

Places for Everyone Representation 2021

Family Name	Royle
Given Name	Harry
Person ID	1287083
Title	Stakeholder Submission
Type	Web
Family Name	Royle
Given Name	Harry
Person ID	1287083
Title	JPA 35: North of Mosley Common
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
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.	There has already been a substantial amount of houses built in the area over the past few years. The area already struggles with substantial traffic and the schools are always full. The proposed plan would only further these issues. The amount of fields and outdoor spaces to exercise us already been reduced massively and the area cannot afford to lose anymore of this precious Greenland.

Family Name	Ruddock
Given Name	Susan
Person ID	1287415
Title	Stakeholder Submission
Type	Web
Include files	PFE1287415_EltonObjection.pdf PFE1287415_SOSElton.pdf PFE1287415_SOSGeneralLegality.pdf
Family Name	Ruddock
Given Name	Susan
Person ID	1287415
Title	Our Vision
Type	Web
Include files	PFE1287415_SOSElton.pdf PFE1287415_SOSGeneralLegality.pdf PFE1287415_EltonObjection.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>-The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid19 on work patterns.</p> <p>-There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local publicity. Public consultations should be repeated, providing clear, understandable information and materials designed to encourage rather than discourage public input.</p> <p>-Several of the authorities involved have consistently failed to meet housing delivery targets. A plan must be deliverable. The plan relies on the cooperation of property developers and a clear indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on its targets. Clear delivery plans for infrastructure should be included.</p> <p>-The site selection process has been opaque with no explanation as to why some sites were excluded from the plan. https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with the public should be held and minutes should be published. The rationale for the selection/rejection of sites should be available including considered alternatives.</p> <p>-There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid for.</p>

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

-The site selection process has been opaque with no explanation as to why some sites were excluded from the plan.
https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public should be held and minutes should be published. The rationale for the selection/rejection of sites should be available including considered alternatives.

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

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

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

-A change in the methodology for Manchester City Council was resulted in a 35% up in the number of brownfield sites in the Manchester City Council area. See Places for Everyone Joint Committee documents for 2021, author Paul Dennett, Page 7 section 2.2 (ii)
https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021
 This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.

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

<p>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</p>	<p>A judicial review to determent the legality of Places for Everyone.</p> <p>A full ecological/bio-diversity examination by an independent environment consultant</p> <p>Detailed information of the total brownfield sites being used and how many dwellings are planned on brownfield sites as brownfield sites first are on the agenda.</p> <p>Details of the meetings held to determine which sites were chosen (it has been stated that these meetings were informal and not minuted. This surely makes this process invalid)</p> <p>No value has been put on the cost of the houses planned to be built therefore no indication of affordable housing. Are there plans for building social housing? These would be a priority.</p> <p>Insufficient public consultation and acknowledgement of objection groups.</p>
<p>Family Name</p>	<p>Ruddock</p>
<p>Given Name</p>	<p>Susan</p>
<p>Person ID</p>	<p>1287415</p>
<p>Title</p>	<p>Our Strategic Objectives</p>
<p>Type</p>	<p>Web</p>
<p>Include files</p>	<p>PFE1287415_EltonObjection.pdf PFE1287415_SOSElton.pdf</p>

[PFE1287415_SOSGeneralLegality.pdf](#)

<p>Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:</p>	<ol style="list-style-type: none"> 1. Meet our housing need 2. Create neighbourhoods of choice 3. Ensure a thriving and productive economy in the districts involved 4. Maximise the potential arising from our national and international assets 5. Reduce inequalities and improve prosperity 6. Promote the sustainable movement of people, goods and information 7. Ensure that districts involved are more resilient and carbon neutral 8. Improve the quality of our natural environment and access to green spaces 9. Ensure access to physical and social infrastructure 10. Promote the health and wellbeing of communities
<p>Soundness - Positively prepared?</p>	<p>NA</p>
<p>Soundness - Justified?</p>	<p>Unsound</p>
<p>Soundness - Consistent with national policy?</p>	<p>NA</p>
<p>Soundness - Effective?</p>	<p>NA</p>
<p>Compliance - Legally compliant?</p>	<p>No</p>
<p>Compliance - In accordance with the Duty to Cooperate?</p>	<p>No</p>
<p>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>	<p>Places for Everyone has yet to be declared legal. It has changed in various ways since out of the Greater Manchester Spatial Framework.</p> <p>There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid for.</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and take into account the effect of Covid19 on work patterns.</p> <p>No partners or industries have been defined nor the number of jobs that will be available.</p> <p>Places for Everyone, under the current plan, looks to build on land in Radcliffe and Bury West. To reach the proposed industrial/business sites people will have to travel from above mentioned areas through Bury East which already becomes gridlocked at busy times.</p> <p>Businesses are operating differently since Covid19 and many more employees are working from home reducing the necessity for large office buildings.</p> <p>Following Covid19 when there were many deaths in Bury has there been a study to assess how it affected the population of Bury and therefore the number of houses needed as the population has fallen from the pandemic. Brexit should also be considered.</p>
<p>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</p>	<p>A review of Places for Everyone and it's legality.</p> <p>How the movement of people from Radcliffe and Bury West will affect the infrastructure of Bury East as they travel to the Northern Gateway.</p> <p>An increase in housing means an increase in population of both adults and children in senior school ages. As most of our schools are full what are the plans for including schools to cope with the additional children and provide education within easy reach of their homes?</p> <p>How is the infrastructure to be financed and by whom.</p> <p>Elton and Within's reservoirs are places of high conservation, ecological and bio-diversity with many endangered species in the areas. They are also recreational places for the public in Bury. Disturbing these habitats would be fatal to the wildlife and plant population and</p>

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	<p>important green space for our residents especially those without transport. A new and ecological and bio-diversity study should be implemented before planning is permitted.</p> <p>Places for Everyone shows removal of greenbelt protection for some areas and creation in others. There is no proof of exceptional circumstances required in the National Planning Framework to justify this</p>
Family Name	Ruddock
Given Name	Susan
Person ID	1287415
Title	JPA 7: Elton Reservoir Area
Type	Web
Include files	PFE1287415_SOSElton.pdf PFE1287415_SOSGeneralLegality.pdf PFE1287415_EltonObjection.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Following the decision of Stockport to opt out of the GMSF leaving the other 9 towns in Manchester with a plan that could not be complied with. PfE was formed as the new plan. PfE be acceptable without a re-write of it's aims and purposes. GMSF may have been acceptable with Regulation 18 of the Town and Country Planning regulations and probably be acceptable at the final consultation stage under regulation 19. With Regulation 18 of the Town and Country Planning regulations PfE legality has not been established and should be examined to see if there is a substantial difference in scope between the GMSF and PfE. It cannot be assumed that the plan is automatically satisfied for PfE. Para 1.23 states "The changes made between GMSF and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen a significant change." So, is "not insignificant" the same as "substantial", if it is, the plan is not legally compliant and should be established by a judicial review. So until proven otherwise the plan must be considered unsound and not put to Government.</p> <p>After the demise of GMSF and if an environmental survey had been done for Elton the plan would have changed. Also, with the pandemic of last year and the further extremes of weather the plan would have changed and there should be a new environmental/bio-diversity plan for PfE.</p> <p>Why was Elton and the reservoir environs chosen as a suitable building site. What were the reasons for choosing this site rather than other sites in the borough. Where are the minutes from the meeting of Bury MBC explaining how they came to choose this site. If building is allowed it will be up with an urban sprawl with no green spaces to benefit the residents of Bury, Radcliffe and Elton.</p> <p>The figures being used are from 2014, some 7 years ago. This cannot be sound as significant changes have occurred in the last 7 years .</p>
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect	<p>There should be proper judicial review to establish the legality of PfE and Elton environment plan.</p> <p>Building of houses will disturb and kill many endangered species that have been found in the area since the pandemic and beyond.</p>

of any legal compliance or soundness matters you have identified above.	
Family Name	Ruddock
Given Name	Susan
Person ID	1287415
Title	JPA 9: Walshaw
Type	Web
Include files	PFE1287415_EltonObjection.pdf PFE1287415_SOSElton.pdf PFE1287415_SOSGeneralLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No

Places for Everyone Representation 2021

Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-Strat 13 Strategic Green Infrastructure
Type	Web
Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-Strat 14 A Sustainable and Integrated Transport Network
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-S 1 Sustainable Development

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Type	Web
Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	For sustainable development, please see the following supporting evidence documents and read them in full. 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
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.	For sustainable development, please see the following supporting evidence documents and read them in full. 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-S 2 Carbon and Energy
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound

Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Simply by over building against inflated 2014 housing figures we are using much more energy than is required and contributing to a higher carbon footprint for Greater Manchester.</p> <p>For carbon and energy, please see the following supporting evidence documents uploaded to the consultation point in full.</p> <ol style="list-style-type: none"> 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	<p>Use the latest available government and ONS figures to reduce the housing initial "starting point" and look at the housing need not try to justify higher starting figures.</p> <p>For carbon and energy, please see the following supporting evidence documents uploaded to the consultation point in full.</p> <ol style="list-style-type: none"> 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-S 4 Resilience
Type	Web
Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No

Places for Everyone Representation 2021

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.	For resilience, please see the following supporting evidence documents uploaded and read them in full. 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
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.	For resilience modifications especially flood risk and over building in uncertain economic conditions, please see the following supporting evidence documents uploaded and read them in full. 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-S 5 Flood Risk and Water Environment
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	For flood risk over building especially in Walshaw will take away the natural water so create greater flooding towards Bury centre, namely Scobell Street, please see the following supporting evidence documents uploaded and read them in full. 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Redacted modification - Please set out the	Remove Walshaw JP9 allocation from the plan and distribute more smaller sights across the area. Please see the following supporting evidence documents uploaded and read them in full.

Places for Everyone Representation 2021

modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	<p>1) General Legality and soundness.pdf</p> <p>2) Walshaw specific Legality and soundness.pdf</p> <p>3) Walshaw Allocation JP9 Further Legality and Soundness.pdf</p> <p>4) Chris_Russell_GMSF Objection 2020.pdf</p> <p>5) Elton specific Legality and soundness.pdf</p>
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-S 6 Clean Air
Type	Web
Include files	<p>PFE1287396_TemplateResponse.pdf</p> <p>PFE1287396_SOSWalshaw.pdf</p> <p>PFE1287396_Letter_Redacted.pdf</p> <p>PFE1287396_SOSElton.pdf</p> <p>PFE1287396_SOSLegality.pdf</p>
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>Specifically for the Walshaw JP9 allocation the level of pollution at the intersections around allocation site JP9 will cause congestion and serious health issues. The proposal of a allocation will not aid the intersection pinch points especially Bury Bridge. The possible service would still have to cross the pinch points along with almost 2500 new cars.</p> <p>Please see the following supporting evidence documents uploaded and read them in</p> <p>1) General Legality and soundness.pdf</p> <p>2) Walshaw specific Legality and soundness.pdf</p> <p>3) Walshaw Allocation JP9 Further Legality and Soundness.pdf</p> <p>4) Chris_Russell_GMSF Objection 2020.pdf</p> <p>5) Elton specific Legality and soundness.pdf</p>
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	<p>Remove Walshaw JP9 allocation from the plan and distribute more smaller sights across causing less impact on the pinch points around the site.</p> <p>Please see the following supporting evidence documents uploaded and read them in</p> <p>1) General Legality and soundness.pdf</p> <p>2) Walshaw specific Legality and soundness.pdf</p> <p>3) Walshaw Allocation JP9 Further Legality and Soundness.pdf</p> <p>4) Chris_Russell_GMSF Objection 2020.pdf</p> <p>5) Elton specific Legality and soundness.pdf</p>

Places for Everyone Representation 2021

Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-S 7 Resource Efficiency
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Specifically for the Walshaw JP9 allocation the level of congestion due to increased due to inadequate public transport in this particular allocation. The proposal of a road allocation will not aid the intersection pinch points especially Bury Bridge. The possible service would still have to cross the pinch points along with almost 2500 new cars, the for a tram service or fast connections to the Bury interchange meaning travel times a commuting sensibly.</p> <p>Please see the following supporting evidence documents uploaded and read them in</p> <ol style="list-style-type: none"> 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	<p>Remove Walshaw JP9 allocation from the plan and distribute more smaller sights across causing less impact on the pinch points around the site. Develop closer to the proposed and new employment sites.</p> <p>Please see the following supporting evidence documents uploaded and read them in</p> <ol style="list-style-type: none"> 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-J 1 Supporting Long Term Economic Growth
Type	Web

Places for Everyone Representation 2021

Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Please see the following supporting evidence documents uploaded and read them in</p> <ol style="list-style-type: none"> 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	<p>Please see the following supporting evidence documents uploaded and read them in</p> <ol style="list-style-type: none"> 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-J 2 Employment Sites and Premises
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound

Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Please see the following supporting evidence documents uploaded and read them in 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
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.	Please see the following supporting evidence documents uploaded and read them in 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-J 3 Office Development
Type	Web
Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant,	Please see the following supporting evidence documents uploaded and read them in 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf

Places for Everyone Representation 2021

is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
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.	Please see the following supporting evidence documents uploaded and read them in 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-J 4 Industry and Warehousing Development
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Please see the following supporting evidence documents uploaded and read them in 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
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	Please see the following supporting evidence documents uploaded and read them in 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf

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or soundness matters you have identified above.	
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Type	Web
Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Please see the following supporting evidence documents uploaded and read them in 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
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.	Please see the following supporting evidence documents uploaded and read them in 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-H 2 Affordability of New Housing
Type	Web
Include files	PFE1287396_SOSLegality.pdf

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	PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Please see the following supporting evidence documents uploaded and read them in</p> <ol style="list-style-type: none"> 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	<p>Please see the following supporting evidence documents uploaded and read them in</p> <ol style="list-style-type: none"> 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-H 3 Type Size and Design of New Housing
Type	Web
Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound

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Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Please see the following supporting evidence documents uploaded and read them in 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
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.	Please see the following supporting evidence documents uploaded and read them in 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-H 4 Density of New Housing
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to	Please see the following supporting evidence documents uploaded and read them in 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf

comply with the duty to co-operate. Please be as precise as possible.	5) Elton specific Legality and soundness.pdf
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.	Please see the following supporting evidence documents uploaded and read them in 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-G 1 Valuing Important Landscapes
Type	Web
Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Please see the following supporting evidence documents uploaded and read them in 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
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	Please see the following supporting evidence documents uploaded and read them in 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf

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you have identified above.	
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-G 2 Green Infrastructure Network
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Moving greenbelt boundaries to suit developers is not justifiable without exceptional circumstances to justify alteration. Walshaw allocation JP9 does not have any justifiable exceptional circumstances to justify being removed from the greenbelt protection. Please see the following supporting evidence documents uploaded and read them in order: 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
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 Walshaw allocation JP9 from the plan and distribute allocation to brownfield sites at strategic locations with infrastructure and transport links. Please see the following supporting evidence documents uploaded and read them in order: 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-G 6 Urban Green Space
Type	Web

Places for Everyone Representation 2021

Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Moving greenbelt boundaries to suit developers is not justifiable without exceptional circumstances to justify alteration. Walshaw allocation JP9 does not have any justifiable exceptional circumstances to justify being removed from the greenbelt protection. The urban green space will be completely removed from the current local area and require travel to get to urban green space under the plan.</p> <p>Please see the following supporting evidence documents uploaded and read them in full:</p> <ol style="list-style-type: none"> 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	<p>Remove Walshaw allocation JP9 from the plan and distribute allocation to brownfield sites and strategic locations with infrastructure and transport links. Protect its current green urban space.</p> <p>Please see the following supporting evidence documents uploaded and read them in full:</p> <ol style="list-style-type: none"> 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-G 10 Green Belt
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound

Places for Everyone Representation 2021

Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
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>National Planning Policy Framework greenbelt protection clauses</p> <p>The purpose of the NPPF greenbelt protection is to prevent urban sprawl. Para 11.1 of the PfE states of the Walshaw allocation,</p> <p>"This is an extensive area of land □□ set entirely within the existing urban area. The site is bounded by the urban areas of Tottington to the north, Woolfold and Elton to the east and the south and Walshaw to the west."</p> <p>Filling in this green belt site will create an urban sprawl contrary to NPPF para 137 and 138 and e.</p> <p>There has been no evidence of the existence of exceptional circumstances to justify the release of greenbelt boundaries to allow building on the Walshaw allocation as is required by NPPF para 140. Housing need is not an exceptional circumstance to justify the release of greenbelt boundaries. NPPF guidance states that housing need is not a target but merely a starting point and figures should be set upwards or downwards according to local circumstances, eg lack of brownfield, economic recovery (Covid-19).</p> <p>To prove that exceptional circumstances to justify alteration to greenbelt boundaries exist requires evidence that all other reasonable options to meet identified need have been exhausted (NPPF para 141). This must include maximising use of brownfield and underutilised sites and increasing density.</p> <p>Please see the following supporting evidence documents uploaded and read them in full:</p> <ol style="list-style-type: none"> 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	<p>Remove Walshaw allocation JP9 from the plan and distribute allocation to brownfield sites and strategic locations with infrastructure and transport links. Protect its current greenbelt.</p> <p>Please see the following supporting evidence documents uploaded and read them in full:</p> <ol style="list-style-type: none"> 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-P6 Health
Type	Web
Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_Letter_Redacted.pdf

Places for Everyone Representation 2021

	PFE1287396_SOSElton.pdf PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Specifically Walshaw allocation JP9 will suffer from a greater risk of health problems and congestion increasing the time to get to emergency services across Bury.</p> <p>Please see the following supporting evidence documents uploaded and read them in</p> <ol style="list-style-type: none"> 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	<p>Remove Walshaw allocation JP9 from the plan and distribute allocation to brownfield strategic locations with infrastructure and transport links. Provide medical infrastructure side of the Bury.</p> <p>Please see the following supporting evidence documents uploaded and read them in</p> <ol style="list-style-type: none"> 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-C1 An Integrated Network
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound

Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Specifically for the Walshaw JP9 allocation the level of congestion due to increased due to inadequate public transport in this particular allocation. The proposal of a road allocation will not aid the intersection pinch points especially Bury Bridge. The possible service would still have to cross the pinch points along with almost 2500 new cars, the for a tram service or fast connections to the Bury interchange meaning travel times a commuting sensibly.</p> <p>Please see the following supporting evidence documents uploaded and read them in</p> <ol style="list-style-type: none"> 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	<p>Remove Walshaw JP9 allocation from the plan and distribute more smaller sights across causing less impact on the pinch points around the site. Develop closer to the proposed and new employment sites.</p> <p>Please see the following supporting evidence documents uploaded and read them in</p> <ol style="list-style-type: none"> 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-C3 Public Transport
Type	Web
Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No

<p>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>	<p>Specifically for the Walshaw JP9 allocation the level of congestion due to increased due to inadequate public transport in this particular allocation. The proposal of a road allocation will not aid the intersection pinch points especially Bury Bridge. The possible service would still have to cross the pinch points along with almost 2500 new cars, the for a tram service or fast connections to the Bury interchange meaning travel times a commuting sensibly.</p> <p>Please see the following supporting evidence documents uploaded and read them in</p> <ol style="list-style-type: none"> 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
<p>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</p>	<p>Remove Walshaw JP9 allocation from the plan and distribute more smaller sights across causing less impact on the pinch points around the site. Develop closer to the proposed and new employment sites.</p> <p>Please see the following supporting evidence documents uploaded and read them in</p> <ol style="list-style-type: none"> 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf
<p>Family Name</p>	<p>Russell</p>
<p>Given Name</p>	<p>Christopher</p>
<p>Person ID</p>	<p>1287396</p>
<p>Title</p>	<p>JP-C7 Transport Requirements of New Developments</p>
<p>Type</p>	<p>Web</p>
<p>Include files</p>	<p>PFE1287396_SOSLegality.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf</p>
<p>Soundness - Positively prepared?</p>	<p>Unsound</p>
<p>Soundness - Justified?</p>	<p>Unsound</p>
<p>Soundness - Consistent with national policy?</p>	<p>Unsound</p>
<p>Soundness - Effective?</p>	<p>Unsound</p>
<p>Compliance - Legally compliant?</p>	<p>No</p>
<p>Compliance - In accordance with the Duty to Cooperate?</p>	<p>No</p>
<p>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</p>	<p>Specifically for the Walshaw JP9 allocation the level of congestion due to increased due to inadequate public transport in this particular allocation. The proposal of a road allocation will not aid the intersection pinch points especially Bury Bridge. The possible service would still have to cross the pinch points along with almost 2500 new cars, the for a tram service or fast connections to the Bury interchange meaning travel times a commuting sensibly.</p> <p>Please see the following supporting evidence documents uploaded and read them in</p>

Places for Everyone Representation 2021

<p>co-operate. Please be as precise as possible.</p>	<p>1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf</p>
<p>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</p>	<p>Remove Walshaw JP9 allocation from the plan and distribute more smaller sights across the site causing less impact on the pinch points around the site. Develop closer to the proposed employment sites and new employment sites.</p> <p>Please see the following supporting evidence documents uploaded and read them in full:</p> <p>1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf 5) Elton specific Legality and soundness.pdf</p>
<p>Family Name</p>	<p>Russell</p>
<p>Given Name</p>	<p>Christopher</p>
<p>Person ID</p>	<p>1287396</p>
<p>Title</p>	<p>JPA 7: Elton Reservoir Area</p>
<p>Type</p>	<p>Web</p>
<p>Include files</p>	<p>PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSLegality.pdf</p>
<p>Soundness - Positively prepared?</p>	<p>Unsound</p>
<p>Soundness - Justified?</p>	<p>Unsound</p>
<p>Soundness - Consistent with national policy?</p>	<p>Unsound</p>
<p>Soundness - Effective?</p>	<p>Unsound</p>
<p>Compliance - Legally compliant?</p>	<p>No</p>
<p>Compliance - In accordance with the Duty to Cooperate?</p>	<p>No</p>
<p>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>	<p>Please see the following supporting evidence documents uploaded and read them in full:</p> <p>1) General Legality and soundness.pdf 2) Elton specific Legality and soundness.pdf</p> <p>Legal Compliance</p> <p>-It is questionable whether PfE and the GMSF can effectively be treated as the same plan. This question must be decided in court before "Places for Everyone" can proceed any further. It is a difficult transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant (in accordance with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if it was established. If there is any substantial difference in scope between the GMSF and PfE, it is not assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a significant number of the plan have seen some form of change." So, is "not insignificant" the same as "substantial"?</p>

plan is not legal. This can only be established by a proper judicial review. So until pro the plan must be considered illegal and not put to Government.

Soundness

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

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

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

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

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

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

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

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

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

-There are no details of how Duty to Cooperate will be achieved. Following their withdrawal, the plan will effectively become a neighbouring borough. However, it is not acceptable to limit the plan to Stockport since each of the authorities in the plan is also neighbouring to areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.

-A change in the methodology for Manchester City Council was resulted in a 35% up in housing need for Manchester City Council area. The revised Local Housing Need methodology states that the need is to be met within the district and not redistributed (see Places for Everyone Joint Consultation documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021) This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.

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 this site allocation from the plan.

Family Name

Russell

Places for Everyone Representation 2021

Given Name	Christopher
Person ID	1287396
Title	JPA 8: Seedfield
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Please see the following supporting evidence documents uploaded and read them in</p> <p>1) General Legality and soundness.pdf</p> <p>Legal Compliance</p> <p>-It is questionable whether PfE and the GMSF can effectively be treated as the same must be decided in court before "Places for Everyone" can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) PfE is established. If there is any substantial difference in scope between the GMSF and PfE it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a new plan have seen some form of change." So, is "not insignificant" the same as "substantially different" the plan is not legal. This can only be established by a proper judicial review. So until proper legal advice is given the plan must be considered illegal and not put to Government.</p> <p>Soundness</p> <p>-The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>-There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid</p> <p>-There are no partners or industries identified for employment provision. Major partners and industries for employment provision should be identified.</p> <p>-There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information and a process designed to encourage rather than discourage public input.</p> <p>-The site selection process has been opaque with no explanation as to why some sites were excluded from the plan. https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public should be repeated.</p>

Places for Everyone Representation 2021

should be held and minutes should be published. The rationale for the selection/rejection should be available including considered alternatives.

-Several of the authorities involved have consistently failed to meet housing delivery targets, a plan must be deliverable. The plan relies on the cooperation of property developers, an indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on targets. Clear delivery plans for infrastructure should be included.

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

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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 this site allocation from the plan.

Family Name

Russell

Given Name

Christopher

Person ID

1287396

Title

JPA 9: Walshaw

Type

Web

Include files

[PFE1287396_TemplateResponse.pdf](#)
[PFE1287396_SOSWalshaw.pdf](#)
[PFE1287396_SOSElton.pdf](#)
[PFE1287396_Letter_Redacted.pdf](#)
[PFE1287396_SOSLegality.pdf](#)

Soundness - Positively prepared?

Unsound

Soundness - Justified?

Unsound

Soundness - Consistent with national policy?

Unsound

Soundness - Effective?

Unsound

Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Please see the following supporting evidence documents uploaded and read them in</p> <ol style="list-style-type: none"> 1) General Legality and soundness.pdf 2) Walshaw specific Legality and soundness.pdf 3) Walshaw Allocation JP9 Further Legality and Soundness.pdf 4) Chris_Russell_GMSF Objection 2020.pdf <p>Legality</p> <p>Failure to comply with Statement of Community Involvement</p> <p>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 was no access to residents of the initial call for sites and the amount spent on making residents aware of the plans disproportionately small (£100 as per the response to a Freedom of Information request) 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 facts eg residents only being told of the plans for their specific ward, and not being informed of the bigger picture across the borough, thus giving the impression that the impact is less than it is. There has been an over reliance on residents finding things out for themselves on social media and thus a failure to engage with various groups due to over reliance on the use of social media technology. There has been no access to public internet, eg in libraries, during Covid. This has disproportionately affected older people and those from deprived backgrounds. This is contrary to the SCI 2.4 & 4.17. Countrywide, Covid restrictions are now lifted but restrictions still remain in Bury's Statement of Community Involvement (SCI para 1.7). Consultations have been conducted in terms of language and terminology used and have been a deterrent to becoming involved in the planning process as they have been wordy, long winded and intrusive, thus producing a low response rate.</p> <p>National Planning Policy Framework greenbelt protection clauses</p> <p>The purpose of the NPPF greenbelt protection is to prevent urban sprawl. Para 11.1 of the NPPF states of the Walshaw allocation,</p> <p>"This is an extensive area of land □□ set entirely within the existing urban area. The site is bounded by the urban areas of Tottington to the north, Woolfold and Elton to the east and Elton to the south and Walshaw to the west."</p> <p>Filling in this green belt site will create an urban sprawl contrary to NPPF para 137 and 138 and e.</p> <p>There has been no evidence of the existence of exceptional circumstances to justify the release of the greenbelt boundaries to allow building on the Walshaw allocation as is required by paragraph 140. Housing need is not an exceptional circumstance to justify the release of greenbelt land. The guidance states that housing need is not a target but merely a starting point and figures should be set upwards or downwards according to local circumstances, eg lack of brownfield, economic conditions (Covid-19).</p> <p>To prove that exceptional circumstances to justify alteration to greenbelt boundaries exist requires evidence that all other reasonable options to meet identified need have been exhausted (NPPF para 141). This must include maximising use of brownfield and underutilised sites and increasing density.</p> <p>Assessments</p> <p>There has been a failure to conduct thorough and independent ecological assessments. The assessments carried out have been done on behalf of developers and are therefore not independent. Flood risk and other surveys have been carried out by consultancies on behalf of and for the benefit of developers rather than entirely independent wildlife organisations or the Department of Environment, Food and Rural Affairs so must be considered potentially biased.</p>

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

Climate change policy and carbon neutral policy

Places for Everyone proposes employment sites on the other side of the borough from the M66 Northern Gateway Corridor, necessitating travel by car as no direct public transport exists or is proposed, thus increasing carbon emissions. Local transport hubs in Bury are accessed from Walshaw by a car journey or an expensive, unreliable and infrequent bus service, thus increasing carbon emissions. The proposed new link road at Walshaw will do nothing to alleviate the roads, simply transferring the problem from one place to another.

Up to date information

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

Soundness

Site Selection

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

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

-The Walshaw site only met one of the criteria for site selection, namely the most general criteria, Criteria 7, land that would deliver significant local benefits by addressing a major local problem (Site Allocation Topic Paper JPA 9 Walshaw pg 8, para 5.4). The only major local problem in Walshaw is the extra traffic that will be created by the proposed 1250 new houses. As there are 1250 houses, there is not a major problem and the infrastructure proposed would not be necessary. This is essentially a cyclical argument and not a specific justification for the inclusion of the Walshaw site.

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

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

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

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

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

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

To prevent neighbouring towns from merging into one another Strong

To assist in safeguarding the countryside from encroachment Moderate-Strong

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

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

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

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

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

Infrastructure

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

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

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

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

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

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

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

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

-Healthcare

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

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

-Education

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

"The Walshaw allocation is expected to yield approximately 263 primary age pupils and 100 secondary age pupils. Current forecasts show both primary and secondary schools in the area are at capacity and therefore all additional demand created would require additional school places."

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

It is proposed that secondary places will merely be funded from "financial contributions 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 V 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 perman 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 maximising 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 hubs residents to travel across Bury to access them. The only improvement to public transport proposed is "a potential upgrade of existing bus services or a new bus service" (PfE public transport route to employment hubs is proposed.

The proposed new road link will not ease traffic and will potentially create further congestion the Transport Locality Assessments GMSF 2020, the map at page B9, figure 3 shows will start from a mini roundabout on a narrow residential road, cross a busy main road Lowercroft Road at Dow Lane where the road is steep and very narrow (barely wide enough for cars to pass safely). The road will be sending traffic to all of the same pinch points through 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 site just down the road from the Walshaw allocation.

Housing delivery targets

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

Housing requirements

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

There is insufficient confidence in the accuracy of the predictions in the current uncertain economic and climate to justify Green Belt loss at the start of the plan. Greenbelt loss should only occur if brownfield has been exhausted. A review mechanism should be built in to only include further loss at a later stage if proven necessary. PfE para1.42 states: "The majority of development between 2021 and 2037 (the "plan period") will be on land within the urban area, most of which is brownfield. The plan favours a brownfield first policy wherever possible as does National Policy. Bury Council has stated to the public in Bury that they will implement a brownfield first policy. When questioned at a Council meeting on 9/9/21 the Leader of the Council Eammon O" Brien clarified this statement by saying that for anything the council themselves build they would adopt a brownfield first policy. However, as the council have no control over the actions of private developers. In reality they cannot limit the release of green belt sites in accordance with National Policy NPPF 134 para 134.

Changes to greenbelt boundaries

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

Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Removal of this site allocation from the plan. Distribute the requirement to smaller m sites such as the Gin Hall proposed site on the M66 and higher density sites on brow
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-D1 Infrastructure Implementation
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Due to the size of the greenbelt sites allocated within the plan it is highly unlikely that t can be provided in good time to bring these sites forward within the plan period. This plan undeliverable within the plan period hence making it unsound.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Smaller sites should be considered that would come forward faster like brownfield si have substantial infrastructure provided close by.
Family Name	Russell

Places for Everyone Representation 2021

Given Name	Christopher
Person ID	1287396
Title	JP-D2 Developer Contributions
Type	Web
Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	It is very well documented that once a site is approved for development it can be revalued with a viability assessment. Local councils have very little control after a site has been approved for houses and it is common practice for a developer to change the number of homes, density, type and number that are classed as affordable. In some extreme cases a developer can claim inflated development costs and no section 106 payments will come forward.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Local council authorities need to enter into more housing partnership projects and develop their own instead of selling it and losing control. Salford Council has now created its own building company that will deliver affordable homes on land they own and other council land in their suit.
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	Bury - Green Belt Additions
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf

Places for Everyone Representation 2021

<p>GBA Bury - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below</p>	<p>Bury GBA03 Pigs Lea Brook 1 Bury GBA04 North of Nuttall Park Bury GBA05 Pigs Lea Brook 2 Bury GBA06 Hollins Brook Bury GBA07 Off New Road, Radcliffe Bury GBA08 Hollins Brow Bury GBA09 Hollybank Street, Radcliffe Bury GBA10 Crow Lumb Wood Bury GBA11 Nuttall West, Ramsbottom Bury GBA12 Woolfold, Bury Bury GBA13 Nuttall East, Ramsbottom Bury GBA14 Chesham, Bury Bury GBA15 Broad Hey Wood North Bury GBA16 Lower Hinds</p>
<p>Soundness - Positively prepared?</p>	<p>Unsound</p>
<p>Soundness - Justified?</p>	<p>Unsound</p>
<p>Soundness - Consistent with national policy?</p>	<p>Unsound</p>
<p>Soundness - Effective?</p>	<p>Unsound</p>
<p>Compliance - Legally compliant?</p>	<p>No</p>
<p>Compliance - In accordance with the Duty to Cooperate?</p>	<p>No</p>
<p>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>	<p>Net greenbelt additions have been nothing but a play on numbers to promote the plan for more greenspace. A lot of the new greenbelt additions are currently not viable for business, they are simply an exercise to take away the protection of greenbelt from useable open greenspace and add them elsewhere in the borough to give the impression that the overall net greenbelt protection is less.</p>
<p>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</p>	<p>Leave the greenbelt boundaries unchanged and present the true loss of greenbelt from the plan proposals.</p>
<p>Family Name</p>	<p>Russell</p>
<p>Given Name</p>	<p>Christopher</p>
<p>Person ID</p>	<p>1287396</p>
<p>Title</p>	<p>Supporting Evidence</p>

Type	Web
Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSLegality.pdf
Redacted comment on supporting documents - Please give details of why you consider any of the evidence not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Legal Compliance</p> <p>-It is questionable whether PfE and the GMSF can effectively be treated as the same must be decided in court before 'Places for Everyone' can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if established. If there is any substantial difference in scope between the GMSF and PfE assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states 'The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a plan have seen some form of change.' So, is 'not insignificant' the same as 'substantial' is not legal. This can only be established by a proper judicial review. So until proven otherwise a plan must be considered illegal and not put to Government.</p> <p>Soundness</p> <p>Soundness</p> <p>-The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and take into account the effect of Covid on work patterns.</p> <p>-There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid</p> <p>-There are no partners or industries identified for employment provision. Major partners for employment provision should be identified.</p> <p>-There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information designed to encourage rather than discourage public input.</p> <p>-The site selection process has been opaque with no explanation as to why some sites were excluded from the plan. https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public should be held and minutes should be published. The rationale for the selection/rejection should be available including considered alternatives.</p> <p>-Several of the authorities involved have consistently failed to meet housing delivery targets a plan must be deliverable. The plan relies on the cooperation of property developers an indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on Clear delivery plans for infrastructure should be included.</p> <p>-PfE shows removal of greenbelt protection for some areas and creation of greenbelts is no proof of exceptional circumstances required in the National Planning Policy Framework this.</p> <p>-In addition to PfE each authority needs to come up with its own local plan. No details about when these plans will be available.</p> <p>-There are no details of how Duty to Cooperate will be achieved. Following their withdrawal 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 outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn Wigan neighbours St Helens and Trafford neighbours Cheshire area.</p>

Places for Everyone Representation 2021

	-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_July2021) This represents a significant change between the previous spatial framework the Gre Spatial Framework and the current joint development plan Places for Everyone.
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	Other Comments
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	Other Comments
Type	Web
Include files	PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Russell
Given Name	Christopher

Places for Everyone Representation 2021

Person ID	1287396
Title	Other Comments
Type	Web
Include files	PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	Other Comments
Type	Web
Include files	PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	Other Comments
Type	Web
Include files	PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound

Places for Everyone Representation 2021

Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	Other Comments
Type	Web
Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSLegality.pdf PFE1287396_Letter_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	Other Comments
Type	Web
Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSLegality.pdf PFE1287396_Letter_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Russell

Places for Everyone Representation 2021

Given Name	Christopher
Person ID	1287396
Title	Stakeholder Submission
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	Our Vision
Type	Web
Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>The vision for Greater Manchester has been desktop planned without proper engagement and consultation from the very beginning. Any consultations that have taken place have been a deterrent asking far too many intrusive questions of residents to put them off completing the consultations have been designed in such a way that they are difficult to respond to for residents with limited I.T skills or digital access. Local councils have not properly published the plan to ensure a place for everyone plan is communicated to everyone. The plan should have been developed by the residents for the residents to address our actual housing requirements over the long term. The above demonstrates a clear lack of community involvement which goes against the spirit of the constitution and makes the preparation of this plan unsound.</p> <p>Legal Compliance</p> <p>-It is questionable whether PfE and the GMSF can effectively be treated as the same thing. This must be decided in court before "Places for Everyone" can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant (in line with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if it was established. If there is any substantial difference in scope between the GMSF and PfE it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a significant number of plan have seen some form of change." So, is "not insignificant" the same as "substantial"?</p>

plan is not legal. This can only be established by a proper judicial review. So until pro the plan must be considered illegal and not put to Government.

Soundness

Soundness

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

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

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

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

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

https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public should be held and minutes should be published. The rationale for the selection/rejection should be available including considered alternatives.

-Several of the authorities involved have consistently failed to meet housing delivery targets. A plan must be deliverable. The plan relies on the cooperation of property developers. An indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on targets. Clear delivery plans for infrastructure should be included.

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

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

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

-A change in the methodology for Manchester City Council was resulted in a 35% up in housing need for Manchester City Council area. The revised Local Housing Need methodology states that need is to be met within the district and not redistributed (see Places for Everyone Joint Consultation documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii))

https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021
This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.

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 as it was prepared with proper public engagement and consultation.

Housing need must be re-assessed using the latest (2018) ONS population prediction and account population changes since Brexit and the effect of Covid.

Identification of how all the infrastructure will be financed.

Identification of major partners for employment provision.

Provision of a strategy to guarantee housing delivery rates.

Family Name

Russell

Places for Everyone Representation 2021

Given Name	Christopher
Person ID	1287396
Title	Our Strategic Objectives
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	<ol style="list-style-type: none"> 1. Meet our housing need 2. Create neighbourhoods of choice 3. Ensure a thriving and productive economy in the districts involved 4. Maximise the potential arising from our national and international assets 5. Reduce inequalities and improve prosperity 6. Promote the sustainable movement of people, goods and information 7. Ensure that districts involved are more resilient and carbon neutral 8. Improve the quality of our natural environment and access to green spaces 9. Ensure access to physical and social infrastructure 10. Promote the health and wellbeing of communities
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Please take the time to read in full the supporting documents I have provided to you this plan fails on all the above points.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Please take the time to read in full the supporting documents I have provided to you this plan fails on all the above points.

Places for Everyone Representation 2021

Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	Our Spatial Strategy
Type	Web
Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	GMCA made the decision to move a poorly prepared plan forward to the publication s and Country planning Act even though major changes have been made to the plan s of consultation. For example Stockport withdrew from what was the GMSF and Manche has had a 35% uplift applied to their housing targets to be met within that specific ar the plan has changed significantly and therefore requires going back to proper consulta directly affected to comment further.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	As above the plan needs to go back to proper consultation with the residents of Grea
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-Strat 1 Core Growth Area
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf

Places for Everyone Representation 2021

Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-Strat 2 City Centre
Type	Web
Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-Strat 3 The Quays
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound

Places for Everyone Representation 2021

Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-Strat 4 Port Salford
Type	Web
Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-Strat 5 Inner Areas
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No

Places for Everyone Representation 2021

Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-Strat 6 Northern Areas
Type	Web
Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-Strat 7 North East Growth Corridor
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to	The plan states capacity improvements for the M66 to cope with justification of new N employment for Bury. This does not take into account the planned housing allocation specifically that is land locked by current infrastructure and reaching an improved M6 terrible traffic / pollution problem.

co-operate. Please be as precise as possible.	
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 Walshaw allocation JP9 needs to be re-assigned to smaller sites closer to the M6 the new proposed employment sites, sites such as Gin hall site that is next to the M6 a much improved link to the new proposed employment area of the Northern Gateway reduce congestion in and around Bury.
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-Strat 8 Wigan Bolton Growth Corridor
Type	Web
Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-Strat 9 Southern Areas
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound

Places for Everyone Representation 2021

Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-Strat 11 New Carrington
Type	Web
Include files	PFE1287396_TemplateResponse.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSElton.pdf PFE1287396_SOSLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Russell
Given Name	Christopher
Person ID	1287396
Title	JP-Strat 12 Main Town Centres
Type	Web
Include files	PFE1287396_SOSLegality.pdf PFE1287396_SOSElton.pdf PFE1287396_Letter_Redacted.pdf PFE1287396_SOSWalshaw.pdf PFE1287396_TemplateResponse.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No