type	Web
Include files	PFE1287212_SOSSimister.pdf PFE1287212_SOSGeneral.pdf

	<p>PFE1287212_SOSElton.pdf PFE1287212_SOSWalshaw.pdf</p>
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>-The PfE indicates in Para 1.63 point 2 that the most up to date information be used so being the most recent Bury's Housing Development Needs Assessment 2020 mu consideration: https://www.bury.gov.uk/index.aspx?articleid=15866</p> <p>-The site selection process for Bury has been especially opaque. Little information h about why other more apparently suitable sites were rejected, or what alternatives w Bury Council admitted in a Freedom of Information response that site selection was de of informal meetings with no list of attendees or minutes available. This site choice ca as the most appropriate when no reasonable alternatives appear to have been exam Reservoir site does not meet the selection criteria laid down in the NPPF or the GMD https://www.bury.gov.uk/index.aspx?articleid=16330 Radcliffe the location of Elton R least expensive housing in Bury but was selected in preference to sites in other areas housing is required.</p> <p>-Para 11.105 p 264 states: " The allocation [Elton Reservoir] is almost entirely surrou existing urban area" Filling this green belt site in will contribute to creating urban spr compliance with National Policy NPPF para 134 parts a,c and e.</p> <p>-Para 11.105 p 264 states: "Although the allocation has the capacity to deliver a total new homes, it is anticipated that around 1,900 of these will be delivered within the pl Nevertheless, it is considered necessary to release the site in full at this stage given the proposed development means that it will need to be supported by significant strate and this level of investment needs the certainty that the remaining development will come forward beyond the plan period". Such gross over release of greenbelt is entire National Guidelines, which regards greenbelt as a precious resource not to be squan to identify the source of infrastructure funding, indeed shortfalls are expected see pa Site owners Peel are not specifically mentioned as being a contributor to the infrastru Questions should be asked regarding the reasons for Bury Council offering up a hug greenbelt at Elton Reservoir that is not required during the plan period (and may nev instead of retaining it in accordance with National Policy.</p> <p>-The Elton site apparently cost Peel £27M (as detailed in the site allocation topic pa 260 hectares (£104K per hectare) as greenbelt. Allowing a conservative price uplift of for green belt conversion to development land, the land for the initial 1900 site becom £875M. Adding in the land for the totally unjustified additional housing beyond the pl approx. another £750 M. The implication being that unless Peel get the whole £1.32 they can't offer any upfront funding for the infrastructure. Infrastructure that would no the development does not go ahead. Peel have indicated that they will possibly build will definitely split the site into lots to be developed by other developers so they (Peel contributions this way. It would be left to Bury to extract the funding from other as yet developers. Bury have a very poor reputation for obtaining developer contributions fo and developers always try to wriggle out of any obligations. It seems Peel have dupe into ignoring National Policy and granting them a huge financial bonus with no comm anything.</p> <p>-Site wildlife, flood risk and other surveys have been carried out by consultancies on b for by developers rather than entirely independent wildlife organisations or the Depa</p>

Environment so must be considered potentially biased. This is particularly important as there are currently problems with the reservoir wall which are being addressed by Rivers trust. These measures may be suitable for providing some protection to open fields suitable to protect homes from flooding if there is a breach? Such surveys should be entirely of benefiter influence.

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

-Bury Council have consistently failed to meet housing delivery targets and are now in breach. To be effective a plan must actually be deliverable. 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 sanctions will apply if they don't. At a Council meeting held on 9/9/21 the Leader of Bury Council Eammon O'Brien confirmed that it was "unlikely" that the proposed building rates for a new development in Bury (as laid out in JPA7 Elton Reservoir Topic Paper PfE 2021, section 27.8 page 52) would be met as they were "unrealistic". So the plan cannot be considered to be effective. So the plan fails the effectiveness test for Soundness.

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

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

-PfE para1.42 states: "The majority of development between 2021 and 2037 (the "plan period") will be on land within the urban area, most of which is brownfield land" PfE favours a brownfield first policy wherever possible as does National Policy. Bury Council have informed the public in the plan that they will implement a brownfield first policy; however, they are going for immediate greenfield development (JPA7 Elton Reservoir Topic Paper PfE 2021, section 27.9 page 52). When questioned at a Council meeting on 9/9/21 the Leader of the Council Eammon O'Brien clarified this statement that for anything the council themselves build they would adopt a brownfield first policy but that the council have no control over the actions of private developers, in reality they can only limit the release of green belt sites in accordance with National Policy NPPF 134 paragraph 134.

Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

Removal of JPA 7 allocation Elton Reservoir from the plan

Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JPA 8: Seedfield

Places for Everyone Representation 2021

Type	Web
Include files	PFE1287212_SOSWalshaw.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSSimister.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JPA 9: Walshaw
Type	Web
Include files	PFE1287212_SOSSimister.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Failure to comply with Statement of Community Involvement Bury Council have failed to comply with their Statement of Community Involvement S Community Involvement (bury.gov.uk) at all stages of the creation of the plan. There w to residents of the initial call for sites and the amount spent on making residents awa disproportionately small (£100 as per the response to a Freedom of Information reques to the effect it will have upon them. There has been a deliberate campaign of misinfo misleading statements to promote and "sell" the Plan to residents, rather than a pres facts eg residents only being told of the plans for their specific ward, and not being in bigger picture across the borough, thus giving the impression that the impact is less has been an over reliance on residents finding things out for themselves on social me and thus a failure to engage with various groups due to over reliance on the use of s technology. There has been no access to public internet, eg in libraries, during Covid. TH and disproportionately affected older people and those from deprived backgrounds. T the SCI 2.4 & 4.17. Countrywide, Covid restrictions are now lifted but restrictions still

in Bury's Statement of Community Involvement (SCI para 1.7). Consultations have been in terms of language and terminology used and have been a deterrent to becoming involved in the planning process as they have been wordy, long winded and intrusive, thus producing a low response rate.

National Planning Policy Framework greenbelt protection clauses

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

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

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

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

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

Assessments

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

The Housing Need Assessment was carried out by Arc4, who were supposed to carry out an independent survey of housing need. However, they have a partnership with Greater Manchester Housing Partnership, an organisation of housing associations, including Six Town Housing in Bury. This assessment was therefore not impartial.

Climate change policy and carbon neutral policy

Places for Everyone proposes employment sites on the other side of the borough from the M66 Northern Gateway Corridor, necessitating travel by car as no direct public transport exists or is proposed, thus increasing carbon emissions. Local transport hubs in Bury are far from Walshaw by a car journey or an expensive, unreliable and infrequent bus service, thus increasing carbon emissions. The proposed new link road at Walshaw will do nothing to alleviate the problem of the roads, simply transferring the problem from one place to another.

Up to date information

The PfE indicates in Para 1.63 point 2 that the most up to date information be used in the assessment so being the most recent Bury's Housing Development Needs Assessment 2020 must be given consideration: <https://www.bury.gov.uk/index.aspx?articleid=15866>

Soundness

Site Selection

The site selection process for Bury has been especially opaque. Little information has been provided about why other more apparently suitable sites were rejected, or what alternatives were considered. Bury Council admitted in a Freedom of Information response that site selection was decided through a series of informal meetings with no list of attendees or minutes available. This site choice cannot be justified as the most appropriate when no reasonable alternatives appear to have been examined. It is possible that other options were ruled out too early or were not considered despite other areas having good transport access or being situated nearer to employment sites.

In addition, the Walshaw site performs poorly against site selection criteria and strongly against the assessment criteria. Therefore the inclusion of the Walshaw site cannot be justified:

-The Walshaw site only met one of the criteria for site selection, namely the most greenbelt criteria, Criteria 7, land that would deliver significant local benefits by addressing a major local problem (Site Allocation Topic Paper JPA 9 Walshaw pg 8, para 5.4). The only major local problem in Walshaw is the extra traffic that will be created by the proposed 1250 new houses. However, as houses, there is not a major problem and the infrastructure proposed would not be new. This is essentially a cyclical argument and not a specific justification for the inclusion of the site. NB In the Site Selection Background Paper, Criteria 7 is missing from the table of site selection criteria at pg 18.

-The Walshaw allocation only meets 3 out of 10 of the broad objectives within Section 2 of the Local Plan (Site Allocation Topic Paper JPA 9 Walshaw pg 8, para 5.7):

- Objective 1 - Meet our housing need;
- Objective 5 - Reduce inequalities and improve prosperity;
- Objective 6 - Promote the sustainable movement of people, goods and information.

Again, these objectives could be satisfied by any number of sites in the area.

-The Walshaw site makes a strong or moderate to strong contribution to the purpose of the Green Belt in each of the areas of the Greater Manchester Greenbelt Assessment 2016 (Site Allocation Topic Paper JPA 9 Walshaw, pages 27 - 28, para 15.3):

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

To prevent neighbouring towns from merging into one another Strong

To assist in safeguarding the countryside from encroachment Moderate-Strong

Preserving the setting and special character of historic towns Moderate-Strong

-Site Allocation Topic Paper JPA 9 Walshaw at page 29 para 15.8 refers to The Greenbelt Assessment, 2020 which concluded that the Walshaw allocation makes a moderate contribution to checking the sprawl of Greater Manchester and safeguarding the countryside from encroachment. The allocation also makes a relatively limited contribution to maintaining the separation of settlements. Tottington which are already merged to a significant degree. Release of the allocation would cause moderate harm to Green Belt purposes.

The lack of selection criteria met and the harm that will be caused by the release of the site from the greenbelt are evidence of the lack of justification for the selection of this site. In fact, an independent leader, David Jones, admitted in writing that sites had been selected due to their sheer size and ease of implementation of infrastructure, saying,

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

The needs of the Walshaw community have been overlooked in favour of mass urban development on this particular site rather than sites on the outskirts nearer motorway access, transport links and employment sites. There is too much emphasis on economic growth at the expense of the physical health of residents with the benefits of the greenbelt being underestimated.

Infrastructure

The only way in which the funding levels required for infrastructure could be achieved would be via a 5% increase in the price of the properties on the site: Site Allocation Topic Paper- JPA 9 Walshaw pg 44, 45 and 46. Realistically, this makes the infrastructure for the site undeliverable.

"The Three Dragons Viability Appraisal of the allocation has been run using the base case model and showed the allocation would likely require public support to proceed.

The Three Dragons report shows that without a contribution to strategic transport costs the allocation produces a positive residual value both for the main and the sensitivity test. However, a contribution of in house prices of less than 5% would be required to accommodate the full strategic transport costs identified.

26.3 With a small increase in values compared to the base model, the sensitivity test shows that the allocation would be able to support all policy costs including 25% affordable housing and the infrastructure required to support the development, including the strategic transport costs. This is considered appropriate for this location as it is in a popular residential area and is close to the motorway.

Walshaw and the areas to the west of Bury where house prices are typically higher than the rest of the town."

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

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

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

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

-Healthcare

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

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

-Education

Whilst there is a plan for an extra primary school in Walshaw, there is no feasible plan for additional secondary school places with the increased number of secondary school age pupils. Site Allocation Topic Paper Walshaw at page 43, para 24.1 states that,

"The Walshaw allocation is expected to yield approximately 263 primary age pupils and 175 secondary age pupils. Current forecasts show both primary and secondary schools in the area are at capacity and therefore all additional demand created would require additional school places."

"Cumulative secondary age demand pressures will need to be considered more strategically (see paragraph 24.2)

It is proposed that secondary places will merely be funded from "financial contributions towards secondary school provision" to meet the needs generated by the development (PfE, paragraph 24.1). This is not acceptable and will only provide a short term solution. The Elton High School in Vauxhall is currently oversubscribed by 175 places in 2021 and the furthest distance offered from the school is 1/3 of a mile. Distribution of places in Bury secondary schools for September 2021. It is therefore clear that the Walshaw site will yield an additional 175 secondary age pupils, a more permanent solution is an additional secondary school in the locality as well as the proposed secondary school. The need for an additional secondary school needs to be found for them in the immediate area and for the additional primary age pupils in the area as they move through the education system.

-Transport

"The most significant role which PfE will play in this respect is to locate development at sustainable locations which reduce the need for car travel, for example by maximising densities around transport hubs." | What are Places for Everyone's proposals for the Bury Council

Walshaw is not situated near to motorway junctions or to transport or employment hubs. It will require residents to travel across Bury to access them. The only improvement to public transport proposed is "a potential upgrade of existing bus services or a new bus service" (PfE, paragraph 24.1). A new public transport route to employment hubs is proposed.

The proposed new road link will not ease traffic and will potentially create further congestion. The Transport Locality Assessments GMSF 2020, the map at page B9, figure 3 shows that the new road will start from a mini roundabout on a narrow residential road, cross a busy main road (Lowercroft Road) at Dow Lane where the road is steep and very narrow (barely wide enough for cars to pass safely). The road will be sending traffic to all of the same pinch points that currently exist in Irwell. It will exacerbate congestion on local roads, which are already highly congested.

has been taken of the additional traffic which will be produced at the Andrews housing site just down the road from the Walshaw allocation.

Housing delivery targets

Bury Council have consistently failed to meet housing delivery targets and are now in breach. To be effective a plan must actually be deliverable. The plan relies heavily on the cooperation of private property developers. There is no indication of how they will be made to keep up with the targets. No sanctions will apply if they don't. At a Council meeting held on 9/9/21 the Leader of the Council Eammon O'Brien confirmed that it was "unlikely" that the proposed building rates for 2021-2026 in Bury (as laid out in JPA9 Walshaw Topic Paper PfE 2021, section 27.4 page 46) were realistic. So the plan cannot be considered to be effective and fails the test for Soundness.

Housing requirements

Government guidance is clear that standard housing methodology is just a starting point and can be changed in exceptional circumstances - this has not been thoroughly explored. A lack of suitable land in the area and in particular the economic shock caused by Brexit and Covid 19 have not been taken into account.

There is insufficient confidence in the accuracy of the predictions in the current uncertain economic and climate to justify Green Belt loss at the start of the plan. Greenbelt loss should only occur if brownfield has been exhausted. A review mechanism should be built in to only include further loss at a later stage if proven necessary. PfE 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. The plan favours a brownfield first policy wherever possible as does National Policy. Bury Council has consulted the public in Bury that they will implement a brownfield first policy. When questioned at a Council meeting on 9/9/21 the Leader of the Council Eammon O'Brien clarified this statement to mean that for anything the council themselves build they would adopt a brownfield first policy. However, as that the council have no control over the actions of private developers. In reality they can only limit the release of green belt sites in accordance with National Policy NPPF 134 paragraph 134.

Changes to greenbelt boundaries

As part of the overall plan Bury have modified green belt boundaries and allocations. This makes it appear that less Greenbelt is being sacrificed. The loss of the Walshaw site has not been partially offset by creating extensive but unusable greenbelt in other areas with the exception of exceptional circumstances. This is not in accordance with National Policy.

Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

Removal of JPA 9 Walshaw from the plan

Family Name

Darbyshire

Given Name

Julie

Person ID

1287212

Title

JP-D1 Infrastructure Implementation

Type

Web

Include files

[PFE1287212_SOSWalshaw.pdf](#)
[PFE1287212_SOSElton.pdf](#)
[PFE1287212_SOSGeneral.pdf](#)
[PFE1287212_SOSSimister.pdf](#)

Soundness - Positively prepared?

Unsound

Places for Everyone Representation 2021

Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Due to the size of the greenbelt sites allocated within the plan it is highly unlikely that t can be provided in good time to bring these sites forward within the plan period. This plan undeliverable within the plan period hence making it unsound.
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.	Smaller sites should be considered that would come forward faster like brownfield si have substantial infrastructure provided close by.
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	JP-D2 Developer Contributions
Type	Web
Include files	PFE1287212_SOSSimister.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details	It is very well documented that once a site is approved for development it can be rev date with a viability assessment. Local councils have very little control after a site has

Places for Everyone Representation 2021

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.	for houses and it is common practice for a developer to change the number of homes density, type and number that are classed as affordable. In some extreme cases a developer can have inflated development costs and no section 106 payments will come forward.
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.	Local council authorities need to enter into more housing partnership projects and develop their own instead of selling it and losing control. Salford Council has now created its own building company that will deliver affordable homes on land they own and other council land in their suit.
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	Bury - Green Belt Additions
Type	Web
Include files	PFE1287212_SOSWalshaw.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSSimister.pdf
GBA Bury - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below	Bury GBA03 Pigs Lea Brook 1 Bury GBA04 North of Nuttall Park Bury GBA05 Pigs Lea Brook 2 Bury GBA06 Hollins Brook Bury GBA07 Off New Road, Radcliffe Bury GBA08 Hollins Brow Bury GBA09 Hollybank Street, Radcliffe Bury GBA10 Crow Lumb Wood Bury GBA11 Nuttall West, Ramsbottom Bury GBA12 Woolfold, Bury Bury GBA13 Nuttall East, Ramsbottom Bury GBA14 Chesham, Bury Bury GBA15 Broad Hey Wood North Bury GBA16 Lower Hinds
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Net greenbelt additions have been nothing but a play on numbers to promote the plan for more greenspace. A lot of the new greenbelt additions are currently not viable for building, they are simply an exercise to take away the protection of greenbelt from useable open greenspace and move them elsewhere in the borough to give the impression that the overall net greenbelt additions are more than is less.
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.	Leave the greenbelt boundaries unchanged and present the true loss of greenbelt in the plan proposals.
Family Name	Darbyshire
Given Name	Julie
Person ID	1287212
Title	Supporting Evidence
Type	Web
Include files	PFE1287212_SOSSimister.pdf PFE1287212_SOSGeneral.pdf PFE1287212_SOSElton.pdf PFE1287212_SOSWalshaw.pdf
Redacted comment on supporting documents - Please give details of why you consider any of the evidence not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Legal Compliance</p> <p>-It is questionable whether PfE and the GMSF can effectively be treated as the same plan. This must be decided in court before 'Places for Everyone' can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant (with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if established. If there is any substantial difference in scope between the GMSF and PfE, it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states 'The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a significant number of plan have seen some form of change.' So, is 'not insignificant' the same as 'substantial difference' is not legal. This can only be established by a proper judicial review. So until proven otherwise, the plan must be considered illegal and not put to Government.</p> <p>Soundness</p> <p>Soundness</p> <p>-The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>-There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid</p>

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

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

-The site selection process has been opaque with no explanation as to why some sites' were excluded from the plan.
https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public should be held and minutes should be published. The rationale for the selection/rejection should be available including considered alternatives.

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

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

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

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

-A change in the methodology for Manchester City Council was resulted in a 35% up in housing need for Manchester City Council area. The revised Local Housing Need methodology states that housing need is to be met within the district and not redistributed (see Places for Everyone Joint Consultation documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii)
https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021
 This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.

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Person ID	1287212
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Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

**Compliance - In
accordance with the
Duty to Cooperate?**

No