

Places for Everyone Representation 2021

Family Name	Leonard
Given Name	Julie
Person ID	1287165
Title	Stakeholder Submission
Type	Web
Family Name	Leonard
Given Name	Julie
Person ID	1287165
Title	JPA 22: Land North of Smithy Bridge
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
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 roads feeding this area are already congested, with queuing on Hollingsworth Rd Smithy Bridge Rd and Milnrow daily. Visitors from all over the North West visit Hollingsworth lake expecting to spend the day in the country side with fresh air and lovely views. The air quality will be significantly be affected. Yes there are convenient train and tram links but that would mean you would have to work with in easy access to the rail and tram links, That would be a small fraction of the people moving into the area. The new primary school would also mean more traffic, as parents drop the kids off on the way to work. The location of the school will also put more pressure on an already busy road with cars and parking. There is no mention about the promise to build a desperately need high school just a faint promise a contribution could be made if one was ever built.
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.	Noise increases with the additional traffic on already busy roads. Lake Bank road is extremely busy with visitors traffic the additional 300 house would mean even more cars creating more pollution

Places for Everyone Representation 2021

Family Name	Lester
Given Name	Jane
Person ID	1286637
Title	Stakeholder Submission
Type	Web
Include files	PFE1286637_FloodMap.jpg PFE1286637_RepLeithPlanning2.pdf PFE1286637_RepLeithPlanning.pdf
Family Name	Lester
Given Name	Jane
Person ID	1286637
Title	Our Vision
Type	Web
Include files	PFE1286637_RepLeithPlanning.pdf PFE1286637_RepLeithPlanning2.pdf PFE1286637_FloodMap.jpg
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 vision for Greater Manchester has been desktop planned without proper engagement and consultation from the very beginning. Any consultations that have taken place have been a deterrent asking far too many intrusive questions of residents to put them off completing the consultations have been designed in such a way that they are difficult to respond to for residents with limited I.T skills or digital access. Local councils have not properly published the plan to ensure the Places 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>Legality</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 the plan have seen some form of change." So, is "not insignificant" the same as "substantial"? If the plan is not legal. This can only be established by a proper judicial review. So until a proper judicial review the plan must be considered illegal and not put to Government.</p>

	<p>Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19.</p> <p>There is little detail on how the required infrastructure will be paid for.</p> <p>There are no partners or industries identified for employment provision.</p> <p>There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information designed to encourage rather than discourage public input.</p> <p>The site selection process has been opaque with no explanation as to why some sites "were excluded from the plan.</p> <p>https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public should be held and minutes should be published. The rationale for the selection/rejection should be available including considered alternatives.</p> <p>Several of the authorities involved have consistently failed to meet housing delivery targets. The plan must be deliverable. The plan relies on the cooperation of property developers. There is no indication of how delivery targets will be maintained. This cannot be left to any local authority currently behind on housing targets. Clear delivery plans for infrastructure should be provided.</p> <p>PfE shows removal of greenbelt protection for some areas and creation of greenbelt. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this.</p> <p>In addition to PfE each authority needs to come up with its own local plan. No details are provided about when these plans will be available.</p> <p>There are no details of how Duty to Cooperate will be achieved. Following their withdrawal, the plan will effectively become a neighbouring borough. However, it is not acceptable to limit the plan to neighbouring boroughs to Stockport since each of the authorities in the plan is also neighbouring to areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.</p> <p>A change in the methodology for Manchester City Council was resulted in a 35% uplift for the City Council area. The revised Local Housing Need methodology states that the 35% uplift should be met within the district and not redistributed (see Places for Everyone Joint Committee Report 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii))</p> <p>https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021</p> <p>This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.</p>
<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>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.</p> <p>Housing need must be re-assessed using the latest (2018) ONS population predictions and to account the effect of Covid on work patterns.</p> <p>The plan needs properly to identify how all the infrastructure will be financed.</p> <p>Major partners for employment provision should be identified.</p> <p>A strategy to guarantee housing delivery rates must be provided.</p>
<p>Family Name</p>	<p>Lester</p>
<p>Given Name</p>	<p>Jane</p>
<p>Person ID</p>	<p>1286637</p>
<p>Title</p>	<p>Our Spatial Strategy</p>
<p>Type</p>	<p>Web</p>
<p>Include files</p>	<p>PFE1286637_FloodMap.jpg</p>

Places for Everyone Representation 2021

	PFE1286637_RepLeithPlanning2.pdf PFE1286637_RepLeithPlanning.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>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 s 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 are the plan has changed significantly and therefore requires going back to proper consulta directly affected to comment further.</p> <p>Please see the supporting documents I have uploaded, in particular the report by Le</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>As above the plan needs to go back to proper consultation with the residents of Grea</p> <p>Please see the supporting documents I have uploaded, in particular the report by Le</p>
Family Name	Lester
Given Name	Jane
Person ID	1286637
Title	JP-S 1 Sustainable Development
Type	Web
Include files	PFE1286637_RepLeithPlanning.pdf PFE1286637_RepLeithPlanning2.pdf PFE1286637_FloodMap.jpg
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?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>The plan does not meet the requirements for sustainable development</p> <p>Re: Places for Everyone, Page 41, Objective 7: Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region.</p> <p>Land is an increasingly precious resource with competing demands for housing, commercial space, transport, carbon sequestration, food production, rural jobs, energy production, water absorption and recreation.</p> <p>In order to comply with the statutory duty to include policies designed to tackle climate change impacts and in order to provide sustainable development, the plan for GM will need to give appropriate weight to all those needs. As well as outlining the benefits of the provision of employment land and transport, the plan and supporting documents need to provide a clear picture of the precise impact of the proposals on:</p> <ul style="list-style-type: none"> -Increased carbon emissions and air pollution due to increased urbanisation. -Effects of transport proposals on carbon emissions and air pollution. -Opportunities for improved carbon sequestration via amended practices in agriculture, forestry, moorland and peat bog management. -Opportunities for alternative energy production from green field and Green Belt sites. -Effect of the proposal on the rural economy, rural jobs and the ability to produce local food. -The impact of loss of green space on the mental and physical health of residents and the associated cost of increased needs for health care. <p>While the use of green field and Green Belt sites may provide an easy route for providing new housing, commercial space and transport routes, by definition it also removes this land from the plan to mitigate negative impacts of population growth, urbanisation and climate change. The loss of this land in the wider region and the country as a whole will suffer from negative impacts on the factors listed above.</p> <p>I highlight as particularly unsustainable proposals for allocations which will destroy protected areas such as Carrington Moss and others.</p> <p>Without a full, detailed evaluation, including proposals for mitigation of any negative impacts, the plan is unsound because it cannot be determined to be consistent with national policies in relation to the delivery of sustainable development, or compliant with national policies on climate change.</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 impacts of changes in land uses on human health and carbon emissions should be professionally evaluated. These aspects should be given more weight in the decisions on the loss of green field and Green Belt land and the plan should be rewritten accordingly, in line with national legislation.</p>
Family Name	Lester
Given Name	Jane
Person ID	1286637
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Type	Web
Include files	PFE1286637_FloodMap.jpg PFE1286637_RepLeithPlanning2.pdf PFE1286637_RepLeithPlanning.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?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>The Government's Standard Method is based on The Office for National Statistics 2019 data and aims to achieve 300,000 new homes per year, but more up to date population data would substantially reduced needs.</p> <p>When asked about the need to use the figures produced by the standard methodology, Housing Ministers have replied that it is just a starting point and it is for Local Authorities to determine the right figure for their authority.</p> <p>Given the high level of uncertainty about future needs, the importance of green field land for uses which mitigate climate change and the level of opposition among residents to the loss of green spaces, it would seem more prudent to avoid any release of Green Belt at the start of the period, but to review the plan every 5 years and only release if it is necessary.</p>
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	This policy should be amended such that no Green Belt is released at the start of the period, but only released if required at review every 5 years, allowing implementation of a brownfield release.
Family Name	Lester
Given Name	Jane
Person ID	1286637
Title	JPA 1.1 Heywood / Pilsworth (Northern Gateway)
Type	Web
Include files	PFE1286637_RepLeithPlanning.pdf PFE1286637_RepLeithPlanning2.pdf PFE1286637_FloodMap.jpg
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>I consider JPA 1.1 Heywood/Pilsworth to be unsound on the grounds that by cutting through the area of green space it will not be consistent with NPPF Section 13 Items 137 and 138. In particular, 138a, 138b, 138c.</p> <p>Looked at in conjunction with JPA 1.2 Simister/Bowlee, the whole area will be turned into an estate if a development of this scale goes ahead, resulting in the loss of separation between the two allocations.</p> <p>The Topic Paper, Section 5, Site Selection states:</p> <p>"5.3 The allocation is positioned at a strategically important intersection around the M6 and M56 motorways. As such, it represents a highly accessible opportunity for growth in Greater Manchester with wider benefits on a regional and national level."</p> <p>However, paragraph 5.4 states</p> <p>"5.4 Due to the current undeveloped nature of the allocation, much of the immediate surrounding area is not of a nature that could accommodate strategic development without an appropriate level of investment. The delivery of the allocation will therefore be the provision of significant improvements to infrastructure, delivery of improved public transport infrastructure through the allocation (including Bus Rapid Transport corridor) and close to the allocation (including potential for the East Lancashire rail line between Bury and Rochdale) and the provision of high quality walking and cycling routes."</p> <p>It is clearly stated that significant investment and changes to the highway network will be required to facilitate and deliver this site. These works are of such a scale as to potentially render the site unviable. Furthermore, the works will have a significant detrimental impact on existing infrastructure, congestion and roadworks during construction, but also congestion, increase idling vehicles and increased travel times once the development is delivered. The investment in public transport is unlikely to be sufficient to mitigate these realistic concerns, particularly when factoring in the cumulative effects of all of the development proposed in the wider local area.</p> <p>I believe the proposed industrial development will not avoid damage to the environment and will not allow the quality of life for future generations to be maintained. Massive impacts on air quality and noise, destruction of wildlife habitats and loss of access to green spaces for existing residents will occur.</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.	Scale back the development to be more sympathetic with the local area and retain more green space. Keep the two allocations JPA 1.1 and JPA 1.2 clearly separated
Family Name	Lester
Given Name	Jane
Person ID	1286637
Title	JPA 1.2: Simister and Bowlee (Northern Gateway)
Type	Web
Include files	PFE1286637_FloodMap.jpg PFE1286637_RepLeithPlanning2.pdf PFE1286637_RepLeithPlanning.pdf PFE1286637_LegalitySimister.pdf
Soundness - Positively prepared?	Unsound

Places for Everyone Representation 2021

Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Please see supporting document attached "Simister and Bowlee Specific Legality and Soundness"</p> <p>I consider JPA 1.2 Simister/Bowlee to be unsound on the grounds that by cutting through green space it will not be consistent with NPPF Section 13 Items 137 and 138. In particular 138b, 138c.</p> <p>Looked at in conjunction with JPA 1.1 Heywood/Pilsworth the whole area will be turned into an estate if a development of this scale goes ahead, resulting in the loss of separation between the village and industrial development.</p> <p>The village of Simister will not be given adequate protection from being swallowed up by industrial development.</p> <p>Paragraph 11.1 of the Topic Paper supporting this allocation makes it clear that in order to deliver this site there is a requirement for significant investment in infrastructure including a public transport improvements. This suggests that as existing the site is unsustainable and related to an existing urban area or settlement.</p> <p>Paragraph 11.2 goes on to confirm that this development, both in isolation and in conjunction with cumulative impacts with other nearby GMSF allocations, is expected to materially impact the strategic and local road networks. The Strategic Road Network (SRN) impacts are expected to be concentrated at M60 Junction 19 and M62 Junction 19, whilst the Local Road Network impacts will mostly impact the junctions on the A6045 Heywood Old Road.</p> <p>It is clear that significant investment and changes to the highway network will be required to build and deliver this site. These works are of such a scale as to potentially render the scheme unviable. Furthermore, the works will have significant detrimental impact on existing residents and roadworks during construction, but also congestion, increase idling vehicles and noise levels times once the development is delivered. The investment in public transport provision is not sufficient to mitigate these realistic concerns, particularly when factoring in the cumulative impacts of all of the development proposed in the wider local area.</p> <p>I believe the proposed industrial development will not avoid damage to the environment and will not allow the quality of life for future generations to be maintained. Massive impacts on air and noise, destruction of wildlife habitats and loss of access to green spaces for existing residents will occur.</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.	Scale back the development to allow the area to retain its rural nature and green space. See allocations 1.1 and 1.2 clearly separated by Green Belt
Family Name	Lester
Given Name	Jane
Person ID	1286637
Title	JPA 7: Elton Reservoir Area

Type	Web
Include files	PFE1286637_RepLeithPlanning.pdf PFE1286637_RepLeithPlanning2.pdf PFE1286637_FloodMap.jpg
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>I believe JPA 7 Elton Reservoir to be unsound on the grounds that it goes against GM Policy. The proposed development will not avoid damage to the environment and climate, and will not allow the quality of life for future generations to be maintained.</p> <p>In addition the quality of life for the current residents of the surrounding area will be affected. NPPF Section 13, items 137 and 138 address this issue.</p> <p>NPPF Section 11 Item 120 items a and b also address this issue.</p> <p>The site selection process for Bury has not been transparent. Little information has been provided as to why other more apparently suitable sites were rejected, or what alternatives were considered. The Council admitted in a Freedom of Information response that site selection was decided through 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. The Elton Reservoir site does not meet the selection criteria laid down in the NPPF or the GM Policy. The Elton Reservoir site does not meet the selection criteria laid down in the NPPF or the GM Policy. Radcliffe, the location of Elton Reservoir has the least expensive housing in Bury but is given preference to sites in other areas where affordable housing is required.</p> <p>Para 11.105 p 264 states:</p> <p>"The allocation [Elton Reservoir] is almost entirely surrounded by the existing urban area. Filling this green belt site in will contribute to creating urban sprawl contrary to compliance with GM Policy NPPF para 134 parts a, c and e.</p> <p>Para 11.105 p 264 states:</p> <p>"Although the allocation has the capacity to deliver a total of around 3,500 new homes that around 1,900 of these will be delivered within the plan period. Nevertheless, it is not necessary to release the site in full at this stage given that the scale of the proposed development means that it will need to be supported by significant strategic infrastructure and this level of release needs the certainty that the remaining development will still be able to come forward within the plan period".</p> <p>Releasing such a large area of Green Belt is in direct contravention of National Policy. The fact that some of the Green Belt release is for the delivery of homes beyond the plan period and that the details about strategic infrastructure are a little disingenuous given that it is the development of the site that necessitates the infrastructure.</p> <p>The owners/developers of the land, Peel Holdings, will see a vast increase in the value of the land if it is taken out of Green Belt, without them actually having to develop it themselves. As a result, they could easily split the allocation into small parcels of land to sell on to other developers, thereby avoiding the need for Peel to have to make any contributions to infrastructure. Yet still see a vast increase in the value of the land. This could result in Bury not receiving the infrastructure needed for the area.</p> <p>As part of the above infrastructure a new secondary school for Radcliffe is mentioned. A new primary school for Radcliffe is already planned, funded by the Government. The proposed</p>

not even cater for existing Radcliffe pupil numbers. Since the proposed school is ind already reserved for the free school we must assume that the PfE document refers to th planned. Regeneration for Radcliffe, the location of the Elton Reservoir development is as part of the infrastructure funding. A regeneration plan for Radcliffe is already in pla have applied for Government levelling up funding and

have stated that even if the application does not succeed the regeneration will go ahea Council money. Bury Council have stated that regeneration and the new school for F dependent on PfE going ahead.

Any mention/implication that PfE will contribute to providing a new secondary school (second school) and regeneration for Radcliffe must be removed from JPA-7.

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

Although there is a new Metrolink stop planned, this will not cover all the journeys ne residents of the proposed new estate. Therefore there will be increased air pollution fro traffic generated, directly contradicting the statement on Page 12 of PfE, para 1.27, n supporting policies around clean air and sustainable travel. To reach the proposed n areas on the other side of Bury, walking and cycling will not be an option for most pe

Site wildlife, flood risk and other surveys have been carried out by consultancies on b for by developers rather than entirely independent wildlife organisations or the Depa Environment so must be considered potentially biased. This is particularly important a as there are currently problems with the reservoir wall which are being addressed by Rivers Trust. These measures may be suitable for providing some protection to open they suitable to protect homes from flooding if there is a breach? Such surveys shou independent of benefiter influence.

Please see uploaded document "Environment Agency Flood Map for Planning" show of the area designated Flood Zone 2 and 3. (This was drawn from Document 10.03.1 Parkland Flood Risk Assessment.)

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

As Green Belt, any development within the proposed allocation area will have an impa site environment. The mitigation proposed by way of the creation of Elton Parkland o green belt land is not of substantial weight to justify the harm cause by the extent of belt release and the associated scale of proposed development.

Within the allocation there are 6 SBIs, with SSSIs and a SAC in proximity to the alloca would be impacted on by the scale of development proposed and for which substant likely to be required.

For the above reasons I do not believe JPA-7 Elton Reservoir Area to be positively pr consistent with national policy or effective. And not actually deliverable in the timesca given the potential lack of infrastructure funding.

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.

Remove this allocation from Places for Everyone

Family Name

Lester

Places for Everyone Representation 2021

Given Name	Jane
Person ID	1286637
Title	JPA 9: Walshaw
Type	Web
Include files	PFE1286637_FloodMap.jpg PFE1286637_RepLeithPlanning2.pdf PFE1286637_RepLeithPlanning.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>I believe JP9 Walshaw to be unsound on the grounds that it goes against Government proposed development will not avoid damage to the environment and climate, and the quality of life for future generations to be maintained.</p> <p>In addition the quality of life for the current residents of the surrounding area will be affected. NPPF Section 13, items 137 and 138 address this issue.</p> <p>NPPF Section 11 Item 120 items a and b also address this issue.</p> <p>The purpose of the NPPF greenbelt protection is to prevent urban sprawl.</p> <p>Para 11.119, page 271 of PfE states of the Walshaw allocation:</p> <p>"This is an extensive area of land <input type="checkbox"/> set entirely within the existing urban area. The site is bounded by the urban areas of Tottington to the north, Woolfold and Elton to the east and the south and Walshaw to the west."</p> <p>Filling in this green belt site will create an urban sprawl contrary to NPPF para 137 and 138 c and e.</p> <p>There has been no evidence of the existence of exceptional circumstances to justify the greenbelt boundaries to allow building on the Walshaw allocation as is required by NPPF para 140. Housing need is not an exceptional circumstance to justify the release of greenbelt land. NPPF guidance states that housing need is not a target but merely a starting point and figures should be set upwards or downwards according to local circumstances, eg lack of brownfield, economic recovery (Covid-19).</p> <p>To prove that exceptional circumstances to justify alteration to greenbelt boundaries 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 under-utilised land and maximising density.</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 the area. The assessment was therefore not impartial.</p> <p>There has been a failure to conduct thorough and independent ecological assessments. The assessments carried out have been done on behalf of developers and are therefore not independent. Flood risk and other surveys have been carried out by consultancies on behalf of and for developers rather than entirely independent wildlife organisations or the Department of Environment, Food and Rural Affairs so must be considered potentially biased.</p>

The land within the allocation makes a moderate to significant contribution to preventing and safeguarding the countryside from encroachment.

The allocation recommends works to the wider green infrastructure as mitigation/compensation for the loss of green belt.

The allocation lies within the "Manchester Pennine Fringe" Landscape Character Area. No identified benefits to the area brought about by the allocation.

An SBI and Recreation Ground are within the southernmost section of the allocation. The site is also within the Wildlife Links and Corridors Unitary Development Plan (UDP) designation.

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 accessible from Walshaw by a car journey or an expensive, unreliable and infrequent bus service, thus increasing carbon emissions.

The only improvement to public transport that is proposed is "a potential upgrade of existing services or a new bus service" (PfE p270). No new public transport route to employment sites 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 1, the proposed road will start from a mini roundabout on a narrow residential road, cross a busy main road, Lowercroft Road at Dow Lane where the road is steep and very narrow (barely wide enough for cars to pass safely). The road will be sending traffic to all of the same pinch points throughout the area. It will exacerbate congestion on local roads, which are already highly congested.

The site selection process for Bury has not been transparent. Little information is available 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 can be justified as the most appropriate when no reasonable alternatives appear to have been examined. It is possible that other options were ruled out too early or were not considered despite other areas having good transport access or being situated nearer to employment sites.

In addition, the Walshaw site performs poorly against site selection criteria and strongly against 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 criteria, Criteria 7, land that would deliver significant local benefits by addressing a major local problem (Site Allocation Topic Paper JPA 9 Walshaw p8, para 5.4). The only major local problem at Walshaw is the extra traffic that will be created by the proposed 1250 new houses. With the proposed infrastructure there is not a major problem and the infrastructure proposed would not be needed. This is a cyclical argument and not a specific justification for the inclusion of the site.

The lack of selection criteria met and the harm that will be caused by the release of the greenbelt are evidence of the lack of justification for the selection of this site. In fact, the Council leader, David Jones, admitted in writing that sites had been selected due to the scale of the development 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 for the viable delivery of the essential major infrastructure to support the development."

This statement underlines my remarks above regarding the proposed infrastructure being a cyclical argument.

In addition I would state that the source of the proposed infrastructure funding is not clear. Bury have a very poor reputation for obtaining developer contributions for infrastructure. It is not clear by the Council that S106 payments are no longer ring-fenced, so there is no guarantee that infrastructure will be forthcoming.

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

The needs of the Walshaw community have been overlooked in favour of mass urban development at this particular site rather than sites on the outskirts nearer motorway access, transport

Places for Everyone Representation 2021

	<p>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.</p> <p>For the above reasons I do not believe JPA-9 Walshaw to be positively prepared, just with national policy or effective. And not actually deliverable in the timescale of the plan of certainty of the source of infrastructure funding.</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.	Remove this allocation from Places for Everyone
Family Name	Lester
Given Name	Jane
Person ID	1286637
Title	JP-D1 Infrastructure Implementation
Type	Web
Include files	PFE1286637_RepLeithPlanning.pdf PFE1286637_RepLeithPlanning2.pdf PFE1286637_FloodMap.jpg
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Due to the size of the greenbelt sites allocated within the plan it is highly unlikely that they 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	Smaller sites should be considered that would come forward faster like brownfield sites. We have substantial infrastructure provided close by.

or soundness matters you have identified above.	
Family Name	Lester
Given Name	Jane
Person ID	1286637
Title	JP-D2 Developer Contributions
Type	Web
Include files	PFE1286637_FloodMap.jpg PFE1286637_RepLeithPlanning2.pdf PFE1286637_RepLeithPlanning.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	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	Lester
Given Name	Jane
Person ID	1286637
Title	Bury - Green Belt Additions
Type	Web
Include files	PFE1286637_RepLeithPlanning.pdf PFE1286637_RepLeithPlanning2.pdf PFE1286637_FloodMap.jpg

Places for Everyone Representation 2021

GBA Bury - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below	<p>Bury GBA03 Pigs Lea Brook 1</p> <p>Bury GBA04 North of Nuttall Park</p> <p>Bury GBA05 Pigs Lea Brook 2</p> <p>Bury GBA06 Hollins Brook</p> <p>Bury GBA07 Off New Road, Radcliffe</p> <p>Bury GBA08 Hollins Brow</p> <p>Bury GBA09 Hollybank Street, Radcliffe</p> <p>Bury GBA10 Crow Lumb Wood</p> <p>Bury GBA11 Nuttall West, Ramsbottom</p> <p>Bury GBA12 Woolfold, Bury</p> <p>Bury GBA13 Nuttall East, Ramsbottom</p> <p>Bury GBA14 Chesham, Bury</p> <p>Bury GBA15 Broad Hey Wood North</p> <p>Bury GBA16 Lower Hinds</p>
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Net greenbelt additions have been nothing but a play on numbers to promote the plan for more green space. A lot of the new greenbelt additions are currently not viable for business, they are simply an exercise to take away the protection of greenbelt from useable open green spaces 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 from the plan proposals.</p>
Family Name	Lester
Given Name	Jane
Person ID	1286637
Title	Supporting Evidence

Type	Web
Include files	PFE1286637_FloodMap.jpg PFE1286637_RepLeithPlanning2.pdf PFE1286637_RepLeithPlanning.pdf
<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>Legal Compliance</p> <p>-It is questionable whether PfE and the GMSF can effectively be treated as the same must be decided in court before 'Places for Everyone' can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) PfE is 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 number of sites in the plan have seen some form of change.' So, is 'not insignificant' the same as 'substantial difference' is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government.</p> <p>Soundness</p> <p>-The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>-There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid</p> <p>-There are no partners or industries identified for employment provision. Major partners and industries for provision should be identified.</p> <p>-There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information and a process designed to encourage rather than discourage public input.</p> <p>-The site selection process has been opaque with no explanation as to why some sites were excluded from the plan. https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public should be held and minutes should be published. The rationale for the selection/rejection of sites should be available including considered alternatives.</p> <p>-Several of the authorities involved have consistently failed to meet housing delivery targets and a plan must be deliverable. The plan relies on the cooperation of property developers and an indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on delivery. Clear delivery plans for infrastructure should be included.</p> <p>-PfE shows removal of greenbelt protection for some areas and creation of greenbelt areas. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this.</p> <p>-In addition to PfE each authority needs to come up with its own local plan. No details of when these plans will be available.</p> <p>-There are no details of how Duty to Cooperate will be achieved. Following their withdrawal from the plan will effectively become a neighbouring borough. However, it is not acceptable to limit the plan to neighbouring boroughs to Stockport since each of the authorities in the plan is also neighbouring to other boroughs outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.</p> <p>-A change in the methodology for Manchester City Council was resulted in a 35% 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 </p>

Places for Everyone Representation 2021

	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	Lester
Given Name	Jane
Person ID	1286637
Title	Other Comments
Type	Web
Include files	PFE1286637_RepLeithPlanning2.pdf PFE1286637_FloodMap.jpg PFE1286637_RepLeithPlanning.pdf PFE1286637_LegalitySimister.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.	RECLASSIFIED Consultation GMCA made the decision to move a poorly prepared plan forward to the publication stage and Country planning Act even though major changes have been made to the plan since the end of consultation. For example Stockport withdrew from what was the GMSF and Manchester City has had a 35% uplift applied to their housing targets to be met within that specific area. As the plan has changed significantly and therefore requires going back to proper consultation with the residents of Greater Manchester directly affected to comment further. Please see the supporting documents I have uploaded, in particular the report by Lester
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.	RECLASSIFIED Consultation As above the plan needs to go back to proper consultation with the residents of Greater Manchester. Please see the supporting documents I have uploaded, in particular the report by Lester
Family Name	Lester
Given Name	Jane
Person ID	1286637
Title	Other Comments
Type	Web
Include files	PFE1286637_RepLeithPlanning.pdf PFE1286637_LegalitySimister.pdf

Places for Everyone Representation 2021

	PFE1286637_FloodMap.jpg PFE1286637_RepLeithPlanning2.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