

Places for Everyone Representation 2021

Family Name	Holland
Given Name	Louise
Person ID	1287035
Title	Stakeholder Submission
Type	Web
Include files	PFE1287035_Table.xlsx PFE1287035_Image3.png PFE1287035_Image1_Redacted.pdf PFE1287035_Redacted.pdf PFE1287035_Email.pdf PFE1287035_Image2.jpg
Family Name	Holland
Given Name	Louise
Person ID	1287035
Title	Our Vision
Type	Web
Include files	PFE1287035_Image2.jpg PFE1287035_Email.pdf PFE1287035_Redacted.pdf PFE1287035_Image1_Redacted.pdf PFE1287035_Image3.png PFE1287035_Table.xlsx
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.	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. 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 (£100 as per the response to a Freedom of Information request) in comparison to the effect it will have upon them. There has been a deliberate campaign of misinformation and misleading statements to promote and "sell" the Plan to residents, rather than a presentation of the facts e.g., 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 finding 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, e.g., 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

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	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.
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.	To have met with the village residents frequently and to discuss the site selection and to justify why this site was selected with evidence. A colleague and I requested a meeting with Eamon O'Brien in 2019 at the council and was informed by him, " well if we dont upset you we got to upset someone!" thats is not sound reasoning, or indeed a legally compliant justification.
Family Name	Holland
Given Name	Louise
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Title	Our Strategic Objectives
Type	Web
Include files	PFE1287035_Table.xlsx PFE1287035_Image3.png PFE1287035_Image1_Redacted.pdf PFE1287035_Redacted.pdf PFE1287035_Email.pdf PFE1287035_Image2.jpg
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	1. Meet our housing need 2. Create neighbourhoods of choice 7. Ensure that districts involved are more resilient and carbon neutral 8. Improve the quality of our natural environment and access to green spaces 10. Promote the health and wellbeing of communities
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
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Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to	Policy JP Allocation 1.2, Simister and Bowlee Legality Strategic Objectives of Places for everyone the simister and Bowlee JP Allocation 1.2 fails to reach these 6 of these 10 objectives due to the following Housing requirements

comply with the duty to co-operate. Please be as precise as possible.

Objective 1 Meet our housing need.

We will: Increase net additional dwellings; Increase the number of affordable homes; Provide a diverse mix of housing.

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>

The table attached as an attachment to the consultation, is taken from the BHDNA 2020 shows objective is already met in Prestwich without the need for more affordable homes.

Objective 2 Create neighbourhoods of choice. We will: Prioritise the use of brownfield land; Focus new homes in the Core Growth Area and the town centres; Focus new homes within 800m of public transport hubs; Ensure that there is no increase in the number of homes and premises at a high risk of flooding; Prioritise sustainable modes of transport to reduce the impact of vehicles on communities.

Simister is already a neighbourhood of choice. The majority of the site is already in Flood Zone 1 - There are also noted to be existing watercourses and ponds which could pose risk. In Addition, given the scale of development being proposed the significant increase in the provision of hard surfacing there is a real danger that the site could result in flooding on adjacent sites and localised flooding as a result of increase surface water, this can be fact checked with bury Council we recently lost horses to a flooded field.

Objective 3 Playing our part in ensuring a thriving and productive economy in all parts of Greater Manchester. We will: Ensure there is adequate development land to meet our employment needs; Prioritise the use of brownfield land; Ensure there is a diverse range of employment sites and premises; Facilitate the development of high value clusters in prime sectors such as: Advanced manufacturing; Business, financial and professional services; Creative and digital; 39 GMCONSULT.ORG Places for Everyone Health innovation; Logistics.

Simister is already set to take 1.2 million square metres of industrial for the whole of greater Manchester, why has bury Council not considered that the people who will work there will not wish to live across the road from work, and that other areas of Bury would have benefited from more homes. Example Ramsbottom which was recently on the news as the children of families that live there have to move out of the area

Climate change policy and carbon neutral policy

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Bury Council and the leaders of GMCA are already aware of the air quality readings for simister which are currently illegal, however instead of using the readings from the motorway they are using the readings from their own monitor which I should add is not located in Simister.

See attached letter from Bury Council on the issue the motorways air pollution is not their problem, but in fact it is if they are proposing to jeopardise the health and wellbeing of any new residents moving into the area in these new homes.

Point 17 Page 233 of Places for Everyone, states, they will - Incorporate appropriate noise and air quality mitigation measures and high quality

landscaping along the M60 motorway corridors and local road network if required within the allocation;

This has already been tried and failed as per highways England Barrier erecting study, we requested the before and after readings and it was confirmed there was no reduction in pollution.

We requested the readings taken by Highways England and gained under a freedom of information act attached to this document. Our readings in 2015/2016 were above the legal limits 75% of the year, and with the introduction of a 1.2 million square metre industrial site and 1550 homes that will have two cars each, I believe the residents of Simister and of Bowlee could face serious health risks, but Bury Council seem to overlook as per the letter from Geoff Little, Leader of Bury Council as motorway pollution is not their problem.

Objective 8 Improve the quality of our natural environment and access to green spaces. We will: Enhance special landscapes, green infrastructure, biodiversity and geodiversity; Improve access to the natural environment and green spaces including parks; Promote the role of green space in climate resilience and reducing flood risk.

During the covid pandemic the countryside walks was utilised by residents from Harpurhey, Salford that currently live in built up areas and needed somewhere to get freedom and fresh air, so removing those walks with the industrial and housing targets planned in places for everyone will actually ensure the opposite to Objective 8.

Objective 10 Promote the health and wellbeing of communities. We will: Ensure new development is properly served by health care services that meet the needs of communities; Improve access to healthy food options for all communities; Reduce the health impacts of air pollution through accessibility of sustainable travel such as public transport, cycling and walking; Maximise the health benefits of access to the natural environment and green spaces; Coordinate with and support the delivery of local and Greater Manchester wide health strategies.

How can destroying a beautiful area used by residents of simister and other neighbouring towns in Manchester be beneficial in promoting the wellbeing of communities? We have real working farms, great crested newts, a historic wetland that allows children to mix with nature and wildlife to flourish. Egypt lane which is used by joggers and running clubs, and local flying club for RC Planes and Hang gliders.

This destruction will further pollute our air in Simister and would be posing a serious risk to life and have not been addressed by the council, as they are throwing this into the hands of government via Highways England. We have two schools in Simister as well and I do worry for the damage to the lungs of those children, walking in and out of simister each day, it is at illegal levels now, how can more homes and roads and a huge industrial site improve this?

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National Planning Policy Framework greenbelt protection clauses - Changes to greenbelt boundaries

The purpose of the NPPF greenbelt protection is to prevent urban sprawl.

Page 231 of PfE paragraph 1. in reference to the Simister and Bowlee sites, to deliver a broad mix of around 1,550 homes to diversify the type of accommodation across the Simister, Bowlee and Birch and Langley areas. It should be noted that Simister is Bury Council, and Bowlee and Birch are Rochdale council therefore these 1550 homes will in fact 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 Simister and Bowlee 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 Greater Manchester currently has enough brownfield to build the need in the LHN, the meta data provided for places for everyone confirms this.

Housing delivery targets

The GMCA has failed to utilise the current brownfield in GM. The GMSF housing need (based of the LHN) was initially 179078 in GMSF, add on the uplift 31875.88 at 17.8% given the total GMSF requirement for homes of 210953.

Stockport have since left the GMSF and it has now become a plan of 9, according to the Places for Everyone. If you remove the 18343 Stockport requirement along with their required uplift 17.8 % = 3265.06, there is a reduction of 21608 from the plan. Thus the need was 210953 less 21608 Stockport results in a current need of 189345 homes needed amongst the nine to cover the LHN need requirement. The metadata Metadata | MappingGM was captured and used to form the basis of both the GMSF and Places for Everyone. According to the metadata the requirement the SHLAA had 197675, if we remove Stockport 11974 brownfield - leaves the SHLAA at 185701, so a mere 3644 homes short that may be required on green built or further assessment of brownfield sites. Further, add into this equation the fact that the angel meadows Colyhurst site has now got to be added back into plan some 5000, means there is enough with the SHLAA without Stockport to cover the LHN

Soundness

Site Selection

Policy JP Allocation 1.2, Simister and Bowlee

Legality

Strategic Objectives of Places for everyone the simister and Bowlee JP Allocation 1.2 fails to reach these 6 of these 10 objectives due to the following

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Infrastructure

There is only one road Heywood old road, a picture of the current state of congestion on this road is included here, how can building 1550 new homes all coming out onto this road, be viable?

The link road proposed takes everyone back to this road, or they will use the village of simister as a cut through which is a single file country lane. There has been no forethought by the officers whatsoever. The thick red markings on the map below show the road where the congestion is already in place, we have much evidence of this.

All the proposed homes will either lead onto this road which is already at capacity or through the single file country village which is the thick grey single file country lane that is simister lane, how can this be justified as a viable plan. It will only make air quality worse and make simister no longer safe for children or the vulnerable residents of Brookvale with disabilities that currently use simister lane for their walks, add onto this two schools and the whole of simister would be at a stand still and the dangerous impact this could have on all residents and children simply walking to school could be immense.

	<p>Infrastructure</p> <p>There is only one road Heywood old road, a picture of the current state of congestion on this road is included here, how can building 1550 new homes all coming out onto this road, be viable?</p> <p>The link road proposed takes everyone back to this road, or they will use the village of simister as a cut through which is a single file country lane. There has been no forethought by the officers whatsoever. The thick red markings on the map below show the road where the congestion is already in place, we have much evidence of this.</p> <p>All the proposed homes will either lead onto this road which is already at capacity or through the single file country village which is the thick grey single file country lane that is simister lane, how can this be justified as a viable plan. It will only make air quality worse and make simister no longer safe for children or the vulnerable residents of Brookvale with disabilities that currently use simister lane for their walks, add onto this two schools and the whole of simister would be at a stand still and the dangerous impact this could have on all residents and children simply walking to school could be immense.</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>There is currently no infrastructure, one single file country lane and another road Hyewood old road is already at capacity (see evidence supplied). And as per Bury Council webiste there is no plan to build the new link road that is shown in places for everyone till after 2037, even if this link road was brought forward it would not ease congestion on heywood old road as the link road starts and ends on Heywood old, so the only other accessible way out would be thorough simister village a single file country land. See photos of Heywood old road, I have hundreds day and night to show this road is already at capacity, then see map and my arrows to show where the traffic will head, directly through simister which is a single file country lane.</p> <p>The air quality is not something that is solveable during the lifetime of this plan, given the already illegal levels of air quately Simister Village faces due to the strategic road network and the fact it is surrounded by motorways, the current greenbelt is our only source of oxygen, to destroy that as proposed with 1.2 square million metres of industrial and 1550 new homes can only increase the air pollution.</p> <p>Highways england did a test study in 2015 to increase the barrier heights of the m60 at simister and took the readings that are attached over the period, after removing the heigh barriers they continued to monitor the sites and there was no difference before or after, so the proposals in places for everyone are not sound, GMCA have been informed and are not listening to residents concerns regarding this.</p> <p>We are impacted on 3 sides by 3 motorways the M60, M62 and M66. No consideration has been given to the fact that our air quality in simister is already at illegal levels as per Geoff Little response they cant do anything about that as it is highway england responsibility, but they do have a responsibility to us and any new residents if they are proposing to build homes here and the employment needs for whole of the Greater Manchester Region. It cant be not our problem as per their email response attached.</p> <p>Further the fact that Bury has been found to have the second highest noise pollution in the whole of the UK shows you the planning inspector that no thought or due diligence has been carried out by Bury Council or indeed GMCA in chosing this site for the industrial needs of the whole of GM.</p>
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<p>Title</p>	<p>JPA 1.2: Simister and Bowlee (Northern Gateway)</p>

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Objective 10 Promote the health and wellbeing of communities. We will: Ensure new development is properly served by health care services that meet the needs of communities; Improve access to healthy food options for all communities; Reduce the health impacts of air pollution through accessibility of sustainable travel such as public transport, cycling and walking; Maximise the health benefits of access to the natural environment

and green spaces; Coordinate with and support the delivery of local and Greater Manchester wide health strategies.

How can destroying a beautiful area used by residents of Simister and other neighbouring towns in Manchester be beneficial in promoting the wellbeing of communities? We have real working farms, great crested newts, a historic wetland that allows children to mix with nature and wildlife to flourish. Egypt lane which is used by joggers and running clubs, and local flying club for RC Planes and Hang gliders.

This destruction will further pollute our air in Simister and would be posing a serious risk to life and have not been addressed by the council, as they are throwing this into the hands of government via Highways England. We have two schools in Simister as well and I do worry for the damage to the lungs of those children, walking in and out of Simister each day, it is at illegal levels now, how can more homes and roads and a huge industrial site improve this?

National Planning Policy Framework greenbelt protection clauses - Changes to greenbelt boundaries

The purpose of the NPPF greenbelt protection is to prevent urban sprawl.

Page 231 of PfE paragraph 1. in reference to the Simister and Bowlee sites, to deliver a broad mix of around 1,550 homes to diversify the type of accommodation across the Simister, Bowlee and Birch and Langley areas. It should be noted that Simister is Bury Council, and Bowlee and Birch are Rochdale council therefore these 1550 homes will in fact 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 Simister and Bowlee 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 Greater Manchester currently has enough brownfield to build the need in the LHN, the meta data provided for places for everyone confirms this.

Housing delivery targets

The GMCA has failed to utilise the current brownfield in GM. The GMSF housing need (based of the LHN) was initially 179078 in GMSF, add on the uplift 31875.88 at 17.8% given the total GMSF requirement for homes of 210953.

Stockport have since left the GMSF and it has now become a plan of 9, according to the Places for Everyone. If you remove the 18343 Stockport requirement along with their required uplift 17.8 % = 3265.06, there is a reduction of 21608 from the plan. Thus the need was 210953 less 21608 Stockport results in a current need of 189345 homes needed amongst the nine to cover the LHN need requirement. The metadata Metadata | MappingGM was captured and used to form the basis of both the GMSF and Places for Everyone. According to the metadata the requirement the SHLAA had 197675, if we remove Stockport 11974 brownfield - leaves the SHLAA at 185701, so a mere 3644 homes short that may be required on green built or further assessment of brownfield sites. Further, add into this equation the fact that the angel meadows Colyhurst site has now got to be

added back into plan some 5000, means there is enough with the SHLAA without Stockport to cover the LHN

Infrastructure

There is only one road Heywood old road, a picture of the current state of congestion on this road is included here, how can building 1550 new homes all coming out onto this road, be viable?

The link road proposed takes everyone back to this road, or they will use the village of simister as a cut through which is a single file country lane. There has been no forethought by the officers whatsoever. The thick red markings on the map below show the road where the congestion is already in place, we have much evidence of this.

All the proposed homes will either lead onto this road which is already at capacity or through the single file country village which is the thick grey single file country lane that is simister lane, how can this be justified as a viable plan. It will only make air quality worse and make simister no longer safe for children or the vulnerable residents of Brookvale with disabilities that currently use simister lane for their walks, add onto this two schools and the whole of simister would be at a stand still and the dangerous impact this could have on all residents and children simply walking to school could be immense.

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.

To review the allocation in light of the evidence that has been provided around air quality, noise pollution, flooding, and the fact that this site will create urban sprawl. Why did Bury Council knowing it has the second highest noise pollution in the UK accept the employment needs of the whole of GM, and all its allocation for houses?

Understand that highways england have already tried and failed to make our air quality better by increasing barrier heights and this failed, so therefore instead of suggesting as places for everyone does that they will put up some trees to solve the issue, without looking at evidence that has been provided to confirm this will not work, and then re think the entire plan and find a better workable solution.

I have asked GMCA and Bury Council in numerous emails what is there evidence base that this site selection is sound, there has been no fact finding on behalf of the council or GMCA, just if we dont upset you we got to upset someone! And I am sure when you delve into this matter you will find that lazy officers have chosen this site due to its ease with land owners wanting to sell.

Further does another child have to die like the child did in London due to air pollution, for our council to take some responsibility and give duty of care to its residents. Or will this just be a case of "we will learn lessons". I have asked Bury Council to install knox tubes in simister for years, they conveniently removed ours several years ago and I am now wondering why this was. Highways England provided the shocking air quality readings under a freedom of information, surely that should have mortified the GMCA that they have infact chosen the wrong site as part of their vision for a huge employment site and 1550 homes in a village that currently has 350 homes.