

Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	Stakeholder Submission
Type	Web
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	Our Vision
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>LEGAL COMPLIANCE:-</p> <p>-The "Places for Everyone"(PfE) and the previous plan, the "Greater Manchester Spatial Framework"(GMSF) cannot be treated as the same plan. It must be for a Court to decide if the PfE can proceed any further. It is not for the GMCA alone to determine if the spatial framework (GMSF) document can merely transfer to being a Joint Development plan (PfE) without having a significant re-write with full and meaningful consultation from the outset.</p> <p>The GMSF may have been legally compliant (with Reg 18 of the Town and Country Planning Regulations) and may have possibly proceeded to this final public consultation and submission under Regulation 19, however, the legality of the PfE has to be questioned. 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 to proceed. 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." By common definition the phrase "not insignificant" has the same meaning as "substantial", and so if that is the case, then the Places for Everyone plan is not legal.</p> <p>The GMCA would appear to have a different view and therefore this can only be established by a Judicial Review. Until proven otherwise the plan should not proceed.</p> <p>SOUNDNESS:-</p> <p>-The Places for Everyone (PfE) uses 2014 data to predict housing need and has ignored the potential impact of Brexit and the Covid-19 pandemic. For this plan to be sound the housing needs must be re-assessed using the latest (2018) ONS population predictions and take account of potential new work practices.</p>

-There is little detail on how the substantial infrastructure that will be needed will be financed.

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

-The public consultation has quite frankly been pathetic. Only minimal amounts have been spent by the GMCA and the individual Councils to inform the public. Virtually nothing has been done to inform the non-digital community. But for the local protest groups a large percentage of the tax paying public would be unaware of these attempts to steal our Greenbelt. This process of so called "consultation" now is totally off putting to most of the public. This process is far too complicated, it will put off many people, particularly older residents. I strongly believe that the GMCA have intentionally made the process cumbersome to reduce the public participation. With regards to Bury I ask the Inspector to take note of the fact that it was only passed for going to this stage by 2 votes at the Council meeting, 26 "For" with 24 "Against", that in itself shows the strength of public feeling. Furthermore of the 9 Radcliffe Councillors, ONLY 1 voted in Favour so Radcliffe (the site of the Elton Reservoir) voted 89% Against.

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

-Some of the local authorities within the plan have failed to meet housing delivery targets for many years and at least one Council is now in presumption. A plan must prove itself to be deliverable. The Places for Everyone plan relies heavily on the cooperation of developers. The plan does not stipulate how developers will be made to achieve targets and what sanctions will apply if they don't.

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

-The PfE states that each authority needs to come up with its own local plan. No details have been given about when these plans will be available. The implication is that the local plans are relevant to, and in fact form part of, the PfE so they should be annexed to the plan at this stage.

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

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.

LEGALITY:-
As above a Judicial Review is necessary.

SOUNDNESS:-

-The housing need must be re-assessed using the latest (2018) ONS population predictions and consider the effect of Covid on working practices.

-The plan needs to be revised to identify how all the substantial infrastructure will be financed.

-Major partners for employment provision should be identified and included in the plan.

-The whole public consultation process should be redone, providing clear, understandable information. The whole process should be designed to encourage rather than discourage public input.

-The site selection process should be repeated using National and GMCA guidelines. Meetings should be held with public representation and minutes

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	<p>should be published. The rationale for the selection / rejection of every site should be available including all the other sites considered.</p> <p>-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.</p> <p>-Evidence of the exceptional circumstances as required in the National Planning Policy Framework to justify the removal of greenbelt protection should be included.</p> <p>-individual local plans should be prepared and included before the PfE is submitted to government.</p> <p>-Include details of how Duty to Cooperate is to be achieved</p>
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	Our Strategic Objectives
Type	Web
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	<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 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?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	Unsound
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.	See the comments above in Section 18 and on JPA-7
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant	See the comments above in Section 18 and on JPA-7

and sound, in respect of any legal compliance or soundness matters you have identified above.	
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	Our Spatial Strategy
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	See comments in Section 18 and on JPA-7
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.	See comments in section 18 and on JPA-7
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	Other Comments
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound

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Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-Strat 12 Main Town Centres
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
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 town of Radcliffe previously had 2 secondary schools; both were closed by Bury Council. Since then, the community of Radcliffe have fought to reinstate a school in Radcliffe. Last year, eventually, we were successful in gaining government approval for a new secondary school on Spring Lane Radcliffe. This Places for Everyone plan is claiming that this new school is part of the infrastructure to enable the development at Elton Reservoir, that is wrong! The new school will not even satisfy the current need for Radcliffe children so the plan will not provide the education infrastructure required for the 3,500 houses being proposed. The document is flawed and reference to the school being part of the infrastructure should be removed from JPA-7.</p> <p>-The town of Radcliffe has recently embarked on a programme for regeneration. Bury Council have applied for levelling up government funding, however the Council have committed to the regeneration plan and stated that the whole process will continue even if the Places for Everyone plan does not go ahead and even if the application for government levelling up funding is unsuccessful. So, again the plan is flawed by including the Radcliffe Regeneration within the infrastructure funding. Any suggestion that the Radcliffe Regeneration would benefit from the PfE should be removed from JPA-7.</p> <p>-This process is far too complicated. It will put off many people, particularly older residents. I strongly believe that the GMCA have intentionally made the process cumbersome to reduce the public participation. With regards to Bury I ask the Inspector to take note of the fact that it was only passed for going to this stage by 2 votes at the Council meeting 26 For with 24 Against, that in itself shows the strength of public feeling. Furthermore of the 9 Radcliffe Councillors, ONLY 1 voted in Favour so Radcliffe (the site of the Elton Reservoir) voted 89% Against.</p>

Places for Everyone Representation 2021

Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-Strat 14 A Sustainable and Integrated Transport Network
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
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>On the Elton Reservoir site (JPA-7) the proposed new link road merely joins one over congested area to another over congested area.</p> <p>In many ways the PfE contradicts itself and its alleged aims. For instance The Metrolink and TfGM are about to substantially expand the size of the car parks at the Radcliffe and Whitefield stations. In addition the PfE also plans to add another station as part of the Elton Reservoir site. Specifically, regarding Radcliffe, the end result is that thousands more cars will travel into Radcliffe to the Metrolink car park which situated in a compact congested residential area and adjacent to the site of the new proposed secondary school.</p> <p>In addition the PfE plans to build a further 3,500 houses in the same area, adding more cars to the roads and therefore more pollution for the existing residents and pupils.</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>Re think the selection of sites and don't plan to build huge residential estates in the centre of already congested areas. The site at Elton Reservoir (JPA-7) is proposing 3,500 houses, that would be the equivalent of a new town.</p> <p>Scrap Metrolink carparks. Make the local stations for local people (ie those who can walk or cycle) and build park and ride stations adjacent to the motorway network.</p>
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-S 1 Sustainable Development
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound

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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.	See comments under JPA-7
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.	See comments under JPA-7
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-S 4 Resilience
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
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.	See comments under Section 18 and JPA-7

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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.	See comments under Section 18 and JPA-7
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-S 5 Flood Risk and Water Environment
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
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.	See comments under JPA-7
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.	See comments under JPA-7
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-J 1 Supporting Long Term Economic Growth

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Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-J 2 Employment Sites and Premises
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
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>-There is little detail on how the substantial infrastructure that will be needed will be financed.</p> <p>-There are no partners or industries identified for employment provision.</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.	See comments under Section 18
Family Name	Sheppard
Given Name	Alan

Places for Everyone Representation 2021

Person ID	1286222
Title	JP-J 4 Industry and Warehousing Development
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
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.	See comments above and under Section 18 and JPA-7
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.	See comments above and under Section 18 and JPA-7
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No

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<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>-The Places for Everyone (PfE) uses 2014 data to predict housing need and has ignored the potential impact of Brexit and the Covid-19 pandemic. For this plan to be sound the housing needs must be re-assessed using the latest (2018) ONS population predictions and take account of potential new work practices.</p> <p>-There is little detail on how the substantial infrastructure that will be needed will be financed.</p> <p>-The site selection process has been less than transparent with no explanation as to why some available sites were excluded from the plan.</p> <p>-Some of the local authorities within the plan have failed to meet housing delivery targets for many years and at least on Council is now in presumption. A plan must prove itself to be deliverable. The Places for Everyone plan relies heavily on the cooperation of developers. The plan does not stipulate how developers will be made to achieve targets and what sanctions will apply if they don't.</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>See comments in Section 18 and under JPA-7</p>
<p>Family Name</p>	<p>Sheppard</p>
<p>Given Name</p>	<p>Alan</p>
<p>Person ID</p>	<p>1286222</p>
<p>Title</p>	<p>JP-H 2 Affordability of New Housing</p>
<p>Type</p>	<p>Web</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>It is obvious to anybody who knows the area, that those who own the land at Elton Reservoir (JPA-7) will want to develop large 5, 6 bedroom expensive homes because the area is such a beautiful place. From previous experience the builders may include a number of smaller more affordable houses on the planning application but they will build those houses last and later in the project will cite that the profit has reduced and will then gain approval from the Council to reduce the number of affordable homes. There is nothing in the PfE which shows how developers will be made to comply with the original application.</p>

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Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-H 3 Type Size and Design of New Housing
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-H 4 Density of New Housing
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-G 1 Valuing Important Landscapes

Places for Everyone Representation 2021

Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>-The public consultation has quite frankly been pathetic. Only minimal amounts have been spent by the GMCA and the individual Councils to inform the public. Virtually nothing has been done to inform the non-digital community. But for local protest groups a large percentage of the tax paying public would be unaware of these attempts to steal our Greenbelt. This process of so called "consultation"now is totally off putting to most of the public.</p> <p>-PfE shows removal of greenbelt protection for some areas and creation of greenbelt in others. There is no proof of exceptional circumstances, as required in the National Planning Policy Framework, to justify this.</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.	See comments under Section 18
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-G 2 Green Infrastructure Network
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No

Places for Everyone Representation 2021

<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>-The public consultation has quite frankly been pathetic. Only minimal amounts have been spent by the GMCA and the individual Councils to inform the public. Virtually nothing has been done to inform the non-digital community. But for local protest groups a large percentage of the tax paying public would be unaware of these attempts to steal our Greenbelt. This process of so called "consultation"now is totally off putting to most of the public.</p> <p>-PfE shows removal of greenbelt protection for some areas and creation of greenbelt in others. There is no proof of exceptional circumstances, as required in the National Planning Policy Framework, to justify this.</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>See comments under Section 18</p>
<p>Family Name</p>	<p>Sheppard</p>
<p>Given Name</p>	<p>Alan</p>
<p>Person ID</p>	<p>1286222</p>
<p>Title</p>	<p>JP-G 4 Lowland Wetlands and Mosslands</p>
<p>Type</p>	<p>Web</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>Family Name</p>	<p>Sheppard</p>
<p>Given Name</p>	<p>Alan</p>
<p>Person ID</p>	<p>1286222</p>
<p>Title</p>	<p>JP-G 5 Uplands</p>
<p>Type</p>	<p>Web</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>

Places for Everyone Representation 2021

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>-PfE shows removal of greenbelt protection for some areas and creation of greenbelt in others. There is no proof of exceptional circumstances, as required in the National Planning Policy Framework, to justify this.</p> <p>-The public consultation has quite frankly been pathetic. Only minimal amounts have been spent by the GMCA and the individual Councils to inform the public. Virtually nothing has been done to inform the non-digital community. But for local protest groups a large percentage of the tax paying public would be unaware of these attempts to steal our Greenbelt. This process of so called "consultation"now is totally off putting to most of the public.</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.	See Comments under Section 18 and JPA-7
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-G 6 Urban Green Space
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
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>-If Urban Green Spaces are essential to our way of life etc (as stated above) why does this PfE plan want to remove the whole of the greenbelt area in the Elton Reservoir site. 50% of the Greenbelt land the plan is set to steal is not required during the life of this plan.</p> <p>-The public consultation has quite frankly been pathetic. Only minimal amounts have been spent by the GMCA and the individual Councils to inform the public. Virtually nothing has been done to inform the non-digital community. But for local protest groups a large percentage of the tax paying public would be unaware of these attempts to steal our Greenbelt. This</p>

	<p>process of so called "consultation"now is totally off putting to most of the public.</p> <p>-PfE shows removal of greenbelt protection for some areas and creation of greenbelt in others. There is no proof of exceptional circumstances, as required in the National Planning Policy Framework, to justify this.</p> <p>-The plan proposes that the whole area of the Elton Reservoir site be released now from Greenbelt protection and suggests that ultimately 3,500 houses would be built on the site (para 11.105 on page 264). However, it anticipates that during the life of this plan only 1,900 of those houses would be built. So, why the need to release the whole of the site from Greenbelt protection now? Such gross over release of Greenbelt is wholly contrary to National Guidelines. Those guidelines state that Greenbelt is precious resource and should not be squandered. The plan attempts to justify this "squandering"of Greenbelt by suggesting that releasing the vast area now is necessary to gain certainty for future development due to the investment required for significant infrastructure. The plan fails to identify the source of any investment funding. Peel Holdings own much of the land subject of the Elton Reservoir site allocation, maybe representatives of Peel were some of the undisclosed attendees involved in the unrecorded site selection meetings? Why else would Bury Council offer up a vast amount of precious Greenbelt land that is not required during the life of this plan? Once the Greenbelt is released the Council would not be able to prevent the landowners (Peel) pressing ahead with building on any part of the allocation. Bury Council should be retaining as much Greenbelt land as is possible in accordance with National Policy.</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>See comments under Section 18 and JPA-7</p>
<p>Family Name</p>	<p>Sheppard</p>
<p>Given Name</p>	<p>Alan</p>
<p>Person ID</p>	<p>1286222</p>
<p>Title</p>	<p>JP-G 7 Trees and Woodland</p>
<p>Type</p>	<p>Web</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>

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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.	See comments above
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.	See comments above
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-G 8 Standards for Greener Places
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
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>-If Urban Green Spaces are essential to our way of life etc (as stated above) why does this PfE plan want to remove the whole of the greenbelt area in the Elton Reservoir site. 50% of the Greenbelt land the plan is set to steal is not required during the life of this plan.</p> <p>-The public consultation has quite frankly been pathetic. Only minimal amounts have been spent by the GMCA and the individual Councils to inform the public. Virtually nothing has been done to inform the non-digital community. But for local protest groups a large percentage of the tax paying public would be unaware of these attempts to steal our Greenbelt. This process of so called "consultation"now is totally off putting to most of the public.</p> <p>-PfE shows removal of greenbelt protection for some areas and creation of greenbelt in others. There is no proof of exceptional circumstances, as required in the National Planning Policy Framework, to justify this.</p> <p>-The plan proposes that the whole area of the Elton Reservoir site be released now from Greenbelt protection and suggests that ultimately 3,500 houses would be built on the site (para 11.105 on page 264). However, it anticipates</p>

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	<p>that during the life of this plan only 1,900 of those houses would be built. So, why the need to release the whole of the site from Greenbelt protection now? Such gross over release of Greenbelt is wholly contrary to National Guidelines. Those guidelines state that Greenbelt is precious resource and should not be squandered. The plan attempts to justify this "squandering" of Greenbelt by suggesting that releasing the vast area now is necessary to gain certainty for future development due to the investment required for significant infrastructure. The plan fails to identify the source of any investment funding. Peel Holdings own much of the land subject of the Elton Reservoir site allocation, maybe representatives of Peel were some of the undisclosed attendees involved in the unrecorded site selection meetings? Why else would Bury Council offer up a vast amount of precious Greenbelt land that is not required during the life of this plan? Once the Greenbelt is released the Council would not be able to prevent the landowners (Peel) pressing ahead with building on any part of the allocation. Bury Council should be retaining as much Greenbelt land as is possible in accordance with National Policy.</p>
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-G 9 A Net Enhancement of Biodiversity and Geodiversity
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-G 10 Green Belt
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No

<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>-Changes to greenbelt boundaries are not necessary if the PfE plan was to FULLY utilise ALL Brownfield sites first.</p> <p>-The public consultation has quite frankly been pathetic. Only minimal amounts have been spent by the GMCA and the individual Councils to inform the public. Virtually nothing has been done to inform the non-digital community. But for local protest groups a large percentage of the tax paying public would be unaware of these attempts to steal our Greenbelt. This process of so called "consultation"now is totally off putting to most of the public.</p> <p>-PfE shows removal of greenbelt protection for some areas and creation of greenbelt in others. There is no proof of exceptional circumstances, as required in the National Planning Policy Framework, to justify this.</p> <p>-The plan proposes that the whole area of the Elton Reservoir site be released now from Greenbelt protection and suggests that ultimately 3,500 houses would be built on the site (para 11.105 on page 264). However, it anticipates that during the life of this plan only 1,900 of those houses would be built. So, why the need to release the whole of the site from Greenbelt protection now? Such gross over release of Greenbelt is wholly contrary to National Guidelines. Those guidelines state that Greenbelt is precious resource and should not be squandered. The plan attempts to justify this "squandering"of Greenbelt by suggesting that releasing the vast area now is necessary to gain certainty for future development due to the investment required for significant infrastructure. The plan fails to identify the source of any investment funding. Peel Holdings own much of the land subject of the Elton Reservoir site allocation, maybe representatives of Peel were some of the undisclosed attendees involved in the unrecorded site selection meetings? Why else would Bury Council offer up a vast amount of precious Greenbelt land that is not required during the life of this plan? Once the Greenbelt is released the Council would not be able to prevent the landowners (Peel) pressing ahead with building on any part of the allocation. Bury Council should be retaining as much Greenbelt land as is possible in accordance with National Policy.</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>See comments under Section 18 and JPA-7</p>
<p>Family Name</p>	<p>Sheppard</p>
<p>Given Name</p>	<p>Alan</p>
<p>Person ID</p>	<p>1286222</p>
<p>Title</p>	<p>JP-G 11 Safeguarded Land</p>
<p>Type</p>	<p>Web</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>

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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.	- This in effect is your underhand way of making it appear that you are "Safeguarding the Land". You are not saving the land as the name suggests, what you are actually doing is preparing the land for more unwanted and probably unneeded development. However, what the plan succeeds in doing is drastically increasing the value of the land for the owners and making it easier for developers to choose to build on new green fields rather than Brownfield sites. In safeguarding the land you are actually increasing the probability of precious Greenbelt and the habitat for our wildlife to be removed.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Leave the land as Greenbelt with all of the protections that entails until such time that it is absolutely necessary to build on that piece of land. In accordance with the NPPF: Do not release land unnecessarily. Do not squander the land. Identify and record all new Brownfield sites that come available and build on those sites instead, Save our precious Greenbelt, protect our wildlife.
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-P1 Sustainable Places
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	-The town of Radcliffe previously had 2 secondary schools; both were closed by Bury Council. Since then, the community of Radcliffe have fought to reinstate a school in Radcliffe. Last year, eventually, we were successful in gaining government approval for a new secondary school on Spring Lane Radcliffe. This Places for Everyone plan is claiming that this new school is part of the infrastructure to enable the development at Elton Reservoir, that is wrong! The new school will not even satisfy the current need for Radcliffe children so the plan will not provide the education infrastructure required for the 3,500 houses being proposed. The document is flawed and reference to the school being part of the infrastructure should be removed from JPA-7

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	-The town of Radcliffe has recently embarked on a programme for regeneration. Bury Council have applied for levelling up government funding, however the Council have committed to the regeneration plan and stated that the whole process will continue even if the Places for Everyone plan does not go ahead and even if the application for government levelling up funding is unsuccessful. So, again the plan is flawed by including the Radcliffe Regeneration within the infrastructure funding. Any suggestion that the Radcliffe Regeneration is part of the benefit that would be delivered by the PfE should be removed from JPA-7.
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.	Any suggestion that the Radcliffe Regeneration is part of the benefit that would be delivered by the PfE should be removed from JPA-7.
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-P2 Heritage
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	The proposed development at Elton Reservoir cuts right across a site of historic and architectural interest
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-P4 New Retail and Leisure Uses in Town Centres
Type	Web

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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 town of Radcliffe has recently embarked on a programme for regeneration. Bury Council have applied for levelling up government funding, however the Council have committed to the regeneration plan and stated that the whole process will continue even if the Places for Everyone plan does not go ahead and even if the application for government levelling up funding is unsuccessful. So, again the plan is flawed by including the Radcliffe Regeneration within the infrastructure funding. Any suggestion that the Radcliffe Regeneration is part of the benefit that would be delivered by the PfE should be removed from JPA-7.</p> <p>Implying that the already ongoing regeneration is part of the PfE plan is deceitful and merely smoke and mirrors</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.	Any suggestion that the Radcliffe Regeneration is part of the benefit that would be delivered by the PfE should be removed from JPA-7.
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-P6 Health
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No

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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.	Open spaces are needed for our physical and mental health and our wellbeing. Leave our Greenbelt untouched for the benefit of our future generations and for the wildlife.
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-C1 An Integrated Network
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
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>In many ways the PfE contradicts itself and its alleged aims. For instance The Metrolink and TfGM are about to substantially expand the size of the car parks at the Radcliffe and Whitefield stations. In addition the PfE also plans to add another station as part of the Elton Reservoir site. Specifically, regarding Radcliffe, the end result is that thousands more cars will travel into Radcliffe to the Metrolink car park which situated in a compact congested residential area and adjacent to the site of the new proposed secondary school.</p> <p>In addition the PfE plans to build a further 3,500 houses in the same area, adding more cars to the roads and therefore more pollution for the existing residents and pupils.</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.	Modifications: Scrap Metrolink carparks. Make the local stations for local people (ie those who can walk or cycle) and build park and ride stations adjacent to the motorway network.
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JPA 7: Elton Reservoir Area

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Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
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 Places for Everyone (Pfe) states that the most up to date information be used in plan Making (Para 1.63). Therefore, regarding anything in the plan relating to Bury, the "Bury Housing Development Needs Assessment 2020" must and should be taken into consideration, the Pfe does not appear to reference or to take account of this document. The plan is therefore flawed from the outset.</p> <p>-Bury Council and the GMCA have been less than transparent regarding the site selections for the Bury area. Hardly any information has been given about the alternative sites they allegedly considered and why those sites were rejected. Apparently when asked about the site selection process, the Council's response to the Freedom of Information request was that the chosen sites were selected at informal meetings and furthermore they have refused (or apparently can't) provide a list of attendees or minutes for those meetings. The ordinary taxpayer, the man in the street, would have to be very suspicious of such clandestine activity. In my opinion such activity could be indicators of concealing of possible corrupt behaviour.</p> <p>Therefore, the choice of sites for the Bury area cannot be substantiated or justified, specifically the Elton Reservoir site does not meet the criteria of the National Planning Policy Framework (NPPF) or the GMCA guidelines.</p> <p>-The Elton Reservoir site is in Radcliffe. The town of Radcliffe has the least expensive housing in the whole of the borough but the Council and the GMCA have chosen the site in preference to sites in other areas where affordable housing is in desperate need.</p> <p>-The Elton Reservoir site is surrounded by urban areas so to build on this treasured piece of Greenbelt would effectively create "urban sprawl" which is in total contradiction of the NPPF (para 134).</p> <p>-The plan proposes that the whole area of the Elton Reservoir site be released now from Greenbelt protection and suggests that ultimately 3,500 houses would be built on the site (para 11.105 on page 264). However, it anticipates that during the life of this plan only 1,900 of those houses would be built. So, why the need to release the whole of the site from Greenbelt protection now? Such gross over release of Greenbelt is wholly contrary to National Guidelines. Those guidelines state that Greenbelt is precious resource and should not be squandered. The plan attempts to justify this "squandering" of Greenbelt by suggesting that releasing the vast area now is necessary to gain certainty for future development due to the investment required for significant infrastructure. The plan fails to identify the source of any investment funding. Peel Holdings own much of the land subject of the Elton Reservoir site allocation, maybe representatives of Peel were some of the undisclosed attendees involved in the unrecorded site selection meetings? Why else would Bury Council offer up a vast amount of precious Greenbelt</p>

land that is not required during the life of this plan? Once the Greenbelt is released the Council would not be able to prevent the landowners (Peel) pressing ahead with building on any part of the allocation. Bury Council should be retaining as much Greenbelt land as is possible in accordance with National Policy.

-Peel apparently paid £27M for their land (270 hectares) at the Elton Reservoir site (as disclosed in the allocation topic paper). That calculates to £104,000 per hectare. Apparently, a conservative uplift on the value of such land from Greenbelt to building land is a multiplication of 60, so the amount of land required for the 1,900 homes (in the PfE plan) uplifts to about £875M. But to add the Greenbelt land being released unnecessarily would add an additional £750M. What a gift from Bury Council to Peel!

The inference is that unless Peel is given the guarantee (certainty) that the whole area is free for development then they will not be investing in the significant infrastructure. Again, my suspicions as a retired police officer are aroused.

Peel do have a building arm to their string of companies, and they may build some homes themselves, but the indications (and evidence from previous deals) are that Peel will divide the land and sell it to other developers. In doing so Peel would avoid paying towards the infrastructure works, leaving Bury Council to attempt to secure funding from multiple, yet unknown, smaller building companies. Based on evidence from previous developments Bury Council have a woeful success in obtaining developer contributions. In my opinion, for their own financial gain, Peel have made fanciful (unenforceable) promises to Bury Council persuading them to ignore National Policy.

-Flood risk surveys and wildlife surveys have been done at the Elton Reservoir site, but all have been done by consultants on behalf of developers. Apparently, none have been conducted by wholly independent organisations or the Department of the Environment. At present work is ongoing to repair a breach to the wall of the reservoir, the work being done may be sufficient to prevent flood to the existing fields but has the need for protection to homes been considered? Prior to the Tudor Grange development (adjacent to the proposed Elton Reservoir development) Peel had a wild life survey done which showed that the great crested newt population which been on the site was all now deceased, however I believe that recent studies have evidence (including photographs) that the land surrounding the reservoir does indeed have great crested newts and other protected species - another example of the need for independent organisations, not influenced by any benefactors, should conduct all such surveys.

-The town of Radcliffe previously had 2 secondary schools; both were closed by Bury Council. Since then, the community of Radcliffe have fought to reinstate a school in Radcliffe. Last year, eventually, we were successful in gaining government approval for a new secondary school on Spring Lane Radcliffe. This Places for Everyone plan is claiming that this new school is part of the infrastructure to enable the development at Elton Reservoir, that is wrong! The new school will not even satisfy the current need for Radcliffe children so the plan will not provide the education infrastructure required for the 3,500 houses being proposed. The document is flawed and reference to the school being part of the infrastructure should be removed from JPA-7.

-The town of Radcliffe has recently embarked on a programme for regeneration. Bury Council have applied for levelling up government funding, however the Council have committed to the regeneration plan and stated that the whole process will continue even if the Places for Everyone plan does not go ahead and even if the application for government levelling up funding is unsuccessful. So, again the plan is flawed by including the Radcliffe Regeneration within the infrastructure funding. Any suggestion that the Radcliffe Regeneration is part of the benefit that would be delivered by the PfE should be removed from JPA-7.

	<p>-Bury Council have failed to meet housing delivery targets for many years and as such they are now in presumption. Any plan now must prove itself to be deliverable. The Places for Everyone plan relies heavily on the cooperation of developers. The plan does not stipulate how developers will be made to achieve targets and what sanctions will apply if they don't. At a Council meeting on 9th September 2021, apparently the Leader of Bury Council confirmed that it was unlikely that the proposed building rates in JPA-7 (section 27.8 on page 52), for developments in Bury would be met as they were unrealistic. So, there is no way the plan can or should be considered as effective. The plan therefore the effectiveness test for Soundness.</p> <p>-The Places for Everyone plan uses smoke and mirrors to make it appear that borough of Bury is losing less Greenbelt than it actually is. The vast area of the Elton Reservoir Greenbelt land is being stolen from the community of Radcliffe reclassifying pieces of other land to create new Greenbelt, some of which is an old landfill site and part of the local graveyard. This is not in accordance with National Policy.</p> <p>-The chosen site locations in the Places for Everyone plan means that most of the housing development will be in the west of Bury (primarily Elton Reservoir but also Walshaw). But the location for the development of jobs is all on the east side (M66 Northern Gateway) which is on the opposite side of an already over congested town. The proposed new link road is also nonsensical because it merely links one congested area to another.</p> <p>-The Places for Everyone plan professes to favour a Brownfield first policy (as per National Policy). Bury Council have stated that they will implement a Brownfield first policy, however despite them having more than enough brownfield land available now to meet the current target for house building for more than 5 years they are proposing to immediately release Greenbelt which would satisfy a target for more like 20 years (certainly vastly more than is needed for the 15-year life of this PfE plan). Apparently at a Council meeting on the 9th of September 2021 the Leader of Bury Council significantly amended his commitment to the people of Bury, stating that his promise of a Brownfield first was only in relation to houses built by the Council themselves and that they do not have control over the actions of private developers! That is not true they can and should control building on Greenbelt by only releasing Greenbelt land when it is absolutely necessary, in accordance with NPPF para 134)</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>-Consider the 'Bury Housing Development Needs Assessment 2020' and include the relevant findings in the PfE</p> <p>-The site selection process should be redone using National and GMCA guidelines. Meetings should be held with public representation and minutes should be published. The rationale for the selection / rejection of every site should be available including all the other sites considered.</p> <p>-Fully consider NPPF (Para 134) re the Elton Reservoir site</p> <p>-Bury Council should retain as much Greenbelt land as is possible in accordance with National Policy.</p> <p>-Evidence of the exceptional circumstances as required in the National Planning Policy Framework to justify the removal of greenbelt protection should be included.</p> <p>-The plan needs to be revised to identify how all the substantial infrastructure will be financed.</p> <p>-Any suggestion that the Radcliffe Regeneration is part of the benefit that would be delivered by the PfE should be removed from JPA-7.</p>
<p>Family Name</p>	<p>Sheppard</p>
<p>Given Name</p>	<p>Alan</p>

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Person ID	1286222
Title	JPA 9: Walshaw
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-D1 Infrastructure Implementation
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JP-D2 Developer Contributions
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No

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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.	Having released land from Greenbelt protection, larger land owners will divide their land into smaller plots. Local authorities will then be left to try to extract developer contributions. Bury Council have a woeful success rate in obtaining developer contributions. The single largest site to be developed on Greenbelt land in the whole of the PfE plan is the Elton Reservoir site, I have no confidence in Bury Council securing or collecting the contributions due and so it would be left for tax payers to fund it and also the developers will use the lack of profit ploy to reduce any requirement on them to build low cost affordable housing.
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	Bury - Green Belt Additions
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	- The Places for Everyone plan uses smoke and mirrors to make it appear that the borough of Bury is losing less Greenbelt than it actually is. The vast area of the Elton Reservoir Greenbelt land is being stolen from the community of Radcliffe reclassifying pieces of other land to create new Greenbelt (none of which would be suitable (or attractive to developers to build on) one of which is an old landfill site. The PfE has not justified the exceptional circumstances and therefore is not in accordance with National Policy.
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	Other Comments
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

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Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JPA 7: Elton Reservoir Area
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	Other Comments
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JPA 1.1 Heywood / Pilsworth (Northern Gateway)
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound

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Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	JPA 8: Seedfield
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Sheppard
Given Name	Alan
Person ID	1286222
Title	Other Comments
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No