

Places for Everyone Representation 2021

Family Name	Pike
Given Name	Emma
Person ID	1287036
Title	Stakeholder Submission
Type	Web
Family Name	Pike
Given Name	Emma
Person ID	1287036
Title	Our Vision
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Pike
Given Name	Emma
Person ID	1287036
Title	Our Strategic Objectives
Type	Web
Soundness - Positively prepared?	NA
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Pike
Given Name	Emma
Person ID	1287036
Title	JPA 9: Walshaw
Type	Web

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
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>Soundness</p> <p>As a fundamental starting point this plan does not accord with the NPPF 2021 test for soundness at paragraph 35</p> <p>-positively prepared, justified, effective and consistent with national policy.</p> <p>Sufficient evidence has not been provided to justify release of greenbelt in this location, NPRF- para 140 states green belt boundaries should only be altered where exceptional circumstances justify release, there is no evidence that these circumstances are applicable.</p> <p>The five purposes of green belt in Para 38 NPRF, -prevent unrestricted sprawl,(development would cause unrestricted sprawl) prevent neighbouring towns merging,(This Greenbelt lands plays important role in identity of Elton, starling, woolfold and walshaw and the distinction between these areas is underpinned by this land) safeguard countryside from encroachment(development undermines this), to assist in urban regeneration by encouraging use of derelict land (this section can not be overstated and should be emphasised. There are a large number of brownfield sites that could be utilised across greater Manchester, development here would undermine the whole concept of regeneration from brownfield sites) this plan has failed entirely to justify greenbelt use when there has been no thorough investigation of utilising and regenerating alternative sites. This should be exhaustively investigated before any consideration is given to greenbelt release.</p> <p>The plan is not consistent with national policy and greenbelt assessment accepts there would be a moderate harm to greenbelt- exceptional circumstances not evidenced.</p> <p>Not sufficient evidence other sites have been fully explored and tested.</p> <p>No evidence plan accords with national policy, infrastructure, through road, major public transport investment, health, retail, school contribution, biodiversity net gain, reduced flood risk through SUDS, - no evidence this is deliverable on this site. on a very real practical level, the local high school, Elton, is hugely oversubscribed, 175 students not offered a place in 2021, furthest distance offered 0.352. Children who already live on outer edge of this area can not attend the school they live in closest proximity to. building in this area will oust from children from their local school, there is insufficient provision and alternatives, the new build in Radcliffe, is required for the children who live in that town already. There is no feasible plan in place for the 175 additional secondary school children and 263 primary school children who are projected to move to the area under this plan.</p> <p>Land is in multiple ownership, no evidence land agreements in place between owners.</p> <p>Part of land falls within special landscape area, heritage assets will be harmed.</p>

Ground report notes potential contamination, insufficient investigation as to suitability of land, which could render site unviable.

The development will have a huge impact on the highways, which already struggle to cope with current level of local traffic from Walshaw/ lowercroft, this would gridlock current road network, significantly increase pollution and compromise road safety, lowercroft road is already unsafe for pedestrians. There is no evidence of the off site highways work required. The site is not close to motorway network resulting in additional traffic crossing the borough to reach access the motorway network.

No planning application has been submitted on the site, no detail work up scheme and achievability has not been evidenced.

No evidence the site can deliver the number of dwellings required over the plan period based on build rates for developers.

The Walshaw site only meets one criteria for site selection - vague criteria -would address major local problem, the major local problem to be identified is the traffic infrastructure, this is a circular argument, without the additional development there is no major issue to addresses.

Site only meets 3 out of 10 of the board objectives, 1, 5 and 6, these could be satisfied by any other site

Walshaw site makes strong or moderate to strong contribution to purpose of the greenbelt in each of the areas of GM greenbelt assessment 2016 site allocation topic paper JPA 9 Walshaw pages 27-28 para 15.3

The above raises significant issues regarding justification of this site; the size of the site has taken priority over well-being of the community

Legality

Failure to comply with community involvement statement throughout. No call to residents to initial call for sites, low spend on making residents aware when compared to effect upon residents. Use of misleading statements to promote the plan, information provided in isolation without reference to wider plan given a veneer of a lesser impact on the borough as a whole,

Lack of transparency ,with residents having to undertake their own research on the plans.

The accessibility of the information to the whole community and to respond to this consultation is unacceptable. A large number of residents are precluded from replying, the information is verbose, difficult to understand, requires research of the plans before a comment on legality and soundness of plan can be responded to. The elderly, those lacking access to the internet, those with any level of learning difficulty have effectively been precluded from responding, artificially bolstering the local authority's position. There is a significant inequality of arms between residents and the Greater Manchester combined authority. I have spent four hours completing this, vast majority of residents who object to this plan will not have time or the wherewithal to respond to this consultation.

Greenbelt protection as referenced above equally applies to legality as well as soundness.

Failure to carry out independent ecological assessment; assessment carried out by developers represent a significant conflict of interest and are not impartial the true impact on the local nature and wildlife has not been properly determined.

The plan proposes employment on the opposite side of the borough to this site allocation. There is no direct public transport route nor is one proposed , travel by car is the most likely outcome, increasing carbon emissions - according to article in bury times several of the roads in the borough (October 2018)are already the most polluted in greater Manchester. The proposed new link road would not ameliorate this problem. This undermines carbon

change and carbon neutral policy, Hundreds of additional motor vehicles will have to cross from one side of the borough to the other daily, affecting not only this site but the carbon emission"s for the whole borough.

Government guidance is clear that standard housing methodology is a starting point and can be changed in exceptional circumstances, this has now been explored fully, brownfield site exploration has not been exhausted. Bury council are only applying this to their own developments and states they have no control over other developers, despite the fact the council have to agree to the release of the greenbelt land and should do so in line with the national police NPPF 134 para c.

Loss of greenbelt policy should not be offset by offering extensive yet unusable greenbelt in other areas, when the the council have not in the first instance satisfied the exceptional circumstances exists for the release of the current greenbelt.

Based on all the above this plan there are significant legality and soundness issues and I object to the plan in the strongest possible terms and submit this land is not suitable, achievable or deliverable.

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

Remove this site from - Walshaw, from the plan and embark on full exploration of regeneration of brownfield sites and smaller scale developments which are deliverable.