

Places for Everyone Representation 2021

Family Name	Marsden
Given Name	Andrew
Person ID	1285894
Title	Stakeholder Submission
Type	Web
Family Name	Marsden
Given Name	Andrew
Person ID	1285894
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Marsden
Given Name	Andrew
Person ID	1285894
Title	JP-H 2 Affordability of New Housing
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Marsden
Given Name	Andrew
Person ID	1285894
Title	JP-H 3 Type Size and Design of New Housing
Type	Web

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Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Marsden
Given Name	Andrew
Person ID	1285894
Title	JP-H 4 Density of New Housing
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Marsden
Given Name	Andrew
Person ID	1285894
Title	JP-P1 Sustainable Places
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Marsden
Given Name	Andrew
Person ID	1285894

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Title	JP-P2 Heritage
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Marsden
Given Name	Andrew
Person ID	1285894
Title	JP-P3 Cultural Facilities
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Marsden
Given Name	Andrew
Person ID	1285894
Title	JP-P4 New Retail and Leisure Uses in Town Centres
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Marsden

Places for Everyone Representation 2021

Given Name	Andrew
Person ID	1285894
Title	JP-P5 Education Skills and Knowledge
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Marsden
Given Name	Andrew
Person ID	1285894
Title	JP-P6 Health
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Marsden
Given Name	Andrew
Person ID	1285894
Title	JP-P7 Sport and Recreation
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes

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Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Marsden
Given Name	Andrew
Person ID	1285894
Title	JPA 26: Land at Hazelhurst Farm
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Marsden
Given Name	Andrew
Person ID	1285894
Title	JPA 27: Land East of Boothstown
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Marsden
Given Name	Andrew
Person ID	1285894
Title	JPA 28: North of Irlam Station
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound

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Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Marsden
Given Name	Andrew
Person ID	1285894
Title	JPA 29: Port Salford Extension
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Marsden
Given Name	Andrew
Person ID	1285894
Title	JP-D1 Infrastructure Implementation
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Marsden
Given Name	Andrew
Person ID	1285894
Title	JP-D2 Developer Contributions
Type	Web
Soundness - Positively prepared?	Sound

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Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes

Places for Everyone Representation 2021

Family Name	Marsden
Given Name	Daniel
Person ID	1287479
Title	Stakeholder Submission
Type	Web
Include files	PFE1287479_SOSWalshaw.pdf PFE1287479_SOSElton.pdf PFE1287479_SOSLegality2.pdf PFE1287479_SOSLegality_Redacted.pdf
Family Name	Marsden
Given Name	Daniel
Person ID	1287479
Title	Our Vision
Type	Web
Include files	PFE1287479_SOSLegality_Redacted.pdf PFE1287479_SOSLegality2.pdf PFE1287479_SOSElton.pdf PFE1287479_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	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 a place for everyone plan is communicated to everyone. The plan should have been developed by the residents for the residents to address our actual housing requirements over the long term. The above demonstrates a clear lack of community involvement which goes against the spirit of the constitution and makes the preparation of this plan unsound.
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.	It is questionable whether PfE and the GMSF can effectively be treated as the same plan. 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 accordance 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 difference between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a significant number of places for everyone plan have seen some form of change.' So, is 'not insignificant' the same as 'substantial'?

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	is not legal. This can only be established by a proper judicial review. So until proven plan must be considered illegal and not put to Government.
Family Name	Marsden
Given Name	Daniel
Person ID	1287479
Title	Our Strategic Objectives
Type	Web
Include files	PFE1287479_SOSWalshaw.pdf PFE1287479_SOSElton.pdf PFE1287479_SOSLegality2.pdf PFE1287479_SOSLegality_Redacted.pdf
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	<ol style="list-style-type: none"> 1. Meet our housing need 2. Create neighbourhoods of choice 3. Ensure a thriving and productive economy in the districts involved 4. Maximise the potential arising from our national and international assets 5. Reduce inequalities and improve prosperity 6. Promote the sustainable movement of people, goods and information 7. Ensure that districts involved are more resilient and carbon neutral 8. Improve the quality of our natural environment and access to green spaces 9. Ensure access to physical and social infrastructure 10. Promote the health and wellbeing of communities
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
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.	Please take the time to read in full the supporting documents I have provided to you this plan fails on all the above points.
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	This plan needs to go back to Regulation 18 of the Town and Country planning act as prepared with proper public engagement and consultation.

you have identified above.	
Family Name	Marsden
Given Name	Daniel
Person ID	1287479
Title	Our Spatial Strategy
Type	Web
Include files	PFE1287479_SOSLegality_Redacted.pdf PFE1287479_SOSLegality2.pdf PFE1287479_SOSElton.pdf PFE1287479_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	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.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	As above the plan needs to go back to proper consultation with the residents of Grea
Family Name	Marsden
Given Name	Daniel
Person ID	1287479
Title	JPA 7: Elton Reservoir Area
Type	Web
Include files	PFE1287479_SOSWalshaw.pdf PFE1287479_SOSElton.pdf PFE1287479_SOSLegality2.pdf

	PFE1287479_SOSLegality_Redacted.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?	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 PfE indicates in Para 1.63 point 2 that the most up to date information be used so being the most recent Bury's Housing Development Needs Assessment 2020 mu consideration: https://www.bury.gov.uk/index.aspx?articleid=15866</p> <p>- The site selection process for Bury has been especially opaque. Little information h about why other more apparently suitable sites were rejected, or what alternatives w Bury Council admitted in a Freedom of Information response that site selection was de of informal meetings with no list of attendees or minutes available. This site choice ca as the most appropriate when no reasonable alternatives appear to have been exam Reservoir site does not meet the selection criteria laid down in the NPPF or the GMD https://www.bury.gov.uk/index.aspx?articleid=16330 Radcliffe the location of Elton R least expensive housing in Bury but was selected in preference to sites in other areas housing is required.</p> <p>- Para 11.105 p 264 states: " The allocation [Elton Reservoir] is almost entirely surro existing urban area" Filling this green belt site in will contribute to creating urban spr compliance with National Policy NPPF para 134 parts a,c and e.</p> <p>- Para 11.105 p 264 states: "Although the allocation has the capacity to deliver a total new homes, it is anticipated that around 1,900 of these will be delivered within the pl Nevertheless, it is considered necessary to release the site in full at this stage given the proposed development means that it will need to be supported by significant strate and this level of investment needs the certainty that the remaining development will come forward beyond the plan period". Such gross over release of greenbelt is entire National Guidelines, which regards greenbelt as a precious resource not to be squan to identify the source of infrastructure funding, indeed shortfalls are expected see pa Site owners Peel are not specifically mentioned as being a contributor to the infrastru Questions should be asked regarding the reasons for Bury Council offering up a hug greenbelt at Elton Reservoir that is not required during the plan period (and may nev instead of retaining it in accordance with National Policy.</p> <p>- The Elton site apparently cost Peel £27M (as detailed in the site allocation topic pa 260 hectares (£104K per hectare) as greenbelt. Allowing a conservative price uplift of for green belt conversion to development land, the land for the initial 1900 site becom £875M. Adding in the land for the totally unjustified additional housing beyond the pl approx. another £750 M. The implication being that unless Peel get the whole £1.32 they can't offer any upfront funding for the infrastructure. Infrastructure that would no the development does not go ahead. Peel have indicated that they will possibly build will definitely split the site into lots to be developed by other developers so they (Peel contributions this way. It would be left to Bury to extract the funding from other as yet developers. Bury have a very poor reputation for obtaining developer contributions fo and developers always try to wriggle out of any obligations. It seems Peel have dupe into ignoring National Policy and granting them a huge financial bonus with no comm anything.</p> <p>- Site wildlife, flood risk and other surveys have been carried out by consultancies or paid for by developers rather than entirely independent wildlife organisations or the D Environment so must be considered potentially biased. This is particularly important a</p>

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 fi suitable to protect homes from flooding if there is a breach? Such surveys should be enti of benefiter influence.

- As part of the infrastructure a new secondary school for Radcliffe is mentioned. A n free school for Radcliffe is already planned funded by the Government. The propose not even cater for existing Radcliffe pupil numbers. Since the proposed school is indi already reserved for the free school we must assume PfE document refers to the sch 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 ap not succeed the regeneration will go ahead using existing Council money. Bury Coun that regeneration and the new school for Radcliffe are not dependent on PfE going a mention/implication that PfE will contribute to providing a new secondary school (unle school) and regeneration for Radcliffe must be removed from JPA-7.

- Bury Council have consistently failed to meet housing delivery targets and are now To be effective a plan must actually be deliverable. The plan relies heavily on the coo property developers. There is no indication of how they will be made to keep up with sanctions will apply if they don't. At a Council meeting held on 9/9/21 the Leader of Eammon O'Brien confirmed that it was "unlikely" that the proposed building rates for a in Bury (as laid out in JPA7 Elton Reservoir Topic Paper PfE 2021, section 27.8 page met as they were "unrealistic". So the plan cannot be considered to be effective. So effectiveness test for Soundness.

- As part of the overall plan Bury have modified green belt boundaries and allocation to make it appear that less Greenbelt is being sacrificed. So the loss of the Elton Reservoir has been partially offset by creating extensive greenbelt in other areas without justify circumstances. This is not in accordance with National Policy.

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

- PfE para1.42 states: "The majority of development between 2021 and 2037 (the "p be on land within the urban area, most of which is brownfield land" PfE favours a brow wherever possible as does National Policy. Bury Council have informed the public in will implement a brownfield first policy; however, they are going for immediate green JPA7 Elton Reservoir Topic Paper PfE 2021, section 27.9 page 52). When questione meeting on 9/9/21 the Leader of the Councillor Eammon O'Brien clarified this statem that for anything the council themselves build they would adopt a brownfield first poli that the council have no control over the actions of private developers, in reality they c limit the release of green belt sites in accordance with National Policy NPPF 134 par

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.

Removal of JPA 7 allocation Elton Reservoir from the plan

Family Name	Marsden
Given Name	Daniel
Person ID	1287479
Title	JPA 8: Seedfield

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Type	Web
Include files	PFE1287479_SOSLegality_Redacted.pdf PFE1287479_SOSLegality2.pdf PFE1287479_SOSElton.pdf PFE1287479_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Marsden
Given Name	Daniel
Person ID	1287479
Title	JPA 9: Walshaw
Type	Web
Include files	PFE1287479_SOSWalshaw.pdf PFE1287479_SOSElton.pdf PFE1287479_SOSLegality2.pdf PFE1287479_SOSLegality_Redacted.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.	Failure to comply with Statement of Community Involvement Bury Council have failed to comply with their Statement of Community Involvement S Community Involvement (bury.gov.uk) at all stages of the creation of the plan. There w to residents of the initial call for sites and the amount spent on making residents awa disproportionately small (£100 as per the response to a Freedom of Information reques to the effect it will have upon them. There has been a deliberate campaign of misinfo misleading statements to promote and "sell" the Plan to residents, rather than a pres facts eg residents only being told of the plans for their specific ward, and not being in bigger picture across the borough, thus giving the impression that the impact is less has been an over reliance on residents finding things out for themselves on social me and thus a failure to engage with various groups due to over reliance on the use of s technology. There has been no access to public internet, eg in libraries, during Covid. TH and disproportionately affected older people and those from deprived backgrounds. T the SCI 2.4 & 4.17. Countrywide, Covid restrictions are now lifted but restrictions still

in Bury's Statement of Community Involvement (SCI para 1.7). Consultations have been in terms of language and terminology used and have been a deterrent to becoming involved in the planning process as they have been wordy, long winded and intrusive, thus producing a low response rate.

National Planning Policy Framework greenbelt protection clauses

The purpose of the NPPF greenbelt protection is to prevent urban sprawl. Para 11.1 of the PfE states of the Walshaw allocation,

"This is an extensive area of land □□ set entirely within the existing urban area. The site is bounded by the urban areas of Tottington to the north, Woolfold and Elton to the east, Elton to the south and Walshaw to the west."

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

There has been no evidence of the existence of exceptional circumstances to justify the release of the greenbelt boundaries to allow building on the Walshaw allocation as is required by NPPF para 140. Housing need is not an exceptional circumstance to justify the release of greenbelt land. NPPF guidance states that housing need is not a target but merely a starting point and figures should be set upwards or downwards according to local circumstances, eg lack of brownfield, economic conditions (Covid-19).

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

Assessments

There has been a failure to conduct thorough and independent ecological assessments. The assessments carried out have been done on behalf of developers and are therefore not independent. Flood risk and other surveys have been carried out by consultancies on behalf of and for the benefit of developers rather than entirely independent wildlife organisations or the Department of Environment, Food and Rural Affairs so must be considered potentially biased.

The Housing Need Assessment was carried out by Arc4, who were supposed to carry out an independent survey of housing need. However, they have a partnership with Greater Manchester Housing Partnership, an organisation of housing associations, including Six Town Housing in Bury. This assessment was therefore not impartial.

Climate change policy and carbon neutral policy

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 not accessible from Walshaw by a car journey or an expensive, unreliable and infrequent bus service, thus increasing carbon emissions. The proposed new link road at Walshaw will do nothing to alleviate the problem of the roads, simply transferring the problem from one place to another.

Up to date information

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

Soundness

Site Selection

The site selection process for Bury has been especially opaque. Little information has been provided about why other more apparently suitable sites were rejected, or what alternatives were considered. Bury Council admitted in a Freedom of Information response that site selection was decided through a series of informal meetings with no list of attendees or minutes available. This site choice cannot be justified as the most appropriate when no reasonable alternatives appear to have been examined. It is likely 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 the 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 geographically sensitive criteria, Criteria 7, land that would deliver significant local benefits by addressing a major local problem (Site Allocation Topic Paper JPA 9 Walshaw pg 8, para 5.4). The only major local problem in Walshaw is the extra traffic that will be created by the proposed 1250 new houses. As Walshaw is a rural area, there is not a major problem and the infrastructure proposed would not be necessary. This is essentially a cyclical argument and not a specific justification for the inclusion of the site. NB In the Site Selection Background Paper, Criteria 7 is missing from the table of site selection criteria at pg 18.

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

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

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

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

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

To prevent neighbouring towns from merging into one another Strong

To assist in safeguarding the countryside from encroachment Moderate-Strong

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

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

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

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

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

Infrastructure

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

"The Three Dragons Viability Appraisal of the allocation has been run using the base case model and showed the allocation would likely require public support to proceed.

The Three Dragons report shows that without a contribution to strategic transport costs the allocation produces a positive residual value both for the main and the sensitivity test. However, a contribution of in house prices of less than 5% would be required to accommodate the full strategic transport costs identified.

26.3 With a small increase in values compared to the base model, the sensitivity test shows that the allocation would be able to support all policy costs including 25% affordable housing and the infrastructure required to support the development, including the strategic transport costs. This is considered appropriate for this location as it is in a popular residential area and is close to the motorway.

Walshaw and the areas to the west of Bury where house prices are typically higher than the rest of the town."

There is no guarantee that higher house prices would be achieved. This also suggests that some infrastructure will not be contemporaneous with the building of houses and will only be forthcoming once funds have been raised. This is supported at Site Allocation Topic Paper Walshaw pg 46 para 27.2 which states that,

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

The plan for infrastructure is therefore unsound as it is undeliverable and thus the site is not viable. Insufficient and vague infrastructure for Walshaw has been proposed, with no sources of funding specified. Bury have a very poor reputation for obtaining developer contributions for infrastructure and developers always try to wriggle out of any obligations. We are told by the Council that the sites are no longer ringfenced so there is no guarantee that promised infrastructure will be delivered.

- Healthcare

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

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

- Education

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

"The Walshaw allocation is expected to yield approximately 263 primary age pupils and 175 secondary age pupils. Current forecasts show both primary and secondary schools in the area are at capacity and therefore all additional demand created would require additional school places."

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

It is proposed that secondary places will merely be funded from "financial contributions towards secondary school provision" to meet the needs generated by the development (PfE, paragraph 24.1). This is not acceptable and will only provide a short term solution. The Elton High School in Vauxhall is currently oversubscribed by 175 places in 2021 and the furthest distance offered from the school is 1/3 of a mile. Distribution of places in Bury secondary schools for September 2021. It is therefore likely that the Walshaw site will yield an additional 175 secondary age pupils, a more permanent solution is an additional secondary school in the locality as well as the proposed secondary school. The need for an additional secondary school needs to be found for them in the immediate area and for the additional primary age pupils in the area as they move through the education system.

- Transport

"The most significant role which PfE will play in this respect is to locate development at sustainable locations which reduce the need for car travel, for example by maximising densities around transport hubs." |What are Places for Everyone"s proposals for the development of the Bury Council

Walshaw is not situated near to motorway junctions or to transport or employment hubs so it will require residents to travel across Bury to access them. The only improvement to public transport proposed is "a potential upgrade of existing bus services or a new bus service" (PfE, paragraph 24.1). A new public transport route to employment hubs is proposed.

The proposed new road link will not ease traffic and will potentially create further congestion. The Transport Locality Assessments GMSF 2020, the map at page B9, figure 3 shows that the new 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 that currently exist at Irwell. It will exacerbate congestion on local roads, which are already highly congested.

has been taken of the additional traffic which will be produced at the Andrews housing site just down the road from the Walshaw allocation.

Housing delivery targets

Bury Council have consistently failed to meet housing delivery targets and are now in breach. To be effective a plan must actually be deliverable. The plan relies heavily on the cooperation of private property developers. There is no indication of how they will be made to keep up with the targets. No sanctions will apply if they don't. At a Council meeting held on 9/9/21 the Leader of the Council Eammon O'Brien confirmed that it was "unlikely" that the proposed building rates for 2021-2026 in Bury (as laid out in JPA9 Walshaw Topic Paper PfE 2021, section 27.4 page 46) were realistic. So the plan cannot be considered to be effective and fails the test for Soundness.

Housing requirements

Government guidance is clear that standard housing methodology is just a starting point and can be changed in exceptional circumstances - this has not been thoroughly explored. A lack of land in the area and in particular the economic shock caused by Brexit and Covid 19 have not been taken into account.

There is insufficient confidence in the accuracy of the predictions in the current uncertain economic climate to justify Green Belt loss at the start of the plan. Greenbelt loss should only occur if brownfield has been exhausted. A review mechanism should be built in to only include further loss at a later stage if proven necessary. PfE para 1.42 states: "The majority of development between 2021 and 2037 (the "plan period") will be on land within the urban area, most of which is brownfield. The plan favours a brownfield first policy wherever possible as does National Policy. Bury Council has promised the public in Bury that they will implement a brownfield first policy. When questioned at a Council meeting on 9/9/21 the Leader of the Council Eammon O'Brien clarified this statement to mean that for anything the council themselves build they would adopt a brownfield first policy. However, as the council have no control over the actions of private developers, in reality they cannot guarantee to limit the release of green belt sites in accordance with National Policy NPPF 134 paragraph 134.

Changes to greenbelt boundaries

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

Modifications box

Removal of JPA 9 Walshaw from the plan

Delivering the plan section

Question 113 infrastructure implementation all marked as unsound

Detail's box

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 makes the plan undeliverable within the plan period hence making it unsound.

Modifications box

Smaller sites should be considered that would come forward faster like brownfield sites where there is already substantial infrastructure provided close by.

Question 104 developer contributions

All marked as unsound

Detail's box

It is very well documented that once a site is approved for development it can be revised before it is built 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 claim inflated development costs and no section 106 payments will come forward.

Modifications box

Places for Everyone Representation 2021

	<p>Local council authorities need to enter into more housing partnership projects and develop them themselves 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 council land where it is most in suit.</p> <p>Proposed Greenbelt additions section</p> <p>Question 116 - Bury Greenbelt additions</p> <p>Tick all site additions</p> <p>Tick all unsound</p> <p>Detail's box</p> <p>Net greenbelt additions have been nothing but a play on numbers to promote the plan for more greenspace. A lot of the new greenbelt additions are currently not viable for building, they are simply an exercise to take away the protection of greenbelt from useable open greenspace and move them elsewhere in the borough to give the impression that the overall net greenbelt protection is less.</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>Leave the greenbelt boundaries unchanged and present the true loss of greenbelt from the current proposals.</p>
<p>Family Name</p>	<p>Marsden</p>
<p>Given Name</p>	<p>Daniel</p>
<p>Person ID</p>	<p>1287479</p>
<p>Title</p>	<p>Bury - Green Belt Additions</p>
<p>Type</p>	<p>Web</p>
<p>Include files</p>	<p>PFE1287479_SOSLegality_Redacted.pdf PFE1287479_SOSLegality2.pdf PFE1287479_SOSElton.pdf PFE1287479_SOSWalshaw.pdf</p>
<p>GBA Bury - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below</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>

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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.	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 Walshaw site has been partially offset by creating extensive but unusable greenbelt in other areas with exceptional circumstances. This is not in accordance with National Policy.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Removal of JPA 9 Walshaw from the plan
Family Name	Marsden
Given Name	Daniel
Person ID	1287479
Title	Supporting Evidence
Type	Web
Include files	PFE1287479_SOSWalshaw.pdf PFE1287479_SOSElton.pdf PFE1287479_SOSLegality2.pdf PFE1287479_SOSLegality_Redacted.pdf
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.	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) if established. If there is any substantial difference in scope between the GMSF and PfE assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states 'The difference between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a plan have seen some form of change.' So, is 'not insignificant' the same as 'substantial' is not legal. This can only be established by a proper judicial review. So until proven otherwise plan must be considered illegal and not put to Government. Soundness

Soundness

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

Places for Everyone Representation 2021

Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	Stakeholder Submission
Type	Web
Include files	PFE1287462_SOSElton.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSGeneral_Redacted.pdf
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	Our Vision
Type	Web
Include files	PFE1287462_SOSGeneral_Redacted.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSElton.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.	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 a place for everyone plan is communicated to everyone. The plan should have been developed by the residents for the residents to address our actual housing requirements over the years. 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.
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.	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 (under 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 cannot be 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' and therefore 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.
Family Name	Marsden

Places for Everyone Representation 2021

Given Name	Lucy
Person ID	1287462
Title	Our Strategic Objectives
Type	Web
Include files	PFE1287462_SOSElton.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSGeneral_Redacted.pdf
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	<ol style="list-style-type: none"> 1. Meet our housing need 2. Create neighbourhoods of choice 3. Ensure a thriving and productive economy in the districts involved 4. Maximise the potential arising from our national and international assets 5. Reduce inequalities and improve prosperity 6. Promote the sustainable movement of people, goods and information 7. Ensure that districts involved are more resilient and carbon neutral 8. Improve the quality of our natural environment and access to green spaces 9. Ensure access to physical and social infrastructure 10. Promote the health and wellbeing of communities
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	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.	This plan needs to go back to Regulation 18 of the Town and Country planning act a prepared with proper public engagement and consultation.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	This plan needs to go back to Regulation 18 of the Town and Country planning act a prepared with proper public engagement and consultation.
Family Name	Marsden
Given Name	Lucy

Places for Everyone Representation 2021

Person ID	1287462
Title	Our Spatial Strategy
Type	Web
Include files	PFE1287462_SOSGeneral_Redacted.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSElton.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.	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.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	As above the plan needs to go back to proper consultation with the residents of Grea
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-Strat 1 Core Growth Area
Type	Web
Include files	PFE1287462_SOSElton.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSGeneral_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound

Places for Everyone Representation 2021

Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-Strat 2 City Centre
Type	Web
Include files	PFE1287462_SOSGeneral_Redacted.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSElton.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
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-Strat 3 The Quays
Type	Web
Include files	PFE1287462_SOSElton.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSGeneral_Redacted.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
Family Name	Marsden
Given Name	Lucy

Places for Everyone Representation 2021

Person ID	1287462
Title	JP-Strat 4 Port Salford
Type	Web
Include files	PFE1287462_SOSGeneral_Redacted.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSElton.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
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-Strat 5 Inner Areas
Type	Web
Include files	PFE1287462_SOSElton.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSGeneral_Redacted.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
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-Strat 6 Northern Areas
Type	Web
Include files	PFE1287462_SOSGeneral_Redacted.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSElton.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
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-Strat 7 North East Growth Corridor
Type	Web
Include files	PFE1287462_SOSElton.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSGeneral_Redacted.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
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-Strat 8 Wigan Bolton Growth Corridor
Type	Web
Include files	PFE1287462_SOSGeneral_Redacted.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSElton.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

Places for Everyone Representation 2021

Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-Strat 9 Southern Areas
Type	Web
Include files	PFE1287462_SOSElton.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSGeneral_Redacted.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
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-Strat 10 Manchester Airport
Type	Web
Include files	PFE1287462_SOSGeneral_Redacted.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSElton.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
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-Strat 11 New Carrington
Type	Web
Include files	PFE1287462_SOSElton.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSGeneral_Redacted.pdf

Places for Everyone Representation 2021

Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-Strat 12 Main Town Centres
Type	Web
Include files	PFE1287462_SOSGeneral_Redacted.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSElton.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
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-Strat 13 Strategic Green Infrastructure
Type	Web
Include files	PFE1287462_SOSElton.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSGeneral_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

Places for Everyone Representation 2021

Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-Strat 14 A Sustainable and Integrated Transport Network
Type	Web
Include files	PFE1287462_SOSGeneral_Redacted.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSElton.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
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-S 1 Sustainable Development
Type	Web
Include files	PFE1287462_SOSElton.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSGeneral_Redacted.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
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-S 2 Carbon and Energy
Type	Web

Places for Everyone Representation 2021

Include files	PFE1287462_SOSGeneral_Redacted.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSElton.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
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-S 3 Heat and Energy Networks
Type	Web
Include files	PFE1287462_SOSElton.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSGeneral_Redacted.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
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-S 4 Resilience
Type	Web
Include files	PFE1287462_SOSGeneral_Redacted.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSElton.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound

Places for Everyone Representation 2021

Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-S 5 Flood Risk and Water Environment
Type	Web
Include files	PFE1287462_SOSElton.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSGeneral_Redacted.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
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-S 6 Clean Air
Type	Web
Include files	PFE1287462_SOSGeneral_Redacted.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSElton.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
Family Name	Marsden
Given Name	Lucy
Person ID	1287462

Places for Everyone Representation 2021

Title	JP-S 7 Resource Efficiency
Type	Web
Include files	PFE1287462_SOSElton.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSGeneral_Redacted.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
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-J 1 Supporting Long Term Economic Growth
Type	Web
Include files	PFE1287462_SOSGeneral_Redacted.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSElton.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
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-J 2 Employment Sites and Premises
Type	Web
Include files	PFE1287462_SOSElton.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSGeneral_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound

Places for Everyone Representation 2021

Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-J 3 Office Development
Type	Web
Include files	PFE1287462_SOSGeneral_Redacted.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSElton.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
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-J 4 Industry and Warehousing Development
Type	Web
Include files	PFE1287462_SOSElton.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSGeneral_Redacted.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
Family Name	Marsden

Places for Everyone Representation 2021

Given Name	Lucy
Person ID	1287462
Title	JPA 7: Elton Reservoir Area
Type	Web
Include files	PFE1287462_SOSGeneral_Redacted.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSElton.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>The PfE indicates in Para 1.63 point 2 that the most up to date information be used i so being the most recent Bury's Housing Development Needs Assessment 2020 mu consideration: https://www.bury.gov.uk/index.aspx?articleid=15866</p> <p>- The site selection process for Bury has been especially opaque. Little information h about why other more apparently suitable sites were rejected, or what alternatives w Bury Council admitted in a Freedom of Information response that site selection was de of informal meetings with no list of attendees or minutes available. This site choice ca as the most appropriate when no reasonable alternatives appear to have been exam Reservoir site does not meet the selection criteria laid down in the NPPF or the GMD https://www.bury.gov.uk/index.aspx?articleid=16330 Radcliffe the location of Elton R least expensive housing in Bury but was selected in preference to sites in other areas housing is required.</p> <p>- Para 11.105 p 264 states: " The allocation [Elton Reservoir] is almost entirely surro existing urban area" Filling this green belt site in will contribute to creating urban spr compliance with National Policy NPPF para 134 parts a,c and e.</p> <p>- Para 11.105 p 264 states: "Although the allocation has the capacity to deliver a total new homes, it is anticipated that around 1,900 of these will be delivered within the pl Nevertheless, it is considered necessary to release the site in full at this stage given the proposed development means that it will need to be supported by significant strate and this level of investment needs the certainty that the remaining development will s come forward beyond the plan period". Such gross over release of greenbelt is entire National Guidelines, which regards greenbelt as a precious resource not to be squan to identify the source of infrastructure funding, indeed shortfalls are expected see pa Site owners Peel are not specifically mentioned as being a contributor to the infrastru Questions should be asked regarding the reasons for Bury Council offering up a hug greenbelt at Elton Reservoir that is not required during the plan period (and may nev instead of retaining it in accordance with National Policy.</p> <p>- The Elton site apparently cost Peel £27M (as detailed in the site allocation topic pa 260 hectares (£104K per hectare) as greenbelt. Allowing a conservative price uplift of for green belt conversion to development land, the land for the initial 1900 site becom £875M. Adding in the land for the totally unjustified additional housing beyond the pl approx. another £750 M. The implication being that unless Peel get the whole £1.32 they can't offer any upfront funding for the infrastructure. Infrastructure that would no the development does not go ahead. Peel have indicated that they will possibly build will definitely split the site into lots to be developed by other developers so they (Peel</p>

contributions this way. It would be left to Bury to extract the funding from other as yet developers. Bury have a very poor reputation for obtaining developer contributions for and developers always try to wriggle out of any obligations. It seems Peel have dupe into ignoring National Policy and granting them a huge financial bonus with no comm anything.

- Site wildlife, flood risk and other surveys have been carried out by consultancies or paid for by developers rather than entirely independent wildlife organisations or the D Environment so must be considered potentially biased. This is particularly important 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 fi suitable to protect homes from flooding if there is a breach? Such surveys should be enti of benefiter influence.

- As part of the infrastructure a new secondary school for Radcliffe is mentioned. A n free school for Radcliffe is already planned funded by the Government. The propose not even cater for existing Radcliffe pupil numbers. Since the proposed school is indi already reserved for the free school we must assume PfE document refers to the sch 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 ap not succeed the regeneration will go ahead using existing Council money. Bury Coun that regeneration and the new school for Radcliffe are not dependent on PfE going a mention/implication that PfE will contribute to providing a new secondary school (unle school) and regeneration for Radcliffe must be removed from JPA-7.

- Bury Council have consistently failed to meet housing delivery targets and are now To be effective a plan must actually be deliverable. The plan relies heavily on the co property developers. There is no indication of how they will be made to keep up with sanctions will apply if they don't. At a Council meeting held on 9/9/21 the Leader of Eammon O'Brien confirmed that it was "unlikely" that the proposed building rates for a in Bury (as laid out in JPA7 Elton Reservoir Topic Paper PfE 2021, section 27.8 page met as they were "unrealistic". So the plan cannot be considered to be effective. So effectiveness test for Soundness.

- As part of the overall plan Bury have modified green belt boundaries and allocation to make it appear that less Greenbelt is being sacrificed. So the loss of the Elton Reserv has been partially offset by creating extensive greenbelt in other areas without justify circumstances. This is not in accordance with National Policy.

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

- PfE para1.42 states: "The majority of development between 2021 and 2037 (the "p be on land within the urban area, most of which is brownfield land" PfE favours a brow wherever possible as does National Policy. Bury Council have informed the public in will implement a brownfield first policy; however, they are going for immediate green JPA7 Elton Reservoir Topic Paper PfE 2021, section 27.9 page 52). When questione meeting on 9/9/21 the Leader of the Councillor Eammon O'Brien clarified this statem that for anything the council themselves build they would adopt a brownfield first poli that the council have no control over the actions of private developers, in reality they c limit the release of green belt sites in accordance with National Policy NPPF 134 par

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

Removal of JPA 7 allocation Elton Reservoir from the plan

Places for Everyone Representation 2021

you have identified above.	
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JPA 8: Seedfield
Type	Web
Include files	PFE1287462_SOSElton.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSGeneral_Redacted.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
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JPA 9: Walshaw
Type	Web
Include files	PFE1287462_SOSGeneral_Redacted.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSElton.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	Failure to comply with Statement of Community Involvement Bury Council have failed to comply with their Statement of Community Involvement S Community Involvement (bury.gov.uk) at all stages of the creation of the plan. There w to residents of the initial call for sites and the amount spent on making residents awa disproportionately small (□100 as per the response to a Freedom of Information reques to the effect it will have upon them. There has been a deliberate campaign of misinfo misleading statements to promote and "sell" the Plan to residents, rather than a pres

co-operate. Please be as precise as possible.

facts eg residents only being told of the plans for their specific ward, and not being in the bigger picture across the borough, thus giving the impression that the impact is less. There has been an over reliance on residents finding things out for themselves on social media and thus a failure to engage with various groups due to over reliance on the use of social technology. There has been no access to public internet, eg in libraries, during Covid. The impact has been disproportionately affected older people and those from deprived backgrounds. This is in line with the SCI 2.4 & 4.17. Countrywide, Covid restrictions are now lifted but restrictions still remain in Bury's Statement of Community Involvement (SCI para 1.7). Consultations have been poor in terms of language and terminology used and have been a deterrent to becoming involved in the planning process as they have been wordy, long winded and intrusive, thus producing a low response rate.

National Planning Policy Framework greenbelt protection clauses

The purpose of the NPPF greenbelt protection is to prevent urban sprawl. Para 11.1 of the PfE states of the Walshaw allocation,

"This is an extensive area of land □□ 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 Elton to the south and Walshaw to the west."

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

There has been no evidence of the existence of exceptional circumstances to justify the alteration of the greenbelt boundaries to allow building on the Walshaw allocation as is required by 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 downturn (Covid-19).

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

Assessments

There has been a failure to conduct thorough and independent ecological assessments. The assessments carried out have been done on behalf of developers and are therefore not independent. Flood risk and other surveys have been carried out by consultancies on behalf of and for the benefit of developers rather than entirely independent wildlife organisations or the Department of Environment, Food and Rural Affairs so must be considered potentially biased.

The Housing Need Assessment was carried out by Arc4, who were supposed to carry out an independent survey of housing need. However, they have a partnership with Greater Manchester Housing Partnership, an organisation of housing associations, including Six Town Housing in Bury. The assessment was therefore not impartial.

Climate change policy and carbon neutral policy

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 not accessible from Walshaw by a car journey or an expensive, unreliable and infrequent bus service, thus increasing carbon emissions. The proposed new link road at Walshaw will do nothing to alleviate the problem of the roads, simply transferring the problem from one place to another.

Up to date information

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

Soundness

Site Selection

The site selection process for Bury has been especially opaque. Little information has been provided about why other more apparently suitable sites were rejected, or what alternatives were considered.

Bury Council admitted in a Freedom of Information response that site selection was done through a series of informal meetings with no list of attendees or minutes available. This site choice was chosen as the most appropriate when no reasonable alternatives appear to have been examined. Other options were ruled out too early or were not considered despite other areas having better 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 green criteria, Criteria 7, land that would deliver significant local benefits by addressing a major local problem (Site Allocation Topic Paper JPA 9 Walshaw pg 8, para 5.4). The only major local problem in Walshaw is the extra traffic that will be created by the proposed 1250 new houses. As there are 1250 houses, there is not a major problem and the infrastructure proposed would not be necessary. This is essentially a cyclical argument and not a specific justification for the inclusion of the Walshaw site.

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

- The Walshaw allocation only meets 3 out of 10 of the broad objectives within Section 5 of the Local Plan (Site Allocation Topic Paper JPA 9 Walshaw pg 8, para 5.7):

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

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

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

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

To prevent neighbouring towns from merging into one another Strong

To assist in safeguarding the countryside from encroachment Moderate-Strong

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

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

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

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

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

Infrastructure

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

"The Three Dragons Viability Appraisal of the allocation has been run using the base case assumptions. It showed the allocation would likely require public support to proceed.

The Three Dragons report shows that without a contribution to strategic transport costs, the allocation produces a positive residual value both for the main and the sensitivity test. However,

in house prices of less than 5% would be required to accommodate the full strategic identified.

26.3 With a small increase in values compared to the base model, the sensitivity test that the allocation would be able to support all policy costs including 25% affordable infrastructure required to support the development, including the strategic transport costs is considered appropriate for this location as it is in a popular residential area and is close to Walshaw and the areas to the west of Bury where house prices are typically higher than the rest of the town."

There is no guarantee that higher house prices would be achieved. This also suggests that some infrastructure will not be contemporaneous with the building of houses and will only be forthcoming once funds have been raised. This is supported at Site Allocation Topic Paper Walshaw pg 46 para 27.2 which states that,

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

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

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

- Healthcare

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

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

- Education

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

"The Walshaw allocation is expected to yield approximately 263 primary age pupils and 175 secondary age pupils. Current forecasts show both primary and secondary schools in the area are at capacity and therefore all additional demand created would require additional school places."

"Cumulative secondary age demand pressures will need to be considered more strategically (Site Allocation Topic Paper Walshaw 24.2)

It is proposed that secondary places will merely be funded from "financial contributions for secondary school provision" to meet the needs generated by the development (PfE, 2019). This is not acceptable and will only provide a short term solution. The Elton High School in Vauxhall is currently oversubscribed by 175 places in 2021 and the furthest distance offered from the school is 1/3 of a mile. Distribution of places in Bury secondary schools for September 2021. It is therefore clear that the Walshaw site will yield an additional 175 secondary age pupils, a more permanent solution is an additional secondary school in the locality as well as the proposed secondary school. The need for an additional secondary school needs to be found for them in the immediate area and for the additional primary age pupils in the area as they move through the education system.

- Transport

"The most significant role which PfE will play in this respect is to locate development on sustainable locations which reduce the need for car travel, for example by maximising densities around transport hubs." "What are Places for Everyone"s proposals for the Bury Council

Walshaw is not situated near to motorway junctions or to transport or employment hubs. It is therefore difficult for residents to travel across Bury to access them. The only improvement to public transport proposed is "a potential upgrade of existing bus services or a new bus service" (PfE, 2019). A public transport route to employment hubs is proposed.

The proposed new road link will not ease traffic and will potentially create further congestion. As shown in the Transport Locality Assessments GMSF 2020, the map at page B9, figure 3 shows 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 town of Irwell. It will exacerbate congestion on local roads, which are already highly congested. No consideration has been taken of the additional traffic which will be produced at the Andrews housing allocation site just down the road from the Walshaw allocation.

Housing delivery targets

Bury Council have consistently failed to meet housing delivery targets and are now in breach of the plan. To be effective a plan must actually be deliverable. The plan relies heavily on the cooperation of private property developers. There is no indication of how they will be made to keep up with the targets. No sanctions will apply if they don't. At a Council meeting held on 9/9/21 the Leader of Bury Council Eammon O'Brien confirmed that it was "unlikely" that the proposed building rates for private housing in Bury (as laid out in JPA9 Walshaw Topic Paper PfE 2021, section 27.4 page 46) would be met as they were "unrealistic". So the plan cannot be considered to be effective and fails the test for Soundness.

Housing requirements

Government guidance is clear that standard housing methodology is just a starting point and can be changed in exceptional circumstances - this has not been thoroughly explored. A lack of available land in the area and in particular the economic shock caused by Brexit and Covid 19 have not been taken into account.

There is insufficient confidence in the accuracy of the predictions in the current uncertain economic and climate to justify Green Belt loss at the start of the plan. Greenbelt loss should only occur if brownfield has been exhausted. A review mechanism should be built in to only include further loss at a later stage if proven necessary. PfE para 1.42 states: "The majority of development between 2021 and 2037 (the "plan period") will be on land within the urban area, most of which is brownfield. The plan favours a brownfield first policy wherever possible as does National Policy. Bury Council has stated to the public in Bury that they will implement a brownfield first policy. When questioned at a Council meeting on 9/9/21 the Leader of the Council Eammon O'Brien clarified this statement to mean that for anything the council themselves build they would adopt a brownfield first policy. However, as the council have no control over the actions of private developers. In reality they cannot limit the release of green belt sites in accordance with National Policy NPPF 134 paragraph 134.".

Changes to greenbelt boundaries

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

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

Removal of JPA 9 Walshaw from the plan

Family Name

Marsden

Given Name

Lucy

Person ID

1287462

Title

JP-D1 Infrastructure Implementation

Type

Web

Places for Everyone Representation 2021

Include files	PFE1287462_SOSElton.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSGeneral_Redacted.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.	Due to the size of the greenbelt sites allocated within the plan it is highly unlikely that t can be provided in good time to bring these sites forward within the plan period. This plan undeliverable within the plan period hence making it unsound.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Smaller sites should be considered that would come forward faster like brownfield si have substantial infrastructure provided close by.
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	JP-D2 Developer Contributions
Type	Web
Include files	PFE1287462_SOSGeneral_Redacted.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSElton.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

Places for Everyone Representation 2021

Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	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 have inflated 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 land they own instead of selling it and losing control. Salford Council has now created it's own building company that will deliver affordable homes on land they own and other council land in their suit.
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	Bury - Green Belt Additions
Type	Web
Include files	PFE1287462_SOSElton.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSGeneral_Redacted.pdf
GBA Bury - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below	Bury GBA03 Pigs Lea Brook 1 Bury GBA04 North of Nuttall Park Bury GBA05 Pigs Lea Brook 2 Bury GBA06 Hollins Brook Bury GBA07 Off New Road, Radcliffe Bury GBA08 Hollins Brow Bury GBA09 Hollybank Street, Radcliffe Bury GBA10 Crow Lumb Wood Bury GBA11 Nuttall West, Ramsbottom Bury GBA12 Woolfold, Bury Bury GBA13 Nuttall East, Ramsbottom Bury GBA14 Chesham, Bury Bury GBA15 Broad Hey Wood North Bury GBA16 Lower Hinds
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound

Places for Everyone Representation 2021

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.	Net greenbelt additions have been nothing but a play on numbers to promote the plan for more greenspace. A lot of the new greenbelt additions are currently not viable for building, they are simply an exercise to take away the protection of greenbelt from useable open greenspace and move them elsewhere in the borough to give the impression that the overall net greenbelt additions is less.
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.	Leave the greenbelt boundaries unchanged and present the true loss of greenbelt from the plan proposals.
Family Name	Marsden
Given Name	Lucy
Person ID	1287462
Title	Supporting Evidence
Type	Web
Include files	PFE1287462_SOSGeneral_Redacted.pdf PFE1287462_SOSWalshaw.pdf PFE1287462_SOSElton.pdf
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>It is questionable whether PfE and the GMSF can effectively be treated as the same plan. 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 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. The plan uses 2014 data to assess housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be assessed using the latest (2018) ONS population predictions and take into account the effect of demographic patterns.</p> <ul style="list-style-type: none"> - There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid - There are no partners or industries identified for employment provision. Major partners and industries for provision should be identified.

Places for Everyone Representation 2021

- 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.

- 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 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. A strategy to guarantee housing delivery rates must be provided. This cannot be left to any local authority that is currently behind its targets. Clear delivery plans for infrastructure should be included.

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

- In addition to PFE each authority needs to come up with its own local plan. No details are provided about when these plans will be available.

- There are no details of how Duty to Cooperate will be achieved. Following their withdrawal from the plan will effectively become a neighbouring borough. However, it is not acceptable to limit the plan 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.

- 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
 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	Marsden
Given Name	Lucy
Person ID	1287462
Title	Other Comments
Type	Web
Include files	PFE1287462_SOSWalshaw.pdf PFE1287462_SOSElton.pdf PFE1287462_SOSGeneral_Redacted.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
Family Name	Marsden

Places for Everyone Representation 2021

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