Family Name	Mohammadisani
Given Name	Marzieh
Person ID	1286516
Title	Stakeholder Submission
Type	Web
Family Name	Mohammadisani
Given Name	Marzieh
Person ID	1286516
Title	JPA 35: North of Mosley Common
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	this area has no capacity to accepting more houses and residences. no proper infrastructure and with 1100 more houses, we will lose our green area which is essential and living here will be a nightmare. I am fully disagree.

Family Name	Mole
Given Name	Carol
Person ID	1287184
Title	Other Comments
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	Stakeholder Submission
Type	Web
Family Name	Mole
Given Name	Carol
Person ID	1287184
Title	Our Vision
Type	Web
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.	Can PfE and the GMSF can be treated as the same plan? No. Legality must be decide "Places for Everyone" can proceed any further. It has been assumed that a transition b framework (GMSF) and a Joint Development plan (PfE) is acceptable without a signi The vision for Greater Manchester has been planned behind closed doors without pro or public consultation from the very beginning. Any consultations that have taken pla active deterrent asking far too many intrusive questions of residents to put them off c The consultations have been put forward in a way that that are difficult to respond to residents with limited I.T skills or digital access. Local councils have not properly pub

	ensure a place for everyone plan is communicated to everyone. The plan should hav by the residents for the residents to address our actual housing requirements over th The above demonstrates a clear lack of community involvement which goes against constitution and makes the preparation of this plan unsound, as the council are to re constituents, not work against their wishes.
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 who are informed of the a only details the council wish them to hear.
Family Name	Mole
Given Name	Carol
Person ID	1287184
Title	Our Strategic Objectives
Type	Web
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	1. Meet our housing need 2. Create neighbourhoods of choice 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	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 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 identify how all the infrastructure will be paid There are no partners or industries identified for employment provision. Major partners provision should be identified.

co-operate. Please be as precise as possible.	There has been poor public consultation, a lack of accessible information and little sp in generating awareness. Interest in the plan has mainly been generated by local pro public consultations should be repeated, providing clear, understandable information designed to encourage rather than discourage public input.
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.	PfE shows removal of greenbelt protection for some areas and creation of greenbelt is no proof of exceptional circumstances required in the National Planning Policy Fra this. Again, This plan needs to go back to Regulation 18 of the Town and Country plannin positively prepared with proper public engagement and consultation who are informe facts, not only details the council wish them to hear.
Family Name	Mole
Given Name	Carol
Person ID	1287184
Title	Our Spatial Strategy
Type	Web
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 sin 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.	the plan needs to go back to proper consultation with the residents of Greater Manch
Family Name	Mole

Given Name	Carol
Person ID	1287184
Title	JP-Strat 1 Core Growth Area
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-Strat 2 City Centre
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-Strat 3 The Quays
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-Strat 4 Port Salford
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-Strat 5 Inner Areas
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-Strat 6 Northern Areas
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-Strat 7 North East Growth Corridor
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-Strat 8 Wigan Bolton Growth Corridor
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-Strat 9 Southern Areas
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-Strat 10 Manchester Airport
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-Strat 11 New Carrington
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-Strat 12 Main Town Centres

Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-Strat 13 Strategic Green Infrastructure
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-Strat 14 A Sustainable and Integrated Transport Network
Type	Web
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	Mole
Given Name	Carol

Person ID	1287184
Title	JP-S 1 Sustainable Development
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-S 2 Carbon and Energy
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-S 3 Heat and Energy Networks
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-S 4 Resilience
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-S 5 Flood Risk and Water Environment
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-S 6 Clean Air
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-S 7 Resource Efficiency
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-J 1 Supporting Long Term Economic Growth
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-J 2 Employment Sites and Premises
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-J 3 Office Development
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-J 4 Industry and Warehousing Development
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-H 2 Affordability of New Housing
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-H 3 Type Size and Design of New Housing
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-H 4 Density of New Housing

Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-G 1 Valuing Important Landscapes
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-G 2 Green Infrastructure Network
Type	Web
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	Mole
Given Name	Carol

Person ID	1287184
Title	JP-G 3 River Valleys and Waterways
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-G 4 Lowland Wetlands and Mosslands
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-G 5 Uplands
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-G 6 Urban Green Space
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-G 7 Trees and Woodland
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-G 8 Standards for Greener Places
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-G 9 A Net Enhancement of Biodiversity and Geodiversity
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-G 10 Green Belt
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-G 11 Safeguarded Land
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-P1 Sustainable Places
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-P2 Heritage
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-P3 Cultural Facilities
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-P4 New Retail and Leisure Uses in Town Centres
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-P5 Education Skills and Knowledge
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-P6 Health

Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-P7 Sport and Recreation
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-C1 An Integrated Network
Type	Web
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	Mole
Given Name	Carol

Person ID	1287184
Title	JP-C2 Digital Connectivity
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-C3 Public Transport
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-C4 Streets for All
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-C5 Walking and Cycling Network
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-C6 Freight and Logistics
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-C7 Transport Requirements of New Developments
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 1.1 Heywood / Pilsworth (Northern Gateway)
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 1.2: Simister and Bowlee (Northern Gateway)
Type	Web
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 Simister and Bowl has been partially offset by creating extensive but unusable greenbelt in other areas 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	Removal of JPA 1.2 Simister and Bowlee from the plan

plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	
Family Name	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 2: Stakehill
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 3.1: Medipark
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 3.2: Timperley Wedge
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 4: Bewshill Farm
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 5: Chequerbent North
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 6: West of Wingates / M61 Junction 6
Type	Web

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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 7: Elton Reservoir Area
Type	Web
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 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 -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 GMC 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. -Para 11.105 p 264 states: '' The allocation [Elton Reservoir] is almost entirely surrou existing urban area'' Filling this green belt site in will contribute to creating urban spra compliance with National Policy NPPF para 134 parts a,c and e. -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 entir 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.

-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 (Pee 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.

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

-As part of the infrastructure a new secondary school for Radcliffe is mentioned. A new school for Radcliffe is already planned funded by the Government. The proposed ne even cater for existing Radcliffe pupil numbers. Since the proposed school is indicate 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 allocations 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 loca 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 "pl 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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 8: Seedfield
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 9: Walshaw
Type	Web
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	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 wa

to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	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. 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 b in terms of language and terminology used and have been a deterrent to becoming i planning process as they have been wordy, long winded and intrusive, thus producin response rate. National Planning Policy Framework greenbelt protection clauses The purpose of the NPPF greenbelt protection is to prevent urban sprawl. Para 11.1 PfE states of the Walshaw allocation, "This is an extensive area of land □□ set entirely within the existing urban area. The bounded by the urban areas of Tottington to the north, Woolfold and Elton to the eas the south and Walshaw to the west." Filling in this green belt site will create an urban sprawl contrary to NPPF para 137 an and e. There has been no evidence of the existence of exceptional circumstances to justify the greenbelt boundaries to allow building on the Walshaw allocation as is required by 140. Housing need is not an exceptional circumstance to justify the release of greenb guidance states that housing need is not a target but merely a starting point and figures upwards or downwards according to local circumstances, eg lack of brownfield, econom Covid-19). To prove that exceptional circumstances to justify alteration to greenbelt boundaries requires evidence that all other reasonable options to meet identified need have bee (NPPF para 141). This must include maximising use of brownfield and underutilised sites density. Assessments There has been a failure to conduct thorough and independent ecological assessmen carried out have been done on behalf of developers and are therefore not independe flood risk and other surveys have been carried out by consultancies on behalf of and developers rather than entirely independent wildlife organisations or the Department of so must be considered potentially biased. The Housing Need Assessment was carried out by Arc4, who were supposed to carry survey of housing need. However, they have a partnership with Greater Manchester Partnership, an organisation of housing associations, including Six Town Housing in 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 fro the M66 Northern Gateway Corridor, necessitating travel by car as no direct public tr exists or is proposed, thus increasing carbon emissions. Local transport hubs in Bury ar from Walshaw by a car journey or an expensive, unreliable and infrequent bus service, carbon emissions. The proposed new link road at Walshaw will do nothing to alleviat 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 i so being the most recent Bury"s Housing Development Needs Assessment 2020 mu 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 ha
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
options were ruled out too early or were not considered despite other areas having c
access or being situated nearer to employment sites.

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

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

-The Walshaw allocation only meets 3 out of 10 of the broad objectives within Sectio
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
in each of the areas of the Greater Manchester Greenbelt Assessment 2016 (Site Al
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 Gree
Assessment, 2020 which concluded that the Walshaw allocation makes a moderate
checking the sprawl of Greater Manchester and safeguarding the countryside from e
The allocation also makes a relatively limited contribution to maintaining the separati
Tottington which are already merged to a significant degree. Release of the allocation
cause moderate harm to Green Belt purposes.

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

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

The needs of the Walshaw community have been overlooked in favour of mass urba
this particular site rather than sites on the outskirts nearer motorway access, transpo
employment sites. There is too much emphasis on economic growth at the expense
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 v
a 5% increase in the price of the properties on the site: Site Allocation Topic Paper- J
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 showed the allocation would likely require public support to proceed.

The Three Dragons report shows that without a contribution to strategic transport co 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 tes that the allocation would be able to support all policy costs including 25% affordable infrastructure required to support the development, including the strategic transport cost is considered appropriate for this location as it is in a popular residential area and is cl Walshaw and the areas to the west of Bury where house prices are typically higher t of the town."

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

"The phasing strategy will be developed through on-going discussions with key stakeh to infrastructure delivery. The estimated phasing and delivery trajectory will evolve as allocation are developed further."

The plan for infrastructure is therefore unsound as it is undeliverable and thus the sit

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

-Healthcare

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

"Further work will be required to determine whether there is additional capacity withi healthcare facilities to meet the increased demands arising from the prospective occu development."

-Education

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

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

"Cumulative secondary age demand pressures will need to be considered more stra 24.2)

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

-Transport

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

	Walshaw is not situated near to motorway junctions or to transport or employment hu residents to travel across Bury to access them. The only improvement to public trans proposed is "a potential upgrade of existing bus services or a new bus service" (PfE public transport route to employment hubs is proposed. The proposed new road link will not ease traffic and will potentially create further con the Transport Locality Assessments GMSF 2020, the map at page B9, figure 3 show will start from a mini roundabout on a narrow residential road, cross a busy main roa Lowercroft Road at Dow Lane where the road is steep and very narrow (barely wide cars to pass safely). The road will be sending traffic to all of the same pinch points th Irwell. It will exacerbate congestion on local roads, which are already highly congest has been taken of the additional traffic which will be produced at the Andrews housin 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 i 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 E Eammon O'' Brien confirmed that it was "unlikely" that the proposed building rates for a in Bury (as laid out in JPA9 Walshaw Topic Paper PfE 2021, section 27.4 page 46) w 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 p changed in exceptional circumstances - this has not been thoroughly explored. A lac land in the area and in particular the economic shock caused by Brexit and Covid 19 taken into account. There is insufficient confidence in the accuracy of the predictions in the current unce climate to justify Green Belt loss at the start of the plan. Greenbelt loss should only c brownfield has been exhausted. A review mechanism should be built in to only inclu later stage if proven necessary. PfE para1.42 states: "The majority of development be 2037 (the "plan period") will be on land within the urban area, most of which is brown favours a brownfield first policy wherever possible as does National Policy. Bury Coun the public in Bury that they will implement a brownfield first policy. When questioned meeting on 9/9/21 the Leader of the Councillor Eammon O'' Brien clarified this stater 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 Changes to greenbelt boundaries 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 g 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.	Delete site JP Allocation 9 Walshaw, Bury. Replace with smaller deliverable sites on non Green Belt sites.
Family Name	Mole
Given Name	Carol

Person ID	1287184
Title	JPA 10: Global Logistics
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 12: Beal Valley
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 13: Bottom Field Farm (Woodhouses)
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 14: Broadbent Moss
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 15: Chew Brook Vale (Robert Fletchers)
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 16: Cowlishaw
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 17: Land South of Coal Pit Lane (Ashton Road)
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 18: South of Rosary Road
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 19: Bamford / Norden
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound

Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 20: Castleton Sidings
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 21: Crimble Mill
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 22: Land North of Smithy Bridge
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 23: Newhey Quarry
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 24: Roch Valley
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 25: Trows Farm

Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 26: Land at Hazelhurst Farm
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 27: Land East of Boothstown
Type	Web
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	Mole
Given Name	Carol

Person ID	1287184
Title	JPA 28: North of Irlam Station
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 29: Port Salford Extension
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 30: Ashton Moss West
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 31: Godley Green Garden Village
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 32: South of Hyde
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 33 New Carrington
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 34 M6 Junction 25
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 35: North of Mosley Common
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 36: Pocket Nook
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JPA 37: West of Gibfield
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-D1 Infrastructure Implementation
Type	Web
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	Mole
Given Name	Carol
Person ID	1287184
Title	JP-D2 Developer Contributions
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	It is very well documented that once a site is approved for development it can be rev date with a viability assessment. Local councils have very little control after a site has for houses and it is common practice for a developer to change the number of home density, type and number that are classed as affordable. In some extreme cases a dev 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 de they own instead of selling it and losing control. Salford Council has now created it's building company that will deliver affordable homes on land they own and other counc suit.
Family Name	Mole
Given Name	Carol
Person ID	1287184
Title	Bury - Green Belt Additions

Type	Web
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
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 pla more greenspace. A lot of the new greenbelt additions are currently not viable for bu simply an exercise to take away the protection of greenbelt from useable open greens them elsewhere in the borough to give the impression that the overall net greenbelt p 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 la proposals.
Family Name	Mole
Given Name	Carol
Person ID	1287184

Title	Supporting Evidence
Type	Web
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.	Legal Compliance -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 cor with Regulation 18 of the Town and Country Planning regulations) and could therefore to final public consultation and submission under Regulation 19 (this current stage) F established. If there is any substantial difference in scope between the GMSF and P assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states 'The 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 'substantia 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. Soundness Soundness -The plan uses 2014 data to predict housing need and ignores the potential impact o Covid-19. Housing need must be re-assessed using the latest (2018) ONS population 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 need to identify how all the infrastructure will be paid -There are no partners or industries identified for employment provision. Major partners provision should be identified. -There has been poor public consultation, a lack of accessible information and little s in generating awareness. Interest in the plan has mainly been generated by local pro 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 sit sites' were excluded from the plan. https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228 The be repeated using National and GMCA guidelines for site selection. Meetings with publ should be held and minutes should be published. The rationale for the selection/rejec should be available including considered alternatives. -Several of the authorities involved have consistently failed to meet housing delivery tar a plan must be deliverable. The plan relies on the cooperation of property developers indication of how delivery targets will be maintained. A strategy to guarantee housing must be provided. This cannot be left to any local authority that is currently behind on Clear delivery plans for infrastructure should be included. -PfE shows removal of greenbelt protection for some areas and creation of greenbelt is no proof of exceptional circumstances required in the National Planning Policy Fra this. -In addition to PfE each authority needs to come up with its own local plan. No details about when these plans will be available. -There are no details of how Duty to Cooperate will be achieved. Following their withd will effectively become a neighbouring borough. However, it is not acceptable to limit boroughs to Stockport since each of the authorities in the plan is also neighbouring to outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackb Wigan neighbours St Helens and Trafford neighbours Cheshire area. -A change in the methodology for Manchester City Council was resulted in a 35% up Manchester City Council area. The revised Local Housing Need methodology states th is to be met within the district and not redistributed (see Places for Everyone Joint C documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July202

	This represents a significant change between the previous spatial framework the Gre Spatial Framework and the current joint development plan Places for Everyone.