

Places for Everyone Representation 2021

<b>Family Name</b>	Neal
<b>Given Name</b>	Jill
<b>Person ID</b>	1287064
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Family Name</b>	Neal
<b>Given Name</b>	Jill
<b>Person ID</b>	1287064
<b>Title</b>	Our Vision
<b>Type</b>	Web
<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>	NA
<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 plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Up to date information is critical to support such major changes.</p> <p>Whilst accepting that public consultation has taken place, this has been patchy at best and deliberately confusing at worst. I have had to rely on local protest groups to provide an understanding of the complexity of the plans. I do not believe that the use of protected greenbelt land for building purposes is legal.</p>
<b>Family Name</b>	Neal
<b>Given Name</b>	Jill
<b>Person ID</b>	1287064
<b>Title</b>	Our Strategic Objectives
<b>Type</b>	Web
<b>Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:</b>	<p>3. Ensure a thriving and productive economy in the districts involved</p> <p>5. Reduce inequalities and improve prosperity</p> <p>7. Ensure that districts involved are more resilient and carbon neutral</p> <p>8. Improve the quality of our natural environment and access to green spaces</p> <p>10. Promote the health and wellbeing of communities</p>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	NA

Places for Everyone Representation 2021

<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>	NA
<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 believe that the building of so many houses does nothing to ensure a thriving economy nor do I believe that this plan reduces inequality or improves prosperity for current residents of the Borough. Nothing that is written in the plan explains how this is to occur. How does the building of so many houses reduce the carbon footprint? The plan is certainly unsound in its reference to improving the natural environment and access to green spaces. It is clear that this plan in fact does the opposite. By adding thousands more vehicles to the local roads this can only worsen the health and wellbeing of residents. Overall I believe that the objectives are neither sound nor legally compliant.
<b>Family Name</b>	Neal
<b>Given Name</b>	Jill
<b>Person ID</b>	1287064
<b>Title</b>	JP-H 1 Scale Distribution and Phasing of New Housing Development
<b>Type</b>	Web
<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>	The plan states that here is a strong focus on directing new housing towards previously-developed sites within the existing urban area. This is simply not the case in Bury. The vast majority of new housing is intended to be built on existing protected greenbelt land. This is neither sound nor legally compliant
<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>	The plan needs to be redrafted to remove the use of greenbelt land for house building and include a guarantee that brownfield sites will be utilised instead. There are a number of brownfield sites available in this area that the local authority could ensure are utilised

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<b>you have identified above.</b>	
<b>Family Name</b>	Neal
<b>Given Name</b>	Jill
<b>Person ID</b>	1287064
<b>Title</b>	JP-H 2 Affordability of New Housing
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	NA
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<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>	Nothing in the plan guarantees that housing built will be affordable for local people. It will increase the number of individuals buying houses in the area but then travelling outside for work, shopping and entertainment.
<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>	The plan should be amended to ensure that affordable housing (if housing must be built at all) is related to the average income of local residents
<b>Family Name</b>	Neal
<b>Given Name</b>	Jill
<b>Person ID</b>	1287064
<b>Title</b>	JP-H 3 Type Size and Design of New Housing
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	NA
<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>	NA
<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>	The plan for each area should specify the number or percentage of each type of houses to be built. For example what percentage will be suitable for elderly residents - ie bungalows or how many will be fully accessible for disabled residents. Without this level of detail it is not possible for residents to understand or support any of the plans.
<b>Family Name</b>	Neal
<b>Given Name</b>	Jill
<b>Person ID</b>	1287064
<b>Title</b>	JP-H 4 Density of New Housing
<b>Type</b>	Web
<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>	In the Bury area in particular the plan to build many thousands of homes in close proximity to each other and on green belt land is unsound and unacceptable. The impact on every aspect of life cannot be underestimated.
<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>	Reduce the overall numbers of houses to be built - based on real need rather than out of date estimates. Remove the prospect of building on greenbelt land.

Places for Everyone Representation 2021

<b>Family Name</b>	Neal
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<b>Person ID</b>	1287064
<b>Title</b>	JP-G 1 Valuing Important Landscapes
<b>Type</b>	Web
<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 site selection process for Bury has not been clarified satisfactorily. No information has been given about why other suitable sites were rejected, or what alternatives were considered. Bury Council admitted in a Freedom of Information response that site selection was decided at a series of informal meetings with no list of attendees or minutes available. This is totally unacceptable. This site choice cannot be justified as the most appropriate when no reasonable alternatives appear to have been examined. The Elton Reservoir site does not meet the selection criteria laid down in the NPPF or the GMCA guidelines. The location of Elton Reservoir has the least expensive housing in Bury but was selected in preference to sites in other areas where affordable housing is required. Why?</p> <p>Filling this greenbelt land will contribute to urban sprawl - contrary to legal requirements Para 11.105 p 264 states: "Although the allocation has the capacity to deliver a total of around 3,500 new homes, it is anticipated that around 1,900 of these will be delivered within the plan period. Nevertheless, it is considered necessary to release the site in full at this stage given that the scale of the proposed development means that it will need to be supported by significant strategic infrastructure and this level of investment needs the certainty that the remaining development will still be able to come forward beyond the plan period". This is contrary to National Guidelines, which regards greenbelt as a precious resource not to be squandered. JPA7 fails to identify the source of infrastructure funding, indeed shortfalls are expected see para 12.16 of PFE. Site owners Peel are not specifically mentioned as being a contributor to the infrastructure funding. Questions should be asked regarding the reasons for Bury Council offering up a huge amount of greenbelt at Elton Reservoir that is not required during the plan period (and may never be required) instead of retaining it in accordance with National Policy.</p> <p>Site wildlife, flood risk and other surveys have been carried out by consultancies on behalf of and paid for by developers rather than entirely independent wildlife organisations or the Department of the Environment so must be considered potentially biased. This is particularly important at Elton Reservoir as there are currently problems with the reservoir wall which are being addressed by the Canal and Rivers trust. Are they suitable to protect homes from flooding if there is a breach? Such surveys should be entirely independent of benefiter influence.</p>
<b>Family Name</b>	Neal
<b>Given Name</b>	Jill
<b>Person ID</b>	1287064
<b>Title</b>	JP-G 6 Urban Green Space
<b>Type</b>	Web
<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>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>	Significantly, they will become increasingly important as a result of climate change, helping to cool overheating urban areas, manage flood risk and enable wildlife to adapt. Other important environmental functions include the ability to mitigate air pollution and help manage water quality. THIS STATEMENT DEMONSTRATES EXACTLY WHY THE PLAN IS NOT SOUND IN RELATION TO BUILDING ON WHAT LITTLE GREENBELT LAND WE CURRENTLY HAVE AVAILABLE IN ONE OF THE POOREST AREAS OF Greater Manchester.
<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 previous section
<b>Family Name</b>	Neal
<b>Given Name</b>	Jill
<b>Person ID</b>	1287064
<b>Title</b>	JP-G 8 Standards for Greener Places
<b>Type</b>	Web
<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>	Please refer to submissions made by Bury Folk Keep it Green - I wholeheartedly agree with and support their submission in its entirety.
<b>Family Name</b>	Neal
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Places for Everyone Representation 2021

<b>Person ID</b>	1287064
<b>Title</b>	JP-G 10 Green Belt
<b>Type</b>	Web
<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>	Proposing the building 3500 houses on greenbelt land goes against everything that green belt land is intended to ensure. Once built on it is lost forever. Suggesting the provision of new green spaces is simply a smokescreen to ensure that the local authority can benefit from selling our most valuable and irreplaceable asset.
<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>	Remove the plan to build on greenbelt land.
<b>Family Name</b>	Neal
<b>Given Name</b>	Jill
<b>Person ID</b>	1287064
<b>Title</b>	JPA 7: Elton Reservoir Area
<b>Type</b>	Web
<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>Para 11.105 p 264 states: " The allocation [Elton Reservoir] is almost entirely surrounded by the existing urban area" Filling this green belt site in will contribute to creating urban sprawl contrary to compliance with National Policy NPPF para 134 parts a,c and e.</p> <p>? Para 11.105 p 264 states: "Although the allocation has the capacity to deliver a total of around 3,500 new homes, it is anticipated that around 1,900 of these will be delivered within the plan period. Nevertheless, it is considered necessary to release the site in full at this stage given that the scale of the proposed development means that it will need to be supported by significant strategic infrastructure and this level of investment needs the certainty that the remaining development will still be able to come forward beyond the plan period". Such gross over release of greenbelt is entirely contrary to National Guidelines, which regards greenbelt as a precious resource not to be</p>

squandered. JPA7 fails to identify the source of infrastructure funding, indeed shortfalls are expected see para 12.16 of PfE. Site owners Peel are not specifically mentioned as being a contributor to the infrastructure funding. Questions should be asked regarding the reasons for Bury Council offering up a huge amount of greenbelt at Elton Reservoir that is not required during the plan period (and may never be required) instead of retaining it in accordance with National Policy.