

Places for Everyone Representation 2021

Family Name	Jones
Given Name	Helen
Person ID	1286243
Title	Stakeholder Submission
Type	Web
Family Name	Jones
Given Name	Helen
Person ID	1286243
Title	JPA 19: Bamford / Norden
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
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>Why use green belt sites when brown belt sites should be used first. The proposed extra 450 homes will cause more traffic , more pollution , more strain on already full schools , Drs and dentists.</p> <p>There is no need for an extra 450 homes in this area.</p> <p>I do not want the limited green space that my children currently have to be taken away. They enjoy walks and looking for wildlife in our local area and if 450 homes are built there - it will take away those animals habitats and my children"s fresh air and open spaces.</p> <p>By building on these proposed sites will also cause flooding in the area and with climate change already making things worse this will only add to the problem.</p> <p>Norden road is already a very busy road and adding even more traffic to it is just going to cause more problems with the road service , traffic and CO2 pollution.</p> <p>My children deserve a green open space to grow up near - not another concrete jungle.</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.	JPA 19 Bamford/ Norden be REMOVED from the pfe.

Places for Everyone Representation 2021

Family Name	Jones
Given Name	Janet
Person ID	1287614
Title	Stakeholder Submission
Type	Web
Include files	PFE1287614_SOSWalshaw.pdf PFE1287614_SOSLegality_Redacted.pdf PFE1287614.pages
Family Name	Jones
Given Name	Janet
Person ID	1287614
Title	Our Vision
Type	Web
Include files	PFE1287614.pages PFE1287614_SOSLegality_Redacted.pdf PFE1287614_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>The National Planning Policy Framework has not been followed.</p> <p>The vision for Greater Manchester has been desktop planned without proper engagement and consultation from the very beginning. Any consultations that have taken place have been a deterrent asking far too many intrusive questions of residents to put them off completing responses. The consultations have been designed in such a way that they are difficult to respond to for residents with limited I.T skills or digital access. Local councils have not properly published the plan and ensure a place for everyone plan is communicated to everyone. The plan should have been developed by the residents for the residents to address our actual housing requirements over the long term. The above demonstrates a clear lack of community involvement which goes against the spirit of the constitution and makes the preparation of this plan unsound.</p> <p>Legal Compliance</p> <p>- It is questionable whether PfE and the GMSF can effectively be treated as the same thing. This must be decided in court before "Places for Everyone" can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant (in line with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if it was established. If there is any substantial difference in scope between the GMSF and PfE, it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a significant number of plans have seen some form of change." So, is "not insignificant" the same as "substantial"?</p>

plan is not legal. This can only be established by a proper judicial review. So until pro the plan must be considered illegal and not put to Government.

Soundness

- The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and 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 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 success in generating awareness. Interest in the plan has mainly been generated by local press. Public consultations should be repeated, providing clear, understandable information and designed to encourage rather than discourage public input.
- The site selection process has been opaque with no explanation as to why some sites "were excluded from the plan. https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public should be held and minutes should be published. The rationale for the selection/rejection of sites should be available including considered alternatives.
- Several of the authorities involved have consistently failed to meet housing delivery targets. For an effective a plan must be deliverable. The plan relies on the cooperation of property 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 its targets. Clear delivery plans for infrastructure should be included.
- PfE shows removal of greenbelt protection for some areas and creation of greenbelts. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this.
- In addition to PfE each authority needs to come up with its own local plan. No details are provided 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 the plan to Stockport boroughs since each of the authorities in the plan is also neighbouring to areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.
- A change in the methodology for Manchester City Council has resulted in a 35% up in housing need for the Manchester City Council area. The revised Local Housing Need methodology states that the need is to be met within the district and not redistributed (see Places for Everyone Joint Consultation documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021) This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.

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

This plan needs to go back to Regulation 18 of the Town and Country planning act as it was prepared with proper public engagement and consultation.

Family Name

Jones

Places for Everyone Representation 2021

Given Name	Janet
Person ID	1287614
Title	Our Strategic Objectives
Type	Web
Include files	PFE1287614_SOSWalshaw.pdf PFE1287614_SOSLegality_Redacted.pdf PFE1287614.pages
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	<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 4. Maximise the potential arising from our national and international assets 5. Reduce inequalities and improve prosperity 6. Promote the sustainable movement of people, goods and information 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
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Jones
Given Name	Janet
Person ID	1287614
Title	Our Spatial Strategy
Type	Web
Include files	PFE1287614.pages PFE1287614_SOSLegality_Redacted.pdf PFE1287614_SOSWalshaw.pdf
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.	GMCA made the decision to move a poorly prepared plan forward to the publication s and Country planning Act even though major changes have been made to the plan si of consultation. For example Stockport withdrew from what was the GMSF and Manche has had a 35% uplift applied to their housing targets to be met within that specific ar the plan has changed significantly and therefore requires going back to proper consulta directly affected to comment further.
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.	As above the plan needs to go back to proper consultation with the residents of Grea
Family Name	Jones
Given Name	Janet
Person ID	1287614
Title	JP-Strat 1 Core Growth Area
Type	Web
Include files	PFE1287614_SOSWalshaw.pdf PFE1287614_SOSLegality_Redacted.pdf PFE1287614.pages
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	Jones
Given Name	Janet
Person ID	1287614
Title	JP-Strat 2 City Centre
Type	Web
Include files	PFE1287614.pages PFE1287614_SOSLegality_Redacted.pdf PFE1287614_SOSWalshaw.pdf

Places for Everyone Representation 2021

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	Jones
Given Name	Janet
Person ID	1287614
Title	JPA 7: Elton Reservoir Area
Type	Web
Include files	PFE1287614_SOSWalshaw.pdf PFE1287614_SOSLegality_Redacted.pdf PFE1287614.pages
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	Jones
Given Name	Janet
Person ID	1287614
Title	JPA 9: Walshaw
Type	Web
Include files	PFE1287614.pages PFE1287614_SOSLegality_Redacted.pdf PFE1287614_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

<p>Compliance - In accordance with the Duty to Cooperate?</p> <p>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</p>	<p>No</p> <p>Policy JP Allocation 9, Walshaw</p> <p>Legality</p> <p>Failure to comply with Statement of Community Involvement</p> <p>Bury Council have failed to comply with their Statement of Community Involvement Statement of Community Involvement (bury.gov.uk) at all stages of the creation of the plan. There was no consultation with residents to residents of the initial call for sites and the amount spent on making residents aware of the plan was disproportionately small (£100 as per the response to a Freedom of Information request). The impact of the plan to the effect it will have upon them. There has been a deliberate campaign of misinformation and misleading statements to promote and "sell" the Plan to residents, rather than a presentation of facts 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 finding things out for themselves on social media and thus a failure to engage with various groups due to over reliance on the use of social media technology. There has been no access to public internet, eg in libraries, during Covid. This has disproportionately affected older people and those from deprived backgrounds. This is contrary to the SCI 2.4 & 4.17. Countrywide, Covid restrictions are now lifted but restrictions still remain in Bury's Statement of Community Involvement (SCI para 1.7). Consultations have been conducted in terms of language and terminology used and have been a deterrent to becoming involved in the planning process as they have been wordy, long winded and intrusive, thus producing a low response rate.</p> <p>National Planning Policy Framework greenbelt protection clauses</p> <p>The purpose of the NPPF greenbelt protection is to prevent urban sprawl. Para 11.1 of the NPPF states of the Walshaw allocation,</p> <p>"This is an extensive area of land which is set entirely within the existing urban area. The site is bounded by the urban areas of Tottington to the north, Woolfold and Elton to the east, Elton to the south and Walshaw to the west."</p> <p>Filling in this green belt site will create an urban sprawl contrary to NPPF para 137 and 138 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 NPPF para 140. Housing need is not an exceptional circumstance to justify the release of greenbelt land. NPPF guidance states that housing need is not a target but merely a starting point and figures should be adjusted upwards or downwards according to local circumstances, eg lack of brownfield, economic conditions (Covid-19).</p> <p>To prove that exceptional circumstances to justify alteration to greenbelt boundaries exist requires evidence that all other reasonable options to meet identified need have been exhausted (NPPF para 141). This must include maximising use of brownfield and underutilised sites and increasing density.</p> <p>Assessments</p> <p>There has been a failure to conduct thorough and independent ecological assessments. The assessments carried out have been done on behalf of developers and are therefore not independent. Flood risk and other surveys have been carried out by consultancies on behalf of and for the benefit of developers rather than entirely independent wildlife organisations or the Department of Environment, Food and Rural Affairs so must be considered potentially biased.</p> <p>The Housing Need Assessment was carried out by Arc4, who were supposed to carry out an independent survey of housing need. However, they have a partnership with Greater Manchester Housing Partnership, an organisation of housing associations, including Six Town Housing in Bury. This partnership assessment was therefore not impartial.</p> <p>Climate change policy and carbon neutral policy</p> <p>Places for Everyone proposes employment sites on the other side of the borough from the M66 Northern Gateway Corridor, necessitating travel by car as no direct public transport exists or is proposed, thus increasing carbon emissions. Local transport hubs in Bury are</p>
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from Walshaw by a car journey or an expensive, unreliable and infrequent bus service, carbon emissions. The proposed new link road at Walshaw will do nothing to alleviate the roads, simply transferring the problem from one place to another.

Up to date information

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

Soundness

Site Selection

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

In addition, the Walshaw site performs poorly against site selection criteria and strongly against 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 significant local benefits criteria, Criteria 7, land that would deliver significant local benefits by addressing a major local problem (Site Allocation Topic Paper JPA 9 Walshaw pg 8, para 5.4). The only major local problem in Walshaw is the extra traffic that will be created by the proposed 1250 new houses. As there are 1250 houses, there is not a major problem and the infrastructure proposed would not be necessary. This is essentially a cyclical argument and not a specific justification for the inclusion of the Walshaw site.

NB In the Site Selection Background Paper, Criteria 7 is missing from the table of site selection criteria at pg 18.

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

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

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

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

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

To prevent neighbouring towns from merging into one another Strong

To assist in safeguarding the countryside from encroachment Moderate-Strong

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

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

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

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

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

Infrastructure

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

"The Three Dragons Viability Appraisal of the allocation has been run using the base case model 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 allocation produces a positive residual value both for the main and the sensitivity test. However, a 5% 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 shows that the allocation would be able to support all policy costs including 25% affordable housing and infrastructure required to support the development, including the strategic transport costs. This is considered appropriate for this location as it is in a popular residential area and is close to the town of 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 the provision of some infrastructure will not be contemporaneous with the building of houses and will be forthcoming once funds have been raised.

Site Allocation topic paper JPA 9 Walshaw page 46 para 27.2 states:-

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

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

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

- Healthcare

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

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

- Education

Whilst there is a plan for an extra primary school in Walshaw, there is no feasible plan for additional secondary school places with the increased number of secondary school age pupils. Site Allocation Topic Paper JPA 9 Walshaw at page 43, para 24.1 states that,

"The Walshaw allocation is expected to yield approximately 263 primary age pupils and 100 secondary age pupils. Current forecasts show both primary and secondary schools in the area are full and therefore all additional demand created would require additional school places."

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

It is proposed that secondary places will merely be funded from "financial contributions for secondary school provision" to meet the needs generated by the development (PfE, para 24.2) which is not acceptable and will only provide a short term solution. The Elton High School in Vauxhall is currently oversubscribed by 175 places in 2021 and the furthest distance offered from the school is 1/3 of a mile.

If it is proposed that the Walshaw site will yield an additional 175 secondary age pupils a permanent solution (ie an additional secondary school in the locality as well as the proposed school in Radcliffe) needs to be found for them in the immediate area and for the additional age children in the area as they move through the education system.

Transport

"The most significant role which PfE will play in this respect is to locate development at sustainable locations which reduce the need for car travel, for example by maximising densities around transport hubs."

Walshaw is not situated near to motorway junctions or to transport or employment hubs so residents to travel across Bury to access them. The only improvement to public transport proposed is "a potential upgrade of existing bus services or a new bus service" (PfE) but no public transport route to employment hubs is proposed.

The proposed new road link will not ease traffic and will potentially create further congestion by moving traffic from one traffic queue to the back of another. As per the Transport Local Plan 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 Dowry Road. Dowry Road is steep and very narrow (barely wide enough for two cars to pass safely). The road will funnel traffic to all of the same pinch points this side of the Irwell. It will exacerbate congestion at these pinch points which are already highly congested. No account has been taken of the additional traffic generated at the Andrews housing development site just down the road from the Walshaw site.

Housing delivery targets

Bury Council have consistently failed to meet housing delivery targets and are now in breach of their targets. To be effective a plan must actually be deliverable. The plan relies heavily on the cooperation of private property developers. There is no indication of how they will be made to keep up with the targets. Sanctions will apply if they don't. At a Council meeting held on 9/9/21 the Leader of Bury Council Eammon O'Brien confirmed that it was "unlikely" that the proposed building rates for a new development in Bury (as laid out in 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 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 available 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 uncertainty of the climate to justify Green Belt loss at the start of the plan. Greenbelt loss should only occur if brownfield has been exhausted. A review mechanism should be built in to only include further loss at a later stage if proven necessary. PfE para 1.42 states: "The majority of development between 2021 and 2037 (the "plan period") will be on land within the urban area, most of which is brownfield. The plan favours a brownfield first policy wherever possible as does National Policy. Bury Council has stated to the public in Bury that they will implement a brownfield first policy. When questioned at a Council meeting on 9/9/21 the Leader of the Council Eammon O'Brien clarified this statement by saying that for anything the council themselves build they would adopt a brownfield first policy but that the council have no control over the actions of private developers. In reality they can only limit the release of green belt sites in accordance with National Policy NPPF 134 paragraph 146."

Changes to greenbelt boundaries

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

Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant

Removal of JPA 9 Walshaw from the plan and identify smaller, more suitable brownfield sites for development.

and sound, in respect of any legal compliance or soundness matters you have identified above.	
Family Name	Jones
Given Name	Janet
Person ID	1287614
Title	JP-D1 Infrastructure Implementation
Type	Web
Include files	PFE1287614_SOSWalshaw.pdf PFE1287614_SOSLegality_Redacted.pdf PFE1287614.pages
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.	Due to the size of the greenbelt sites allocated within the plan it is highly unlikely that t can be provided in good time to bring these sites forward within the plan period. This plan undeliverable within the plan period hence making it unsound.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Smaller sites should be considered that would come forward faster like brownfield si have substantial infrastructure provided close by.
Family Name	Jones
Given Name	Janet
Person ID	1287614
Title	JP-D2 Developer Contributions
Type	Web
Include files	PFE1287614.pages

Places for Everyone Representation 2021

	PFE1287614_SOSLegality_Redacted.pdf PFE1287614_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	It is very well documented that once a site is approved for development it can be redeveloped with a viability assessment. Local councils have very little control after a site has been approved for houses and it is common practice for a developer to change the number of homes, density, type and number that are classed as affordable. In some extreme cases a developer can inflate development costs and no section 106 payments will come forward.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Local council authorities need to enter into more housing partnership projects and develop their own instead of selling it and losing control. Salford Council has now created its own building company that will deliver affordable homes on land they own and other council land.
Family Name	Jones
Given Name	Janet
Person ID	1287614
Title	Bury - Green Belt Additions
Type	Web
Include files	PFE1287614_SOSWalshaw.pdf PFE1287614_SOSLegality_Redacted.pdf PFE1287614.pages
GBA Bury - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below	Bury GBA03 Pigs Lea Brook 1 Bury GBA04 North of Nuttall Park Bury GBA05 Pigs Lea Brook 2 Bury GBA06 Hollins Brook Bury GBA07 Off New Road, Radcliffe Bury GBA08 Hollins Brow Bury GBA09 Hollybank Street, Radcliffe Bury GBA10 Crow Lumb Wood Bury GBA11 Nuttall West, Ramsbottom

Places for Everyone Representation 2021

	<p>Bury GBA12 Woolfold, Bury Bury GBA13 Nuttall East, Ramsbottom Bury GBA14 Chesham, Bury Bury GBA15 Broad Hey Wood North Bury GBA16 Lower Hinds</p>
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>National Planning Policy Framework paras 137 to 143 refers.</p> <p>Net greenbelt additions have been nothing but a play on numbers to promote the plan for more greenspace. A lot of the new greenbelt additions are currently not viable for business, so are simply an exercise to take away the protection of greenbelt from useable open greenspace and move them elsewhere in the borough to give the impression that the overall net greenbelt additions are less.</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>Leave the greenbelt boundaries unchanged and present the true loss of greenbelt land from the proposals.</p>