

Places for Everyone Representation 2021

Family Name	Clowes
Given Name	Halina
Person ID	1287429
Title	Stakeholder Submission
Type	Web
Family Name	Clowes
Given Name	Halina
Person ID	1287429
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>The site is an important area next to Ashworth valley and supports a vast array of animal and bird species, including protected ones such as newts, voles, shrews, bats, badgers, dormice and hedgehogs.</p> <p>This site has significant environmental and local amenity value and its inclusion will deprive future generations and severely diminish the natural environment.</p> <p>The site fails to comply with PfE Objective 8 and is not consistent with NPPF Chapter 15.</p> <p>The site is not justified and not consistent with national policy.</p>
Family Name	Clowes
Given Name	Halina
Person ID	1287429
Title	JP-H 2 Affordability of New Housing
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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Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Clowes
Given Name	Halina
Person ID	1287429
Title	JP-H 3 Type Size and Design of New Housing
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	Clowes
Given Name	Halina
Person ID	1287429
Title	JP-H 4 Density of New Housing
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	Clowes
Given Name	Halina
Person ID	1287429
Title	JP-G 1 Valuing Important Landscapes
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound

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Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Clowes
Given Name	Halina
Person ID	1287429
Title	JP-G 2 Green Infrastructure Network
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	Clowes
Given Name	Halina
Person ID	1287429
Title	JP-G 3 River Valleys and Waterways
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	Clowes
Given Name	Halina
Person ID	1287429
Title	JP-G 4 Lowland Wetlands and Mosslands
Type	Web
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?	No
Family Name	Clowes
Given Name	Halina
Person ID	1287429
Title	JP-G 5 Uplands
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	Clowes
Given Name	Halina
Person ID	1287429
Title	JP-G 6 Urban Green Space
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	Clowes
Given Name	Halina
Person ID	1287429
Title	JP-G 7 Trees and Woodland

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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.	The areas are unable to support flooding as it is. removing further greenspace will cause more damage
Family Name	Clowes
Given Name	Halina
Person ID	1287429
Title	JP-G 8 Standards for Greener Places
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	Clowes
Given Name	Halina
Person ID	1287429
Title	JP-G 9 A Net Enhancement of Biodiversity and Geodiversity
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound

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Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Clowes
Given Name	Halina
Person ID	1287429
Title	JP-G 10 Green Belt
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	Clowes
Given Name	Halina
Person ID	1287429
Title	JP-G 11 Safeguarded Land
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	Clowes
Given Name	Halina
Person ID	1287429
Title	JPA 19: Bamford / Norden
Type	Web
Soundness - Positively prepared?	Unsound

Places for Everyone Representation 2021

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 site is an important area next to Ashworth valley and supports a vast array of animal and bird species, including protected ones such as newts, voles, shrews, bats, badgers, dormice and hedgehogs.</p> <p>This site has significant environmental and local amenity value and its inclusion will deprive future generations and severely diminish the natural environment.</p> <p>there are several bats nesting in the area and you have failed to legally comply by removing the trees and green area</p> <p>The site fails to comply with PfE Objective 8 and is not consistent with NPPF Chapter 15.</p> <p>The site is not justified and not consistent with national policy.</p>
Family Name	Clowes
Given Name	Halina
Person ID	1287429
Title	JPA 21: Crimble Mill
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>The site is an important area next to Ashworth valley and supports a vast array of animal and bird species, including protected ones such as newts, voles, shrews, bats, badgers, dormice and hedgehogs.</p> <p>This site has significant environmental and local amenity value and its inclusion will deprive future generations and severely diminish the natural environment.</p> <p>The site fails to comply with PfE Objective 8 and is not consistent with NPPF Chapter 15.</p> <p>The site is not justified and not consistent with national policy.</p>
Family Name	Clowes
Given Name	Halina
Person ID	1287429

Places for Everyone Representation 2021

Title	JPA 22: Land North of Smithy Bridge
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	Clowes
Given Name	Halina
Person ID	1287429
Title	JPA 23: Newhey Quarry
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	Clowes
Given Name	Halina
Person ID	1287429
Title	JPA 24: Roch Valley
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	Clowes

Places for Everyone Representation 2021

Given Name	Halina
Person ID	1287429
Title	JPA 25: Trows Farm
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	Cluer
Given Name	Stephen
Person ID	1287366
Title	Stakeholder Submission
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_Redacted.pdf
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	Our Vision
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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 long term. 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 (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"?</p>

plan is not legal. This can only be established by a proper judicial review. So until pro the 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 targets. 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 will effectively become a neighbouring borough. However, it is not acceptable to limit other 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 Manchester City Council area. The revised Local Housing Need methodology states that 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

Cluer

Places for Everyone Representation 2021

Given Name	Stephen
Person ID	1287366
Title	Our Strategic Objectives
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_Redacted.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?	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
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.	Please take the time to read in full the supporting documents I have provided to you this plan fails on all the above points.
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.	Please take the time to read in full the supporting documents I have provided to you this plan fails on all the above points.
Family Name	Cluer

Places for Everyone Representation 2021

Given Name	Stephen
Person ID	1287366
Title	Our Spatial Strategy
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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 are 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 and sound, in respect of any legal compliance or soundness matters you have identified above.	As above the plan needs to go back to proper consultation with the residents of Grea
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-Strat 1 Core Growth Area
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_Redacted.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
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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-Strat 2 City Centre
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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	Please read in full my supporting documents.

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.	
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-Strat 3 The Quays
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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.	Please read in full my supporting documents.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect	Please read in full my supporting documents.

of any legal compliance or soundness matters you have identified above.	
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-Strat 4 Port Salford
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JPA 8: Seedfield
Type	Web
Include files	PFE1287366_LeithRep.pdf

Places for Everyone Representation 2021

	PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-Strat 6 Northern Areas
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

Places for Everyone Representation 2021

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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-Strat 7 North East Growth Corridor
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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.	Please read in full my supporting documents.

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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-Strat 8 Wigan Bolton Growth Corridor
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer

Places for Everyone Representation 2021

Given Name	Stephen
Person ID	1287366
Title	JP-Strat 9 Southern Areas
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-Strat 10 Manchester Airport
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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
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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-Strat 11 New Carrington
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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	Please read in full my supporting documents.

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.	
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-Strat 12 Main Town Centres
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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.	Please read in full my supporting documents.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect	Please read in full my supporting documents.

of any legal compliance or soundness matters you have identified above.	
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-Strat 13 Strategic Green Infrastructure
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-Strat 14 A Sustainable and Integrated Transport Network
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf

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	PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-S 1 Sustainable Development
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

Places for Everyone Representation 2021

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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-S 2 Carbon and Energy
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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.	Please read in full my supporting documents.

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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-S 3 Heat and Energy Networks
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer

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Given Name	Stephen
Person ID	1287366
Title	JP-S 4 Resilience
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-S 5 Flood Risk and Water Environment
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_Redacted.pdf
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
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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-S 6 Clean Air
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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	Having a spatial framework plan to deliver car dependant housing estates and a clear same time is contradictory.

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.	
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-S 7 Resource Efficiency
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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.	Please read in full my supporting documents.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect	Please read in full my supporting documents.

of any legal compliance or soundness matters you have identified above.	
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-J 1 Supporting Long Term Economic Growth
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-J 2 Employment Sites and Premises
Type	Web
Include files	PFE1287366_LeithRep.pdf

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	PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-J 3 Office Development
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

Places for Everyone Representation 2021

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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-J 4 Industry and Warehousing Development
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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.	Please read in full my supporting documents.

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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer

Places for Everyone Representation 2021

Given Name	Stephen
Person ID	1287366
Title	JP-H 2 Affordability of New Housing
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-H 3 Type Size and Design of New Housing
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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
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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-H 4 Density of New Housing
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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	Please read in full my supporting documents.

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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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-G 1 Valuing Important Landscapes
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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.	Please read in full my supporting documents.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect	Please read in full my supporting documents.

of any legal compliance or soundness matters you have identified above.	
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-G 2 Green Infrastructure Network
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-G 3 River Valleys and Waterways
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf

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	PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-G 4 Lowland Wetlands and Mosslands
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

Places for Everyone Representation 2021

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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-G 5 Uplands
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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.	Please read in full my supporting documents.

Places for Everyone Representation 2021

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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-G 6 Urban Green Space
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer

Places for Everyone Representation 2021

Given Name	Stephen
Person ID	1287366
Title	JP-G 7 Trees and Woodland
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-G 8 Standards for Greener Places
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_Redacted.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
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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-G 9 A Net Enhancement of Biodiversity and Geodiversity
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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	Please read in full my supporting documents.

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.	
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-G 10 Green Belt
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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.	Please read in full my supporting documents.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect	Please read in full my supporting documents.

of any legal compliance or soundness matters you have identified above.	
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-G 11 Safeguarded Land
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-P1 Sustainable Places
Type	Web
Include files	PFE1287366_LeithRep.pdf

Places for Everyone Representation 2021

	PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-P2 Heritage
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

Places for Everyone Representation 2021

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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-P3 Cultural Facilities
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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.	Please read in full my supporting documents.

Places for Everyone Representation 2021

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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-P4 New Retail and Leisure Uses in Town Centres
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer

Places for Everyone Representation 2021

Given Name	Stephen
Person ID	1287366
Title	JP-P5 Education Skills and Knowledge
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-P6 Health
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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
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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-P7 Sport and Recreation
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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	Please read in full my supporting documents.

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.	
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-C1 An Integrated Network
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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.	Please read in full my supporting documents.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect	Please read in full my supporting documents.

of any legal compliance or soundness matters you have identified above.	
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-C2 Digital Connectivity
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-C3 Public Transport
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf

Places for Everyone Representation 2021

	PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-C4 Streets for All
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

Places for Everyone Representation 2021

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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-C5 Walking and Cycling Network
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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.	Please read in full my supporting documents.

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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-C6 Freight and Logistics
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer

Places for Everyone Representation 2021

Given Name	Stephen
Person ID	1287366
Title	JP-C7 Transport Requirements of New Developments
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JPA 1.1 Heywood / Pilsworth (Northern Gateway)
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_Redacted.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
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.	Please read in full my supporting documents.
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.	Please read in full my supporting documents.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JPA 1.2: Simister and Bowlee (Northern Gateway)
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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	RECLASSIFIED Policy JP Allocation 1.2, Simister and Bowlee Legality

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.

Failure to comply with Statement of Community Involvement

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 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 against the SCI 2.4 & 4.17. Countrywide, Covid restrictions are now lifted but restrictions remain 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 participation involved in the planning process as they have been wordy, long winded, and intrusive leading to an irrelevant response rate.

National Planning Policy Framework greenbelt protection clauses

The purpose of the NPPF greenbelt protection is to prevent urban sprawl. Developing a greenbelt site will create an urban sprawl contrary to NPPF para 137 and para 138 a,b,c, and d.

This proposed allocation will result in the loss of approximately 74 hectares of Green Belt. The Green Belt currently performs strongly in relation to checking the unrestricted sprawl of urban areas and in preventing neighbouring towns from merging. The loss of this land from the Green Belt will therefore clearly result in harm which has not been justified. The case for exception to release this site for development has simply not been made given the lack of suitable and reasonable alternatives.

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 considered (NPPF para 141). This must include maximising use of brownfield and underutilised sites to increase density.

Assessments

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. Flood risk and other surveys have been carried out by consultancies on behalf of and for developers rather than entirely independent wildlife organisations or the Department of Environment, Food and Rural Affairs so must be considered potentially biased.

The Housing Need Assessment was carried out by Arc4, who were supposed to carry out a 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.

Climate change policy and carbon neutral policy

Simister and Bowlee currently have illegal air quality readings due to the motorways (M66) surrounding the site. Bury Council have confirmed by email that they are not responsible for Strategic Road Networks (motorways) and this is Highways England. However, the local authority has a duty of care for all residents and should consider all intelligence particularly when it relates to the health and wellbeing of local residents.

Highways England provided the readings through a freedom of information request and the readings on the Strategic Road Networks around Simister and Bowlee in 2015/2016 were:

- 75% at illegal limit

-15% at legal limit

-10% not full year readings

With the introduction of a 1.2 million square metres of industrial and 1550 homes this will increase already illegal levels of carbon emissions even further.

Point 17 Page 233 of the PfE states we will "incorporate appropriate noise and air quality measures and high-quality landscaping along the M60 motorway corridors and local roads where required within the allocation."

Highways England have already tried this through the Barrier erecting study and it failed and after results were provided and it was confirmed there was no reduction in pollution.

Up to date information

The PfE indicates in Para 1.63 point 2 that the most up to date information be used in the plan 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 cannot be justified as the most appropriate when no reasonable alternatives appear to have been examined. It is possible that other options were ruled out too early or were not considered despite other areas having sites that meet appropriate criteria.

The Simister and Bowlee allocation only meets 4 out of 10 of the broad objectives within the PfE plan:

- Objective 1 - Meet our housing need.
- Objective 3 Playing our part in ensuring a thriving and productive economy in all parts of Greater Manchester.
- Objective 5 - Reduce inequalities and improve prosperity.
- Objective 6 - Promote the sustainable movement of people, goods, and information.

These and other objectives could be satisfied by any number of sites in the area.

According to the Greater Manchester Green Belt assessment the Simister and Bowlee sites make a strong or weak to moderate contribution to the purpose of the greenbelt in each of the following areas:

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

To prevent neighbouring towns from merging into one another - Strong

To assist in safeguarding the countryside from encroachment - Weak to moderate

Preserving the setting and special character of historic towns - Weak to moderate

However, it is believed the Simister and Bowlee site has been assessed incorrectly and its contributions should be strong or strong to moderate. The definitions below have been taken from the GM Green Belt Assessment document:

-To assist in safeguarding the countryside from encroachment

oStrong - The land parcel contains the characteristics of countryside, has no or very little built-up development, and is open.

oModerate - The land parcel contains the characteristics of countryside, has limited built-up development, and is relatively open.

-Preserving the setting and special character of historic towns

oStrong - The parcel plays a major role in the setting and or special character of historic towns in terms of its physical extent and degree of visibility and/or its significant contribution to special character.

oModerate - The parcel plays a moderate role in the setting of historic towns in terms of its physical extent and degree of visibility and/or its contribution to special character.

Several character areas are included in this allocation, such as National Character Area Pennine Fringe, Simister, Slattocks and Heald Green, as well as Fringe Settled Valley and Settled Farmlands. At paragraph 18.3, the Topic Paper describes the character of the area as undulating pasture and rough grassland, mature trees, hedgerows, woodland blocks and farmsteads etc. These would all be destroyed if the development of this allocation were to proceed.

The site can be seen from a number of longer vantage points, as well as in the immediate vicinity. However, due to the scale, form, and nature of the proposed development, visual amenity will be adversely affected. The landscape mitigation proposals will not address these fundamental concerns.

There are numerous key habitats on the site, including wetlands, woodland, grassland, and trees. All will be damaged and could be lost as a result of this scheme. Additionally, the scheme will impact protected species, including great crested newts, as well as wider ecological value. These impacts have not been adequately considered in the plan. There is no consensus that biodiversity net gain can be achieved at this site, given the extent of loss of existing vegetation and green space.

According to the Topic Paper at paragraph 191.0, there will be an attempt to achieve net gain, but there is no guarantee that it will be delivered. This is contrary to current national planning policy which could jeopardize the allocation. In addition to the impact of the development itself, the proximity of the site area to major highways also raises concerns about air and noise pollution.

The lack of selection criteria met and the harm that will be caused by the release of the site from the Bowlee greenbelt are evidence of the lack of justification for the selection of this site. In a recent statement, Council leader, David Jones, admitted in writing that sites had been selected due to their proximity to major roads and the ease of implementation of infrastructure, saying,

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

The majority of the site is located within flood zone 1 with existing watercourses within the site boundary and ponds which could pose a risk. Furthermore, given the anticipated scale of development and the large increase in hard surfacing, there is a serious risk that the site could result in flooding of adjacent sites as well as localised floods due to increased surface water runoff.

Paragraph 12.2 of the Topic Paper supports these concerns and draws attention to potential risks from groundwater flooding. Given the importance of ensuring that developments are placed in the most appropriate and safe areas, greater consideration of flood risk should be given during the Plan process, prior to adoption, to ensure that the allocations are appropriate and justified. Leaving these issues to the design stage is simply inappropriate as they fall to the promoter of the development.

The viability of this site is noted to have been calculated with a 25% contribution towards affordable housing in Bury and at 7.5% of GDV in Rochdale. However, because the PfE Plan does not set the conditions for delivering affordable housing throughout the Plan, it is uncertain whether these figures are based on correct and reasonable assumptions. The GMCA has determined that the site is viable, but there are a number of issues that must be addressed before the site can be considered deliverable.

Infrastructure

The Topic Paper supporting this allocation states in paragraph 11.1 that extensive infrastructure investment, including a wide range of public transportation enhancements, is required for the site's implementation. This aims to prove that the site is unsustainable in its current state and needs to be connected to an existing urban area or community. As a result, the site is deemed unsuitable for allocation.

In paragraph 11.2, it is confirmed that this development will have a major influence on both regional and local road networks, both in isolation and in combination with other neighbouring developments. The impact on the Strategic Road Network (SRN) is expected to be focused at M60 Junction 19, while the impact on the Local Road Network (LRN) is projected to be concentrated at several key intersections on the A6045 Heywood Old Road. To facilitate and deliver this site, it is estimated that significant investment and improvements to the highway network will be required.

These works are of such a scale as to potentially render the scheme unviable. Further, the construction will have a major negative impact on current inhabitants, not just due to the disruption of roadworks during construction, but also due to traffic, increased idle vehicles, and local air quality issues once the development is completed.

Investment in public transport is unlikely to be adequate to alleviate these legitimate concerns, particularly when considering the cumulative consequences of all the anticipated growth in the site.

Any development within the proposed allocation site would need to assess the requirements for social infrastructure (education, healthcare etc). the impact of these contributions on the site also needs careful consideration to ensure that the allocation is in fact deliverable.

To deliver this allocation there are requirements for investment in the transport network, provision, school places, health, historic assets etc. All of which could well have a detrimental impact on the viability and delivery of the site

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 private property developers. There is no indication of how they will be made to keep up with the targets. No 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 development in Bury would be met as they were "unrealistic". So, the plan cannot be considered to pass and fails the effectiveness 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 large area of land in the area and in particular the economic shock caused by Brexit and Covid 19 have not been considered.

There is insufficient confidence in the accuracy of the predictions in the current uncertainty of the 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 para 1.42 states: "The majority of development between 2017 and 2037 (the "plan period") will be on land within the urban area, most of which is brownfield. The plan 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 but that the council have no control over the actions of private developers. In reality they cannot and will not limit the release of green belt sites in accordance with National Policy NPPF 134 paragraph 134.

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 Simister and Bowland has been partially offset by creating extensive but unusable greenbelt in other areas under the guise of exceptional circumstances. This is not in accordance with National Policy.

Also see uploaded supporting documents.

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.

RECLASSIFIED
Removal of this site from the plan.

Family Name

Cluer

Given Name

Stephen

Person ID

1287366

Title

JPA 7: Elton Reservoir Area

Type

Web

Include files

[PFE1287366_LeithRep.pdf](#)

	PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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.	<p>Elton Reservoir Proposal (JPA-7)</p> <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 decided through a series of informal meetings with no list of attendees or minutes available. This site choice was presented 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 housing is required.</p> <p>-Para 11.105 p 264 states: " The allocation [Elton Reservoir] is almost entirely surrounded by an existing urban area" Filling this green belt site in will contribute to creating urban sprawl and non-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 investment and this level of investment needs the certainty that the remaining development will 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. To identify the source of infrastructure funding, indeed shortfalls are expected see paragraph 11.105. 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 required) instead of retaining it in accordance with National Policy.</p> <p>-The Elton site apparently cost Peel £27M (as detailed in the site allocation topic paragraph 11.105) for 260 hectares (£104K per hectare) as greenbelt. Allowing a conservative price uplift of 20% for green belt conversion to development land, the land for the initial 1900 site becomes worth £875M. Adding in the land for the totally unjustified additional housing beyond the plan period costs approx. another £750 M. The implication being that unless Peel get the whole £1.32bn they can't offer any upfront funding for the infrastructure. Infrastructure that would not be built if the development does not go ahead. Peel have indicated that they will possibly build the infrastructure will definitely split the site into lots to be developed by other developers so they (Peel) can get 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 commitment for anything.</p>

-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 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 of benefiter influence.

-As part of the infrastructure a new secondary school for Radcliffe is mentioned. A new 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 not as part of the infrastructure funding. A regeneration plan for Radcliffe is already in place and we 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 has 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. 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 targets and what 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 development 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 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 locating 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 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 the consultation that they will implement a brownfield first policy; however, they are going for immediate greenfield development (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 this statement by saying that for anything the council themselves build they would adopt a brownfield first policy but 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 134.

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 Elton Reservoir from the plan

Family Name

Cluer

Given Name

Stephen

Places for Everyone Representation 2021

Person ID	1287366
Title	JPA 9: Walshaw
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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>Policy JP Allocation 9, Walshaw</p> <p>Legality</p> <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, 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 PFE 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, 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 NPPF para 140. Housing need is not an exceptional circumstance to justify the release of greenbelt land. NPPF 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 recovery (Covid-19).</p>

To prove that exceptional circumstances to justify alteration to greenbelt boundaries requires evidence that all other reasonable options to meet identified need have been considered (NPPF para 141). This must include maximising use of brownfield and underutilised sites to increase housing density.

Assessments

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. Flood risk and other surveys have been carried out by consultancies on behalf of and for developers rather than entirely independent wildlife organisations or the Department of Environment, Food and Rural Affairs, so must be considered potentially biased.

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.

Climate change policy and carbon neutral policy

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 not accessible 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 traffic on 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 cannot be justified as the most appropriate when no reasonable alternatives appear to have been examined. It appears that other 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 Walshaw 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 Local Plan 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 checking the sprawl of Greater Manchester and safeguarding the countryside from encroachment. The allocation also makes a relatively limited contribution to maintaining the separation of Bury and Tottington 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 on 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 - JPA 9 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 which 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 contribution of 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 Bury, 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 - JPA 9 Walshaw pg 46 para 27.2 which states that,

"The phasing strategy will be developed through on-going discussions with key stakeholders to ensure the timing of 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 sites are 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 - JPA 9 Walshaw at page 43, para 25.1 states that,

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

-Education

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

"The Walshaw allocation is expected to yield approximately 263 primary age pupils and 175 secondary age pupils. Current forecasts show both primary and secondary schools in the area to be full, therefore all additional demand created would require additional school places."

"Cumulative secondary age demand pressures will need to be considered more strategically (24.2)

It is proposed that secondary places will merely be funded from "financial contributions to secondary school provision" to meet the needs generated by the development (PfE, 2021). 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 1/3 of a mile. Distribution of places in Bury secondary schools for September 2021. If the Walshaw site will yield an additional 175 secondary age pupils, a more permanent solution is 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 pupils in the 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." (What are Places for Everyone's proposals for the Bury Council)

Walshaw is not situated near to motorway junctions or to transport or employment hubs. 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 2021). 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 the area. It will exacerbate congestion on local roads, which are already highly congested. No consideration 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 Bury Council, Eammon O'Brien confirmed that it was "unlikely" that the proposed building rates for 2021 in Bury (as laid out in JPA9 Walshaw Topic Paper PfE 2021, section 27.4 page 46) were "unrealistic". 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 should be changed in exceptional circumstances - this has not been thoroughly explored. A lack of available land in the area and in particular the economic shock caused by Brexit and Covid 19 should be taken into account.

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 be considered if brownfield has been exhausted. A review mechanism should be built in to only include

Places for Everyone Representation 2021

	<p>later stage if proven necessary. PfE para1.42 states: "The majority of development be 2037 (the "plan period") will be on land within the urban area, most of which is brown favours a brownfield first policy wherever possible as does National Policy. Bury Council the public in Bury that they will implement a brownfield first policy. When questioned 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 that the council have no control over the actions of private developers. In reality they limit the release of green belt sites in accordance with National Policy NPPF 134 paragraph</p> <p>Changes to greenbelt boundaries</p> <p>As part of the overall plan Bury have modified green belt boundaries and allocations make it appear that less Greenbelt is being sacrificed. The loss of the Walshaw site has been partially offset by creating extensive but unusable greenbelt in other areas with exceptional circumstances. This is not in accordance with National Policy.</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.	Removal of JPA 9 Walshaw from the plan
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-D1 Infrastructure Implementation
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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 they 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 sites have substantial infrastructure provided close by.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	JP-D2 Developer Contributions
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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 redeveloped 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 have 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 their own instead of selling it and losing control. Salford Council has now created its own building company that will deliver affordable homes on land they own and other council land in their suit.
Family Name	Cluer

Places for Everyone Representation 2021

Given Name	Stephen
Person ID	1287366
Title	Bury - Green Belt Additions
Type	Web
Include files	PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_Letter_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 Bury GBA11 Nuttall West, Ramsbottom Bury GBA12 Woolfold, Bury Bury GBA13 Nuttall East, Ramsbottom Bury GBA14 Chesham, Bury Bury GBA15 Broad Hey Wood North Bury GBA16 Lower Hinds
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.	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 and 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 protection is less.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect	Leave the greenbelt boundaries unchanged and present the true loss of greenbelt from the plan proposals.

of any legal compliance or soundness matters you have identified above.	
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	Supporting Evidence
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.pdf PFE1287366_LeithRep.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.	<p>Legal Compliance</p> <p>-It is questionable whether PfE and the GMSF can effectively be treated as the same 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 proceed to final public consultation and submission under Regulation 19 (this current stage) if established. If there is any substantial difference in scope between the GMSF and PfE 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 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 otherwise a plan must be considered illegal and not put to Government.</p> <p>Soundness</p> <p>Soundness</p> <p>-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 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 identify how all the infrastructure will be paid</p> <p>-There are no partners or industries identified for employment provision. Major partners for employment provision should be identified.</p> <p>-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.</p> <p>-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.</p> <p>-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 and 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.</p> <p>-PfE shows removal of greenbelt protection for some areas and creation of greenbelt areas. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this.</p>

Places for Everyone Representation 2021

	<p>-In addition to PfE each authority needs to come up with its own local plan. No details about when these plans will be available.</p> <p>-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 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.</p> <p>-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. Also see my supporting documents.</p>
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	Other Comments
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.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>RECLASSIFIED</p> <p>Please read in full my supporting documents.</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	<p>RECLASSIFIED</p> <p>Please read in full my supporting documents.</p>

or soundness matters you have identified above.	
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	Other Comments
Type	Web
Include files	PFE1287366_Letter_Redacted.pdf PFE1287366_LeithRep.pdf PFE1287366_LegalityBury.pdf PFE1287366_Simister.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.	RECLASSIFIED Consultation Public consultation has been poor and apparently designed to achieve very low response. This consultation is yet another example. A plan can only be justified if it can demonstrate that it has consulted the public and other stakeholders. So GMSF/PfE is not Justified on these grounds.
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.	RECLASSIFIED Consultation The public consultations need to be repeated, made understandable and with more information to enable choices to be made. They should be designed to encourage public contribution not designed to put people off.
Family Name	Cluer
Given Name	Stephen
Person ID	1287366
Title	Other Comments
Type	Web
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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
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>RECLASSIFIED</p> <p>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 access to residents of the initial call for sites and the amount spent on making residents aware of the plan was disproportionately small (c.100 as per the response to a Freedom of Information request) and 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 conducted 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 PfE states of the Walshaw allocation,</p> <p>"This is an extensive area of land c.100 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, 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 adjusted 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.</p>

flood risk and other surveys have been carried out by consultancies on behalf of and developers rather than entirely independent wildlife organisations or the Department of so must be considered potentially biased.

The Housing Need Assessment was carried out by Arc4, who were supposed to carry survey of housing need. However, they have a partnership with Greater Manchester Partnership, an organisation of housing associations, including Six Town Housing in assessment was therefore not impartial.

Climate change policy and carbon neutral policy

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 from Walshaw by a car journey or an expensive, unreliable and infrequent bus service, 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 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 be seen as the most appropriate when no reasonable alternatives appear to have been examined. It is possible that other options were ruled out too early or were not considered despite other areas having good 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 Walshaw 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 Local Plan 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 Greater Manchester Greenbelt Assessment, 2020 which concluded that the Walshaw allocation makes a moderate

checking the sprawl of Greater Manchester and safeguarding the countryside from e
The allocation also makes a relatively limited contribution to maintaining the separati
Tottington which are already merged to a significant degree. Release of the allocation
cause moderate harm to Green Belt purposes.

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

"the proposed strategy within the GMSF is to release a small number of large strateg
Green Belt as these will provide the scale and massing of development that is neede
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
this particular site rather than sites on the outskirts nearer motorway access, transpo
employment sites. There is too much emphasis on economic growth at the expense
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 v
a 5% increase in the price of the properties on the site: Site Allocation Topic Paper-
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
showed the allocation would likely require public support to proceed.

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

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

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

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

The plan for infrastructure is therefore unsound as it is undeliverable and thus the sit

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

-Healthcare

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

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

-Education

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

"The Walshaw allocation is expected to yield approximately 263 primary age pupils and 175 secondary age pupils. Current forecasts show both primary and secondary schools in the area are full, therefore all additional demand created would require additional school places."

"Cumulative secondary age demand pressures will need to be considered more strategically (see section 24.2)

It is proposed that secondary places will merely be funded from "financial contributions to secondary school provision" to meet the needs generated by the development (PfE, para 1.42). 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 1/3 of a mile. Distribution of places in Bury secondary schools for September 2021. It is estimated that the Walshaw site will yield an additional 175 secondary age pupils, a more permanent solution is an additional secondary school in the locality as well as the proposed secondary school. The need for an additional secondary school needs to be found for them in the immediate area and for the additional primary age pupils in the 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." |What are Places for Everyone"s proposals for the transport strategy Bury Council

Walshaw is not situated near to motorway junctions or to transport or employment hubs, therefore 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 para 1.42). 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 proposed 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 the area. It will exacerbate congestion on local roads, which are already highly congested. No consideration has been taken of the additional traffic which will be produced at the Andrews housing allocation 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 of their 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 2021 in Bury (as laid out in JPA9 Walshaw Topic Paper PfE 2021, section 27.4 page 46) would be met as they were "unrealistic". 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 available 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 economic 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 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. The plan favours a brownfield first policy wherever possible as does National Policy. Bury Council has stated to 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 to mean that for anything the council themselves build they would adopt a brownfield first policy. However, as 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 para 134

Places for Everyone Representation 2021

	<p>Changes to greenbelt boundaries</p> <p>As part of the overall plan Bury have modified green belt boundaries and allocations make it appear that less Greenbelt is being sacrificed. The loss of the Walshaw site has been partially offset by creating extensive but unusable greenbelt in other areas with exceptional circumstances. This is not in accordance with National Policy.</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>RECLASSIFIED</p> <p>Removal of JPA 9 Walshaw from the plan</p>
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Soundness - Justified?	Unsound
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