

Places for Everyone Representation 2021

Family Name	Bentham
Given Name	Jamie
Person ID	1286934
Title	Stakeholder Submission
Type	Web
Include files	PFE1286934.pdf JamieBentham.pdf
Family Name	Bentham
Given Name	Jamie
Person ID	1286934
Title	Our Vision
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	Our Strategic Objectives
Type	Web
Include files	PFE1286934.pdf
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	<ol style="list-style-type: none"> 1. Meet our housing need 2. Create neighbourhoods of choice 3. Ensure a thriving and productive economy in the districts involved 4. Maximise the potential arising from our national and international assets 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?	NA
Soundness - Justified?	Unsound

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Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Bentham
Given Name	Jamie
Person ID	1286934
Title	Our Spatial Strategy
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-Strat 1 Core Growth Area
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934

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Title	JP-Strat 2 City Centre
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-Strat 3 The Quays
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-Strat 4 Port Salford
Type	Web
Include files	PFE1286934.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA

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Compliance - In accordance with the Duty to Cooperate?	NA
Family Name	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-Strat 5 Inner Areas
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-Strat 6 Northern Areas
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-Strat 7 North East Growth Corridor
Type	Web
Include files	PFE1286934.pdf
Soundness - Positively prepared?	Unsound

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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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-Strat 8 Wigan Bolton Growth Corridor
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-Strat 9 Southern Areas
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie

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Person ID	1286934
Title	JP-Strat 10 Manchester Airport
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-Strat 11 New Carrington
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-Strat 12 Main Town Centres
Type	Web
Include files	PFE1286934.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound

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Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-Strat 13 Strategic Green Infrastructure
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-Strat 14 A Sustainable and Integrated Transport Network
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-S 1 Sustainable Development
Type	Web
Include files	PFE1286934.pdf

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Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-S 2 Carbon and Energy
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-S 3 Heat and Energy Networks
Type	Web
Include files	PFE1286934.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	Bentham

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Given Name	Jamie
Person ID	1286934
Title	JP-S 4 Resilience
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-S 5 Flood Risk and Water Environment
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-S 6 Clean Air
Type	Web
Include files	PFE1286934.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound

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Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-S 7 Resource Efficiency
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-J 1 Supporting Long Term Economic Growth
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-J 2 Employment Sites and Premises
Type	Web
Include files	PFE1286934.pdf

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Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-J 3 Office Development
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-J 4 Industry and Warehousing Development
Type	Web
Include files	PFE1286934.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	Bentham

Places for Everyone Representation 2021

Given Name	Jamie
Person ID	1286934
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-H 2 Affordability of New Housing
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-H 3 Type Size and Design of New Housing
Type	Web
Include files	PFE1286934.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound

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Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-H 4 Density of New Housing
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JPA 26: Land at Hazelhurst Farm
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JPA 27: Land East of Boothstown
Type	Web
Include files	PFE1286934.pdf

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Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Bentham
Given Name	Jamie
Person ID	1286934
Title	JPA 28: North of Irlam Station
Type	Web
Include files	PFE1286934.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
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 Planning and Housing Team Greater Manchester Combined Authority Broadhurst House 56 Oxford Street Manchester M1 6EU Placesforeveryone@greatermanchester-ca.gov.uk September 2021</p> <p>Consultation Process: Places for Everyone (Formally GMSF Policy) - Site Allocation Topic Paper Proposal to build 800 dwellings on Greenbelt land North of Irlam Station, between Astley Road and New Moss Road)</p> <p>This development will affect all residents of Irlam and Cadishead As required by Government Policy (paragraph 35 of the National Planning Policy Framework)</p> <p>there has to be a consultation. As an Irlam and Cadishead resident I wish to challenge the</p>

strategy and policy of "Places for Everyone" and the Consultation Process regarding the above

proposed development.

Overview: Having read the above document it is obvious that this plan has been conceived and

produced from the "We must build houses on Chat Moss" point of view and it has been prepared for the

purpose of justifying this. The document takes no account of the people currently living in Irlam and

Cadishead or the effect that this development will have on them. Most objections raised by residents

over the past years to previous incarnations of the plan (17000 of them in Greater Manchester to the

GMSF Redraft of March 2019) have been ignored and those that have been "taken into consideration"

have been dismissed as not relevant enough.

Throughout the document, where residents' comments have been recognised, there is no actual action

set out. The document is littered with: "Possible Mitigation Action", "Appropriate mitigation", "Appropriate

Social Infrastructure", "Consider Issues Further" "Potential Tram Service"? "To be assessed at each

stage of development" In other words - We will go ahead and see what we find.

NPPF Paragraph 35:

Has the plan been positively prepared? The area's "objectively assessed needs" actually appear to be

"subjectly addressed" on the basis of need to build houses, which are not needed. Irlam and Cadishead

residents' objective assessments have either not been considered, left out, ignored or belittled.

Regardless of this the Places for Everyone policy was passed at council through a whipped vote -

almost all labour councillors voting as directed. Democracy in action!

Is the plan justified? On the basis that half of the supposed need for 800 houses could be provided on

previously identified brownfield sites in the area, then taking into account reasonable alternatives and

proportionate evidence, the plan is not justified. There is no justification for releasing 30 hectares of

greenbelt.

Is the plan effective? Not for the people of Irlam and Cadishead. Not for the people of Salford.

Is it consistent with National Policy? It appears to contradict National Policy in terms of Climate change,

Environmental policy, Carbon reduction and Air pollution.

10 Questions that should be asked:

1. Q. Does the plan mitigate climate change?

A. No. It accelerates Climate Change. We lose 30 Hectares of Agricultural Land. Mostly

Grade 1 and replace it with 800 houses and probably 1200 cars worth of pollution.

2. Q. Does the plan help us achieve our Carbon Neutral Goals?

A. No. It guarantees that we produce/release more carbon by breaking into the peat on Chat

Moss and then removing a natural facility for storing carbon.

3. Q. Is the land proposed for development suitable?

A. So far there has been a preliminary assessment made on the depth of peat on the site.

20 bore holes were drilled but this is insufficient data for a site of this size. Proper

assessments for Flood Risk, Drainage, Air pollution, Carbon Release Levels, Loss of

Carbon Storage, Effect on Wildlife and any mitigation requirements have not been

completed.

4. Q. Are the housing requirements identified accurate?

A. No. When the GMSF was first produced the housing requirement figures were out of date

and overstated. And they still are. The latest figure for Salford is calculated at an increase

in population of 31000 between 2020 and 2037. However, the housing requirement

currently being proposed is 37700 - enough to house roughly 54000 people. And since

Covid there has been a reduction in the numbers of people from overseas in our area,

so even the 31000 figure is overstated.

5. Q. Can the local transport infrastructure cope with the extra volume of vehicles from this

development?

A. No. The plan says it can, but does not recognise that the "One road in - One road out

situation in Irlam and Cadishead is already overloaded by through traffic on the A57. The

plan does mention improvements to two junctions on Liverpool road but these will have a

minimal effect on the flow of traffic.

The plan "justifies" the location of the development as it being close to Irlam Railway

Station, giving easy access to Manchester and Trafford Park but again, at peak times

trains are already full when they arrive at Irlam.

The plan also fails to realise the effect that the proposed housing developments at

Carrington and at Boysnope Golf Course. Thousands of houses if they go ahead. Nearest

Rail station? Irlam. More cars, more traffic, more pollution.

6. Q. Does the plan recognise the ecological significance of the site?

A. Not sufficiently. The site has significant contributions to:

Places for Everyone Representation 2021

- Biodiversity
- Important habitats for wildlife
- Carbon capture
- Reduction in flooding
- Improvement of air quality
- The well being and mental health of the community

7. Q. Does the plan recognise the potential for food production on this site?
A. No. Grade 1 Agricultural land is at a premium. With all the problems getting fresh produce from abroad caused by Brexit we should be protecting and using this land to grow food.

8. Q Does the plan recognise the importance of this land in terms of well-being of the public?
A. The plan recognises the value of Chat Moss but basically says that losing 30 Hectares won't make much difference. Chat Moss is known as the "Lungs of Salford". Salford's air pollution is 4 times higher than the Government target. Losing 30 Hectares of priceless greenbelt will only make things worse.

9. Q. Does the plan guarantee a good percentage of affordable homes in the development?
A. No. The cost of stabilising the peat will be huge and that cost will be passed on to housebuyers.

10. Q. Should "Places for Everyone" be used as a tool to grab greenbelt for development?

Family Name	Bentham
Given Name	Jamie
Person ID	1286934
Title	JPA 29: Port Salford Extension
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934

Places for Everyone Representation 2021

Title	JP-D1 Infrastructure Implementation
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	JP-D2 Developer Contributions
Type	Web
Include files	PFE1286934.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	Bentham
Given Name	Jamie
Person ID	1286934
Title	Supporting Evidence
Type	Web
Include files	PFE1286934.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.	The Planning and Housing Team Greater Manchester Combined Authority Broadhurst House 56 Oxford Street Manchester M1 6EU Placesforeveryone@greatermanchester-ca.gov.uk September 2021

Consultation Process:

Places for Everyone (Formally GMSF Policy) - Site Allocation Topic Paper Proposal to build 800 dwellings on Greenbelt land North of Irlam Station, between Astley Road and New Moss Road)

This development will affect all residents of Irlam and Cadishead

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A. The plan recognises the value of Chat Moss but basically says that losing 30 Hectares

won't make much difference. Chat Moss is known as the 'Lungs of Salford'. Salford's air

pollution is 4 times higher than the Government target. Losing 30 Hectares of priceless

greenbelt will only make things worse.

9. Q. Does the plan guarantee a good percentage of affordable homes in the development?

A. No. The cost of stabilising the peat will be huge and that cost will be passed on to housebuyers.

10. Q. Should 'Places for Everyone' be used as a tool to grab greenbelt for development?

A. No.

Family Name	Bentham
Given Name	Jamie
Person ID	1286934
Title	Other Comments
Type	Web
Include files	PFE1286934.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound

Places for Everyone Representation 2021

Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Bentham
Given Name	Jamie
Person ID	1286934
Title	Other Comments
Type	Web
Include files	PFE1286934.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