

Places for Everyone Representation 2021

Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	Stakeholder Submission
Type	Web
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
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
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 plan is contra to every point of the vision statement published.</p> <p>The plan has not been positively prepared. It is the transition from a failed GMSF and it is therefore questionable whether it is even legal.</p> <p>It is not justified. The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.</p> <p>It is inconsistent with National Policy. The plan for Bury is completely at odds with the Government's house building strategy relating to brownfield development and greenbelt protection. The reliance almost entirely on greenbelt for the proposed housing in Bury goes against national policy that greenbelt be used only as a last resort. It is contra to the policies on environment and climate change.</p> <p>It is not effective as a plan. It is based on outdated information and is therefore not now a proper reflection of the current needs of Bury. There is a lack of information particularly in respect of infrastructure requirements, employment opportunities and skills matching. There is little detail on infrastructure and on how the required infrastructure will be paid for. There</p>

Places for Everyone Representation 2021

	<p>are no partners or industries identified for employment provision and there has been a lack of transparency on any needs assessment for prospective industries. The housing developments are sited away from the proposed employment centres with no synergy between housing and jobs proposals.</p> <p>It is doubtful whether the plan is legally compliant. As stated above, the plan is a transition from the GMSF but all sections of the plan have seen some change. It is therefore not likely that section 18 of the Town and Country Planning regulations would be automatically satisfied without a judicial review.</p> <p>The plan has not been prepared in accordance with the duty to co-operate. With the withdrawal of Stockport from the GMSF the plan was undermined. PfE does not set out how the relationship between Stockport and the remaining boroughs will be maintained or how for example Bury will co-operate with boroughs outside of the PfE plan. The withdrawal undermines the plan for Greater Manchester and more reliance should be placed on local plans.</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>The plans should be rewritten taking into account the latest information on housing needs together with planning approvals already in place. A brownfield first approach in line with Government policy together with greater protection of greenbelt land should be proposed. Full transparency on site selection, infrastructure plans and their funding together with employment needs analysis should be incorporated. Local plans should be published and proper engagement with residents should be undertaken.</p>
<p>Family Name</p>	<p>Halliwel</p>
<p>Given Name</p>	<p>Julie</p>
<p>Person ID</p>	<p>1286360</p>
<p>Title</p>	<p>Our Strategic Objectives</p>
<p>Type</p>	<p>Web</p>
<p>Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:</p>	<ol style="list-style-type: none"> 1. Meet our housing need 2. Create neighbourhoods of choice 3. Ensure a thriving and productive economy in the districts involved 7. Ensure that districts involved are more resilient and carbon neutral 8. Improve the quality of our natural environment and access to green spaces 9. Ensure access to physical and social infrastructure 10. Promote the health and wellbeing of communities
<p>Soundness - Positively prepared?</p>	<p>NA</p>
<p>Soundness - Justified?</p>	<p>Unsound</p>

Places for Everyone Representation 2021

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>In the case of the plan for Bury almost all development is on Greenbelt land. Despite the declaration by Bury MBC that the council has a brownfield first approach they admitted that this would only apply should the council themselves be the builders. As this is not the case it is clear that the greenbelt would be severely depleted.</p> <p>The site selection process was opaque with no explanation as to why some sites in the "call for sites" were excluded from the plan. The process should be repeated using National and GMCA guidelines for site selection. Meetings with public representation should be held and minutes should be published. The rationale for the selection/rejection of every site should be available including considered alternatives.</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, "This is an extensive area of land <input type="checkbox"/> 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." Filling in 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. 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, eg lack of brownfield, economic shock (Brexit, Covid-19).</p> <p>To prove that exceptional circumstances to justify alteration to greenbelt boundaries exist, the NPPF requires evidence that all other reasonable options to meet identified need have been considered (NPPF para 141). This must include maximising use of brownfield and underutilised sites and maximising density.</p> <p>The proposed building in Walshaw will significantly increase the volume of traffic due to its position away from the proposed employment sites, in a semi rural area with limited transport links. As an example of lack of proper planning I can describe my own road. The rural road which I live on is single width with blind bends and has been described as "dangerous" due to the volume and type of traffic using it. The plan however shows no infrastructure improvement and redesignates the road as a "cycle route".</p> <p>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</p>

Places for Everyone Representation 2021

	<p>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 potentially biased.</p> <p>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.</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>The plan needs to be revisited based on up to date housing needs assessments with proper regard to the process of site selection and taking into account independently prepared housing need and environmental assessments. The reliance on greenbelt for ease of development should be replaced by a proper brownfield first policy which holds developers accountable for sustainable, environmentally friendly, affordable housing .</p>
<p>Family Name</p>	<p>Halliwell</p>
<p>Given Name</p>	<p>Julie</p>
<p>Person ID</p>	<p>1286360</p>
<p>Title</p>	<p>Our Spatial Strategy</p>
<p>Type</p>	<p>Web</p>
<p>Soundness - Positively prepared?</p>	<p>Unsound</p>
<p>Soundness - Justified?</p>	<p>Unsound</p>
<p>Soundness - Consistent with national policy?</p>	<p>Unsound</p>
<p>Soundness - Effective?</p>	<p>Unsound</p>
<p>Compliance - Legally compliant?</p>	<p>No</p>
<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>No evidence within plan that it will boost northern competitiveness. No evidence of industries that would be attracted to Northern should the plan go ahead. It is not a plan but a wish</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>Needs to be rewritten to ensure employment is achievable and housing ties in with sites of employment which the Bury plan does not</p>
<p>Family Name</p>	<p>Halliwell</p>

Places for Everyone Representation 2021

Given Name	Julie
Person ID	1286360
Title	JP-Strat 6 Northern Areas
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.	The plan for Bury is not in line with the strategy - housing is planned too far away from areas designated for employment, virtually all on greenbelt with no adequate infrastructure or evidence of need
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.	Needs to be rewritten using up to date information and based on proper researched demand
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-Strat 13 Strategic Green Infrastructure
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

Places for Everyone Representation 2021

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.	Building almost entirely on greenbelt land in Bury without due regard to residents use of the available countryside and attempting to replace the green assets with small newly designated "greenbelt" which is inadequate and clearly not fit for purpose does not make sense and is contra to the policy outlined. Reports on ecological impact have not been independent and therefore should be deemed to be unfit for purpose. Much of the planned areas are subject to flooding so protect the existing housing stock. Insufficient regard has been made to ecological damage should the residential developments in Bury go ahead.
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.	Needs to be rewritten taking into account protection of greenbelt land both for the well-being of residents and protection of land from ecological damage
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-Strat 14 A Sustainable and Integrated Transport Network
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.	The plan does not meet the outlined strategy. In the case of Bury the housing is planned well away from existing transport links in semi rural areas with no thought to road infrastructure and so far away from planned industrial sites thereby increasing traffic etc
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.	Needs to be rewritten to maximise brownfield sites nearer to town centre and to proposed employment sites to minimise damage to green infrastructure. This would be in line with climate change agenda and protect from environmental damage
Family Name	Halliwell

Places for Everyone Representation 2021

Given Name	Julie
Person ID	1286360
Title	JP-S 1 Sustainable 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.	<p>In respect of policy JPS-1, in the case of the plan for Bury the proposals are directly opposed to the outlined policy on sustainable development. The proposed building of c5000 houses on existing greenbelt land is contra to the policy on greenbelt protection. The purpose of the NPPF greenbelt protection is to prevent urban sprawl. Para 11.119, page 271 of PfE states of the Walshaw allocation, "This is an extensive area of land <input type="checkbox"/> 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." Filling in 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. 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, eg lack of brownfield, economic shock (Brexit, Covid-19).</p> <p>To prove that exceptional circumstances to justify alteration to greenbelt boundaries exist, the NPPF requires evidence that all other reasonable options to meet identified need have been considered (NPPF para 141). This must include maximising use of brownfield and underutilised sites and maximising density.</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>The plan needs to be rewritten to take into account maximising brownfield sites, use of empty properties and up to date housing needs assessments. In addition independent ecological surveys should be undertaken.</p>
Family Name	Halliwell

Places for Everyone Representation 2021

Given Name	Julie
Person ID	1286360
Title	JP-S 4 Resilience
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.	<p>The plan for Bury does not rely on retrofitting but on a developer led new build strategy. The sites proposed are ecologically and socially important to residents and include areas which act as flood plains. The Bury plan therefore does not stand scrutiny against the resilience policy.</p> <p>The reliance on building almost entirely on greenbelt land in Bury will have a significant negative impact on health and air quality of residents.</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.	Rewrite required to give greater resilience to climate change agenda including development of brownfield sites and review of empty housing
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-J 1 Supporting Long Term Economic Growth
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

Places for Everyone Representation 2021

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.	Whilst there are laudable policies within the agenda for jobs there is little evidence of demand or how employers and industries would be encouraged or would want to invest in Bury. The policy is currently "build it and they shall come"which is not a plan but a wish list. There is little synergy between employment and housing requirements which could have the potential of building on greenbelt whilst increasing car journeys as their could be a mismatch between the two.
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.	The plan needs to be rewritten taking into account proper research into employment needs and investment potential with proper safeguards to protect greenbelt and climate change agenda
Family Name	Halliwel
Given Name	Julie
Person ID	1286360
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 to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Whilst there are laudable policies within the agenda for jobs there is little evidence of demand or how employers and industries would be encouraged or would want to invest in Bury. The policy is currently "build it and they shall come"which is not a plan but a wish list. There is little synergy between employment and housing requirements which could have the potential of building on greenbelt whilst increasing car journeys as their could be a mismatch between the two.
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.	The plan needs to be rewritten taking into account proper research into employment needs and investment potential with proper safeguards to protect greenbelt and climate change agenda

Places for Everyone Representation 2021

Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-H 1 Scale Distribution and Phasing of New Housing 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.	The plan for Bury relies on development almost entirely on greenbelt land which is contra to the strategy and not in line with national guidelines.
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.	Rewrite the plan looking at the up to date housing requirements, site selection (which is opaque in the existing plan) and brownfield first policy.
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-H 2 Affordability of New Housing
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

Places for Everyone Representation 2021

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.	There is little within the Bury plan to require developers to build sustainably and affordably. The sites selected lend themselves to larger less affordable housing with a requirement on cars as the main transport with little regard to road infrastructure
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.	Plan should be rewritten in line with policy and national guidelines on protection of greenbelt land and climate change agenda
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-H 3 Type Size and Design of New Housing
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.	There is no legal requirement for developers to build in line with the policy and it is highly likely therefore that the policy will be totally disregarded in preference to larger, more expensive and possibly less eco friendly housing
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.	Site selection in Bury should be realigned with areas of need closer to public transport links and employment areas which they currently are not anywhere near. Any housing development should bring with it more prescriptive eco credentials and affordable housing requirements
Family Name	Halliwell
Given Name	Julie
Person ID	1286360

Places for Everyone Representation 2021

Title	JP-H 4 Density of New Housing
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.	The plan for Bury is counter to the strategy with greater reliance on density of housing developments on greenbelt well away from existing road and transport infrastructure and also from planned increases in industrial/employability development.
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.	The plan needs to be rewritten to ensure a better distribution of housing across the borough, making full use of brownfield availability, plans already in the pipeline/underway and minimising infrastructure development by building closer to existing transport network and employment areas
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-G 1 Valuing Important Landscapes
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	The housing plan for Bury is almost entirely dependent on greenbelt release. Offsetting is inadequate and unnecessary as proper regard to brownfield release and cross borough site selection has not been properly undertaken. The semi rural nature of the proposed

Places for Everyone Representation 2021

compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	development sites and the cultural heritage of the affected communities which go towards making Bury a pleasant and popular place to live would be swept aside. This is contra to national policy on greenbelt protection, protection of heritage and ecological protection.
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.	The plan needs to be rewritten to ensure protection of green assets as well as community, heritage and environmental assets
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-G 2 Green Infrastructure Network
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.	National guidelines require plans to be drawn up having due regard to the protection of green belt land. The plan for Bury is almost entirely dependent on housing developments in one area of Bury and on green belt land. This is counter to national policy. The impact on existing areas of ecological, environmental, social, recreational would not be offset by the planned green infrastructure network.
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.	The plan needs to be rewritten to take account of up to date housing needs, protection of green belt, brownfield first approach and with proper regard to equitable site selection and independent ecological and environmental surveys
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-G 3 River Valleys and Waterways

Places for Everyone Representation 2021

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.	The plan for Bury relies on destruction of vast areas of important green belt land surrounding waterways. This currently provides public realm as well as being of environmental and ecological importance. It provides social and recreational benefits to the residents of Bury. It is counter to national policy as well as the strategy outlined that this should be destroyed without due regard to alternative site selections and up to date data as well as taking into account published independent ecological reports (not produced on behalf of developers who would benefit financially from the developments).
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.	The plan needs to be rewritten to take account of up to date housing needs, protection of green belt, brownfield first approach and with proper regard to equitable site selection and independent ecological and environmental surveys
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-G 4 Lowland Wetlands and Mosslands
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	The plan for Bury would destroy vast areas of important greenbelt with little regard to the risk of flooding, the protection of wildlife including protected species and the current access for

Places for Everyone Representation 2021

compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	recreational purposes which has contributed to the physical and mental well-being of residents. This is counter to national policies on green belt protection, environmental protection, the climate change agenda as well as protection of species under threat.
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.	The plan needs to be rewritten to take account of up to date housing needs, protection of green belt, brownfield first approach and with proper regard to equitable site selection and independent ecological and environmental surveys
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-G 5 Uplands
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.	The plan for Bury involves destruction of vast areas of important greenbelt land of distinctive character that adds to the distinctive character of the semi rural nature of the area. This is directly counter to the strategy outlined and is against the national policies on protection of greenbelt land and without regard to the importance of ecological and environmental protection.
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.	The plan needs to be rewritten to take account of up to date housing needs, protection of green belt, brownfield first approach and with proper regard to equitable site selection and independent ecological and environmental surveys
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-G 8 Standards for Greener Places

Places for Everyone Representation 2021

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.	Replacing existing greenbelt land by built green infrastructure is counter to national policy on greenbelt protection.
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.	The plan needs to be rewritten to take account of up to date housing needs, protection of green belt, brownfield first approach and with proper regard to equitable site selection and independent ecological and environmental surveys
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-G 9 A Net Enhancement of Biodiversity and Geodiversity
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.	The plan for Bury is dependent on the destruction of vast areas of greenbelt land. The areas designated for housing already are biodiverse, provide connectivity between habitats and much of the area is agricultural in nature. The plan therefore is counter to national policies on protection of greenbelt as well as being directly opposed to the policy/strategy meant to

Places for Everyone Representation 2021

	protect these areas. Whilst there are alternative solutions such as a brownfield first approach and alternative site selections the plan can not be considered to be legally compliant
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.	The plan needs to be rewritten to take account of up to date housing needs, protection of green belt, brownfield first approach and with proper regard to equitable site selection and independent ecological and environmental surveys
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-G 10 Green Belt
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.	<p>The housing plan for Bury is almost entirely based on destruction of the greenbelt land predominantly in one area of Bury. This is counter to national policy and the outlined policy/strategy. The offsetting and redesignating of land as greenbelt to "improve"the perceived loss of greenbelt in the plan does not satisfy the proper definition and purpose of greenbelt given the fractured nature, scale of pockets of redesignated land and type of reclassification.</p> <p>Building almost entirely on greenbelt land in Bury without due regard to residents use of the available countryside and attempting to replace the green assets with small newly designated "greenbelt"which is inadequate and clearly not fit for purpose does not make sense and is contra to the policy outlined. Reports on ecological impact have not been independent and therefore should be deemed to be unfit for purpose. Much of the planned areas are subject to flooding so protect the existing housing stock. Insufficient regard has been made to ecological damage should the residential developments in Bury go ahead.</p>
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in	The plan needs to be rewritten to take account of up to date housing needs, protection of green belt, brownfield first approach and with proper regard to equitable site selection and independent ecological and environmental surveys

Places for Everyone Representation 2021

respect of any legal compliance or soundness matters you have identified above.	Needs to be rewritten taking into account protection of greenbelt land both for the well-being of residents and protection of land from ecological damage
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-P2 Heritage
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.	The plan for Bury relies on significant building on greenbelt land which is surrounded by heritage rich semi rural areas. No consideration has been given to the infrastructure requirements to protect these areas. This is counter to national policy on protection of greenbelt land and policies on preservation of heritage rich sites
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.	The plan needs to be rewritten to take account of up to date housing needs, protection of green belt, brownfield first approach and with proper regard to equitable site selection, independent ecological and environmental surveys and protection of heritage assets which make Bury a pleasant place to live
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-C1 An Integrated Network
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound

Places for Everyone Representation 2021

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 plan for Bury relies on housing development predominantly on greenbelt land. The building is not close to the proposed sites for employment infrastructure in the plan and there is inadequate infrastructure and transport improvement to provide accessible links without reliance on cars. Many of the link roads to the site of the new housing are semi rural narrow roads with blind bends and historic houses adjoining the roads. They are therefore unsuitable for traffic now without the increase of c 5000 houses. In fact my own road has been designated as "dangerous"because of the nature and volume of traffic now using it. The plan will inevitably lead to more accidents on a road such as my own and the many other narrow semi rural roads surrounding it. Indeed my own road has been designated in the plan as a cycle route with no planned infrastructure investment to mitigate the dangers. It is not legal for a plan to cause potential danger to residents without due mitigation.
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.	The plan needs to be rewritten to take account of up to date housing needs, protection of green belt, brownfield first approach and with proper regard to equitable site selection, independent ecological and environmental surveys and adequate infrastructure improvements. Building on brownfield land would inevitably mean a wider distribution of sites across the borough and therefore less requirements for major changes to infrastructure as they would be more likely to be sited nearer to existing public transport networks. The current site selections are not adequately catered for by public transport so would require greater investment.
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-C3 Public Transport
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	The plan for Bury relies on housing development predominantly on greenbelt land. The building is not close to the proposed sites for employment infrastructure in the plan and there

Places for Everyone Representation 2021

<p>compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</p>	<p>is inadequate infrastructure and transport improvement to provide accessible links without reliance on cars. Many of the link roads to the site of the new housing are semi rural narrow roads with blind bends and historic houses adjoining the roads. They are therefore unsuitable for traffic now without the increase of c 5000 houses. In fact my own road has been designated as "dangerous"because of the nature and volume of traffic now using it. The plan will inevitably lead to more accidents on a road such as my own and the many other narrow semi rural roads surrounding it. Indeed my own road has been designated in the plan as a cycle route with no planned infrastructure investment</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>The plan needs to be rewritten to take account of up to date housing needs, protection of green belt, brownfield first approach and with proper regard to equitable site selection, independent ecological and environmental surveys and adequate infrastructure improvements. Building on brownfield land would inevitably mean a wider distribution of sites across the borough and therefore less requirements for major changes to infrastructure as they would be more likely to be sited nearer to existing public transport networks. The current site selections are not adequately catered for by public transport so would require greater investment.</p>
<p>Family Name</p>	<p>Halliwell</p>
<p>Given Name</p>	<p>Julie</p>
<p>Person ID</p>	<p>1286360</p>
<p>Title</p>	<p>JP-C5 Walking and Cycling Network</p>
<p>Type</p>	<p>Web</p>
<p>Soundness - Positively prepared?</p>	<p>Unsound</p>
<p>Soundness - Justified?</p>	<p>Unsound</p>
<p>Soundness - Consistent with national policy?</p>	<p>Unsound</p>
<p>Soundness - Effective?</p>	<p>Unsound</p>
<p>Compliance - Legally compliant?</p>	<p>No</p>
<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>The plan for Bury relies on building housing on vast areas of greenbelt which is not close to public transport . However some roads designated as cycle routes would also inevitably become main link roads between the new housing developments (c5000 in one area) and adjoining towns and would therefore increase the dangers for road users.</p> <p>This is against the strategy/policy for greenbelt and the national policy on environmental protection and green strategy</p>

Places for Everyone Representation 2021

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.	The plan needs to be rewritten to take account of up to date housing needs, protection of green belt, brownfield first approach and with proper regard to equitable site selection, independent ecological and environmental surveys and adequate infrastructure improvements. Building on brownfield land would inevitably mean a wider distribution of sites across the borough and therefore less requirements for major changes to infrastructure as they would be more likely to be sited nearer to existing public transport networks. The current site selections are not adequately catered for by public transport so would require greater investment.
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-C7 Transport Requirements of New Developments
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.	The plan for Bury relies on building housing on vast areas of greenbelt which is not close to public transport . Little transport infrastructure improvements are included in the plan despite the potential issue of increased traffic. Some roads designated as cycle routes would also inevitably become main link roads between the new housing developments (c5000 in one area) and adjoining towns and would therefore increase the dangers for road users. This is against the strategy/policy for greenbelt and the national policy on environmental protection and green strategy
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.	The plan needs to be rewritten to take account of up to date housing needs, protection of green belt, brownfield first approach and with proper regard to equitable site selection, independent ecological and environmental surveys and adequate infrastructure improvements. Building on brownfield land would inevitably mean a wider distribution of sites across the borough and therefore less requirements for major changes to infrastructure as they would be more likely to be sited nearer to existing public transport networks. The current site selections are not adequately catered for by public transport so would require greater investment.

Places for Everyone Representation 2021

Family Name	Halliwell
Given Name	Julie
Person ID	1286360
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
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 for Bury and specifically Walshaw, demonstrates major failings in meeting the vision and strategy outlined as overarching requirements of PfE.</p> <p>Community involvement</p> <p>Bury Council have failed to comply with their Statement of Community Bury Involvement at all stages of the creation of the plan. There was no notification to residents of the initial call for sites and this is still opaque in terms of options, decision making and officers/members present. The amount spent on making residents aware of the plan is disproportionately small (£100 as per the response to a Freedom of Information request) in comparison to the effect it will have upon them. The Council have been disingenuous in presenting the plans to residents. eg 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 is less than it is. There has been an over reliance on residents having to find things out for themselves on social media and websites and thus a failure to engage with various groups due to over reliance on the use of social media and technology. There has been no access to public internet, eg in libraries, during Covid. This 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 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>NPPF & Greenbelt</p> <p>As stated previously, 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>

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

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. 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, eg lack of brownfield, economic shock (Brexit, Covid-19).

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

Ecological and needs 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 potentially 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 & carbon neutral policy

In respect of Climate change policy and carbon neutral policy, Places for Everyone proposes employment sites on the other side of the borough from Walshaw on 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. No consideration has been given to traffic travelling in the direction of Bolton, Blackburn, Darwen etc with a major link road being a single width road with blind bends which has been designated in the plan as a cycle route despite numerous accidents and the Councils own officers stating it is now "dangerous".

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.

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. 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. 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 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 particular 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.

In respect of the main infrastructure requirements:

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 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

In respect of 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, requiring residents to travel across Bury to access them. 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 this side of the Irwell. It will exacerbate congestion on local roads, 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 or the increase towards Bolton north.

Housing delivery targets

Bury Council have consistently failed to meet housing delivery targets and are now in presumption. 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 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". So the plan 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

Places for Everyone Representation 2021

	<p>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 Councillor Eammon O" Brien clarified this statement by saying that for anything the council themselves build they would adopt a brownfield first policy but claimed that the council have no control over the actions of private developers. In reality they do, as they could limit the release of green belt sites in accordance with National Policy NPPF 134 part e.</p> <p>Changes to greenbelt boundaries</p> <p>As part of the overall plan Bury have modified green belt boundaries and allocations in such a way to make it appear that less Greenbelt is being sacrificed. 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>The plan is unsound and needs to be rewritten taking into account the issues raised, in particular :</p> <ul style="list-style-type: none"> - using up to date information - protecting Greenbelt and reviewing alternatives - proper preparation of infrastructure plans to support the housing & employment needs including funding - proper consultation appropriate to the needs of residents
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-D2 Developer Contributions
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

Places for Everyone Representation 2021

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.	There is nothing within the plans to legally compel developers to build in accordance with the spatial strategy or for the section 106 planning obligations to fund infrastructure requirements or be even earmarked as such.
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.	There must be greater legal requirements on developers to contribute towards infrastructure, to build affordable housing in line with independent housing needs assessment and to ensure greenbelt, ecological and resilience does not become residents problems
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	Bury - Green Belt Additions
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.	The identified additions are significantly smaller and less able to properly act in line with the purpose of greenbelt land as set out in NPPF greenbelt protection. Existing greenbelt which does meet the criteria is proposed to be given up in lieu of small pockets of space which have limited benefit to residents
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.	Rewrite the plans to remove as far as possible the release of greenbelt land for building in preference for brownfield sites
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	Supporting Evidence

Type	Web
<p>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>	<p>Legality</p> <p>Legal Compliance</p> <ul style="list-style-type: none"> - It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before 'Places for Everyone' can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states 'The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change.' So, is 'not insignificant' the same as 'substantial', if it is, the plan 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>Soundness</p> <p>Soundness</p> <ul style="list-style-type: none"> - The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns. - There is little detail on how the required infrastructure will be paid for. The plan needs to be revised to identify how all the infrastructure will be paid - There are no partners or industries identified for employment provision. Major partners for employment provision should be identified. - There has been poor public consultation, a lack of accessible information and little spent by councils in generating awareness. Interest in the plan has mainly been generated by local protest groups. The public consultations should be repeated, providing clear, understandable information. They should be designed to encourage rather than discourage public input. - The site selection process has been opaque with no explanation as to why some sites in the 'call for 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 representation should be held and minutes should be published. The rationale for the selection/rejection of every site should be available including considered alternatives. - Several of the authorities involved have consistently failed to meet housing delivery targets. An effective a plan must be deliverable. The plan relies on the cooperation of property

Places for Everyone Representation 2021

developers. There is no indication of how delivery targets will be maintained. A strategy to guarantee housing delivery rates must be provided. This cannot be left to any local authority that is currently behind on housing targets. Clear delivery plans for infrastructure should be included.

- PfE shows removal of greenbelt protection for some areas and creation of greenbelt in others. There is no proof of exceptional circumstances required in the National Planning Policy Framework to justify this.

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

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

- A change in the methodology for Manchester City Council was resulted in a 35% uplift for the Manchester City Council area. The revised Local Housing Need methodology states that the 35% uplift is to be met within the district and not redistributed (see Places for Everyone Joint Committee documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatmanchesterca.gov.uk/documents/s15613/PFE_JC_July2021_ISSUED.pdf) This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.

Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	Other Comments
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	Halliwell

Places for Everyone Representation 2021

Given Name	Julie
Person ID	1286360
Title	Other Comments
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	Halliwell
Given Name	Julie
Person ID	1286360
Title	Other Comments
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	Halliwell
Given Name	Julie
Person ID	1286360
Title	Other Comments
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound

Places for Everyone Representation 2021

Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	Other Comments
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	Halliwell
Given Name	Julie
Person ID	1286360
Title	JPA 1.1 Heywood / Pilsworth (Northern Gateway)
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	Halliwell
Given Name	Julie

Places for Everyone Representation 2021

Person ID	1286360
Title	JPA 1.2: Simister and Bowlee (Northern Gateway)
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