Family Name	Smith
Given Name	Claire
Person ID	1287489
Title	Stakeholder Submission
Туре	Web
Family Name	Smith
Given Name	Claire
Person ID	1287489
Title	JPA 19: Bamford / Norden
Туре	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	subscribed this therefore shows that the site fails to comply with PF a objective nine and is not consistent with NPPF chapter 8 paragraph 95. Also in Rochdale there is no acute shortage of large detached executive homes in Rochdale therefore there is no need to build on the greenbelt as we do not need these houses. The only acute shortage is for truly affordable homes and large detached executive homes is not that. In Rochdale we can build on brownfield sites first and would cover 99% Of the housing needs in the borough. Rochdale MBC have a local housing need of 8048 and land available for 7997 houses and therefore means we do not need to build on the Greenbelt. The only reason why Rochdale want to build on the greenbelt is for profits
Redacted modification - Please set out the modification(s) you	only. The site fails to comply with PFA objective to and is not consistent with NPPF chapter 2 Further more the site has pylons running through it and there have been many studies to show this can cause leukaemia to children living within 50 m of the lines. How can this even be possible to be acceptable to allow houses to be built on such land that is so dangerous to our children"s health. Therefore the site fails to comply with PFE objective 10 and it"s not consistent with NPPF chat to 8. The site is not consistent with national policy. The modification we are seeking is for JPA 19 Bamford/Norden to be removed from the PFE
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	Smith
Given Name	Craig
Person ID	1287048
Title	Stakeholder Submission
Туре	Web
Include files	PFE1287048_Legality_Simister.pdf PFE1287048_SOSGeneral.pdf PFE1287048_ObjectionToPlan.pdf PFE1287048_SOSWalshaw.pdf PFE1287048_SOSElton.pdf
Family Name	Smith
Given Name	Craig
Person ID	1287048
Title	Our Vision
Туре	Web
Include files	PFE1287048_SOSEIton.pdf PFE1287048_SOSWalshaw.pdf PFE1287048_ObjectionToPlan.pdf PFE1287048_SOSGeneral.pdf PFE1287048_Legality_Simister.pdf
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including considered alternatives.

Redacted modification
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modification(s) you
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of any legal compliance
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 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public representation should be held and minutes should be published. The rationale for the selection/rejection of every site should be available
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Smith
Craig
1287048
Our Strategic Objectives
Web
PFE1287048_Legality_Simister.pdf PFE1287048_SOSGeneral.pdf PFE1287048_SOSWalshaw.pdf PFE1287048_SOSElton.pdf
Unsound
NA
NA
NA
No
NA
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	Places for Everyone.
Family Name	Smith
Given Name	Craig
Person ID	1287048
Title	JP-G 2 Green Infrastructure Network
Туре	Web
Include files	PFE1287048_ObjectionToPlan.pdf PFE1287048_Legality_Simister.pdf PFE1287048_SOSGeneral.pdf PFE1287048_SOSWalshaw.pdf PFE1287048_SOSElton.pdf
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Family Name	Smith
Given Name	Craig
Person ID	1287048
Title	JP-G 3 River Valleys and Waterways
Туре	Web
Include files	PFE1287048_SOSElton.pdf PFE1287048_SOSWalshaw.pdf PFE1287048_SOSGeneral.pdf PFE1287048_Legality_Simister.pdf

PFE1287048 ObjectionToPlan.pdf

	Places for Everyone Representation 2021
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Smith
Given Name	Craig
Person ID	1287048
Title	JP-G 4 Lowland Wetlands and Mosslands
Туре	Web
Include files	PFE1287048_ObjectionToPlan.pdf PFE1287048_Legality_Simister.pdf PFE1287048_SOSGeneral.pdf PFE1287048_SOSWalshaw.pdf PFE1287048_SOSElton.pdf
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Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound

	Places for Everyone Representation 2021
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Smith
Given Name	Craig
Person ID	1287048
Title	JP-G 6 Urban Green Space
Туре	Web
Include files	PFE1287048_ObjectionToPlan.pdf PFE1287048_Legality_Simister.pdf PFE1287048_SOSGeneral.pdf PFE1287048_SOSWalshaw.pdf PFE1287048_SOSElton.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Smith
Given Name	Craig
Person ID	1287048
Title	JP-G 7 Trees and Woodland
Туре	Web
Include files	PFE1287048_SOSElton.pdf PFE1287048_SOSWalshaw.pdf PFE1287048_SOSGeneral.pdf PFE1287048_Legality_Simister.pdf PFE1287048_ObjectionToPlan.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No

Duty to Cooperate?

	Flaces for Everyone Representation 2021
Family Name	Smith
Given Name	Craig
Person ID	1287048
Title	JP-G 8 Standards for Greener Places
Туре	Web
Include files	PFE1287048_ObjectionToPlan.pdf PFE1287048_Legality_Simister.pdf PFE1287048_SOSGeneral.pdf PFE1287048_SOSWalshaw.pdf PFE1287048_SOSElton.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Smith
Given Name	Craig
Person ID	1287048
Title	JP-G 9 A Net Enhancement of Biodiversity and Geodiversity
Туре	Web
Include files	PFE1287048_SOSElton.pdf PFE1287048_SOSWalshaw.pdf PFE1287048_SOSGeneral.pdf PFE1287048_Legality_Simister.pdf PFE1287048_ObjectionToPlan.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Smith
Given Name	Craig
Person ID	1287048
Title	JP-G 10 Green Belt

Web

Type

	Places for Everyone Representation 2021
Include files	PFE1287048_ObjectionToPlan.pdf PFE1287048_SOSGeneral.pdf PFE1287048_SOSWalshaw.pdf PFE1287048_SOSElton.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Smith
Given Name	Craig
Person ID	1287048
Title	JP-G 11 Safeguarded Land
Туре	Web
Include files	PFE1287048_SOSElton.pdf PFE1287048_SOSWalshaw.pdf PFE1287048_SOSGeneral.pdf PFE1287048_Legality_Simister.pdf PFE1287048_ObjectionToPlan.pdf
Soundness - Positively prepared?	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	Smith
Given Name	Craig
Person ID	1287048
Title	JPA 7: Elton Reservoir Area
Туре	Web
Include files	PFE1287048_Legality_Simister.pdf PFE1287048_ObjectionToPlan.pdf PFE1287048_SOSGeneral.pdf PFE1287048_SOSWalshaw.pdf PFE1287048_SOSElton.pdf
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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.

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

Policy.

period (and may never be required) instead of retaining it in accordance with National

? The Elton site apparently cost Peel 27M (as detailed in the site allocation topic

conservative price uplift of around 60 times for green belt conversion to developmen land, the land for the initial 1900 site becomes worth around $\square 875M$. Adding in the land for the totally unjustified additional housing beyond the plan period adds approxanother $\square 750$ M. The implication being that unless Peel get the whole $\square 1.325$ Billion up front they can"t offer any upfront funding for the infrastructure. Infrastructure that

paper) for approx 260 hectares (\$\subseteq\$104K per hectare) as greenbelt. Allowing a

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 hug
financial bonus with no commitment to do anything.
? Site wildlife, flood risk and other surveys have been carried out by consultancies o
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. This is particularly important at Elton Reservoir as there are
currently problems with the reservoir wall which are being addressed by the Canal
and Rivers trust. These measures may be suitable for providing some protection to
open fields but are they suitable to protect homes from flooding if there is a breech?
Such surveys should be entirely independent of benefiter influence.
? As part of the infrastructure a new secondary school for Radcliffe is mentioned. A
new secondary free school for Radcliffe is already planned funded by the
Government. The proposed new school will not even cater for existing Radcliffe pupi
numbers. Since the proposed school is indicated on the site already reserved for the
free school we must assume PfE document refers to the school already planned.
Regeneration for Radcliffe the location of the Elton Reservoir development is also
mentioned as part of the infrastructure funding. A regeneration plan for Radcliffe is
already in place. Bury Council have applied for Government levelling up funding and
have stated that even if the application does not succeed the regeneration will go
ahead using existing Council money. Bury Council have stated that regeneration and
the new school for Radcliffe are not dependent on PfE going ahead.
Any mention/implication that PfE will contribute to providing a new secondary school
(unless it is a second school) and regeneration for Radcliffe must be removed from
JPA-7.
? Bury Council have consistently failed to meet housing delivery targets and are now
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 deliverability test in terms of "soundness".

? As part of the overall plan Bury have modified green belt boundaries and allocation in such a way to make it appear that less greenbelt is being sacrificed. So the loss of the Elton Reservoir site greenbelt has been partially offset by creating extensive greenbelt in other areas without justifying exceptional circumstances. This is not in accordance with National Policy.

? 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 the other side of an already congested Bury town centre. The proposed new link road winot help this problem as it links one congested area to another.

? 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 thi 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 par

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
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Legal Compliance

? It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before 'Places for Everyone' can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfier for PfE. Para 1.23 states 'The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change.' So, is 'not insignificant' the same as 'substantial', if it is, the plan is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government. Soundness

? The plan uses 2014 data to predict housing need and ignores the potential impact Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ON population predictions and take into account the effect of Covid on work patterns. ? There is little detail on how the required infrastructure will be paid for. The plan need

to be revised to identify how all the infrastructure will be paid

- ? There are no partners or industries identified for employment provision. Major partners for employment provision should be identified.
- ? There has been poor public consultation, a lack of accessible information and little spent by councils in generating awareness. Interest in the plan has mainly been generated by local protest groups. The public consultations should be repeated, providing clear, understandable information. They should be designed to encourage rather than discourage public input.
- ? The site selection process has been opaque with no explanation as to why some sites in the 'call for sites' were excluded from the plan.

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

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

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Fami	ly N	ame
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Smith

Craig

Person ID

1287048

Title

JPA 8: Seedfield

Type

Web

	Places for Everyone Representation 2021
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Redacted modification

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Family Name	Smith	
Given Name	Craig	
Person ID	1287048	
Title	JPA 9: Walshaw	
Туре	Web	
Include files	PFE1287048_ObjectionToPlan.pdf PFE1287048_Legality_Simister.pdf PFE1287048_SOSGeneral.pdf PFE1287048_SOSWalshaw.pdf PFE1287048_SOSElton.pdf	
Soundness - Positively prepared?	Unsound	
Soundness - Justified?	Unsound	
Soundness - Consistent with national policy?	Unsound	
Soundness - Effective?	Unsound	
Compliance - Legally compliant?	No	
Compliance - In accordance with the Duty to Cooperate?	No	
Redacted reasons -	Legal Compliance	
Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	? It is questionable whether PfE and the GMSF can effectively be treated as the san plan. Legality must be decided in court before "Places for Everyone" can proceed ar further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfies for PfE. Para 1.23 states "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change." So, is "not insignificant" the same as "substantial", if it is, the	
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Redacted modification

- Please set out the modification(s) you consider necessary to plan legally compliant and sound, in respect of any legal compliance or soundness matters

Legal Compliance

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Person ID	1287048
Title	Bury - Green Belt Additions
Туре	Web
	PFE1287048_SOSElton.pdf PFE1287048_SOSWalshaw.pdf PFE1287048_SOSGeneral.pdf PFE1287048_ObjectionToPlan.pdf
_	Bury GBA03 Pigs Lea Brook 1
Green Belt addition/s within this District your	Bury GBA04 North of Nuttall Park
response relates to -	Bury GBA05 Pigs Lea Brook 2
•	Bury GBA06 Hollins Brook
questions below	Bury GBA07 Off New Road, Radcliffe
	Bury GBA08 Hollins Brow
	Bury GBA09 Hollybank Street, Radcliffe
	Bury GBA10 Crow Lumb Wood
	Bury GBA11 Nuttall West, Ramsbottom
	Bury GBA12 Woolfold, Bury
	Bury GBA13 Nuttall East, Ramsbottom
	Bury GBA14 Chesham, Bury
	Bury GBA15 Broad Hey Wood North
	Bury GBA16 Lower Hinds
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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Family Name

Smith

Given Name

Craig

Person ID

1287048

Title

Supporting Evidence

Type

Web

Include files

PFE1287048_ObjectionToPlan.pdf PFE1287048_SOSGeneral.pdf

PFE1287048_SOSWalshaw.pdf PFE1287048_SOSElton.pdf

Redacted comment on supporting documents - Please give details of why you consider any of the evidence not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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Family Name	Smith
Given Name	Craig
Person ID	1287048
Title	Other Comments
Туре	Web
Include files	PFE1287048_SOSGeneral.pdf PFE1287048_ObjectionToPlan.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
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Compliance - Legally compliant?	No
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Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Smith
Given Name	Craig
Person ID	1287048
Title	JPA 1.2: Simister and Bowlee (Northern Gateway)
Туре	Web
Include files	PFE1287048_SOSGeneral.pdf PFE1287048_Legality_Simister.pdf PFE1287048_ObjectionToPlan.pdf PFE1287048_SOSElton.pdf PFE1287048_SOSWalshaw.pdf
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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