

<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	Other Comments
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	RECLASSIFIED
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	RECLASSIFIED
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	Our Vision
<b>Type</b>	Web

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<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>It is questionable whether this plan and the GMSF can effectively be treated as the same plan. While the GMSF may have been established as legally compliant, the legality of the PfE has not been established. In Bury there has been a substantial difference in dwellings in numerical terms, therefore both plans cannot be treated the same. Therefore, until proven otherwise, the plan must be considered illegal and not put to Government.</p> <p>The PfE uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.</p> <p>There has been very poor public consultation and, particularly in Bury, a lack of accessible information and little spent by councils in generating awareness.</p>
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	In my opinion this plan should go back to Regulation 18 of the Town and Country planning act and be positively prepared with proper public engagement and consultation.
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	Our Strategic Objectives
<b>Type</b>	Web
<b>Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:</b>	<ol style="list-style-type: none"> <li>1. Meet our housing need</li> <li>2. Create neighbourhoods of choice</li> <li>3. Ensure a thriving and productive economy in the districts involved</li> <li>4. Maximise the potential arising from our national and international assets</li> <li>5. Reduce inequalities and improve prosperity</li> <li>6. Promote the sustainable movement of people, goods and information</li> <li>7. Ensure that districts involved are more resilient and carbon neutral</li> <li>8. Improve the quality of our natural environment and access to green spaces</li> <li>9. Ensure access to physical and social infrastructure</li> <li>10. Promote the health and wellbeing of communities</li> </ol>

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<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	NA
<b>Soundness - Consistent with national policy?</b>	NA
<b>Soundness - Effective?</b>	NA
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>By building thousands of houses on precious greenbelt land, the health and wellbeing of those communities will be adversely affected; I consider this to be unsound. It was well proven during the pandemic that access to green spaces was vital to help the country come through the worst time in a generation. Green spaces and natural elements boost people"s mental health at a time where a crisis is looming.</p> <p>How can the PfE possibly "Improve the quality of our natural environment and access to green spaces" when the plan is intent on destroying them and replacing with bricks and mortar ?</p>
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	Councils should be legally bound to regenerate town centres and use all the brownfield sites before taking the easy option of destroying our precious countryside.
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	Our Spatial Strategy
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not</b>	GMCA made the decision to move an ill-prepared plan forward to the publication stage of the Town and Country planning Act even though significant amendments were made to the plan since the last round of consultation. This means the plan has changed in a major way and thus

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<b>to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	requires going back to proper consultation for those residents directly affected to comment further.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	As above, the PfA needs to go back to the residents of Greater Manchester for the proper consultation.
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-Strat 1 Core Growth Area
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-Strat 2 City Centre
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No

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<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-Strat 3 The Quays
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-Strat 4 Port Salford
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-Strat 5 Inner Areas
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No

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<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-Strat 6 Northern Areas
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-Strat 7 North East Growth Corridor
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-Strat 8 Wigan Bolton Growth Corridor
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound

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<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-Strat 9 Southern Areas
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-Strat 10 Manchester Airport
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-Strat 11 New Carrington
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound

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<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-Strat 12 Main Town Centres
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-Strat 13 Strategic Green Infrastructure
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-Strat 14 A Sustainable and Integrated Transport Network



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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	Richardson
Given Name	Janine
Person ID	1287172
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	Richardson
Given Name	Janine
Person ID	1287172
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	Richardson
Given Name	Janine

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<b>Person ID</b>	1287172
<b>Title</b>	JP-S 6 Clean Air
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-H 1 Scale Distribution and Phasing of New Housing Development
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-H 2 Affordability of New Housing
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No

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<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-H 3 Type Size and Design of New Housing
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-H 4 Density of New Housing
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-G 1 Valuing Important Landscapes
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No

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<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-G 2 Green Infrastructure Network
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-G 5 Uplands
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-G 6 Urban Green Space
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound

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<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-G 8 Standards for Greener Places
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-G 9 A Net Enhancement of Biodiversity and Geodiversity
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-G 10 Green Belt
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound

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<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-G 11 Safeguarded Land
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JPA 1.1 Heywood / Pilsworth (Northern Gateway)
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JPA 1.2: Simister and Bowlee (Northern Gateway)

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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
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	Bury Council have failed to comply with their Statement of Community Involvement Statement of Community Involvement at all stages of the creation of the plan. There was no notification to residents of the initial call for sites and the amount spent on making residents aware of the plan is disproportionately small (£100 as per the response to a Freedom of Information request) in comparison to the effect it will have upon them. There has been a deliberate campaign of misinformation and misleading statements to promote and sell the Plan to residents, rather than a presentation of the facts. There has been an over reliance on residents finding things out for themselves on social media and websites and thus a failure to engage with various groups due to over reliance on the use of social media and technology.
Family Name	Richardson
Given Name	Janine
Person ID	1287172
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
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	Wildlife, flood risk and other surveys have been carried out by consultancies on behalf of and paid for by developers rather than independent wildlife organisations or the Department of the Environment so must be considered as potentially biased. This is particularly important at Elton Reservoir as there are currently problems with the reservoir wall which are being addressed by the Canal and Rivers trust. These measures may be suitable for providing some protection to open fields but they are not suitable to protect homes from flooding. Surveys should be entirely independent of developer influence. Paragraph 11.105 p 264 states: " The allocation [Elton Reservoir] is almost entirely surrounded by the existing urban area" Filling this green belt site in

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	will contribute to creating urban sprawl contrary to compliance with National Policy NPPF paragraph 134 parts a,c and e.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	I consider the removal of JPA 7 allocation Elton Reservoir from the plan to be a necessary modification.
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JPA 8: Seedfield
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JPA 9: Walshaw
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not</b>	There has been no evidence of the existence of exceptional circumstances to justify the alteration of the greenbelt boundaries to allow building on the Walshaw allocation as is required by the NPPF, para 140. Housing need is not an exceptional circumstance to justify the release of greenbelt.



<p><b>to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	<p>Government guidance states that housing need is not a target but merely a starting point and figures can be mitigated upwards or downwards according to local circumstances, eg lack of brownfield, economic shock (Brexit, Covid-19).</p> <p>To prove that exceptional circumstances to justify alteration to greenbelt boundaries exist, the NPPF requires evidence that all other reasonable options to meet identified need have been considered (NPPF para 141). This must include maximising use of brownfield and underutilised sites and maximising density.</p> <p>The Housing Need Assessment was carried out by Arc4, who were supposed to carry out a non-biased survey of housing need. However, they have a partnership with Greater Manchester Housing Partnership, an organisation of housing associations, including Six Town Housing in Bury. The assessment was therefore not impartial.</p> <p>The site selection process for Bury has been especially opaque. Little information has been given about why other more apparently suitable sites were rejected, or what alternatives were considered. Bury Council admitted in a Freedom of Information response that site selection was decided at a series of informal meetings with no list of attendees or minutes available. This site choice cannot be justified as the most appropriate when no reasonable alternatives appear to have been examined. Alternative options were ruled out too early or were not considered despite other areas having direct motorway access or being situated nearer to employment sites.</p> <p>In addition, the Walshaw site performs poorly against site selection criteria and strongly against greenbelt assessment criteria. Therefore the inclusion of the Walshaw site cannot be justified:</p> <p>The Walshaw site only met one of the criteria for site selection, namely the most general and vague criteria, Criteria 7, land that would deliver significant local benefits by addressing a major local problem (Site Allocation Topic Paper JPA 9 Walshaw pg 8, para 5.4). The only major local problem identified in Walshaw is the extra traffic that will be created by the proposed 1250 new houses. Without the houses, there is not a major problem and the infrastructure proposed would not be needed. This is essentially a cyclical argument and not a specific justification for the inclusion of the site.</p> <p>The proposed new road link will not ease traffic and will potentially create further congestion. As per the Transport Locality Assessments GMSF 2020, the map at page B9, figure 3 shows that the road will start from a mini roundabout on a narrow residential road, cross a busy main road, enter onto Lowercroft Road at Dow Lane where the road is steep and very narrow (barely wide enough for two cars to pass safely). The road will be sending traffic to all of the same pinch points this side of the Irwell. It will exacerbate congestion on local roads, which are already highly congested. No account has been taken of the additional traffic which will be produced at the Andrews housing development site just down the road from the Walshaw allocation.</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>Removal of JPA 9 Walshaw from the plan</p>
<p><b>Family Name</b></p>	<p>Richardson</p>

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<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-D1 Infrastructure Implementation
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	Due to the size of the greenbelt sites allocated within the plan it is highly unlikely that the infrastructure can be provided in good time to bring these sites forward within the plan period. This would make the plan undeliverable within the plan period hence making it unsound.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	Smaller sites should be considered that would come forward faster like brownfield sites that already have substantial infrastructure provided close by.
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	JP-D2 Developer Contributions
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No

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<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	It is very well documented that once a site is approved for development it can be reviewed at a later date with a viability assessment. Local councils have very little control after a site has been approved for houses and it is common practice for a developer to change the number of homes on the site, density, type and number that are classed as affordable. In some extreme cases a developer can state inflated development costs and no section 106 payments will come forward.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	Local council authorities need to enter into more housing partnership projects and develop the land they own instead of selling it and losing control. Salford Council has now created it's own housing building company that will deliver affordable homes on land they own and other councils should follow suit.
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	Bury - Green Belt Additions
<b>Type</b>	Web
<b>GBA Bury - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below</b>	<p>Bury GBA03 Pigs Lea Brook 1</p> <p>Bury GBA04 North of Nuttall Park</p> <p>Bury GBA05 Pigs Lea Brook 2</p> <p>Bury GBA06 Hollins Brook</p> <p>Bury GBA07 Off New Road, Radcliffe</p> <p>Bury GBA08 Hollins Brow</p> <p>Bury GBA09 Hollybank Street, Radcliffe</p> <p>Bury GBA10 Crow Lumb Wood</p> <p>Bury GBA11 Nuttall West, Ramsbottom</p> <p>Bury GBA12 Woolfold, Bury</p> <p>Bury GBA13 Nuttall East, Ramsbottom</p> <p>Bury GBA14 Chesham, Bury</p> <p>Bury GBA15 Broad Hey Wood North</p> <p>Bury GBA16 Lower Hinds</p>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound

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<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	A lot of the new greenbelt additions are currently not viable for building. This is simply an exercise to take away the protection of greenbelt from useable open greenspaces and apply them elsewhere in the borough to give the impression that the overall net greenbelt percentage loss is less.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	Leave the greenbelt boundaries unchanged and present the true loss of greenbelt land in any further proposals. Stop destroying our countryside.
<b>Family Name</b>	Richardson
<b>Given Name</b>	Janine
<b>Person ID</b>	1287172
<b>Title</b>	Supporting Evidence
<b>Type</b>	Web
<b>Redacted comment on supporting documents - Please give details of why you consider any of the evidence not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	There are no details of how Duty to Cooperate will be achieved. Following their withdrawal Stockport will effectively become a neighbouring borough. However, it is not acceptable to limit neighbouring boroughs to Stockport since each of the authorities in the plan is also neighbouring to other authorities outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn with Darwen, Wigan neighbours St Helens and Trafford neighbours Cheshire area.  The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.