

Places for Everyone Representation 2021

<b>Family Name</b>	Ruddock
<b>Given Name</b>	Susan
<b>Person ID</b>	1287415
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287415_SOSElton.pdf</a> <a href="#">PFE1287415_SOSGeneralLegality.pdf</a> <a href="#">PFE1287415_EltonObjection.pdf</a>
<b>Family Name</b>	Ruddock
<b>Given Name</b>	Susan
<b>Person ID</b>	1287415
<b>Title</b>	Our Vision
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287415_SOSElton.pdf</a> <a href="#">PFE1287415_SOSGeneralLegality.pdf</a> <a href="#">PFE1287415_EltonObjection.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	-The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid19 on work patterns.  -There has been poor public consultation, a lack of accessible information and little spent by councils in generating awareness. Interest in the plan has mainly been generated by local protest groups. The public consultations should be repeated, providing clear, understandable information. They should be designed to encourage rather than discourage public input.

-Several of the authorities involved have consistently failed to meet housing delivery targets. An effective 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 rates must be provided. This cannot be left to any local authority that is currently behind on housing targets. Clear delivery plans for infrastructure should be included.

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

[https://mappinggm.org.uk/call-for-sites/#os\\_maps\\_outdoor/16/53.6380/-2.3228](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 representation should be held and minutes should be published. The rationale for the selection/rejection of every site should be available including considered alternatives.

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

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

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

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

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

-A change in the methodology for Manchester City Council was resulted in a 35% uplift for the Manchester City Council area. See Places for Everyone Joint Committee documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii)

[https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE\\_JC\\_July2021\\_ISSUED.pdf](https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021_ISSUED.pdf)

Places for Everyone Representation 2021

	<p>This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.</p> <p>-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 any 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 established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical 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 proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government.</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>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 to built on these 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 by Bury MBC that these meetings were informal and not minuted. This surely makes this process illegal.</p> <p>No value has been put on the cost of the houses planned to be built therefore no indication of the cost of affordable housing. Are there plans for building social housing? These would be affordable.</p> <p>Insufficient public consultation and acknowledgement of objection groups.</p>
<p><b>Family Name</b></p>	<p>Ruddock</p>
<p><b>Given Name</b></p>	<p>Susan</p>
<p><b>Person ID</b></p>	<p>1287415</p>
<p><b>Title</b></p>	<p>Our Strategic Objectives</p>
<p><b>Type</b></p>	<p>Web</p>
<p><b>Include files</b></p>	<p><a href="#">PFE1287415_SOSElton.pdf</a>  <a href="#">PFE1287415_SOSGeneralLegality.pdf</a>  <a href="#">PFE1287415_EltonObjection.pdf</a></p>

Places for Everyone Representation 2021

<p><b>Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:</b></p>	<ol style="list-style-type: none"> <li>1. Meet our housing need</li> <li>2. Create neighbourhoods of choice</li> <li>3. Ensure a thriving and productive economy in the districts involved</li> <li>4. Maximise the potential arising from our national and international assets</li> <li>5. Reduce inequalities and improve prosperity</li> <li>6. Promote the sustainable movement of people, goods and information</li> <li>7. Ensure that districts involved are more resilient and carbon neutral</li> <li>8. Improve the quality of our natural environment and access to green spaces</li> <li>9. Ensure access to physical and social infrastructure</li> <li>10. Promote the health and wellbeing of communities</li> </ol>
<p><b>Soundness - Positively prepared?</b></p>	<p>NA</p>
<p><b>Soundness - Justified?</b></p>	<p>Unsound</p>
<p><b>Soundness - Consistent with national policy?</b></p>	<p>NA</p>
<p><b>Soundness - Effective?</b></p>	<p>NA</p>
<p><b>Compliance - Legally compliant?</b></p>	<p>No</p>
<p><b>Compliance - In accordance with the Duty to Cooperate?</b></p>	<p>No</p>
<p><b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	<p>Places for Everyone has yet to be declared legal. It has changed in various ways since Stockport opted 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 be revised to identify how all the infrastructure will be paid .</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of 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 as to how this has affected the population of Bury and therefore the number of houses needed as the population recover from the pandemic. Brexit should also be considered.</p>

Places for Everyone Representation 2021

<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>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 and residents 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 of primary and senior school ages. As most of our schools are full what are the plans for including sufficient 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 importance with many endangered species in the areas. They are also recreational places for the residents of Bury. Disturbing these habitats would be fatal to the wildlife and plant population and remove an important green space for our residents especially those without transport. A new and independent 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 of greenbelt in others. There is no proof of exceptional circumstances required in the National Planning Policy Framework to justify this</p>
<b>Family Name</b>	Ruddock
<b>Given Name</b>	Susan
<b>Person ID</b>	1287415
<b>Title</b>	JPA 7: Elton Reservoir Area
<b>Type</b>	Web
<b>Include files</b>	<p><a href="#">PFE1287415_SOSElton.pdf</a>  <a href="#">PFE1287415_SOSGeneralLegality.pdf</a>  <a href="#">PFE1287415_EltonObjection.pdf</a></p>
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<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally</b>	Following the decision of Stockport to opt out of the GMSF leaving the other 9 townships of Greater Manchester with a plan that could not be complied with. PfE was formed as the new

Places for Everyone Representation 2021

**compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.**

GMSF. How can PfE be acceptable without a re-write of it's aims and purposes. GMSF may have been legally compliant with Regulation 18 of the Town and Country Planning regulations and probably be able to proceed to 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 any substantial difference in scope between the GMSF and PfE. It cannot be assumed that Regulation 18 is automatically satisfied for PfE. Para 1.23 states "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical 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 should be established by a judicial review. So until proven otherwise the plan must be considered illegal and not put to Government.

After the demise of GMSF and if an environmental survey had been done for Elton then these findings will have changed. Also, with the pandemic of last year and the further extremes of weather the findings will have changed and there should be a new environmental/bio-diversity plan for PfE.

Why was Elton and the reservoir environs chosen as a suitable building site. What were the criteria for choosing this site rather than other sites in the borough. Where are the minutes from a planning meeting of Bury MBC explaining how they came to choose this site. If building is allowed we will end up with an urban sprawl with no green spaces to benefit the residents of Bury, Radcliffe and beyond.

The figures being used are from 2014, some 7 years ago. This cannot be sound as so many changes have occurred in the last 7 years .

**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.**

There should be proper judicial review to establish the legality of PfE and Elton environs. Building of houses will disturb and kill many endangered species that have been found during the pandemic and beyond.

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Susan

**Person ID**

1287415

**Title**

JPA 9: Walshaw

**Type**

Web

**Include files**

[PFE1287415\\_SOSElton.pdf](#)  
[PFE1287415\\_SOSGeneralLegality.pdf](#)  
[PFE1287415\\_EltonObjection.pdf](#)

**Soundness - Positively prepared?**

Unsound

Places for Everyone Representation 2021

<b>Soundness - Justified?</b>	Unsound
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