

Places for Everyone Representation 2021

Family Name	Simm
Given Name	Jennifer
Person ID	1287016
Title	Stakeholder Submission
Type	Web
Family Name	Simm
Given Name	Jennifer
Person ID	1287016
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
Family Name	Simm
Given Name	Jennifer
Person ID	1287016
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 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

Places for Everyone Representation 2021

Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Simm
Given Name	Jennifer
Person ID	1287016
Title	JP-S 1 Sustainable Development
Type	Web
Soundness - Positively prepared?	NA
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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>homes to be built on greenbelt land will be built by developers with little oversight from anyone and as they are in areas of higher house prices anyway , and need to be so in order to get the 5% extra needed by Bury council to fund essential infrastructure the policy of affordable homes is not viable.</p> <p>Site Allocation Topic Paper- JPA 9 Walshaw pg 44, 45 and 46. Realistically, this makes the infrastructure for the site undeliverable.</p> <p>Bury Council have consistently failed to meet housing delivery targets and are now in presumption. 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 and what sanctions will apply if they don't</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>use brownfield sites that already have infrastructure and access to employment centres (yes it might need updating but that is not as costly or destructive)</p> <p>and enable the building of affordable homes.</p>
Family Name	Simm
Given Name	Jennifer
Person ID	1287016
Title	JP-S 2 Carbon and Energy
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound

Places for Everyone Representation 2021

Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
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>Places for Everyone proposes employment sites on the other side of the borough from greenfield sites on the M66 Northern Gateway Corridor, necessitating travel by car from Walshaw certainly as no direct public transport route exists or is proposed, thus increasing carbon emissions. Local transport hubs in Bury are only accessible from Walshaw by a car journey or an expensive, unreliable and infrequent bus service, again increasing carbon emissions.</p> <p>The proposals in Radcliffe necessitate much more funded infrastructure to an already busy area instead of using existing brown field sites and infrastructure there.</p> <p>The proposed new link road at Walshaw will do nothing to alleviate congestion on the roads, simply transferring the problem from one place to another.</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.	use brownfield sites instead of greenfield sites
Family Name	Simm
Given Name	Jennifer
Person ID	1287016
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?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	
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.	A new plan with more careful and knowledgeable consideration of where to build and expert independent advice.
Family Name	Simm
Given Name	Jennifer
Person ID	1287016
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?	NA
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 areas in Bury earmarked for development are already notorious for flooding. the evidence is obvious and the prevention aspects are not sound enough to mitigate this.</p> <p>Site wildlife, flood risk and other surveys have been carried out by consultancies on behalf of and paid for by developers rather than entirely independent wildlife organisations or the Department of the Environment so must be considered potentially biased.</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.	A new plan with more careful and knowledgeable consideration of where to build and expert independent advice.
Family Name	Simm

Places for Everyone Representation 2021

Given Name	Jennifer
Person ID	1287016
Title	JP-S 6 Clean Air
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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>Places for Everyone proposes employment sites on the other side of the borough from greenfield sites on the M66 Northern Gateway Corridor, necessitating travel by car from Walshaw certainly as no direct public transport route exists or is proposed, thus increasing carbon emissions. Local transport hubs in Bury are only accessible from Walshaw by a car journey or an expensive, unreliable and infrequent bus service, again increasing carbon emissions.</p> <p>The proposals in Radcliffe necessitate much more funded infrastructure to an already busy area instead of using existing brown field sites and infrastructure there.</p> <p>The proposed new link road at Walshaw will do nothing to alleviate congestion on the roads, simply transferring the problem from one place to another</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.	A new plan with more careful and knowledgeable consideration of where to build and expert independent advice.
Family Name	Simm
Given Name	Jennifer
Person ID	1287016
Title	JP-S 7 Resource Efficiency
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound

Places for Everyone Representation 2021

Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	more traffic, more carbon emissions ,more resources used instead of utilising and improving what is already there..see arguements in other sections
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.	A new plan with more careful and knowledgeable consideration of where to build and expert independent advice.
Family Name	Simm
Given Name	Jennifer
Person ID	1287016
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
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 is insufficient confidence in the accuracy of the predictions of housing requirements in the current uncertain economic climate to justify Green Belt loss at the start of the plan. Greenbelt loss should only occur once all brownfield has been exhausted. PFE , Bury council and National Policy recommend a brownfield first policy. As stated above this has not been explored sufficiently
Redacted modification - Please set out the	A new plan using upto date predictions of need

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.	
Family Name	Simm
Given Name	Jennifer
Person ID	1287016
Title	JP-H 2 Affordability of New Housing
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
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 only way in which the funding levels required for infrastructure could be achieved would be through a 5% increase in the price of the properties on the site, making the infrastructure for the site undeliverable. (Three Dragons Viability Appraisal), so no guarantee that funding will be reliable, and will only evolve when (if) the funds have been raised. (Site Allocation Topic Paper- JPA 9 Walshaw pg 46 para 27.2)</p> <p>The plan for infrastructure is therefore unsound as it is undeliverable and thus the site unviable.</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.	A new plan reconsidering othe options of Brown field land
Family Name	Simm
Given Name	Jennifer
Person ID	1287016
Title	JP-H 4 Density of New Housing
Type	Web

Places for Everyone Representation 2021

Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
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>Increasing the average density of new housing developments in the most accessible locations is an important part of the overall strategy.</p> <p>It will reduce the amount of land that needs to be used for development, thereby assisting the protection of greenfield and Green Belt land. It will help to minimise the need to travel, enabling more people to live close to shops and services, and increasing the local population necessary to support local facilities and support regeneration.</p> <p>It will also maximise the number of people living in the most accessible places, helping to increase the proportion of trips made by walking, cycling and public transport, and reducing the demand for car-based travel.</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.	adherence to above in a new plan
Family Name	Simm
Given Name	Jennifer
Person ID	1287016
Title	JP-G 1 Valuing Important Landscapes
Type	Web
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
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>Greenbelt is greenbelt and legally protected for valid, necessary and cherished reasons. This should not be able to be changed on a whim, especially without clear consultation.</p> <p>No details of how Duty to co operate is to be achieved.</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>Use of brown field development is said to be a priority but is not followed through and protected in practice. It should be compulsory to exhaust all brown field areas.</p> <p>The "new" greenbelt areas designated added to established ones without any swaps.</p> <p>.</p>
<p>Family Name</p>	<p>Simm</p>
<p>Given Name</p>	<p>Jennifer</p>
<p>Person ID</p>	<p>1287016</p>
<p>Title</p>	<p>JP-G 7 Trees and Woodland</p>
<p>Type</p>	<p>Web</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>tree destruction is surely not legal in a drive to plant and sustain trees for the environment</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>use brownfield sites</p>
<p>Family Name</p>	<p>Simm</p>
<p>Given Name</p>	<p>Jennifer</p>
<p>Person ID</p>	<p>1287016</p>
<p>Title</p>	<p>JPA 7: Elton Reservoir Area</p>
<p>Type</p>	<p>Web</p>
<p>Soundness - Positively prepared?</p>	<p>Unsound</p>
<p>Soundness - Justified?</p>	<p>Unsound</p>

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>1 BMBC failed to adhere to their own statement of community involvement. No notification to residents of initial call for sites Residents not informed of plan accross the borough so scope not able to be appreciated Over reliance on residents own research through technology..not accessible to many during covid and still remain in Bury SCI(1.7) Inaccessible language and terminology deterring response</p> <p>2 Green belt protection is to prevent urban sprawl (para 11.119 of NPPF) filling it in creates urban sprawl against NPPF para134, a,,c,e NO evidence of exceptional circumstances to allow change in greenbelt boundaries as required (NPPF, para 140) housing need is not exceptional circumstance unless lack of brown field land. NPPF requires other all other reasonable options to have been considered (NPPF para 141)</p> <p>3 Ecological assessments of flood risk, wildlife etc have been made made by consultantancies on behalf of and paid for by developers, not independent organisations or DfE so potentially biased. His is especially important in the case of Elton due to problems with the reservoir wall. Remedial work by the canal and rivers trust is not verified to provide sufficient protection for homes.</p> <p>4 Housing Need assessment in Pfe requires (para 1.63) the most up to date information to be used , this is not the case</p> <p>5 Site selection process has been unclear little information given why some sites were rejected and what alternatives were considered FOI shows decisions were taken in informal meetings with no minutes taken . Elton reservoir site does not meet the criteria laid down in NPPF or GMCA guidelines. This site was chosen although other areas require affordable housing. Needs of the community have not been respected or considered, mental and physical health give way to economic growth.</p> <p>6 Para 11.105 p 264 states: "Although the allocation has the capacity to deliver a total of around 3,500 new homes, it is anticipated that around 1,900 of these will be delivered within the plan period. Nevertheless, it is considered necessary to release the site in full at this stage given that the scale of the proposed development means that it will need to be supported by significant strategic infrastructure and this level of investment needs the certainty that the remaining development will still be able to come forward beyond the plan period". Such gross over release of greenbelt is entirely contrary to National Guidelines, which regards greenbelt as a precious resource not to be squandered. JPA7 fails to identify the source of infrastructure funding, indeed shortfalls are expected see para 12.16 of PfE. Site owners Peel are not specifically mentioned as being a contributor to the infrastructure funding.</p> <p>7 The Elton site apparently cost Peel £27M (as detailed in the site allocation topic paper) for approx. 260 hectares (£104K per hectare) as greenbelt. Allowing a conservative price uplift of around 60 times for green belt conversion to development land, the land for the initial 1900 site becomes worth around £875M. Adding in the land for the totally unjustified additional housing beyond the plan period adds approx. another £750 M. The</p>

implication being that unless Peel get the whole £1.325 Billion up front they can't offer any upfront funding for the infrastructure. Infrastructure that would not be needed if the development does not go ahead. Peel have indicated that they will possibly build some homes but will definitely split the site into lots to be developed by other developers so they (Peel) would avoid contributions this way. It would be left to Bury to extract the funding from other as yet unknown developers. Bury have a very poor reputation for obtaining developer contributions for infrastructure and developers always try to wriggle out of any obligations. It seems Peel have duped Bury Council into ignoring National Policy and granting them a huge financial bonus with no commitment to do anything.

8 PfE puts the majority of housing in the West of Bury (Elton Reservoir site) while locating the jobs on the East side of Bury on the M66 Northern Gateway corridor completely the other side of an already congested Bury. The proposed new link road will not help this problem as it links one congested area to another.

9 A new secondary school for Radcliffe is mentioned sited where there is a new free school already planned which in itself will not cater for existing Radcliffe pupil numbers. So there will be a lack of capacity.

A regeneration plan is already in place for Radcliffe and Government funding applied for but it is stated to still go ahead if refused funding and so not dependent on PfE

10 There is insufficient confidence in the accuracy of the predictions of housing requirements in the current uncertain economic climate to justify Green Belt loss at the start of the plan. Greenbelt loss should only occur once all brownfield has been exhausted. PFE , Bury council and National Policy recommend a brownfield first policy. As stated above this has not been explored sufficiently.

11 Bury Council have consistently failed to meet housing delivery targets and are now in presumption. 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 and what sanctions will apply if they don't. At a Council meeting held on 9/9/21 the Leader of Bury Council Eammon O'Brien confirmed that it was "unlikely" that the proposed building rates for all developments in Bury (as laid out in JPA7 Elton Reservoir Topic Paper PfE 2021, section 27.8 page 52) would be met as they were "unrealistic". So the plan cannot be considered to be effective. So the plan fails the effectiveness test for Soundness.

12 The loss of the reservoir site superficially appears to have been partially offset by creating extensive green belt in other areas without justifying exceptional circumstances to make it appear that less greenbelt is being sacrificed. This is not in accordance with National Policy

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 land" PfE favours a brownfield first policy wherever possible as does National Policy. Bury Council have informed the public in Bury that they will implement a brownfield first policy; however, they are going for immediate green belt release (see JPA7 Elton Reservoir Topic Paper PfE 2021, section 27.9 page 52). When questioned at a council meeting on 9/9/21 the Leader of the Councillor Eammon O'Brien clarified this statement by saying that for anything the council themselves build they would adopt a brownfield first policy but claimed that the council have no control over the actions of private developers, in reality they do, as they could limit the release of green belt sites in accordance with National Policy NPPF 134 part e.

Redacted modification - Please set out the modification(s) you

A new plan with full community involvement, surveys independent of benefiter influence and including Bury Housing Development Needs Assessment 2020

Places for Everyone Representation 2021

<p>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 further audit of Brown field sites and valid justification as to why all brown field sites are not used as priority and an acceptable case for any exceptional circumstances</p> <p>Questions should be asked regarding the reasons for Bury Council offering up a huge amount of greenbelt at Elton Reservoir that is not required during the plan period (and may never be required) instead of retaining it in accordance with National Policy.</p> <p>Bury needs to have secured all the funding necessary for infrastructure without recourse to developers.</p> <p>Plans and funding are needed for a second school to cope with increases in numbers. Unless a second school is planned this and regeneration should be removed from JPA7</p>
<p>Family Name</p>	<p>Simm</p>
<p>Given Name</p>	<p>Jennifer</p>
<p>Person ID</p>	<p>1287016</p>
<p>Title</p>	<p>JPA 9: Walshaw</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>1 BMBC failed to adhere to their own statement of community involvement. No notification to residents of initial call for sites Amount spent for awareness raising (100k..FOI) Residents not informed of plan accross the borough so scope not able to be appreciated Ove reliance on residents own research through technology..not accessible to many during covid and still remain in Bury SCI(1.7) Inaccessible language and terminology deterring response</p> <p>2 Green belt protection is to prevent urban sprawl (para 11.119 of NPPF) filling it in creates urban sprawl against NPPF para 137, 138a,b,c,e NO evidence of exceptional circumstances to allow change in greenbelt boundries as required (NPPF, para 140) housing need is not exceptional circumstance unless lack of brown field land. NPPF requires other all other reasonable options to have been considered (NPPF para 141)</p> <p>3 Ecological assessments made by consultantancies on behalf of and paid for by developers, not independent organisations or DfE so potentially biased</p> <p>4 Housing Need assessment carried out by Arc4 who havre a partnership with GM housing Parnership and Bury six town housing and so is also potentially biased Pfe requires (para 1.63) the most up to date information</p>

to be used and so should include Bury Housing Development Needs Assessment 2020

5 PFE employment. sites are on the other side of bury and necessitate travel by car or unreliable bus service, increasing carbon emissions. the new link road will only move congestion problems.

6 Site selection process has been unclear little information given why some sites were rejected and what alternatives were considered FOI shows decisions were taken in informal meetings with no minutes taken. Walshaw site performs poorly against site selection criteria and strongly for green belt inclusion. the only criteria is extra traffic created by building, without building the problem does not exist.

Walshaw meets only 3 out of 10 broad objectives in section 3 of PFE plan which could be met by a number of sites in the area. (site Allocation paper JPA9 Walshaw pg8, para5.7)

Walshaw site makes a strong or moderate to strong contribution to the purpose of greenbelt (GMgreenbelt assessment assessment 2016, site allocation topic paper JPA9 walshaw pgs 27-28 para 15.3)-Release of the allocation would therefore cause moderate harm to Green Belt purposes and a contribution to maintaining the separation of Bury and Tottington Site Allocation Topic Paper JPA 9 Walshaw at page 29 para 15.8 refers to The Green Belt Harm 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.

Needs of the community have not been respected or considered, mental and physical health give way to economic growth.

8 (Site Allocation Topic Paper- JPA 9 Walshaw pg 44, 45 and 46.)

The only way in which the funding levels required for infrastructure could be achieved would be through a 5% increase in the price of the properties on the site, making the infrastructure for the site undeliverable. (three Dragons Viability Appraisal), so no guarantee that funding will be reliable, and will only evolve when (if) the funds have been raised. (Site Allocation Topic Paper- JPA 9 Walshaw pg 46 para 27.2)

The plan for infrastructure is therefore unsound as it is undeliverable and thus the site unviable.

No specific proposal for additional healthcare provision. (Topic Paper PA 9 Walshaw at page 43, para 25.1)

No feasible plan in place to deal with the increased number of secondary school age pupils. (Site Allocation Topic Paper PA 9 Walshaw at page 43, para 24.1) although 175 new secondary age pupils are expected and local schools are oversubscribed and more children will pass from the new proposed primary school.

PfE proposes to locate development in locations reducing the need for car travel by maximising densities round transport hubs and Walshaw is not near any of these. only a potential upgrade of bus services or new bus service is offered.

The new road link proposed will create further congestion (Transport Locality Assessments GMSF 2020) by sending traffic to the already congested pinch points at this side of the river and no account has been taken of the Andrews housing development near the walshaw site.

To be effective a plan must be realistic and deliverable and this plan depends on the whims of developers for whom there is no indication of sanctions . Therefore the plan is not sound.

9 There is insufficient confidence in the accuracy of the predictions of housing requirements in the current uncertain economic climate to justify Green Belt loss at the start of the plan. Greenbelt loss should only occur once all

	<p>brownfield has been exhausted. PFE , Bury council and National Policy recommend a brownfield first policy. As stated above this has not been explored sufficiently.</p> <p>10 The loss of the Walshaw site greenbelt has been partially offset by creating extensive but unusable greenbelt in other areas without justifying exceptional circumstances. This is not 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>A new, viable plan to be written, taking into consideration all the points above and;</p> <ul style="list-style-type: none"> -Use of Brownfield sites to meet new revised and closely monitored housing needs and eliminate use of any greenbelt land. -Adherence to up to date assessments of housing needs. (Pfe para 1.63 point 2, Bury Housing development Needs Assessment) -Compliance with the spirit of greenbelt protection legislation e.g reduction in urbanisation. -Use of sites near to transport hubs in the town before encroaching on greenbelt. -Employment of truly independent detailed assessments on ecology. -Adherence to the Clean Air aspirations -Compliance with independent infrastructure, health care, education al provision requirements and funding detailed and protected. -Detailed costing and identification of funding for viable infrastructure for any sites chosen -Information on all above to be open to public inspection and consultation