

Places for Everyone Representation 2021

<b>Family Name</b>	Lester
<b>Given Name</b>	Jane
<b>Person ID</b>	1286637
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1286637_RepLeithPlanning2.pdf</a> <a href="#">PFE1286637_FloodMap.jpg</a> <a href="#">PFE1286637_RepLeithPlanning.pdf</a>
<b>Family Name</b>	Lester
<b>Given Name</b>	Jane
<b>Person ID</b>	1286637
<b>Title</b>	Our Vision
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1286637_RepLeithPlanning.pdf</a> <a href="#">PFE1286637_FloodMap.jpg</a> <a href="#">PFE1286637_RepLeithPlanning2.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	The vision for Greater Manchester has been desktop planned without proper engagement or public consultation from the very beginning. Any consultations that have taken place have been an active deterrent asking far too many intrusive questions of residents to put them off completing them. Also, the consultations have been designed in such a way that they are difficult to respond to especially for residents with limited I.T skills or digital access. Local councils have not properly publicised plans to ensure the Places for Everyone plan is communicated to everyone. The plan should have been designed by the residents for the residents to address our actual housing requirements over the next 15 years. The above

demonstrates a clear lack of community involvement which goes against the council constitution and makes the preparation of this plan unsound.

#### Legality

It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before "Places for Everyone" can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change." So, is "not insignificant" the same as "substantial", if it is, the plan is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government.

#### Soundness

The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19.

There is little detail on how the required infrastructure will be paid for.

There are no partners or industries identified for employment provision.

There has been poor public consultation, a lack of accessible information and little spent by councils in generating awareness. Interest in the plan has mainly been generated by local protest groups. The public consultations should be repeated, providing clear, understandable information. They should be designed to encourage rather than discourage public input.

The site selection process has been opaque with no explanation as to why some sites in the "call for sites" were excluded from the plan.

[https://mappinggm.org.uk/call-for-sites/#os\\_maps\\_outdoor/16/53.6380/-2.3228](https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228) The process should be repeated using National and GMCA guidelines for site selection. Meetings with public representation should be held and minutes should be published. The rationale for the selection/rejection of every site should be available including considered alternatives.

Several of the authorities involved have consistently failed to meet housing delivery targets. An effective 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 that is currently behind on housing targets. Clear delivery plans for infrastructure should be included.

Places for Everyone Representation 2021

	<p>PfE shows removal of greenbelt protection for some areas and creation of greenbelt in others. There is no proof of exceptional circumstances required in the National Planning Policy Framework to justify this.</p> <p>In addition to PfE each authority needs to come up with its own local plan. No details have been given about when these plans will be available.</p> <p>There are no details of how Duty to Cooperate will be achieved. Following their withdrawal Stockport will effectively become a neighbouring borough. However, it is not acceptable to limit neighbouring boroughs to Stockport since each of the authorities in the plan is also neighbouring to other authorities outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn with Darwen, Wigan neighbours St Helens and Trafford neighbours Cheshire area.</p> <p>A change in the methodology for Manchester City Council was resulted in a 35% uplift for the Manchester City Council area. The revised Local Housing Need methodology states that the 35% uplift is to be met within the district and not redistributed (see Places for Everyone Joint Committee documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) <a href="https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021_ISSUED.pdf">https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021_ISSUED.pdf</a>) 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><b>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.</b></p>	<p>This plan needs to go back to Regulation 18 of the Town and Country planning act and be positively prepared with proper public engagement and consultation.</p> <p>Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.</p> <p>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><b>Family Name</b></p>	<p>Lester</p>
<p><b>Given Name</b></p>	<p>Jane</p>
<p><b>Person ID</b></p>	<p>1286637</p>
<p><b>Title</b></p>	<p>Our Spatial Strategy</p>
<p><b>Type</b></p>	<p>Web</p>
<p><b>Include files</b></p>	<p><a href="#">PFE1286637_RepLeithPlanning2.pdf</a>  <a href="#">PFE1286637_FloodMap.jpg</a>  <a href="#">PFE1286637_RepLeithPlanning.pdf</a></p>
<p><b>Soundness - Positively prepared?</b></p>	<p>Unsound</p>

Places for Everyone Representation 2021

<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>GMCA made the decision to move a poorly prepared plan forward to the publication stage of the Town and Country planning Act even though major changes have been made to the plan since its last round of consultation. For example Stockport withdrew from what was the GMSF and Manchester City council has had a 35% uplift applied to their housing targets to be met within that specific area. This means the plan has changed significantly and therefore requires going back to proper consultation for residents directly affected to comment further.</p> <p>Please see the supporting documents I have uploaded, in particular the report by Leith Planning.</p>
<b>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.</b>	<p>As above the plan needs to go back to proper consultation with the residents of Greater Manchester.</p> <p>Please see the supporting documents I have uploaded, in particular the report by Leith Planning.</p>
<b>Family Name</b>	Lester
<b>Given Name</b>	Jane
<b>Person ID</b>	1286637
<b>Title</b>	JP-S 1 Sustainable Development
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1286637_RepLeithPlanning.pdf</a> <a href="#">PFE1286637_FloodMap.jpg</a> <a href="#">PFE1286637_RepLeithPlanning2.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA

<p><b>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.</b></p>	<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 buildings, transport, carbon sequestration, food production, rural jobs, energy production, water storage, water absorption and recreation.</p> <p>In order to comply with the statutory duty to include policies designed to tackle climate change and its impacts and in order to provide sustainable development, the plan for GM will need to give the appropriate weight to all those needs. As well as outlining the benefits of the provision of housing, employment land and transport, the plan and supporting documents need to provide careful evaluation of the precise impact of the proposals on:</p> <ul style="list-style-type: none"> <li>-Increased carbon emissions and air pollution due to increased urbanisation.</li> <li>-Effects of transport proposals on carbon emissions and air pollution.</li> <li>-Opportunities for improved carbon sequestration via amended practices in agriculture, forestry and moorland and peat bog management.</li> <li>-Opportunities for alternative energy production from green field and Green Belt sites.</li> <li>-Effect of the proposal on the rural economy, rural jobs and the ability to produce local food.</li> <li>-The impact of loss of green space on the mental and physical health of residents and the resultant cost of increased needs for health care.</li> </ul> <p>While the use of green field and Green Belt sites may provide an easy route for providing additional housing, commercial space and transport routes, by definition it also removes this land from opportunities to mitigate negative impacts of population growth, urbanisation and climate change. Residents in the wider region and the country as a whole will suffer from negative impacts on the factors outlined above.</p> <p>I highlight as particularly unsustainable proposals for allocations which will destroy peat mosses, 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 enabling the delivery of sustainable development, or compliant with national policies on climate change.</p>
<p><b>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.</b></p> <p><b>Family Name</b></p>	<p>The impacts of changes in land uses on human health and carbon emissions should be fully and professionally evaluated. These aspects should be given more weight in the decisions on any potential loss of green field and Green Belt land and the plan should be rewritten accordingly, in order to comply with national legislation.</p> <p>Lester</p>

## Places for Everyone Representation 2021

<b>Given Name</b>	Jane
<b>Person ID</b>	1286637
<b>Title</b>	JP-H 1 Scale Distribution and Phasing of New Housing Development
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1286637_RepLeithPlanning2.pdf</a> <a href="#">PFE1286637_FloodMap.jpg</a> <a href="#">PFE1286637_RepLeithPlanning.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>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.</b>	<p>The Government's Standard Method is based on The Office for National Statistics 2014 population data and aims to achieve 300,000 new homes per year, but more up to date population data show substantially reduced needs.</p> <p>When asked about the need to use the figures produced by the standard methodology, Government Housing Ministers have replied that it is just a starting point and it is for Local Authorities to decide on the right figure for their authority.</p> <p>Given the high level of uncertainty about future needs, the importance of green field and Green Belt land for uses which mitigate climate change and the level of opposition among residents to loss of green spaces, it would seem more prudent to avoid any release of Green Belt at the start of the plan period, but to review the plan every 5 years and only release if it is necessary.</p>
<b>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.</b>	This policy should be amended such that no Green Belt is released at the start of the plan period and only released if required at review every 5 years, allowing implementation of a brownfield first policy.
<b>Family Name</b>	Lester
<b>Given Name</b>	Jane
<b>Person ID</b>	1286637
<b>Title</b>	JPA 1.1 Heywood / Pilsworth (Northern Gateway)

Places for Everyone Representation 2021

<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1286637_RepLeithPlanning.pdf</a> <a href="#">PFE1286637_FloodMap.jpg</a> <a href="#">PFE1286637_RepLeithPlanning2.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>I consider JPA 1.1 Heywood/Pilsworth to be unsound on the grounds that by cutting through a swathe of green space it will not be consistent with NPPF Section 13 Items 137 and 138. In particular items 138a, 138b, 138c.</p> <p>Looked at in conjunction with JPA 1.2 Simister/Bowlee, the whole area will be turned into an industrial estate if a development of this scale goes ahead, resulting in the loss of separation between villages.</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 M60, M62 and M66 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 highway network is not of a nature that could accommodate strategic development without an appropriate upgrade. Key to delivery of the allocation will therefore be the provision of significant improvements to highway infrastructure, delivery of improved public transport infrastructure through the allocation (potentially including Bus Rapid Transport corridor) and close to the allocation (including potential tram-train on 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 scheme unviable. Furthermore, the works will have a significant detrimental impact on existing residents from 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 provision is unlikely to be sufficient to mitigate these realistic</p>



Places for Everyone Representation 2021

	<p>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 climate, and will not allow the quality of life for future generations to be maintained. Massive increases in traffic and noise, destruction of wildlife habitats and loss of access to green spaces for existing residents will occur.</p>
<p><b>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.</b></p>	<p>Scale back the development to be more sympathetic with the local area and retain more natural green space. Keep the two allocations JPA 1.1 and JPA 1.2 clearly separated</p>
<p><b>Family Name</b></p>	<p>Lester</p>
<p><b>Given Name</b></p>	<p>Jane</p>
<p><b>Person ID</b></p>	<p>1286637</p>
<p><b>Title</b></p>	<p>JPA 1.2: Simister and Bowlee (Northern Gateway)</p>
<p><b>Type</b></p>	<p>Web</p>
<p><b>Include files</b></p>	<p><a href="#">PFE1286637_RepLeithPlanning2.pdf</a>  <a href="#">PFE1286637_FloodMap.jpg</a>  <a href="#">PFE1286637_RepLeithPlanning.pdf</a>  <a href="#">PFE1286637_LegalitySimister.pdf</a></p>
<p><b>Soundness - Positively prepared?</b></p>	<p>Unsound</p>
<p><b>Soundness - Justified?</b></p>	<p>Unsound</p>
<p><b>Soundness - Consistent with national policy?</b></p>	<p>Unsound</p>
<p><b>Soundness - Effective?</b></p>	<p>Unsound</p>
<p><b>Compliance - Legally compliant?</b></p>	<p>No</p>
<p><b>Compliance - In accordance with the Duty to Cooperate?</b></p>	<p>No</p>
<p><b>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.</b></p>	<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 a swathe of green space it will not be consistent with NPPF Section 13 Items 137 and 138. In particular items 138a, 138b, 138c.</p> <p>Looked at in conjunction with JPA 1.1 Heywood/Pilsworth the whole area will be turned into an industrial estate if a development of this scale goes ahead, resulting in the loss of separation between villages.</p>



Places for Everyone Representation 2021

	<p>The village of Simister will not be given adequate protection from being swallowed up by a huge industrial development.</p> <p>Paragraph 11.1 of the Topic Paper supporting this allocation makes it clear that in order to secure its delivery there is a requirement for significant investment in infrastructure including a wide range of public transport improvements. This suggests that as existing the site is unsustainable and not well 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 consideration of the cumulative impacts with other nearby GMSF allocations, is expected to materially impact both 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 (LRN) impacts 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 facilitate 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 from 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 provision 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 climate, and will not allow the quality of life for future generations to be maintained. Massive increases in traffic and noise, destruction of wildlife habitats and loss of access to green spaces for existing residents will occur.</p>
<p><b>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.</b></p>	<p>Scale back the development to allow the area to retain its rural nature and green space. Keep the allocations 1.1 and 1.2 clearly separated by Green Belt</p>
<p><b>Family Name</b></p>	<p>Lester</p>
<p><b>Given Name</b></p>	<p>Jane</p>
<p><b>Person ID</b></p>	<p>1286637</p>
<p><b>Title</b></p>	<p>JPA 7: Elton Reservoir Area</p>
<p><b>Type</b></p>	<p>Web</p>
<p><b>Include files</b></p>	<p><a href="#">PFE1286637_RepLeithPlanning.pdf</a>  <a href="#">PFE1286637_FloodMap.jpg</a>  <a href="#">PFE1286637_RepLeithPlanning2.pdf</a></p>

Places for Everyone Representation 2021

<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>I believe JPA 7 Elton Reservoir to be unsound on the grounds that it goes against Government 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 detrimentally 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 given about why other more apparently suitable sites were rejected, or what alternatives were considered. Bury Council admitted in a Freedom of Information response that site selection was decided at a series of informal meetings with no list of attendees or minutes available. This site choice cannot be justified as the most appropriate when no reasonable alternatives appear to have been examined. The Elton Reservoir site does not meet the selection criteria laid down in the NPPF or the GMCA guidelines.</p> <p>Radcliffe, the location of Elton Reservoir has the least expensive housing in Bury but was selected in 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"</p> <p>Filling this green belt site will contribute to creating urban sprawl contrary to compliance with National 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, it is anticipated that around 1,900 of these will be delivered within the plan period. Nevertheless, it is considered 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 investment needs the certainty that the remaining development will still be able to come forward beyond the plan period".</p> <p>Releasing such a large area of Green Belt is in direct contravention of National Policy guidelines. In fact some of the Green Belt release is for the delivery of homes beyond the</p>

plan period. The comments about strategic infrastructure are a little disingenuous given that it is the development itself that necessitates the infrastructure.

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 is commonplace, 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 seeing a massive increase in the value of the land. This could result in Bury not receiving the infrastructure funding at all.

As part of the above infrastructure a new secondary school for Radcliffe is mentioned. A new secondary free school for Radcliffe is already planned, funded by the Government. The proposed new school will not even cater for existing Radcliffe pupil numbers. Since the proposed school is indicated on the site already reserved for the free school we must assume that the PfE document refers to the school already planned. Regeneration for Radcliffe, the location of the Elton Reservoir development is also mentioned as part of the infrastructure funding. A regeneration plan for Radcliffe is already in place. Bury Council have applied for Government levelling up funding and

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

Any mention/implication that PfE will contribute to providing a new secondary school (unless it is a 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 locating the jobs on the East side of Bury on the M66 Northern Gateway corridor, completely the other side of an already congested Bury. The proposed new link road will not help this problem as it links one congested area to another.

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

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

Places for Everyone Representation 2021

	<p>Please see uploaded document "Environment Agency Flood Map for Planning" showing large parts of the area designated Flood Zone 2 and 3. (This was drawn from Document 10.03.12 - JPA7 Elton Parkland Flood Risk Assessment.)</p> <p>As part of the overall plan Bury have modified green belt boundaries and allocations in such a way to make it appear that less Greenbelt is being sacrificed. The loss of the Elton Reservoir site greenbelt has been partially offset by creating extensive but unusable greenbelt in other areas without justifying exceptional circumstances. This is not in accordance with National Policy.</p> <p>As Green Belt, any development within the proposed allocation area will have an impact on the existing site environment. The mitigation proposed by way of the creation of Elton Parkland on the remaining green belt land is not of substantial weight to justify the harm cause by the extent of proposed green belt release and the associated scale of proposed development.</p> <p>Within the allocation there are 6 SBIs, with SSSIs and a SAC in proximity to the allocation - all of which would be impacted on by the scale of development proposed and for which substantial mitigation is likely to be required.</p> <p>For the above reasons I do not believe JPA-7 Elton Reservoir Area to be positively prepared, justified, consistent with national policy or effective. And not actually deliverable in the timescale of the plan, given the potential lack of infrastructure funding.</p>
<b>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.</b>	Remove this allocation from Places for Everyone
<b>Family Name</b>	Lester
<b>Given Name</b>	Jane
<b>Person ID</b>	1286637
<b>Title</b>	JPA 9: Walshaw
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1286637_RepLeithPlanning2.pdf</a> <a href="#">PFE1286637_FloodMap.jpg</a> <a href="#">PFE1286637_RepLeithPlanning.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound

<p><b>Compliance - Legally compliant?</b></p>	<p>No</p>
<p><b>Compliance - In accordance with the Duty to Cooperate?</b></p>	<p>No</p>
<p><b>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.</b></p>	<p>I believe JP9 Walshaw to be unsound on the grounds that it goes against Government 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 detrimentally 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 land is loosely bounded by the urban areas of Tottington to the north, Woolfold and Elton to the east, Lowercroft to the south and Walshaw to the west."</p> <p>Filling in this green belt site will create an urban sprawl contrary to NPPF para 137 and para 138 a, b, c and e.</p> <p>There has been no evidence of the existence of exceptional circumstances to justify the alteration of the greenbelt boundaries to allow building on the Walshaw allocation as is required by the NPPF, para 140. Housing need is not an exceptional circumstance to justify the release of greenbelt. Government guidance states that housing need is not a target but merely a starting point and figures can be mitigated upwards or downwards according to local circumstances, eg lack of brownfield, economic shock (Brexit, Covid-19).</p> <p>To prove that exceptional circumstances to justify alteration to greenbelt boundaries exist, the NPPF requires evidence that all other reasonable options to meet identified need have been considered (NPPF para 141). This must include maximising use of brownfield and under-utilised sites and maximising density.</p> <p>The Housing Need Assessment was carried out by Arc4, who were supposed to carry out a non-biased survey of housing need. However, they have a partnership with Greater Manchester Housing Partnership, an organisation of housing associations, including Six Town Housing in Bury. The assessment was therefore not impartial.</p> <p>There has been a failure to conduct thorough and independent ecological assessments. Assessments carried out have been done on behalf of developers and are therefore not independent. Site wildlife, flood risk and other surveys have been carried out by consultancies on behalf of and paid for by developers rather than entirely independent wildlife organisations or the Department of the Environment so must be considered potentially biased.</p> <p>The land within the allocation makes a moderate to significant contribution to preventing urban sprawl and safeguarding the countryside from encroachment.</p>

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 and there are no identified benefits to the area brought about by the allocation.

An SBI and Recreation Ground are within the southernmost section of the allocation located with a Wildlife Links and Corridors Unitary Development Plan (UDP) designation.

Places for Everyone proposes employment sites on the other side of the borough from Walshaw on the M66 Northern Gateway Corridor, necessitating travel by car as no direct public transport route exists or is proposed, thus increasing carbon emissions. Local transport hubs in Bury are only accessible from Walshaw by a car journey or an expensive, unreliable and infrequent bus service, again increasing carbon emissions.

The only improvement to public transport that is proposed is "a potential upgrade of existing bus services or a new bus service" (PfE p270). No new public transport route to employment hubs is proposed. The proposed new road link will not ease traffic and will potentially create further congestion. As per the Transport Locality Assessments GMSF 2020, the map at page B9, figure 3 shows that the road will start from a mini roundabout on a narrow residential road, cross a busy main road, enter onto Lowercroft Road at Dow Lane where the road is steep and very narrow (barely wide enough for two cars to pass safely). The road will be sending traffic to all of the same pinch points this side of the Irwell. It will exacerbate congestion on local roads, which are already highly congested.

The site selection process for Bury has been not been transparent. Little information has been given about why other more apparently suitable sites were rejected, or what alternatives were considered. Bury Council admitted in a Freedom of Information response that site selection was decided at a series of informal meetings with no list of attendees or minutes available. This site choice cannot be justified as the most appropriate when no reasonable alternatives appear to have been examined. Alternative options were ruled out too early or were not considered despite other areas having direct motorway access or being situated nearer to employment sites.

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

-The Walshaw site only met one of the criteria for site selection, namely the most general and vague criteria, Criteria 7, land that would deliver significant local benefits by addressing a major local problem (Site Allocation Topic Paper JPA 9 Walshaw p8, para 5.4). The only major local problem identified in Walshaw is the extra traffic that will be created by the proposed 1250 new houses. Without the houses, there is not a major problem and the infrastructure proposed would not be needed. This is essentially a cyclical argument and not a specific justification for the inclusion of the site.



Places for Everyone Representation 2021

	<p>The lack of selection criteria met and the harm that will be caused by the release of the Walshaw greenbelt are evidence of the lack of justification for the selection of this site. In fact, a former Bury Council leader, David Jones, admitted in writing that sites had been selected due to their sheer size and the ease of implementation of infrastructure, saying, "the proposed strategy within the GMSF is to release a small number of large strategic sites from the Green Belt as these will provide the scale and massing of development that is needed to enable the viable delivery of the essential major infrastructure to support the development." This statement underlines my remarks above regarding the proposed infrastructure being essentially, a cyclical argument.</p> <p>In addition I would state that the source of the proposed infrastructure funding is not really specified. Bury have a very poor reputation for obtaining developer contributions for infrastructure. We are told by the Council that S106 payments are no longer ring-fenced, so there is no guarantee that promised infrastructure will be forthcoming.</p> <p>As part of the overall plan Bury MBC has modified green belt boundaries and allocations in such a way to make it appear that less Greenbelt is being sacrificed. The loss of the Walshaw site greenbelt has been partially offset by creating extensive but unusable greenbelt in other areas without justifying exceptional circumstances. This is not in accordance with National Policy.</p> <p>The needs of the Walshaw community have been overlooked in favour of mass urbanisation by using this particular site rather than sites on the outskirts nearer motorway access, transport hubs and employment sites. There is too much emphasis on economic growth at the expense of mental and physical health of residents with the benefits of the greenbelt being underestimated.</p> <p>For the above reasons I do not believe JPA-9 Walshaw to be positively prepared, justified, consistent with national policy or effective. And not actually deliverable in the timescale of the plan, given the lack of certainty of the source of infrastructure funding.</p>
<p><b>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.</b></p>	<p>Remove this allocation from Places for Everyone</p>
<p><b>Family Name</b></p>	<p>Lester</p>
<p><b>Given Name</b></p>	<p>Jane</p>
<p><b>Person ID</b></p>	<p>1286637</p>
<p><b>Title</b></p>	<p>JP-D1 Infrastructure Implementation</p>
<p><b>Type</b></p>	<p>Web</p>



Places for Everyone Representation 2021

<b>Include files</b>	<a href="#">PFE1286637_RepLeithPlanning.pdf</a> <a href="#">PFE1286637_FloodMap.jpg</a> <a href="#">PFE1286637_RepLeithPlanning2.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>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.</b>	Due to the size of the greenbelt sites allocated within the plan it is highly unlikely that the infrastructure can be provided in good time to bring these sites forward within the plan period. This would make the plan undeliverable within the plan period hence making it unsound.
<b>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.</b>	Smaller sites should be considered that would come forward faster like brownfield sites that already have substantial infrastructure provided close by.
<b>Family Name</b>	Lester
<b>Given Name</b>	Jane
<b>Person ID</b>	1286637
<b>Title</b>	JP-D2 Developer Contributions
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1286637_RepLeithPlanning2.pdf</a> <a href="#">PFE1286637_FloodMap.jpg</a> <a href="#">PFE1286637_RepLeithPlanning.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA

Places for Everyone Representation 2021

<p><b>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.</b></p>	<p>It is very well documented that once a site is approved for development it can be reviewed at a later date 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 on the site, density, type and number that are classed as affordable. In some extreme cases a developer can state inflated development costs and no section 106 payments will come forward.</p>
<p><b>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.</b></p>	<p>Local council authorities need to enter into more housing partnership projects and develop the land they own instead of selling it and losing control. Salford Council has now created its own housing building company that will deliver affordable homes on land they own and other councils should follow suit.</p>
<p><b>Family Name</b></p>	<p>Lester</p>
<p><b>Given Name</b></p>	<p>Jane</p>
<p><b>Person ID</b></p>	<p>1286637</p>
<p><b>Title</b></p>	<p>Bury - Green Belt Additions</p>
<p><b>Type</b></p>	<p>Web</p>
<p><b>Include files</b></p>	<p><a href="#">PFE1286637_RepLeithPlanning.pdf</a>  <a href="#">PFE1286637_FloodMap.jpg</a>  <a href="#">PFE1286637_RepLeithPlanning2.pdf</a></p>
<p><b>GBA Bury - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below</b></p>	<p>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  Bury GBA12 Woolfold, Bury  Bury GBA13 Nuttall East, Ramsbottom  Bury GBA14 Chesham, Bury  Bury GBA15 Broad Hey Wood North  Bury GBA16 Lower Hinds</p>

Places for Everyone Representation 2021

<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>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.</b>	Net greenbelt additions have been nothing but a play on numbers to promote the plan as protecting more green space. A lot of the new greenbelt additions are currently not viable for building. This is simply an exercise to take away the protection of greenbelt from useable open green spaces and apply them elsewhere in the borough to give the impression that the overall net greenbelt percentage loss is less.
<b>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.</b>	Leave the greenbelt boundaries unchanged and present the true loss of greenbelt land in any further proposals.
<b>Family Name</b>	Lester
<b>Given Name</b>	Jane
<b>Person ID</b>	1286637
<b>Title</b>	Supporting Evidence
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1286637_RepLeithPlanning2.pdf</a> <a href="#">PFE1286637_FloodMap.jpg</a> <a href="#">PFE1286637_RepLeithPlanning.pdf</a>
<b>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.</b>	Legal Compliance -It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before 'Places for Everyone' can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states 'The changes made between

GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change.' So, is 'not insignificant' the same as 'substantial', if it is, the plan is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government.

#### Soundness

-The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.

-There is little detail on how the required infrastructure will be paid for. The plan needs to be revised to identify how all the infrastructure will be paid

-There are no partners or industries identified for employment provision. Major partners for employment provision should be identified.

-There has been poor public consultation, a lack of accessible information and little spent by councils in generating awareness. Interest in the plan has mainly been generated by local protest groups. The public consultations should be repeated, providing clear, understandable information. They should be designed to encourage rather than discourage public input.

-The site selection process has been opaque with no explanation as to why some sites in the 'call for sites' were excluded from the plan.

[https://mappinggm.org.uk/call-for-sites/#os\\_maps\\_outdoor/16/53.6380/-2.3228](https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228) The process should be repeated using National and GMCA guidelines for site selection. Meetings with public representation should be held and minutes should be published. The rationale for the selection/rejection of every site should be available including considered alternatives.

-Several of the authorities involved have consistently failed to meet housing delivery targets. An effective a plan must be deliverable. The plan relies on the cooperation of property developers. There is no indication of how delivery targets will be maintained. A strategy to guarantee housing delivery rates must be provided. This cannot be left to any local authority that is currently behind on housing targets. Clear delivery plans for infrastructure should be included.

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

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

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

Places for Everyone Representation 2021

	<p>Bolton neighbours Blackburn with Darwen, 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 Manchester City Council area. The revised Local Housing Need methodology states that the 35% uplift is to be met within the district and not redistributed (see Places for Everyone Joint Committee documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) <a href="https://democracy.greatmanchesterca.gov.uk/documents/s15613/PFE_JC_July2021_ISSUED.pdf">https://democracy.greatmanchesterca.gov.uk/documents/s15613/PFE_JC_July2021_ISSUED.pdf</a>) 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>
<b>Family Name</b>	Lester
<b>Given Name</b>	Jane
<b>Person ID</b>	1286637
<b>Title</b>	Other Comments
<b>Type</b>	Web
<b>Include files</b>	<p><a href="#">PFE1286637_RepLeithPlanning2.pdf</a>  <a href="#">PFE1286637_RepLeithPlanning.pdf</a>  <a href="#">PFE1286637_FloodMap.jpg</a>  <a href="#">PFE1286637_LegalitySimister.pdf</a></p>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>RECLASSIFIED</p> <p>Consultation</p> <p>GMCA made the decision to move a poorly prepared plan forward to the publication stage of the Town and Country planning Act even though major changes have been made to the plan since its last round of consultation. For example Stockport withdrew from what was the GMSF and Manchester City council has had a 35% uplift applied to their housing targets to be met within that specific area. This means the plan has changed significantly and therefore requires going back to proper consultation for residents directly affected to comment further.</p> <p>Please see the supporting documents I have uploaded, in particular the report by Leith Planning.</p>

Places for Everyone Representation 2021

<b>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.</b>	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 Leith Planning.
<b>Family Name</b>	Lester
<b>Given Name</b>	Jane
<b>Person ID</b>	1286637
<b>Title</b>	Other Comments
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1286637_RepLeithPlanning.pdf</a> <a href="#">PFE1286637_FloodMap.jpg</a> <a href="#">PFE1286637_RepLeithPlanning2.pdf</a> <a href="#">PFE1286637_LegalitySimister.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No