

Places for Everyone Representation 2021

Family Name	Wilkinson
Given Name	Amanda
Person ID	1286706
Title	Stakeholder Submission
Type	Web
Family Name	Wilkinson
Given Name	Amanda
Person ID	1286706
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	Wilkinson
Given Name	Barbara
Person ID	1287424
Title	Stakeholder Submission
Type	Web
Include files	PFE1287424_SOSElton.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_SOSGeneral_Redacted.pdf
Family Name	Wilkinson
Given Name	Barbara
Person ID	1287424
Title	Our Vision
Type	Web
Include files	PFE1287424_SOSGeneral_Redacted.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_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 - 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 vision for Greater Manchester has been desktop planned without proper engagement and consultation from the very beginning. Any consultations that have taken place have been a deterrent asking far too many intrusive questions of residents to put them off completing the consultations have been designed in such a way that they are difficult to respond to for residents with limited I.T skills or digital access. Local councils have not properly published the plan to ensure a place for everyone plan is communicated to everyone. The plan should have been developed by the residents for the residents to address our actual housing requirements over the years. The above demonstrates a clear lack of community involvement which goes against the spirit of the constitution and makes the preparation of this plan unsound.</p> <p>Legal Compliance</p> <p>-It is questionable whether PfE and the GMSF can effectively be treated as the same thing. This must be decided in court before "Places for Everyone" can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant (in accordance with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if it was established. If there is any substantial difference in scope between the GMSF and PfE, it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a significant number of the plan have seen some form of change." So, is "not insignificant" the same as "substantial"? If the plan is not legal. This can only be established by a proper judicial review. So until a proper judicial review the plan must be considered illegal and not put to Government.</p>

Soundness

- The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must 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 needs to identify how all the infrastructure will be paid for.
- 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 success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information designed to encourage rather than discourage public input.
- The site selection process has been opaque with no explanation as to why some 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 the public should be held and minutes should be published. The rationale for the selection/rejection of sites should be available including considered alternatives.
- Several of the authorities involved have consistently failed to meet housing delivery targets. A plan must be deliverable. The plan relies on the cooperation of property developers. An indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on delivery. Clear delivery plans for infrastructure should be included.
- PfE shows removal of greenbelt protection for some areas and creation of greenbelts. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this.
- In addition to PfE each authority needs to come up with its own local plan. No details about when these plans will be available.
- There are no details of how Duty to Cooperate will be achieved. Following their withdrawal, the boroughs will effectively become a neighbouring borough. However, it is not acceptable to limit the boroughs to Stockport since each of the authorities in the plan is also neighbouring to other boroughs outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.
- A change in the methodology for Manchester City Council was resulted in a 35% up in housing need for the Manchester City Council area. The revised Local Housing Need methodology states that the need is to be met within the district and not redistributed (see Places for Everyone Joint Consultation documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021) This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.

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.

This plan needs to go back to Regulation 18 of the Town and Country planning act as it was prepared with proper public engagement and consultation.

Family Name	Wilkinson
Given Name	Barbara
Person ID	1287424

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Title	Our Strategic Objectives
Type	Web
Include files	PFE1287424_SOSElton.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_SOSGeneral_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Wilkinson
Given Name	Barbara
Person ID	1287424
Title	Our Spatial Strategy
Type	Web
Include files	PFE1287424_SOSGeneral_Redacted.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_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 - 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.	GMCA made the decision to move a poorly prepared plan forward to the publication s and Country planning Act even though major changes have been made to the plan s of consultation. For example Stockport withdrew from what was the GMSF and Manche has had a 35% uplift applied to their housing targets to be met within that specific ar the plan has changed significantly and therefore requires going back to proper consulta directly affected to comment further.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant	As above the plan needs to go back to proper consultation with the residents of Grea

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and sound, in respect of any legal compliance or soundness matters you have identified above.	
Family Name	Wilkinson
Given Name	Barbara
Person ID	1287424
Title	JP-Strat 6 Northern Areas
Type	Web
Include files	PFE1287424_SOSElton.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_SOSGeneral_Redacted.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?	NA
Family Name	Wilkinson
Given Name	Barbara
Person ID	1287424
Title	JP-Strat 7 North East Growth Corridor
Type	Web
Include files	PFE1287424_SOSGeneral_Redacted.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_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?	NA
Family Name	Wilkinson
Given Name	Barbara
Person ID	1287424
Title	JP-Strat 12 Main Town Centres

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Type	Web
Include files	PFE1287424_SOSElton.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_SOSGeneral_Redacted.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	Wilkinson
Given Name	Barbara
Person ID	1287424
Title	JP-Strat 13 Strategic Green Infrastructure
Type	Web
Include files	PFE1287424_SOSGeneral_Redacted.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_SOSElton.pdf
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
Family Name	Wilkinson
Given Name	Barbara
Person ID	1287424
Title	JP-Strat 14 A Sustainable and Integrated Transport Network
Type	Web
Include files	PFE1287424_SOSElton.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_SOSGeneral_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound

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Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Family Name	Wilkinson
Given Name	Barbara
Person ID	1287424
Title	JP-J 1 Supporting Long Term Economic Growth
Type	Web
Include files	PFE1287424_SOSGeneral_Redacted.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_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	Wilkinson
Given Name	Barbara
Person ID	1287424
Title	JP-J 2 Employment Sites and Premises
Type	Web
Include files	PFE1287424_SOSElton.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_SOSGeneral_Redacted.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	Wilkinson
Given Name	Barbara

Places for Everyone Representation 2021

Person ID	1287424
Title	JP-J 3 Office Development
Type	Web
Include files	PFE1287424_SOSGeneral_Redacted.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_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 - 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.	No consideration appears to be given to the changing face of employment following the C - is so much office space really needed now?
Family Name	Wilkinson
Given Name	Barbara
Person ID	1287424
Title	JP-J 4 Industry and Warehousing Development
Type	Web
Include files	PFE1287424_SOSElton.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_SOSGeneral_Redacted.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 - Please give us details of why you consider the consultation point not	No details of potential employers or opportunities

to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	
Family Name	Wilkinson
Given Name	Barbara
Person ID	1287424
Title	JPA 1.2: Simister and Bowlee (Northern Gateway)
Type	Web
Include files	PFE1287424_SOSGeneral_Redacted.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_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 - 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>Failure to comply with Statement of Community Involvement</p> <p>Bury Council have failed to comply with their Statement of Community Involvement S Community Involvement (bury.gov.uk) at all stages of the creation of the plan. There was no consultation with residents of the initial call for sites and the amount spent on making residents aware of the plan was disproportionately small (£100 as per the response to a Freedom of Information request) to the effect it will have upon them. There has been a deliberate campaign of misinformation and misleading statements to promote and "sell" the Plan to residents, rather than a presentation of the facts e.g., residents only being told of the plans for their specific ward, and not being told the bigger picture across the borough, thus giving the impression that the impact is less than it is. There has been an over reliance on residents finding things out for themselves on social media and thus a failure to engage with various groups due to over reliance on the use of social media technology. There has been no access to public internet, e.g., in libraries, during Covid which has adversely and disproportionately affected older people and those from deprived backgrounds. This is against the SCI 2.4 & 4.17. Countrywide, Covid restrictions are now lifted but restrictions are still in place in Bury's Statement of Community Involvement (SCI para 1.7). Consultation materials were inaccessible in terms of language and terminology used and have been a deterrent to residents involved in the planning process as they have been wordy, long winded, and intrusive. This has resulted in an irrelevant response rate.</p>
Family Name	Wilkinson
Given Name	Barbara
Person ID	1287424
Title	JPA 2: Stakehill
Type	Web
Include files	PFE1287424_SOSElton.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_SOSGeneral_Redacted.pdf

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Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	NA
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Wilkinson
Given Name	Barbara
Person ID	1287424
Title	JPA 7: Elton Reservoir Area
Type	Web
Include files	PFE1287424_SOSGeneral_Redacted.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_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 - 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 PfE indicates in Para 1.63 point 2 that the most up to date information be used so being the most recent Bury's Housing Development Needs Assessment 2020 under consideration: https://www.bury.gov.uk/index.aspx?articleid=15866</p> <p>-The site selection process for Bury has been especially opaque. Little information has been provided about why other more apparently suitable sites were rejected, or what alternatives were considered. Bury Council admitted in a Freedom of Information response that site selection was determined by a series of informal meetings with no list of attendees or minutes available. This site choice was considered as the most appropriate when no reasonable alternatives appear to have been examined. The Elton Reservoir site does not meet the selection criteria laid down in the NPPF or the GMCA. https://www.bury.gov.uk/index.aspx?articleid=16330 Radcliffe the location of Elton Reservoir is the least expensive housing in Bury but was selected in preference to sites in other areas where affordable housing is required.</p> <p>-Para 11.105 p 264 states: " The allocation [Elton Reservoir] is almost entirely surrounded by existing urban area" Filling this green belt site in will contribute to creating urban sprawl and is not in compliance with National Policy NPPF para 134 parts a,c and e.</p> <p>-Para 11.105 p 264 states: "Although the allocation has the capacity to deliver a total of 1,900 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 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 be delivered."</p>

come forward beyond the plan period". Such gross over release of greenbelt is entirely against National Guidelines, which regards greenbelt as a precious resource not to be squandered. To identify the source of infrastructure funding, indeed shortfalls are expected see para 27.8. Site owners Peel are not specifically mentioned as being a contributor to the infrastructure. Questions should be asked regarding the reasons for Bury Council offering up a huge release of greenbelt at Elton Reservoir that is not required during the plan period (and may never be needed) instead of retaining it in accordance with National Policy.

-The Elton site apparently cost Peel £27M (as detailed in the site allocation topic paper). 260 hectares (£104K per hectare) as greenbelt. Allowing a conservative price uplift of 10% for green belt conversion to development land, the land for the initial 1900 site becomes £267M. Adding in the land for the totally unjustified additional housing beyond the plan period is approx. another £750 M. The implication being that unless Peel get the whole £1.32B they can't offer any upfront funding for the infrastructure. Infrastructure that would not be developed if the development does not go ahead. Peel have indicated that they will possibly build some infrastructure but will definitely split the site into lots to be developed by other developers so they (Peel) can get their contributions this way. It would be left to Bury to extract the funding from other as yet to be identified 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 into ignoring National Policy and granting them a huge financial bonus with no commensurate contribution anything.

-Site wildlife, flood risk and other surveys have been carried out by consultancies on behalf of developers rather than entirely independent wildlife organisations or the Department for Environment so must be considered potentially biased. This is particularly important as there are currently problems with the reservoir wall which are being addressed by the Environment Rivers trust. These measures may be suitable for providing some protection to open fields but are not suitable to protect homes from flooding if there is a breach? 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 school for Radcliffe is already planned funded by the Government. The proposed new school would not even cater for existing Radcliffe pupil numbers. Since the proposed school is indicated as 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 indicated as part of the infrastructure funding. A regeneration plan for Radcliffe is already in place. Bury 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. There is no mention/implication that PfE will contribute to providing a new secondary school (unless it is a new school) and regeneration for Radcliffe must be removed from JPA-7.

-Bury Council have consistently failed to meet housing delivery targets and are now in breach of their own plan. To be effective a plan must actually be deliverable. The plan relies heavily on the cooperation of private property developers. There is no indication of how they will be made to keep up with the targets. 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 a new secondary school in Bury (as laid out in JPA7 Elton Reservoir Topic Paper PfE 2021, section 27.8 page 27) 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.

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

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

-PfE para 1.42 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 approach wherever possible as does National Policy. Bury Council have informed the public in

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	will implement a brownfield first policy; however, they are going for immediate green (JPA7 Elton Reservoir Topic Paper PFE 2021, section 27.9 page 52). When questioned at a meeting on 9/9/21 the Leader of the Council Eammon O'Brien clarified this statement that for anything the council themselves build they would adopt a brownfield first policy and that the council have no control over the actions of private developers, in reality they can only limit the release of green belt sites in accordance with National Policy NPPF 134 paragraph 147.
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.	Removal of JPA 7 allocation Elton Reservoir from the plan
Family Name	Wilkinson
Given Name	Barbara
Person ID	1287424
Title	JPA 8: Seedfield
Type	Web
Include files	PFE1287424_SOSElton.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_SOSGeneral_Redacted.pdf
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
Family Name	Wilkinson
Given Name	Barbara
Person ID	1287424
Title	JPA 9: Walshaw
Type	Web
Include files	PFE1287424_SOSGeneral_Redacted.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_SOSElton.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
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.	<p>Failure to comply with Statement of Community Involvement</p> <p>Bury Council have failed to comply with their Statement of Community Involvement S Community Involvement (bury.gov.uk) at all stages of the creation of the plan. There was to residents of the initial call for sites and the amount spent on making residents aware disproportionately small (£100 as per the response to a Freedom of Information request) to the effect it will have upon them. There has been a deliberate campaign of misinformation and misleading statements to promote and "sell" the Plan to residents, rather than a presentation of facts eg residents only being told of the plans for their specific ward, and not being informed of the bigger picture across the borough, thus giving the impression that the impact is less than it is. There has been an over reliance on residents finding things out for themselves on social media and thus a failure to engage with various groups due to over reliance on the use of social media technology. There has been no access to public internet, eg in libraries, during Covid. This has disproportionately affected older people and those from deprived backgrounds. This is in breach of the SCI 2.4 & 4.17. Countrywide, Covid restrictions are now lifted but restrictions still remain in Bury's Statement of Community Involvement (SCI para 1.7). Consultations have been poor in terms of language and terminology used and have been a deterrent to becoming involved in the planning process as they have been wordy, long winded and intrusive, thus producing a low response rate.</p> <p>National Planning Policy Framework greenbelt protection clauses</p> <p>The purpose of the NPPF greenbelt protection is to prevent urban sprawl. Para 11.1 of the NPPF states of the Walshaw allocation,</p> <p>"This is an extensive area of land set entirely within the existing urban area. The site is bounded by the urban areas of Tottington to the north, Woolfold and Elton to the east and Elton to the south and Walshaw to the west."</p> <p>Filling in this green belt site will create an urban sprawl contrary to NPPF para 137 and 138 and e.</p> <p>There has been no evidence of the existence of exceptional circumstances to justify the release of the greenbelt boundaries to allow building on the Walshaw allocation as is required by para 140. Housing need is not an exceptional circumstance to justify the release of greenbelt land. The guidance states that housing need is not a target but merely a starting point and figures should be set upwards or downwards according to local circumstances, eg lack of brownfield, economic conditions (Covid-19).</p> <p>To prove that exceptional circumstances to justify alteration to greenbelt boundaries exist requires evidence that all other reasonable options to meet identified need have been exhausted (NPPF para 141). This must include maximising use of brownfield and underutilised sites and increasing density.</p> <p>Assessments</p> <p>There has been a failure to conduct thorough and independent ecological assessments. The assessments carried out have been done on behalf of developers and are therefore not independent. Flood risk and other surveys have been carried out by consultancies on behalf of and for the benefit of developers rather than entirely independent wildlife organisations or the Department of Environment, Food and Rural Affairs so must be considered potentially biased.</p> <p>The Housing Need Assessment was carried out by Arc4, who were supposed to carry out an independent survey of housing need. However, they have a partnership with Greater Manchester Housing Partnership, an organisation of housing associations, including Six Town Housing in Bury. This assessment was therefore not impartial.</p> <p>Climate change policy and carbon neutral policy</p>

Places for Everyone proposes employment sites on the other side of the borough from the M66 Northern Gateway Corridor, necessitating travel by car as no direct public transport exists or is proposed, thus increasing carbon emissions. Local transport hubs in Bury are accessed from Walshaw by a car journey or an expensive, unreliable and infrequent bus service, thus increasing carbon emissions. The proposed new link road at Walshaw will do nothing to alleviate the roads, simply transferring the problem from one place to another.

Up to date information

The PfE indicates in Para 1.63 point 2 that the most up to date information be used in the assessment, so being the most recent Bury's Housing Development Needs Assessment 2020 must be given consideration: <https://www.bury.gov.uk/index.aspx?articleid=15866>

Soundness

Site Selection

The site selection process for Bury has been especially opaque. Little information has been provided about why other more apparently suitable sites were rejected, or what alternatives were considered. Bury Council admitted in a Freedom of Information response that site selection was decided through a series of informal meetings with no list of attendees or minutes available. This site choice can only be justified as the most appropriate when no reasonable alternatives appear to have been examined. It is possible that options were ruled out too early or were not considered despite other areas having good public transport access or being situated nearer to employment sites.

In addition, the Walshaw site performs poorly against site selection criteria and strongly against assessment criteria. Therefore the inclusion of the Walshaw site cannot be justified:

-The Walshaw site only met one of the criteria for site selection, namely the most general criteria, Criteria 7, land that would deliver significant local benefits by addressing a major local problem (Site Allocation Topic Paper JPA 9 Walshaw pg 8, para 5.4). The only major local problem in Walshaw is the extra traffic that will be created by the proposed 1250 new houses. As there are 1250 houses, there is not a major problem and the infrastructure proposed would not be necessary. This is essentially a cyclical argument and not a specific justification for the inclusion of the site.

NB In the Site Selection Background Paper, Criteria 7 is missing from the table of site selection criteria at pg 18.

-The Walshaw allocation only meets 3 out of 10 of the broad objectives within Section 2 of the Local Plan (Site Allocation Topic Paper JPA 9 Walshaw pg 8, para 5.7):

- Objective 1 - Meet our housing need;
- Objective 5 - Reduce inequalities and improve prosperity;
- Objective 6 - Promote the sustainable movement of people, goods and information

Again, these objectives could be satisfied by any number of sites in the area.

-The Walshaw site makes a strong or moderate to strong contribution to the purpose of the Green Belt in each of the areas of the Greater Manchester Greenbelt Assessment 2016 (Site Allocation Topic Paper JPA 9 Walshaw, pages 27 - 28, para 15.3):

To check the unrestricted sprawl of large built up areas Moderate-Strong

To prevent neighbouring towns from merging into one another Strong

To assist in safeguarding the countryside from encroachment Moderate-Strong

Preserving the setting and special character of historic towns Moderate-Strong

-Site Allocation Topic Paper JPA 9 Walshaw at page 29 para 15.8 refers to The Green Belt Assessment, 2020 which concluded that the Walshaw allocation makes a moderate contribution to the purpose of the Green Belt in each of the areas of the Greater Manchester Greenbelt Assessment 2016. The allocation also makes a relatively limited contribution to maintaining the separation of the towns of Tooting and Tooting North which are already merged to a significant degree. Release of the allocation would cause moderate harm to Green Belt purposes.

The lack of selection criteria met and the harm that will be caused by the release of the site from the greenbelt are evidence of the lack of justification for the selection of this site. In fact, an independent leader, David Jones, admitted in writing that sites had been selected due to their sheer ease of implementation of infrastructure, saying,

"the proposed strategy within the GMSF is to release a small number of large strategic sites in the Green Belt as these will provide the scale and massing of development that is needed for the viable delivery of the essential major infrastructure to support the development."

The needs of the Walshaw community have been overlooked in favour of mass urban development on this particular site rather than sites on the outskirts nearer motorway access, transport links and employment sites. There is too much emphasis on economic growth at the expense of the physical health of residents with the benefits of the greenbelt being underestimated.

Infrastructure

The only way in which the funding levels required for infrastructure could be achieved would be a 5% increase in the price of the properties on the site: Site Allocation Topic Paper - Walshaw pg 44, 45 and 46. Realistically, this makes the infrastructure for the site undeliverable.

"The Three Dragons Viability Appraisal of the allocation has been run using the base case model and showed the allocation would likely require public support to proceed.

The Three Dragons report shows that without a contribution to strategic transport costs, the allocation produces a positive residual value both for the main and the sensitivity test. However, a 5% increase in house prices of less than 5% would be required to accommodate the full strategic transport costs identified.

26.3 With a small increase in values compared to the base model, the sensitivity test shows that the allocation would be able to support all policy costs including 25% affordable housing and infrastructure required to support the development, including the strategic transport costs. This is considered appropriate for this location as it is in a popular residential area and is close to the town of Walshaw and the areas to the west of Bury where house prices are typically higher than the rest of the town."

There is no guarantee that higher house prices would be achieved. This also suggests that some infrastructure will not be contemporaneous with the building of houses and will be forthcoming once funds have been raised. This is supported at Site Allocation Topic Paper - Walshaw pg 46 para 27.2 which states that,

"The phasing strategy will be developed through on-going discussions with key stakeholders and will be linked to infrastructure delivery. The estimated phasing and delivery trajectory will evolve as the allocation are developed further."

The plan for infrastructure is therefore unsound as it is undeliverable and thus the site is not viable.

Insufficient and vague infrastructure for Walshaw has been proposed, with no sources of funding specified. Bury have a very poor reputation for obtaining developer contributions for infrastructure. Developers always try to wriggle out of any obligations. We are told by the Council that the site is no longer ringfenced so there is no guarantee that promised infrastructure will be delivered.

-Healthcare

There is no specific proposal for additional healthcare facilities. Site Allocation Topic Paper - Walshaw at page 43, para 25.1 states that,

"Further work will be required to determine whether there is additional capacity within existing healthcare facilities to meet the increased demands arising from the prospective occupation of the site for development."

-Education

Whilst there is a plan for an extra primary school in Walshaw, there is no feasible plan for secondary schools with the increased number of secondary school age pupils. Site Allocation Topic Paper - Walshaw at page 43, para 24.1 states that,

"The Walshaw allocation is expected to yield approximately 263 primary age pupils and 100 secondary age pupils. Current forecasts show both primary and secondary schools in the area to be full and therefore all additional demand created would require additional school places."

"Cumulative secondary age demand pressures will need to be considered more strategically (Site Allocation Topic Paper - Walshaw 24.2)

It is proposed that secondary places will merely be funded from "financial contributions for secondary school provision" to meet the needs generated by the development (PfE, Walshaw). This is not acceptable and will only provide a short term solution. The Elton High School in Vauxhall is currently oversubscribed by 175 places in 2021 and the furthest distance offered from the school is 1.5 miles.

1/3 of a mile Distribution of places in Bury secondary schools for September 2021. If that the Walshaw site will yield an additional 175 secondary age pupils, a more permanent an additional secondary school in the locality as well as the proposed secondary school needs to be found for them in the immediate area and for the additional primary age area as they move through the education system.

-Transport

"The most significant role which PfE will play in this respect is to locate development at sustainable locations which reduce the need for car travel, for example by maximising densities around transport hubs." IWhat are Places for Everyone"s proposals for the Bury Council

Walshaw is not situated near to motorway junctions or to transport or employment hubs for residents to travel across Bury to access them. The only improvement to public transport proposed is "a potential upgrade of existing bus services or a new bus service" (PfE) a public transport route to employment hubs is proposed.

The proposed new road link will not ease traffic and will potentially create further congestion. The Transport Locality Assessments GMSF 2020, the map at page B9, figure 3 shows the road will start from a mini roundabout on a narrow residential road, cross a busy main road Lowercroft Road at Dow Lane where the road is steep and very narrow (barely wide enough for cars to pass safely). The road will be sending traffic to all of the same pinch points throughout Irwell. It will exacerbate congestion on local roads, which are already highly congested. No thought has been taken of the additional traffic which will be produced at the Andrews housing site just down the road from the Walshaw allocation.

Housing delivery targets

Bury Council have consistently failed to meet housing delivery targets and are now in breach. 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 the targets. Sanctions will apply if they don't. At a Council meeting held on 9/9/21 the Leader of the Council Eammon O" Brien confirmed that it was "unlikely" that the proposed building rates for a new plan in Bury (as laid out in JPA9 Walshaw Topic Paper PfE 2021, section 27.4 page 46) were realistic. So the plan cannot be considered to be effective and fails the test for Soundness.

Housing requirements

Government guidance is clear that standard housing methodology is just a starting point and can be changed in exceptional circumstances - this has not been thoroughly explored. A lack of land in the area and in particular the economic shock caused by Brexit and Covid 19 have not been taken into account.

There is insufficient confidence in the accuracy of the predictions in the current uncertain climate to justify Green Belt loss at the start of the plan. Greenbelt loss should only occur if brownfield has been exhausted. A review mechanism should be built in to only include further loss at a later stage if proven necessary. 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. Bury Council favours a brownfield first policy wherever possible as does National Policy. Bury Council has promised the public in Bury that they will implement a brownfield first policy. When questioned at a Council meeting on 9/9/21 the Leader of the Council Eammon O" Brien clarified this statement by saying that for anything the council themselves build they would adopt a brownfield first policy. However, that the council have no control over the actions of private developers. In reality they can only limit the release of green belt sites in accordance with National Policy NPPF 134 paragraph 147.

Changes to greenbelt boundaries

As part of the overall plan Bury have modified green belt boundaries and allocations in a way that make it appear that less Greenbelt is being sacrificed. The loss of the Walshaw site has not been partially offset by creating extensive but unusable greenbelt in other areas with no regard for exceptional circumstances. This is not in accordance with National Policy.

Redacted modification - Please set out the modification(s) you consider necessary to

Removal of JPA 9 Walshaw from the plan

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	Wilkinson
Given Name	Barbara
Person ID	1287424
Title	JP-D1 Infrastructure Implementation
Type	Web
Include files	PFE1287424_SOSElton.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_SOSGeneral_Redacted.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 - 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.	Due to the size of the greenbelt sites allocated within the plan it is highly unlikely that t can be provided in good time to bring these sites forward within the plan period. This plan undeliverable within the plan period hence making it unsound.
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.	Smaller sites should be considered that would come forward faster like brownfield si have substantial infrastructure provided close by.
Family Name	Wilkinson
Given Name	Barbara
Person ID	1287424
Title	JP-D2 Developer Contributions
Type	Web

Places for Everyone Representation 2021

Include files	PFE1287424_SOSGeneral_Redacted.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_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 - 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 very well documented that once a site is approved for development it can be revalued with a viability assessment. Local councils have very little control after a site has been approved for houses and it is common practice for a developer to change the number of homes, density, type and number that are classed as affordable. In some extreme cases a developer can claim inflated development costs and no section 106 payments will come forward.
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.	Local council authorities need to enter into more housing partnership projects and develop land they own instead of selling it and losing control. Salford Council has now created it's own building company that will deliver affordable homes on land they own and other council land in their suit.
Family Name	Wilkinson
Given Name	Barbara
Person ID	1287424
Title	Bury - Green Belt Additions
Type	Web
Include files	PFE1287424_SOSElton.pdf PFE1287424_SOSWalshaw.pdf PFE1287424_SOSGeneral_Redacted.pdf
GBA Bury - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below	Bury GBA03 Pigs Lea Brook 1 Bury GBA04 North of Nuttall Park Bury GBA05 Pigs Lea Brook 2 Bury GBA06 Hollins Brook Bury GBA07 Off New Road, Radcliffe Bury GBA08 Hollins Brow Bury GBA09 Hollybank Street, Radcliffe Bury GBA10 Crow Lumb Wood

Places for Everyone Representation 2021

	<p>Bury GBA11 Nuttall West, Ramsbottom</p> <p>Bury GBA12 Woolfold, Bury</p> <p>Bury GBA13 Nuttall East, Ramsbottom</p> <p>Bury GBA14 Chesham, Bury</p> <p>Bury GBA15 Broad Hey Wood North</p> <p>Bury GBA16 Lower Hinds</p>
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?	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>Net greenbelt additions have been nothing but a play on numbers to promote the plan for more greenspace. A lot of the new greenbelt additions are currently not viable for business, they are simply an exercise to take away the protection of greenbelt from useable open greenspace and move them elsewhere in the borough to give the impression that the overall net greenbelt additions are more than is less.</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>Leave the greenbelt boundaries unchanged and present the true loss of greenbelt from the plan proposals.</p>
Family Name	Wilkinson
Given Name	Barbara
Person ID	1287424
Title	Supporting Evidence
Type	Web
Include files	<p>PFE1287424_SOSGeneral_Redacted.pdf</p> <p>PFE1287424_SOSWalshaw.pdf</p> <p>PFE1287424_SOSElton.pdf</p>
Redacted comment on supporting documents - Please give details of why you consider any of the evidence not to be legally compliant, is	<p>Legal Compliance</p> <p>-It is questionable whether PFE and the GMSF can effectively be treated as the same plan. This must be decided in court before 'Places for Everyone' can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PFE) without a significant re-write. While the GMSF may have been established as legally compliant (with Regulation 18 of the Town and Country Planning regulations) and could therefore</p>

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

to final public consultation and submission under Regulation 19 (this current stage) P established. If there is any substantial difference in scope between the GMSF and P assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states 'The between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a plan have seen some form of change.' So, is 'not insignificant' the same as 'substantial is not legal. This can only be established by a proper judicial review. So until proven plan must be considered illegal and not put to Government.

Soundness

Soundness

-The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population 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 needs to identify how all the infrastructure will be paid

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

-There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information designed to encourage rather than discourage public input.

-The site selection process has been opaque with no explanation as to why some 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 should be held and minutes should be published. The rationale for the selection/rejection should be available including considered alternatives.

-Several of the authorities involved have consistently failed to meet housing delivery targets. A plan must be deliverable. The plan relies on the cooperation of property developers. An indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on Clear delivery plans for infrastructure should be included.

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

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

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

-A change in the methodology for Manchester City Council was resulted in a 35% up Manchester City Council area. The revised Local Housing Need methodology states that is to be met within the district and not redistributed (see Places for Everyone Joint Consultation documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021) This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.