

Places for Everyone Representation 2021

Family Name	Edgington
Given Name	John
Person ID	1286767
Title	Stakeholder Submission
Type	Web
Family Name	Edgington
Given Name	John
Person ID	1286767
Title	Our Vision
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Edgington
Given Name	John
Person ID	1286767
Title	Our Strategic Objectives
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Edgington
Given Name	John
Person ID	1286767
Title	JP-J 1 Supporting Long Term Economic Growth
Type	Web

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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>No consideration has been made for Brexit or the sharp economic effects of Covid-19. No detailed information has been provided on specifically what jobs are being created and in what industries.</p> <p>No consideration has been made for the effects of creating such a large number of jobs, assuming this was possible, on the already at breaking point infrastructure including roads and access points to the areas being considered as an employment hub.</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.	Be realistic and your numbers may be more acceptable
Family Name	Edgington
Given Name	John
Person ID	1286767
Title	JP-J 2 Employment Sites and Premises
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not	No consideration has been made for Brexit or the sharp economic effects of Covid-19. No detailed information has been provided on specifically what jobs are being created and in what industries.

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to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	No consideration has been made for the effects of creating such a large number of jobs, assuming this was possible, on the already at breaking point infrastructure including roads and access points to the areas being considered as an employment hub.
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.	Be realistic and your numbers may be more acceptable
Family Name	Edgington
Given Name	John
Person ID	1286767
Title	JP-J 3 Office Development
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	What a ludicrous plan given that more workers are working from home than anyone could have anticipated yet this plan is intent on creating yet more office space.
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.	Stop building unnecessary office space and build more economically viable homes
Family Name	Edgington

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Given Name	John
Person ID	1286767
Title	JP-J 4 Industry and Warehousing Development
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Edgington
Given Name	John
Person ID	1286767
Title	JPA 7: Elton Reservoir Area
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Edgington
Given Name	John
Person ID	1286767
Title	JPA 9: Walshaw
Type	Web
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>No</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>Legality</p> <p>Failure to comply with Statement of Community Involvement</p> <p>Bury Council have failed to comply with their Statement of Community Involvement Statement of Community Involvement (bury.gov.uk) at all stages of the creation of the plan. This is the case with PFE and its predecessor the GMSF.</p> <p>There was no notification to residents of the initial call for sites and the amount spent on making residents aware of the plan is disproportionately small in comparison to the effect it will have upon those who will be directly affected by the plan. There has been a deliberate campaign of misinformation and misleading statements to promote and "sell" the Plan to residents, rather than a presentation of the facts. For example, residents only being told of the plans for their specific ward, and not being informed of the bigger picture across the borough, thus giving the impression that the impact would be significantly less than the reality.</p> <p>There has been an over reliance on residents finding things out about the plan for themselves via social media and websites thus there has been a failure to engage with local groups due to an over reliance on the use of social media and technology. There has been no access to public internet in libraries during Covid and this has adversely and disproportionately affected older people and those from deprived backgrounds. This almost amounts to discrimination and contradicts SCI 2.4 & 4.17 of the Statement of Community Involvement. Given the magnitude of the changes planned it would have been prudent for Bury Council to have ensured that communication with the local communities who will be both directly and in-directly affected were put in place, unfortunately this has not happened.</p> <p>Covid restrictions are now lifted but restrictions still remain in place in Bury's Statement of Community Involvement (SCI para 1.7). 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.</p> <p>National Planning Policy Framework greenbelt protection clauses</p> <p>The purpose of the NPPF greenbelt protection is to prevent urban sprawl. Para 11.119, page 271 of PFE states of the Walshaw allocation,</p> <p>"This is an extensive area of land □□ set entirely within the existing urban area. The land is loosely bounded by the urban areas of Tottington to the north, Woolfold and Elton to the east Lowercroft to the south and Walshaw to the west."</p> <p>Building on, and the destruction of, this green belt site will create an urban sprawl contrary to NPPF para 137 and para 138 a,b,c and e.</p> <p>There has been no evidence of the existence of exceptional circumstances to justify the alteration of the greenbelt boundaries to allow building on the Walshaw allocation as is required by the NPPF, para 140. Housing need is not an exceptional circumstance to justify the release of greenbelt.</p> <p>Government guidance states that housing need is not a target but merely a starting point and figures can be mitigated upwards or downwards according to local circumstances for example the lack of brownfield sites, economic shock (Brexit, Covid-19).</p> <p>To prove that exceptional circumstances exists in order to justify alteration to greenbelt boundaries, the NPPF requires evidence that all other reasonable options to meet identified need have been considered (NPPF para 141).</p>

This must include maximising use of brownfield and underutilised sites and maximising density.

Assessments

There has been a failure to conduct thorough and independent ecological assessments. Assessments carried out have been done on behalf of developers and are therefore not independent. 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 biased.

The Housing Need Assessment was carried out by Arc4, who were supposed to carry out a non-biased 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. The 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 Walshaw at the M66 Northern Gateway Corridor, necessitating travel by car as no direct public transport route exists or is proposed, thus increasing carbon emissions. Local transport hubs in Bury are only accessible from Walshaw by a car journey or an expensive, unreliable and infrequent bus service, again increasing carbon emissions. The proposed new link road at Walshaw will do nothing to alleviate congestion on 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 plan making, so being the most recent Bury's Housing Development Needs Assessment 2020 must be taken into consideration: <https://www.bury.gov.uk/index.aspx?articleid=15866>

Soundness

Site Selection

The site selection process for Bury has been especially opaque. Little information has been given about why other more apparently suitable sites were rejected, or what alternatives were considered. Bury Council admitted in a Freedom of Information response that site selection was decided at a series of informal meetings with no list of attendees or minutes available. One must seriously question the motives behind this lack of transparency.

This site choice cannot be justified as the most appropriate when no reasonable alternatives appear to have been examined. Alternative options were ruled out too early or were not considered despite other areas having direct motorway access or being situated nearer to employment sites.

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

-The Walshaw site only met one of the criteria for site selection, namely the most general and vague 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 identified in Walshaw is the extra traffic that will be created by the proposed 1250 new houses. Without the houses, there is not a major problem and the infrastructure proposed would not be needed. 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 3 of the PFE 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 greenbelt 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 Green Belt Harm 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 Bury and Tottington which are already merged to a significant degree. Release of the allocation would therefore 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 Walshaw greenbelt are evidence of the lack of justification for the selection of this site. In fact, an ex-Bury Council leader, David Jones, admitted in writing that sites had been selected due to their sheer size and the 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 to enable 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 urbanisation by using this site rather than sites on the outskirts nearer motorway access, transport hubs and employment sites. There is too much emphasis on economic growth at the expense of

mental and 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 through 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 model, which showed the allocation would likely require public support to proceed.

The Three Dragons report shows that without a contribution to strategic transport costs, the scheme produces a positive residual value both for the main and the sensitivity test. However, a small increase 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 demonstrates 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. A 5% increase is considered appropriate for this location as it is in a popular residential area and is closely linked with Walshaw and the areas to the west of Bury where house prices are typically higher than other parts of the town."

There is no guarantee that higher house prices would be achieved. This also suggests that provision of 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- JPA 9 Walshaw pg 46 para 27.2 which states that,

"The phasing strategy will be developed through on-going discussions with key stakeholders in relation to infrastructure delivery. The estimated phasing and delivery trajectory will evolve as the plans for the allocation are developed further."

The plan for infrastructure is therefore unsound as it is undeliverable and thus the site unviable.

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 s106 payments are no longer ringfenced so there is no guarantee that promised infrastructure will be forthcoming.

-Healthcare

There is no specific proposal for additional healthcare facilities. Site Allocation Topic Paper PA 9 Walshaw at page 43, para 25.1 states that,

"Further work will be required to determine whether there is additional capacity within any local healthcare facilities to meet the increased demands arising from the prospective occupants of the new development."

-Education

Whilst there is a plan for an extra primary school in Walshaw, there is no feasible plan in place to deal with the increased number of secondary school age pupils. Site Allocation Topic Paper PA 9 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 full to capacity, therefore all additional demand created would require additional school places."

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

It is proposed that secondary places will merely be funded from "financial contributions towards off-site secondary school provision" to meet the needs generated by the development (PfE, pg 270). This is not acceptable and will only provide a short term solution. The Elton High School in Walshaw was oversubscribed by 175 places in 2021 and the furthest distance offered from the school was just over 1/3 of a mile Distribution of places in Bury secondary schools for September 2021. If it is proposed that the Walshaw site will yield an additional 175 secondary age pupils, a more permanent solution (ie an additional secondary school in the locality as well as the proposed secondary school in Radcliffe) needs to be found for them in the immediate area and for the additional primary age children 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 in the most sustainable locations which reduce the need for car travel, for example by

maximising residential densities around transport hubs." (What are Places for Everyone's proposals for the environment? - Bury Council

Walshaw is not situated near to motorway junctions or to transport or employment hubs. This requires residents to travel across Bury in order to access any of these important facilities. The only improvement to public transport that is proposed is "a potential upgrade of existing bus services or a new bus service" (PfE pg 270). No new public transport route to employment hubs is proposed.

The proposed new road link will not ease traffic and will potentially create further congestion. As per the Transport Locality Assessments GMSF 2020, the map at page B9, figure 3 shows that the road will start from a mini roundabout on a narrow residential road, cross a busy main road, enter onto Lowercroft Road at Dow Lane where the road is steep and very narrow (barely wide enough for two cars to pass safely). The road will be sending traffic to all of the same "pinch points" on the Walshaw side of side of the river Irwell. It will exacerbate congestion on local roads all of which are already highly congested. No account has been taken of the additional traffic which will be produced at the Andrews housing development 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 presumption. To be effective a plan must 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 and what 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 all developments in Bury (as laid out in JPA9 Walshaw Topic Paper PfE 2021, section 27.4 page 46) would be met as they were "unrealistic". The plan therefore cannot be considered to be effective and fails the effectiveness 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 brownfield 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 climate to justify Green Belt loss at the start of the plan. Greenbelt loss should only occur once all brownfield has been exhausted. A review mechanism should be built in to only include greenbelt 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 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 stating "that for anything the council choose to 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.

Changes to greenbelt boundaries

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	As part of the overall plan Bury Council have modified Green Belt boundaries and allocations in such a way to make it appear that less Greenbelt is being sacrificed. The loss of the Walshaw 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.
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.	<p>Brownfield sites first</p> <p>Use the latest data from the ONS</p> <p>Stop trying to pull the wool over our eyes by creating new areas of Greenbelt so that you can offset your numbers.</p> <p>Consult properly with the local communities</p> <p>Abide by the NPPF guidelines and rules</p> <p>Utilise all of the empty properties before even considering the destruction of Greenbelt</p> <p>Don't shove marketing speak down our throats and tell us that what type of Greenbelt we need. The areas for relaxation and unwinding already exist, we do not want you to create artificial areas and call them open spaces in order to appease the local communities</p> <p>Have due consideration for the local wildlife of which there is an abundance in the areas marked for destruction.</p> <p>Dont talk to us about creating clean air and show us an artificial concern for the health of our local communities when your plan will do the exact opposite.</p> <p>Dont tell us that you are wishing to help our overall health and well being but then tell us that you are going to destroy the exact places where we go in order to take a way some of todays lifes pressures.</p> <p>Our local communities are sick to the back teeth of Councils such as Bury being hell bent upon destroying what we all love and cherish.</p>
Family Name	Edgington
Given Name	John
Person ID	1286767
Title	Bury - Green Belt Additions
Type	Web
GBA Bury - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below	Bury GBA12 Woolfold, Bury
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	As part of the overall plan Bury Council have modified Green Belt boundaries and allocations in such a way to make it appear that less Greenbelt is being

<p>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>sacrificed. The loss of the Walshaw 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>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.</p>	<p>You must think that we are all stupid. How arrogant of Bury Council to offer a piecemeal addition to the Greenbelt so that they can feel happy that they have done something to balance the destruction with an alternative. Is this area really suitable as a replacement for the open countryside at Walshaw once its built on. Adequate and natural Greenbelt already exists and does not needed to be added to. Simply revisit all of the contrived and out of date numbers including population expectation and density and use town centres and Brownfield sites first, then come back and talk to the local communities to discuss any shortfull. Town centres are dying and need re-vitalising so why not use this as a way forward and create homes in the centres instead of building warehousing which is likely to remain empty for a considerable period of time or at least until we have an economy that is stable.</p>