

Places for Everyone Representation 2021

<b>Family Name</b>	Cross
<b>Given Name</b>	Natasha
<b>Person ID</b>	1287266
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287266_SOSGeneral.pdf</a> <a href="#">PFE1287266_SOSWalshaw.pdf</a> <a href="#">PFE1287266_SOSElton.pdf</a>
<b>Family Name</b>	Cross
<b>Given Name</b>	Natasha
<b>Person ID</b>	1287266
<b>Title</b>	Our Vision
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287266_SOSElton.pdf</a> <a href="#">PFE1287266_SOSWalshaw.pdf</a> <a href="#">PFE1287266_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>This has been planned without proper public consultation from the beginning. Most residents were not even made aware of these plans by those responsible for ensuring that happened. Seemingly we have been kept in the dark. The questionnaires have been designed to put off people objecting, long winded, convoluted and personal questions which are irrelevant included. Residents with little IT skills or no Internet can not object.</p> <p>The failure to address the local housing needs for the next 15 years which added to to the lack of community involvement. Councillors have gone against the constitution which makes the plan unsound.</p>
<b>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.</b>	<p>Whilst GMSF complies with regulation 18 f the Town and Country Planning regulations, and could possibly proceed to the final public consultation and submission under regulation 19 (current stage) PfE legality is not established and can not be treated as the same plan. PfE can not assume that regulation 18 is met if there is substantial difference in scope between the two plans.</p> <p>The legality of PfE can only be established by a proper judicial review. Until proven otherwise the plan must be considered illegal and not put to government.</p>
<b>Family Name</b>	Cross

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<b>Given Name</b>	Natasha
<b>Person ID</b>	1287266
<b>Title</b>	Our Strategic Objectives
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287266_SOSGeneral.pdf</a> <a href="#">PFE1287266_SOSWalshaw.pdf</a> <a href="#">PFE1287266_SOSElton.pdf</a>
<b>Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:</b>	<ol style="list-style-type: none"> <li>1. Meet our housing need</li> <li>2. Create neighbourhoods of choice</li> <li>3. Ensure a thriving and productive economy in the districts involved</li> <li>4. Maximise the potential arising from our national and international assets</li> <li>5. Reduce inequalities and improve prosperity</li> <li>6. Promote the sustainable movement of people, goods and information</li> <li>7. Ensure that districts involved are more resilient and carbon neutral</li> <li>8. Improve the quality of our natural environment and access to green spaces</li> <li>9. Ensure access to physical and social infrastructure</li> <li>10. Promote the health and wellbeing of communities</li> </ol>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	NA
<b>Soundness - Consistent with national policy?</b>	NA
<b>Soundness - Effective?</b>	NA
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	Please read the attached documents to explain why this plan fails on all the above points.
<b>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.</b>	This plan needs to go back to Regulation 18 of the Town and Country Planning Act and properly engage public consultation.
<b>Family Name</b>	Cross
<b>Given Name</b>	Natasha

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<b>Person ID</b>	1287266
<b>Title</b>	Our Spatial Strategy
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287266_SOSElton.pdf</a> <a href="#">PFE1287266_SOSWalshaw.pdf</a> <a href="#">PFE1287266_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	GMCA moved forward with a poorly prepared plan to the public consultation stage of the Town and Country Planning Act despite substantial changes being made to the plan since the last consultation. Example Stockport has withdrawn from what was the GMSF and Manchester City Council has had a 35% increase applied to their housing target. This means the plan has changed significantly so therefore requires going back to proper consultation to residents directly to comment.
<b>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.</b>	As above. Go back to proper consultation to residents.
<b>Family Name</b>	Cross
<b>Given Name</b>	Natasha
<b>Person ID</b>	1287266
<b>Title</b>	JP-Strat 1 Core Growth Area
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287266_SOSGeneral.pdf</a> <a href="#">PFE1287266_SOSWalshaw.pdf</a> <a href="#">PFE1287266_SOSElton.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound

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<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	I have supported these views in the attached documention
<b>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.</b>	Seeabove
<b>Family Name</b>	Cross
<b>Given Name</b>	Natasha
<b>Person ID</b>	1287266
<b>Title</b>	JP-Strat 2 City Centre
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287266_SOSElton.pdf</a> <a href="#">PFE1287266_SOSWalshaw.pdf</a> <a href="#">PFE1287266_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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</b>	See attached supporting documents

<b>co-operate. Please be as precise as possible.</b>	
<b>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.</b>	See above
<b>Family Name</b>	Cross
<b>Given Name</b>	Natasha
<b>Person ID</b>	1287266
<b>Title</b>	JPA 8: Seedfield
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287266_SOSGeneral.pdf</a> <a href="#">PFE1287266_SOSWalshaw.pdf</a> <a href="#">PFE1287266_SOSElton.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	See attached supporting documents
<b>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.</b>	See above

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<b>Family Name</b>	Cross
<b>Given Name</b>	Natasha
<b>Person ID</b>	1287266
<b>Title</b>	JP-Strat 7 North East Growth Corridor
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287266_SOSElton.pdf</a> <a href="#">PFE1287266_SOSWalshaw.pdf</a> <a href="#">PFE1287266_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	See attached supporting documents
<b>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.</b>	See above
<b>Family Name</b>	Cross
<b>Given Name</b>	Natasha
<b>Person ID</b>	1287266
<b>Title</b>	JP-Strat 12 Main Town Centres
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287266_SOSGeneral.pdf</a> <a href="#">PFE1287266_SOSWalshaw.pdf</a> <a href="#">PFE1287266_SOSElton.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound

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<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	See attached supporting documents
<b>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.</b>	See above.
<b>Family Name</b>	Cross
<b>Given Name</b>	Natasha
<b>Person ID</b>	1287266
<b>Title</b>	JP-Strat 13 Strategic Green Infrastructure
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287266_SOSElton.pdf</a> <a href="#">PFE1287266_SOSWalshaw.pdf</a> <a href="#">PFE1287266_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not</b>	See attached supporting documents

<b>to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>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.</b>	See attached supporting documents
<b>Family Name</b>	Cross
<b>Given Name</b>	Natasha
<b>Person ID</b>	1287266
<b>Title</b>	JP-Strat 14 A Sustainable and Integrated Transport Network
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287266_SOSGeneral.pdf</a> <a href="#">PFE1287266_SOSWalshaw.pdf</a> <a href="#">PFE1287266_SOSElton.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	See attached documents
<b>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</b>	See above



Places for Everyone Representation 2021

<b>you have identified above.</b>	
<b>Family Name</b>	Cross
<b>Given Name</b>	Natasha
<b>Person ID</b>	1287266
<b>Title</b>	JPA 7: Elton Reservoir Area
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287266_SOSElton.pdf</a> <a href="#">PFE1287266_SOSWalshaw.pdf</a> <a href="#">PFE1287266_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>The PfE indicates in paragraph 1.63 point 2 that the most up to date information should be used. The most recent Bury's Housing Development Needs Assesment 2020 must be taken into consideration.</p> <p>The site selection for Bury has been unclear. Radcliffe has the cheapest housing in Bury yet has been selected as the best area for affordable housing over areas more in need.</p> <p>Little information has been given regarding site selection choices and admittedly they were decided during informal meetings without a list of attendees or minutes available. The site choice can not be justified when it appears no alternatives appear to be examined.</p> <p>This site is almost entirely surrounded by the existing urban area. Filling this will create urban sprawl contry to National Policy NPPF paragraph 134 parts a, c and e.</p> <p>Such gross release of greenbelt land is contry to National guidelines which regards greenbelt as a precious resource not to be squandered. Release of the entire site for 3500 houses when 1900 will be built in the given timescale is squander. Questions should be raised as to why Bury Council are offering such a huge amount of greenbelt land that may never be required for housing.</p> <p>JPA7 fails to identify the source of infrastructure funding. Short falls are expected.</p> <p>It appears that Peel Holdings have duped Bury Council into selling off the whole area at an 60% inflated price, ignoring National Policy and granting them a huge financial deal with no commitment to do anything.</p> <p>Site surveys such a wildlife and flood risk have bee carried out on behalf of and paid by developers rather than independently carried put. This could be seen as biased. These surveys must be carried out by someone entirely independent if benefitter influence.</p> <p>A new high school for Radcliffe is part of the infrastructure plan. This is already planned for and funded by the government. The new school will not</p>

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	<p>even cater for existing high school aged children in Radcliffe let alone children who will be on the new development.</p> <p>Bury council have already stated that the new school won't be dependent on PfE going ahead and have committed funds to regeneration. Unless PfE is building a second new high school any implications of doing so as part of PfE, it should be removed from JPA7.</p> <p>Bury council have consistently failed to meet housing targets and are now in presumption. To be effective the plan must be deliverable. The plan relies heavily on the cooperation of developers. There is no mention of how these targets will be imposed or sanctions for not doing so. REDACTED TEXT confirmed it was unlikely that the proposed building rates for all developers would be met as they are unrealistic. So the plan can not be effective and fails the effectiveness test for soundness test.</p> <p>Bury has modified greenbelt boundaries and allocations to make it appear that less greenbelt land is being sacrificed. Offsetting doesn't justify in accordance with national policy for exceptional circumstances.</p> <p>PfE puts the majority of housing in West Bury while locating proposed jobs in East Bury. The proposed link Road will not ease the congestion, just link one congested area with another.</p> <p>Bury council have informed residents that they will implement a brownfield first policy, yet first releases greenbelt land. Eammon O'Brien stated that they have no control over the actions of private developers. Greenbelt release should be limited in accordance to National Policy NPPF 134 part e.</p>
<p><b>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.</b></p>	<p>Removal of JPA-7 allocation Elton Reservoir from the plan.</p>
<p><b>Family Name</b></p>	<p>Cross</p>
<p><b>Given Name</b></p>	<p>Natasha</p>
<p><b>Person ID</b></p>	<p>1287266</p>
<p><b>Title</b></p>	<p>JPA 9: Walshaw</p>
<p><b>Type</b></p>	<p>Web</p>
<p><b>Include files</b></p>	<p><a href="#">PFE1287266_SOSGeneral.pdf</a>  <a href="#">PFE1287266_SOSWalshaw.pdf</a>  <a href="#">PFE1287266_SOSElton.pdf</a></p>
<p><b>Soundness - Positively prepared?</b></p>	<p>Unsound</p>
<p><b>Soundness - Justified?</b></p>	<p>Unsound</p>
<p><b>Soundness - Consistent with national policy?</b></p>	<p>Unsound</p>
<p><b>Soundness - Effective?</b></p>	<p>Unsound</p>
<p><b>Compliance - Legally compliant?</b></p>	<p>No</p>

<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>Bury council have failed to comply with their statement of community involvement at all stages of this plan. There was no notification to residents of the initial call for sites and spent only <input type="checkbox"/>100 on making residents aware of the plan. There has been a deliberate misleading and misinformation to promote the plan rather than facts. There has been a reliance on residents to find out for themselves the plan and the overall scale. There has been no access to public Internet due to covid so residents without Internet at home.e have been kept out of the planning and denied the views to be shared especially when they are reliant on getting information from various online groups as PfE and Bury council have failed to do so.</p> <p>Consultations have been inaccessible in terms of language and terminology used. They have included personal questions, long winded and intrusive which will put people off filling them in. It is not a true response rate.</p> <p>NPPF greenbelt protection from urban sprawl paragraph 11.119, page 271 of PfE states of the walshaw allocation</p> <p>"This is an extensive piece of land set entirely in an existing urban area. The land is loosely bounded by the urban areas of Tottington to the North, Woolfold and Elton to the East, Lowercroft to the south and Walshaw to the west. Building on this land will create urban sprawl contrary to NPPF paragraph 137 and paragraph 138 a, b, c and e.</p> <p>There has been no evidence given to the existence of exceptional circumstances to justify the alteration of greenbelt boundaries to allow building on the Walshaw allocation. Housing g need is not an exceptional circumstance. Government guidance states the housing need is not a target but merely a starting point and figures van be mitigated upwards or downwards according to local brownfield, economic shock (Brexit and Covid 19)</p> <p>NPPF require evidence that all other reasonable options to meet identified need have been considered. This must include maximising use of brownfield and underutilised sites and maximising density.</p> <p>There has been a failure to carry out thorough and independent assessments. Those carried out have been done on behalf of developers, not entirely independent wildlife organisations or the Department of the Environment. Therefore these assessments must be considered biased.</p> <p>The Housing Need Assesment was carried out by Arc4 who were supposed to carry out a non biased survey on housing need. However they have a partnership with Greater Manchester Housing Partnership, an organisation of housing associations including Six Town Houseing in Bury. The assessments were therefore not impartial.</p> <p>PfE proposes employment sites on the other side of town. This will increase traffic congestion, carbon emissions, noise pollution as car travel will be essential as no bus route exists or is proposed.</p> <p>The proposed link road at Walshaw will do nothing to alleviate congestion, just transfer it from one problem area to another.</p> <p>The PfE indicates in paragraph 1.63 that the most up to date information should be used in plan making, so being Bury's most recent Housing Development Needs Assesment 2020 must be taken into consideration.</p> <p>Bury's site selection process has been very unclear. Little information has been given about why other, seemingly more appropriate sites were rejected or what alternatives were considered. Bury Council has admitted that site selections were made during informal meetings with no list of attendees or minutes available. This site choice can not be justified as the most appropriate when no reasonable alternatives were examined. Alternative options were</p>

ruled out too early or were not considered despite having direct motorway access which Walshaw does not have or being situated closer to the employment sites.

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

Walshaw only met 1 of the criteria for site selection (criteria 7) this is a cynical argument as without the proposed 1250 new builds there wouldn't be a major problem and the proposed infrastructure wouldn't be needed. This does not justify the inclusion of the site.

Walshaw only meets 3 out of 10 Broad objectives within section 3 of the PFE plan

(Objectives 1, 5 and 6)

The objectives could be satisfied by any number of sites in the town.

The lack of selection criteria met and the harm that will be caused by the release of the greenbelt land are evidence of the lack of justification for the selection of this site.

The needs of residents in this area have been overlooked in favour of mass urbanisation by using this site instead of one closer to transport links and motorways. There is too much emphasis on economic growth rather than the physical and mental health of the residents. The benefits of this greenbelt land was even more greatly needed during the covid 19 pandemic than it was before which has been overlooked and the use of this land underestimated.

The only way infrastructure funding will be met is through a 5% increase in property prices on the proposed development. That makes the delivery of the required infrastructure undeliverable.

The Three Dragons Viability Appraisal of the allocation showed the site would likely to need public support to proceed.

It also showed that without a contribution to strategic transport costs, the scheme produces a positive residual value both for the main and sensitivity test. However an increase in house prices would be required to meet the transport costs identified.

There is no guarantee that high house prices would be achieved. It also suggests that the funding for needed infrastructure will only be forthcoming once funds have been raised.

"The phasing strategy will be developed through ongoing discussions with key stakeholders in relation to infrastructure delivery. The estimated phasing and delivery trajectory will evolve as the plans for the allocation are developed further."

The plan for infrastructure is undeliverable and therefore the walshaw site is unviable.

Vague infrastructure plans and Bury's poor reputation for obtaining funds from developers who attempt to avoid costs and obligations does not bode well. We were told by Bury Council that s106 payments are no longer ring-fenced, so there is no guarantee that promised infrastructure will actually be delivered.

There's no specific health care facilities proposed. Site Allocation Topic paper PA 9 Walshaw pg 43 paragraph 25.1 states

"Further work will be required to determine whether there is additional capacity within any local health care facilities to meet the increased demands arising from the prospective occupants of the new development."

There is a plan for 1 new primary school but no plan to deal with the increase in high school aged children. Current forecasts show both primary and

secondary schools in the area to be full to capacity, therefore additional demand for school places created would require additional school places. It is proposed that the secondary places will be funded by "financial contributions towards off-site secondary school provision." This is unacceptable and a best only provide a short term solution.

Elton High School is consistently oversubscribed by more than 175 children. If the proposed 175 extra places are also needed there needs to be a permanent solution.

Walshaw isn't situated near a motorway, transport or employment hubs therefore residents will be required to travel via car on already heavily congested roads. Yet stated in the PfE proposals for the Environment- Bury Council. " The most significant role PfE will play in this respect is to locate development in the most sustainable locations which reduce the need for car travel, for example by maximising residential densities around transport hubs "

This is clearly not the case for this site.

The proposed link roads shown on the map pg B9 figure 3 enters on to a narrow, busy road which is barely wide enough for 2 cars to pass safely. This will only exacerbate the already heavy congestion and no account has been taken for the numerous of cars that will be from the new Andrew's factory development.

Bury council have consistently failed to meet housing delivery targets and are now in presumption. To be effective the plan must be deliverable. The plan relies heavily on the cooperation of developers. There is no indication of how they will be made to keep up with targets and what sanctions will be applied if they don't. At a council meeting held on 9/9/21 the council leader Eammon O'Brien confirmed that it was unlikely that the proposed building rates for all developments in Bury would be met as they are unrealistic." A plan can not be considered to be effective and fails the effectiveness for soundness test.

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. Lack of brownfield land and inparticular the economic shock caused by Brexit and Covid 19 pandemic haven't been taken into account.

There is insufficient confidence in the accuracy of the predictions in the current economic climate to justify the the loss of greenbelt land at the start of this plan.

Brownfield sites have not yet been exhausted, yet release of greenbelt is proposed first contrary to guidance.

A review mechanism should be built in to only include greenbelt land if proven at a later stage it is essential.

The release of this land for development would go against government guidelines and PfE favouring brownfield first policy. Bury council have informed residents that they too adopt this policy yet again, when questioned Eammon O'Brien clarified this to mean that anything the council build on will implement this and they have no control over the actions of private developers. Actually they do as they could limit the amount of land released in accordance with National Policy NPPF 134 part e.

As part of the overall plan Bury have modified greenbelt boundaries and allocations in such a way as to make it appear that less greenbelt is being lost. The loss at Walshaw has been partialy offset by creating large, but unusable greenbelt in other areas without justifying exceptional circumstances. This is not in accordance to National Policy.

**Redacted modification  
- Please set out the**

Removal of JPA 9 Walshaw from the plan.

<b>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.</b>	
<b>Family Name</b>	Cross
<b>Given Name</b>	Natasha
<b>Person ID</b>	1287266
<b>Title</b>	JP-D1 Infrastructure Implementation
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287266_SOSElton.pdf</a> <a href="#">PFE1287266_SOSWalshaw.pdf</a> <a href="#">PFE1287266_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	See attached documents and Bury allocation sites section
<b>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.</b>	See above
<b>Family Name</b>	Cross
<b>Given Name</b>	Natasha
<b>Person ID</b>	1287266

## Places for Everyone Representation 2021

<b>Title</b>	JP-D2 Developer Contributions
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287266_SOSGeneral.pdf</a> <a href="#">PFE1287266_SOSWalshaw.pdf</a> <a href="#">PFE1287266_SOSElton.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	See attached documents and site Bury location section
<b>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.</b>	See above
<b>Family Name</b>	Cross
<b>Given Name</b>	Natasha
<b>Person ID</b>	1287266
<b>Title</b>	Other Comments
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287266_SOSElton.pdf</a> <a href="#">PFE1287266_SOSWalshaw.pdf</a> <a href="#">PFE1287266_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound

Places for Everyone Representation 2021

<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Cross
<b>Given Name</b>	Natasha
<b>Person ID</b>	1287266
<b>Title</b>	JPA 1.1 Heywood / Pilsworth (Northern Gateway)
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287266_SOSGeneral.pdf</a> <a href="#">PFE1287266_SOSWalshaw.pdf</a> <a href="#">PFE1287266_SOSElton.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Cross
<b>Given Name</b>	Natasha
<b>Person ID</b>	1287266
<b>Title</b>	JPA 1.2: Simister and Bowlee (Northern Gateway)
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287266_SOSElton.pdf</a> <a href="#">PFE1287266_SOSGeneral.pdf</a> <a href="#">PFE1287266_SOSWalshaw.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Cross
<b>Given Name</b>	Natasha
<b>Person ID</b>	1287266



Places for Everyone Representation 2021

<b>Title</b>	Other Comments
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287266_SOSWalshaw.pdf</a> <a href="#">PFE1287266_SOSGeneral.pdf</a> <a href="#">PFE1287266_SOSElton.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Cross
<b>Given Name</b>	Natasha
<b>Person ID</b>	1287266
<b>Title</b>	Other Comments
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287266_SOSElton.pdf</a> <a href="#">PFE1287266_SOSGeneral.pdf</a> <a href="#">PFE1287266_SOSWalshaw.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No