

Places for Everyone Representation 2021

<b>Family Name</b>	Topping
<b>Given Name</b>	Christopher
<b>Person ID</b>	1287407
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Family Name</b>	Topping
<b>Given Name</b>	Christopher
<b>Person ID</b>	1287407
<b>Title</b>	Our Vision
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Sound
<b>Soundness - Justified?</b>	Sound
<b>Soundness - Consistent with national policy?</b>	NA
<b>Soundness - Effective?</b>	NA
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Family Name</b>	Topping
<b>Given Name</b>	Christopher
<b>Person ID</b>	1287407
<b>Title</b>	Our Strategic Objectives
<b>Type</b>	Web
<b>Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:</b>	2. Create neighbourhoods of choice 8. Improve the quality of our natural environment and access to green spaces
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	NA
<b>Soundness - Consistent with national policy?</b>	NA
<b>Soundness - Effective?</b>	NA
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA

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<p><b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	<p>In relation to the proposed developments at Elton (JPA-7) and Walshaw (JPA-9), they do not meet Strategic Objective 2, in that they do not prioritise the use of brownfield land. They are pristine Green belt. In the case of the Elton site, part of which is close to the River Irwell and prone to flooding, it does not "ensure that there is no increase in the number of homes and premises at high risk of flooding".</p> <p>Both the above fail to meet Strategic Objective 8 in that building on these sites removes green infrastructure and biodiversity, decreases access to green spaces and decreases climate resilience.</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>Select brownfield sites for development.</p>
<p><b>Family Name</b></p>	<p>Topping</p>
<p><b>Given Name</b></p>	<p>Christopher</p>
<p><b>Person ID</b></p>	<p>1287407</p>
<p><b>Title</b></p>	<p>JP-Strat 6 Northern Areas</p>
<p><b>Type</b></p>	<p>Web</p>
<p><b>Soundness - Positively prepared?</b></p>	<p>Unsound</p>
<p><b>Soundness - Justified?</b></p>	<p>Unsound</p>
<p><b>Soundness - Consistent with national policy?</b></p>	<p>Unsound</p>
<p><b>Soundness - Effective?</b></p>	<p>Unsound</p>
<p><b>Compliance - Legally compliant?</b></p>	<p>NA</p>
<p><b>Compliance - In accordance with the Duty to Cooperate?</b></p>	<p>NA</p>
<p><b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	<p>I do not believe that the proposed development of Green Belt is necessary and consider it to be damaging to environment and wellbeing of the communities in this area. Brownfield development has not been prioritised here. I fail to grasp how building on Green Belt will enhance the natural environment and local character. It will create a greater urban sprawl, more traffic and reduced air quality.</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance</b></p>	<p>Prioritise brownfield development. That would enhance the natural environment and improve the local character.</p>

<b>or soundness matters you have identified above.</b>	
<b>Family Name</b>	Topping
<b>Given Name</b>	Christopher
<b>Person ID</b>	1287407
<b>Title</b>	JPA 7: Elton Reservoir Area
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>Whereas GMSF complied with Regulation 18 of Town and Country Planning Regulations, Places for Everyone is a significantly changed plan and it cannot be assumed that Regulation 18 is automatically and the plan should be subject to a judicial review.</p> <p>The process by which this site was selected for development was not open to public scrutiny - it was a a series of informal meetings with no minutes or lists of attendees.</p> <p>According to the document "What criteria were used to select the proposed GMSF sites across Greater Manchester?", the Elton site matches only two of the seven criteria. The main reason for the selection would appear to be its proximity to the existing Metrolink line. This site has previously been praised for breaking up the "urban sprawl" and providing a natural break between Radcliffe and Bury. Developing this site would increase the urban sprawl contrary to compliance with National Policy NPPF para 134 parts a,c and e.</p> <p>According to PfE (Para 1.63 point 2), up to date information has been used in plan making. It would seem that Bury"s Housing Development Needs Assessment 2020 (which is the most up to date assessment of need) has not been used. According to this (D14 Table D3) the greatest needs are for one person dwellings, mostly for the 60+ age group, and couple only, mostly for the 60+ age group. Brownfield sites in Radcliffe (e.g. the former East Lancs Paper Mill site) could make significant contribution to these needs and allow the Green Belt to remain.</p> <p>Elton Reservoir and it environs is a major wildlife site in Greater Manchester, especially for birds, and, by far, the best in Bury. Wildlife surveys for the area have been carried out by consultancies on behalf on of the developers and paid for by them and not by</p> <p>an entirely independent wildlife organisation.</p> <p>Para11.105 p 264 states "Although the allocation has the capacity to deliver around 3,500 new homes, it is anticipated that around 1900 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</p>

infrastructure and this level of investment needs the certainty that the remaining development will still be able to come forward beyond the plan period. This over release is contrary to National Guidelines which regards Green Belt as a resource not to be squandered. The plan does not identify the source of the infrastructure funding and, according to para 12.6 of PfE, shortfalls are expected. Peel, the site owners, are not mentioned as contributors to infrastructure funding. One item of infrastructure mentioned is a new secondary school in Radcliffe. The council have been promising this for years ever since they closed the two secondary schools in the town. This should be removed from JPA-7 as this forms part of a separate Regeneration of Radcliffe scheme that seeks levelling up funding, but is promised to go ahead anyway.

Bury Council have consistently failed to meet housing delivery targets and are now in presumption. They are also well behind all other boroughs of Greater Manchester in applying for, and achieving funding for the development of brownfield sites. This plan, to be effective, must be deliverable and relies heavily on cooperation of the developers. No details are given of how targets will be met. The council leader confirmed on 9/9/21, at a council meeting, that it was "unlikely" that the proposed building rates for Bury (as stated in JPA-7 Elton Reservoir Topic Paper PfE 2021, section 27.8, p.52) would be met as they are "unrealistic". That being the case, the plan cannot be wholly effective.

According to PfE para 1.42 " The majority of development between 2021-2037 will be on land within the urban area, most of which is brownfield land". Whilst, this may apply in other areas, it does not apply in Bury. National Policy favours brownfield first, wherever possible. When questioned on this matter at a council meeting on 9/9/2, the leader of Bury Council stated that for anything the council themselves would build, they would adopt a brownfield first policy and claimed that the council had no control over private developers, totally ignoring the fact that they have come up with a plan that releases vast tracts of Green Belt to private developers in preference to brownfield sites.

The council leader claims to have the support of the people of Bury. While he may have the support of people unaffected by loss of there adjacent Green Belt he does not have the support of the people of Radcliffe or the MP"s for Bury. Christian Wakefield, MP for Bury South, regards the Elton proposals as "environmental vandalism". In the last council elections in Radcliffe, always a Labour stronghold, his party gained 27.9% of the vote and lost all of its seats contested. Out of nine seats in Radcliffe, they are now left with only two.

**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.**

Abandon the proposed development of the Elton site and adopt a brownfield first policy.

**Family Name**

Topping

**Given Name**

Christopher

**Person ID**

1287407

**Title**

JP-D1 Infrastructure Implementation

**Type**

Web

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<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	The population growth figures used are pre-Brexit and are not reliable.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	Use later assessments of population growth.
<b>Family Name</b>	Topping
<b>Given Name</b>	Christopher
<b>Person ID</b>	1287407
<b>Title</b>	Bury - Green Belt Additions
<b>Type</b>	Web
<b>GBA Bury - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below</b>	Bury GBA16 Lower Hinds
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA

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<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	Much of the Lower Hinds site is former industrial land and not pristine green belt. Given what is being lost at Elton, re-classifying this is rather insulting.