

Family Name	Bruce
Given Name	Tina
Person ID	1286854
Title	Stakeholder Submission
Type	Web
Family Name	Bruce
Given Name	Tina
Person ID	1286854
Title	JPA 35: North of Mosley Common
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>As a local resident, I will, along with hundreds of other local residents, be directly and negatively affected by the loss of this Green Belt land, the construction process itself, and also by the resulting further increase in local population. There have already been thousands of houses built in the local area since the now failed original Spatial Framework consultation.</p> <p>Implementation of GM CAZ in 2022 would increase construction, and therefore property, costs while simultaneously reducing the vital green spaces which currently contribute to improving air quality in the local area.</p> <p>Our location does not have the infrastructure to cope with even more of a population increase; the local roads (including the East Lancs itself) are already substantially congested both at peak times and at any time of problems arising on the local motorway or road network. There new homes at Garrett Hall, Maxilead, Bridgewater View and numerous other local developments, have already had a significant impact on traffic flows on the already congested local road network. The Wigan Local Plan Core Strategy which was adopted in September 2013 recognises that "2.8 The road network in the borough is based largely on the 19th century network with single carriageways, 30 mph speed limits and relatively few new routes or significant widening schemes. This gives rise to congestion along key routes and at key locations at peak times. It impacts adversely on the perception of the borough for economic investment and affects amenity and environmental quality. Conditions for walking and cycling on or adjacent to such routes are generally poor. A programme of improvements to the network has begun to aid traffic flows."</p> <p>Significant improvements would need to be made not only to local roads but consideration would also need to be given to providing leisure and educational facilities to meet the needs of a population increase of this size. There are five local primary schools, and all the schools are oversubscribed for annual admissions. A similar situation is mirrored in the local secondary</p>

education establishments. Such improvements would need to be implemented concurrently with any provision of new homes in the area in order to provide community integration. No evidence of any such firm plans have been provided within the GMSF.

Wigan council published its most recent Brownfield land register in December 2020.

It identifies Brownfield sites with the potential to accommodate over 8,800 new homes across the borough. Green Belt land should not be considered for release for development as an easy option over the work required to restore Brownfield sites to create sustainable urban regeneration, returning derelict land to use or using other sites. The Government's National Planning Policy Framework updated 29 December 2016 clearly reinforces that "inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances"; PfE provides no evidence that the use of this Green Belt meets any special or exceptional circumstances, and that this provision could not be accommodated by repurposing existing land not covered by Green Belt protection. PfE refers to a land supply gap which could potentially be overcome by neighbouring authorities releasing land to accommodate some of the housing requirements but has received a negative response, therefore creating the exceptional circumstances required. If alternative suitable land could be made available but is hindered only by a neighbouring authority blocking this use, then government intervention should be secured to ensure the provision of necessary homes without the permanent destruction of Green Belt land.

Wigan Strategic Housing Land Availability Assessment 2021 Update identifies potential land which could accommodate 16,859 new homes; this exceeds the PfE target build of 15,554 without any loss of Green Belt land.

The Manchester Green Belt Assessment 2016 carried out by LUC (environmental planning, design and management company) states that the Strategic Green Belt area (WG080) which lies between Atherton, Over Hulton, Tyldesley and Little Hulton (of which the land referred to in my opening paragraph forms part) plays "a strong part in checking the unrestricted sprawl of Tyldesley and Worsley, and again a strong role in protecting open land from urban sprawl". It also forms part of a "critical gap between Walkden, Boothstown, Ellenbrook, Worsley and Tyldesley; playing an essential role in preventing the merging or erosion of the visual and physical gap between settlements".

A portion of the planned development at ELR1 comprises an area which is currently categorised as high on the DCLG Index of Multiple Deprivation which, coupled with average house prices in that area of between £125,000 - £250,000 (based on 2014 Land Registry data), should exclude this area for property development other than social housing. According to the Office for National Statistics, the median average UK salary for y/e April 2016 was £28,200, and it would not be unreasonable to assume that local average wages are likely to be lower than this national average. It would therefore be unlikely that properties built on that land would be within the reach of those people on average wages, so this development would not meet the aims of either The Wigan Local Plan Core Strategy or the Draft PfE to "create a strategic plan for the whole of Greater Manchester up to 2035.

I would like my objection to the Green Belt release for the purposes outlined to be noted.

Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant

To redraw the plan to utilise Brownfield and other sites as identified in Wigan Strategic Housing Land Availability Assessment 2021 Update, and to utilise EDMOs to return existing properties to residential use, and to convert existing suitable unused commercial properties to residential use prior to any use of Green Belt land.

and sound, in respect of any legal compliance or soundness matters you have identified above.	
Family Name	Bruce
Given Name	Tina
Person ID	1286854
Title	JP-D1 Infrastructure Implementation
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	Bruce
Given Name	Tina
Person ID	1286854
Title	JP-D2 Developer Contributions
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

Places for Everyone Representation 2021

Family Name	Buck
Given Name	Steve
Person ID	1286009
Title	Stakeholder Submission
Type	Web
Family Name	Buck
Given Name	Steve
Person ID	1286009
Title	Our Vision
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
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>Legal Compliance</p> <p>? 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 satisfied 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.</p> <p>Soundness</p> <p>? The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONA population predictions and take into account the effect of Covid on work patterns.</p> <p>? There is little detail on how the required infrastructure will be paid for. The plan needs to be revised to identify how all the infrastructure will be paid</p> <p>? There are no partners or industries identified for employment provision. Major</p>

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.

? Several of the authorities involved have consistently failed to meet housing delivery targets. An effective a plan must be deliverable. The plan relies on the cooperation of property developers. There is no indication of how delivery targets will be maintained. A strategy to guarantee housing delivery rates must be provided. This cannot be left to any local authority that is currently behind on housing targets. Clear delivery plans for infrastructure should be included.

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

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

? There are no details of how Duty to Cooperate will be achieved. Following their withdrawal Stockport 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 other authorities outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn with Darwen, Wigan neighbours St Helens and Trafford neighbours Cheshire area.

? 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))

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

Family Name	Buck
Given Name	Steve
Person ID	1286009
Title	Our Strategic Objectives
Type	Web

Places for Everyone Representation 2021

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	Buck
Given Name	Steve
Person ID	1286009
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
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This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone

The PfE indicates in Para 1.63 point 2 that the most up to date information be used in plan making, so being the most recent Bury's Housing Development Needs Assessment 2020 must be taken into consideration:

<https://www.bury.gov.uk/index.aspx?articleid=15866>

? The site selection process for Bury has been especially opaque. Little information has been given 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 at a series of informal meetings with no list of attendees or minutes available. This site choice cannot be justified 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 guidelines:

<https://www.bury.gov.uk/index.aspx?articleid=16330>

Radcliffe the location of Elton Reservoir has the least expensive housing in Bury but was selected in preference to sites in other other areas where affordable housing is required.

? Para 11.105 p 264 states:

" The allocation [Elton Reservoir] is almost entirely surrounded by the existing urban area"

Filling this green belt site in will contribute to creating urban sprawl contrary to compliance with National Policy NPPF para 134 parts a,c and e.

? Para 11.105 p 264 states:

"Although the allocation has the capacity to deliver a total of around 3,500 new homes, it is anticipated that around 1,900 of these will be delivered within the plan period. Nevertheless, it is considered necessary to release the site in full at this stage given that the scale of the proposed development means that it will need to be supported by significant strategic infrastructure and this level of investment needs the certainty that the remaining development will still be able to come forward beyond the plan period".

Such gross over release of greenbelt is entirely contrary to National Guidelines, which regards greenbelt as a precious resource not to be squandered. JPA7 fails to identify the source of infrastructure funding, indeed shortfalls are expected see para 12.16 of PfE. Site owners Peel are not specifically mentioned as being a contributor to the infrastructure funding.

Questions should be asked regarding the reasons for Bury Council offering up a huge amount of greenbelt at Elton Reservoir that is not required during the plan period (and may never be required) instead of retaining it in accordance with National Policy.

? The Elton site apparently cost Peel £27M (as detailed in the site allocation topic paper) for approx 260 hectares (£104K per hectare) as greenbelt. Allowing a conservative price uplift of around 60 times for green belt conversion to development land, the land for the initial 1900 site becomes worth around £875M. Adding in the land for the totally unjustified additional housing beyond the plan period adds approx another £750 M. The implication being that unless Peel get the whole £1.325 Billion up front they can't offer any upfront funding for the infrastructure. Infrastructure that would not be needed if the development does not go ahead. Peel have indicated that they will possibly build some homes but will definitely split the site into lots to be developed by other developers so they (Peel) would avoid contributions this way. It

would be left to Bury to extract the funding from other as yet unknown developers. Bury have a very poor reputation for obtaining developer contributions for infrastructure and developers always try to wriggle out of any obligations. It seems Peel have duped Bury Council into ignoring National Policy and granting them a huge financial bonus with no commitment to do anything.

? Site wildlife, flood risk and other surveys have been carried out by consultancies on behalf of and paid for by developers rather than entirely independent wildlife organisations or the Department of the Environment so must be considered potentially biased. 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 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 free school for Radcliffe is already planned funded by the Government. The proposed new school will not even cater for existing Radcliffe pupil 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 in breach of the 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 Eamonn 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 will not help this problem as it links one congested area to another.

Places for Everyone Representation 2021

	<p>? 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 Council Eammon O'Brien clarified the statement by saying that for anything the council themselves build they would adopt a brownfield first policy but claimed that the council have no control over the actions of private developers, in reality they do, as they could limit the release of green belt sites in accordance with National Policy NPPF 134 part e.</p>
Family Name	Buck
Given Name	Steve
Person ID	1286009
Title	Other Comments
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
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they will possibly build some homes but will definitely split the site into lots to be developed by other developers so they (Peel) would avoid contributions this way. It would be left to Bury to extract the funding from other as yet unknown developers. Bury have a very poor reputation for obtaining developer contributions for infrastructure and developers always try to wriggle out of any obligations. It seems Peel have duped Bury Council into ignoring National Policy and granting them a huge financial bonus with no commitment to do anything.

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? 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 will not help this problem as it links one congested 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 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 Council Eamonn O'Brien clarified the statement by saying that for anything the council themselves build they would adopt a brownfield first policy but claimed that the council have no control over the actions of private developers, in reality they do, as they could limit the release of green belt sites in accordance with National Policy NPPF 134 part e.