

Family Name	Burke
Given Name	Carol
Person ID	1286941
Title	Stakeholder Submission
Type	Web
Family Name	Burke
Given Name	Carol
Person ID	1286941
Title	Our Vision
Type	Web
Soundness - Positively prepared?	NA
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
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>There was no notification to residents of the initial call for sites and the amount spent on making residents aware of the plan is disproportionately small (□100 as per the response to a Freedom of Information request) in comparison 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 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 websites and thus a failure to engage with various groups due to over reliance on the use of social media and technology. There has been no access to public internet, eg in libraries, during Covid. This 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 still remain in place in Bury's Statement of Community Involvement (SCI para 1.7). Consultations have been inaccessible 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 an irrelevant response rate.</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	<p>There has been a failure to conduct thorough and independent ecological assessments. Assessments carried out have been done on behalf of developers and are therefore not independent. 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.</p> <p>The Housing Need Assessment was carried out by Arc4, who were supposed to carry out a non-biased survey of housing need. However, they have a partnership with Greater Manchester Housing Partnership, an organisation</p>

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you have identified above.	of housing associations, including Six Town Housing in Bury. The assessment was therefore not impartial.
Family Name	Burke
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Title	Our Strategic Objectives
Type	Web
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	1. Meet our housing need 8. Improve the quality of our natural environment and access to green spaces
Soundness - Positively prepared?	NA
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Burke
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Person ID	1286941
Title	Our Spatial Strategy
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	There was no notification to residents of the initial call for sites and the amount spent on making residents aware of the plan is disproportionately small (£100 as per the response to a Freedom of Information request) in comparison 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 eg residents only being told of the plans for their specific ward, and not being informed

co-operate. Please be as precise as possible.	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 websites and thus a failure to engage with various groups due to over reliance on the use of social media and technology. There has been no access to public internet, eg in libraries, during Covid. This 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 still remain in place in Bury's Statement of Community Involvement (SCI para 1.7). Consultations have been inaccessible 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 an irrelevant response rate.
Family Name	Burke
Given Name	Carol
Person ID	1286941
Title	JP-Strat 1 Core Growth 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
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>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 brownfield land in the area and in particular the economic shock caused by Brexit and Covid 19 have not been taken into account.</p> <p>There is insufficient confidence in the accuracy of the predictions in the current uncertain economic climate to justify Green Belt loss at the start of the plan. Greenbelt loss should only occur once all brownfield has been exhausted. A review mechanism should be built in to only include greenbelt 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 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. When questioned at a council meeting on 9/9/21 the Leader of the Councillor Eammon O'Brien clarified this 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>
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Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
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>There is no guarantee that higher house prices would be achieved. This also suggests that provision of some infrastructure will not be contemporaneous with the building of houses and will only be forthcoming once funds have been raised. This is supported at Site Allocation Topic Paper- JPA 9 Walshaw pg 46 para 27.2 which states that,</p> <p>"The phasing strategy will be developed through on-going discussions with key stakeholders in relation to infrastructure delivery. The estimated phasing and delivery trajectory will evolve as the plans for the allocation are developed further."</p> <p>The plan for infrastructure is therefore unsound as it is undeliverable and thus the site unviable.</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>Walshaw is not situated near to motorway junctions or to transport or employment hubs, requiring residents to travel across Bury to access them. The only improvement to public transport that is proposed is 'a potential upgrade of existing bus services or a new bus service' (PfE pg 270). No new public transport route to employment hubs is proposed.</p> <p>The proposed new road link will not ease traffic and will potentially create further congestion. As per the Transport Locality Assessments GMSF 2020, the map at page B9, figure 3 shows that the road will start from a mini roundabout on a narrow residential road, cross a busy main road, enter onto Lowercroft Road at Dow Lane where the road is steep and very narrow (barely wide enough for two cars to pass safely). The road will be sending traffic to all of the same pinch points this side of the Irwell. It will exacerbate congestion on local roads, which are already highly congested. No account has been taken of the additional traffic which will be produced at the Andrews housing development site just down the road from the Walshaw allocation.</p>
Family Name	Burke
Given Name	Carol
Person ID	1286941
Title	JPA 9: Walshaw
Type	Web
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
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 Walshaw site only met one of the criteria for site selection, namely the most general and vague 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 identified in Walshaw is the extra traffic that will be created by the proposed 1250 new houses. Without the houses, there is not a major problem and the infrastructure proposed would not be needed. This is essentially a cyclical argument and not a specific justification for the inclusion of the site.</p> <p>NB In the Site Selection Background Paper, Criteria 7 is missing from the table of site selection criteria at pg 18.</p> <p>-The Walshaw allocation only meets 3 out of 10 of the broad objectives within Section 3 of the PfE plan (Site Allocation Topic Paper JPA 9 Walshaw pg 8, para 5.7):</p> <ul style="list-style-type: none"> - Objective 1 - Meet our housing need; - Objective 5 - Reduce inequalities and improve prosperity; - Objective 6 - Promote the sustainable movement of people, goods and information. <p>Again, these objectives could be satisfied by any number of sites in the area.</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>-The Walshaw site makes a strong or moderate to strong contribution to the purpose of the greenbelt 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):</p> <p>To check the unrestricted sprawl of large built up areas Moderate-Strong Walshaw is not situated near to motorway junctions or to transport or employment hubs, requiring residents to travel across Bury to access them. The only improvement to public transport that is proposed is 'a potential upgrade of existing bus services or a new bus service' (PfE pg 270). No new public transport route to employment hubs is proposed.</p> <p>The proposed new road link will not ease traffic and will potentially create further congestion. As per the Transport Locality Assessments GMSF 2020, the map at page B9, figure 3 shows that the road will start from a mini roundabout on a narrow residential road, cross a busy main road, enter onto Lowercroft Road at Dow Lane where the road is steep and very narrow (barely wide enough for two cars to pass safely). The road will be sending traffic to all of the same pinch points this side of the Irwell. It will exacerbate congestion on local roads, which are already highly congested. No account has been taken of the additional traffic which will be produced at the Andrews housing development site just down the road from the Walshaw allocation.</p>
Family Name	Burke
Given Name	Carol
Person ID	1286941
Title	JP-G 10 Green Belt
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound

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Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Burke
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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