

<b>Given Name</b>	Rosedale Property Holdings Limited
<b>Company / Organisation</b>	Rosedale Property Holdings Limited
<b>Person ID</b>	1286650
<b>Title</b>	Stakeholder Submission
<b>Agent Company / Organisation</b>	Wharfeside Planning
<b>Type</b>	Web
<b>Given Name</b>	Rosedale Property Holdings Limited
<b>Company / Organisation</b>	Rosedale Property Holdings Limited
<b>Person ID</b>	1286650
<b>Title</b>	Our Vision
<b>Agent Company / Organisation</b>	Wharfeside Planning
<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>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<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 throughout highlights conditions which create uncertainty for Strategic Planning (such as the implications of the Pandemic for long-term homeworking, the ability of the market to deliver development proposals, population pressures for increased private space with impacts for density [please see paragraphs 1.6 and 1.8 by way of examples]) but the Vision suggests a degree of certainty in what needs to be and can be delivered. This approach runs through the key sections of the Plan.</p> <p>The document highlights changes from previous manifestations of the Framework which are not suitably justified. For example, at paragraph 1.34 it is stated that there is a 40% reduction in new employment land "to minimise the release of Green Belt". It is difficult to see how this meets needs or is consistent with the Framework.</p> <p>It is considered that while it is stated that the Plan Housing need figure (165,000) is based on the required methodology (although we have not confirmed this) this is nonetheless a surprising figure in the context of a 2016 figure of 227,200 and even the reduced 2019 figure of 200,980.</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</b>	<p>Additional flexibility needs to be built in simply to confirm that the Plan has been positively prepared and will be effective.. It is accepted that this is difficult to achieve - not least because it is required to address uncertainties and so alternatives would themselves be subject to the same uncertainties. It is therefore suggested that the Plan should incorporate greater flexibility for review and minor modifications so that changing and emerging needs can be accommodated. Given that this document is a Strategic Plan and , as it states, the nine local planning authorities will be continuing to prepare</p>

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<b>or soundness matters you have identified above.</b>	their own suites of local development plans then this need not involve major amendments to the existing document but confirmation that the Local Plans can provide a mechanism for review with amendments as necessary and provide appropriate explanation. As stated, this document already highlights the factors which may necessitate review.
<b>Given Name</b>	Rosedale Property Holdings Limited
<b>Company / Organisation</b>	Rosedale Property Holdings Limited
<b>Person ID</b>	1286650
<b>Title</b>	Our Strategic Objectives
<b>Agent Company / Organisation</b>	Wharfeside Planning
<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>	<ol style="list-style-type: none"> <li>1. Meet our housing need</li> <li>2. Create neighbourhoods of choice</li> </ol>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	NA
<b>Soundness - Consistent with national policy?</b>	Sound
<b>Soundness - Effective?</b>	NA
<b>Compliance - Legally compliant?</b>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<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 see comments on Vision
<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>	Please see comments on Vision
<b>Given Name</b>	Rosedale Property Holdings Limited

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<b>Company / Organisation</b>	Rosedale Property Holdings Limited
<b>Person ID</b>	1286650
<b>Title</b>	Our Spatial Strategy
<b>Agent Company / Organisation</b>	Wharfeside Planning
<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>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<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 Strategy is dependent on delivery of development in the Core Growth area. This is inherently unsound as the level of development within Plan timescales cannot be and has not been demonstrated to be deliverable and so is not effective There is no explicit demonstration of how this will be resolved and so the plan lacks the certainty of positive preparation required.</p> <p>This focus on the Core Growth Area has the direct consequence that it is not demonstrated whether areas outside it (i.e. the rest of the nine Districts) could meet the needs if not delivered.</p> <p>In any case, the reliance on the Core for housing means that there will be a significant increase in the role of apartments. Indeed, the approach would seem to be contradicted within the Plan which states at paragraph 7.12 that:</p> <p>"We must be able to demonstrate that (the) land supply has sufficient flexibility within it to demonstrate that it represents a deliverable, viable and robust land supply and will deliver balanced and inclusive growth, thereby achieving the overall spatial strategy" :</p> <p>it therefore itself enshrines the uncertainty.</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>We would rely on the Plan's own statement in paragraph 7.12, quoted above. The Plan does indeed need to demonstrate that it will achieve the stated objectives.</p>
<b>Given Name</b>	Rosedale Property Holdings Limited
<b>Company / Organisation</b>	Rosedale Property Holdings Limited
<b>Person ID</b>	1286650
<b>Title</b>	JP-Strat 1 Core Growth Area
<b>Agent Company / Organisation</b>	Wharfeside Planning

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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?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
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 see comments above on Spatial Strategy. The level of development in the Core Growth Area upon which the Plan relies has not been shown to be deliverable while the impact of this concentration of growth on achieving, for example, a mix of housing as required over the nine Districts does not appear to have been established. The Plan explains that additional support will be required with no certainty that this will be delivered.
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 see comments on Spatial Strategy above.
Given Name	Rosedale Property Holdings Limited
Company / Organisation	Rosedale Property Holdings Limited
Person ID	1286650
Title	Other Comments
Agent Company / Organisation	Wharfeside Planning
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes

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<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>	Same comments as for the Core Growth Area.
<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>	Same comments as for the Core Growth Area.
<b>Given Name</b>	Rosedale Property Holdings Limited
<b>Company / Organisation</b>	Rosedale Property Holdings Limited
<b>Person ID</b>	1286650
<b>Title</b>	JP-Strat 6 Northern Areas
<b>Agent Company / Organisation</b>	Wharfeside Planning
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Sound
<b>Soundness - Consistent with national policy?</b>	Sound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<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 need for development in the Northern Area covered by the Plan are well-explained but the solutions proposed do not introduce the flexibility required to encourage the required development. There are several significant employment allocations proposed but the approach to new housing seems neither positive nor flexible. This may be to a significant extent a consequence of the extent of inner area housing development that is proposed. This is despite Policy JP-Strat 6 stating that there should be a strong focus "on prioritising the re-use of brownfield land.....increasing the mix, quality and range of the residential offer"</p> <p>The 2016/2017 Draft included the North Bolton Strategic Opportunity Area as a location within which there would be opportunities to deliver housing which would meet the housing needs still identified in 2021.</p>
<b>Redacted modification - Please set out the</b>	The re-introduction of an approach such as the 2016/2017 Opportunity Area would introduce significant additional flexibility but also the certainty of

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<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>	delivery. It is notable that this Plan makes NO housing allocation in Bolton and rather relies on historic allocations/commitments which have failed to deliver the suggested numbers either in terms of numbers or the rate of delivery.
<b>Given Name</b>	Rosedale Property Holdings Limited
<b>Company / Organisation</b>	Rosedale Property Holdings Limited
<b>Person ID</b>	1286650
<b>Title</b>	JP-H 1 Scale Distribution and Phasing of New Housing Development
<b>Agent Company / Organisation</b>	Wharfeside Planning
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Sound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<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 issue here returns to our earlier comments on the concentration of housing development in the Inner Growth Area and the uncertainties relating to this are as previously set out.
<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>	Previous submissions have identified general and specific changes which could be implemented to resolve these concerns.
<b>Given Name</b>	Rosedale Property Holdings Limited
<b>Company / Organisation</b>	Rosedale Property Holdings Limited
<b>Person ID</b>	1286650
<b>Title</b>	JP-H 3 Type Size and Design of New Housing

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<b>Agent Company / Organisation</b>	Wharfeside Planning
<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>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<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 increased proportion of housing to be delivered at high density, particularly apartments but housing generally, is not suitable for the range and mix of dwelling types required. While the SHMAA does indicate growth in demand for smaller dwellings there are still needs for detached and semi-detached and larger dwellings. Once more, this is inevitable given the concentration in the Inner Growth Zone.
<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 rightly focusses on regeneration but this need not be an aim to be achieved without development in the outer areas, especially when, for example, another objective is to encourage development across the northern Districts.
<b>Given Name</b>	Rosedale Property Holdings Limited
<b>Company / Organisation</b>	Rosedale Property Holdings Limited
<b>Person ID</b>	1286650
<b>Title</b>	JP-G 10 Green Belt
<b>Agent Company / Organisation</b>	Wharfeside Planning
<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>	Sound
<b>Compliance - Legally compliant?</b>	Yes

<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<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 PfE document is the Strategic Plan for nine of the Greater Manchester Districts. It is evident that revisions to the strategy as well as the detailed proposals have arisen to a significant extent from a political objective of reducing the scale of land being removed from the Green Belt. Paragraph 1.49 of the Plan states that "The net loss of Green Belt has been reduced by nearly 60% since 2016". While the reduction in identified housing need has no doubt been a significant factor the focus on high density development in the Core Growth Area has inevitably also had a major impact. While encouraging the use of brownfield land is a Framework policy this should not risk overall delivery of not only the number but also the variety of housing types as also required by the Framework. While the pandemic has meant that there are uncertainties over the nature of housing for which there will be demand in the future then greater flexibility needs to be retained.</p> <p>The Plan at paragraph 1.44 and subsequently (7.17) confirms that additional, as yet unsecured and unidentified, support for remediation will be required and so the reliance on the increased densities cannot be sound,</p> <p>This is effectively confirmed at 7.18 which states that "it will be necessary to develop new markets for housing, which is vital to delivering the overall strategy for Greater Manchester but may take some time to achieve". This acceptance confirms a lack of soundness.</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>	Ensure that greater flexibility is explicitly retained for Districts and indeed for the PfE going forward, while reflecting paragraph 140 of the Framework.
<b>Given Name</b>	Rosedale Property Holdings Limited
<b>Company / Organisation</b>	Rosedale Property Holdings Limited
<b>Person ID</b>	1286650
<b>Title</b>	JP-G 11 Safeguarded Land
<b>Agent Company / Organisation</b>	Wharfeside Planning
<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>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes



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<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 comments on Green Belt above: to ensure boundaries can be retained for at least this Plan period, in-built flexibility in accordance with the Framework is required.
<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 set out above in relation to Green Belts.
<b>Given Name</b>	Rosedale Property Holdings Limited
<b>Company / Organisation</b>	Rosedale Property Holdings Limited
<b>Person ID</b>	1286650
<b>Title</b>	JPA 4: Bewshill Farm
<b>Agent Company / Organisation</b>	Wharfeside Planning
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Sound
<b>Soundness - Consistent with national policy?</b>	Sound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<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>Throughout our submission we have focussed on the shortcomings of the strategy being promoted. There is no specific section in the on-line consultation document which allows a general Bolton comment to be made and so this site is being taken as a proxy.</p> <p>Bolton has no housing allocations and housing delivery appears to be reliant on methods of delivery which have not previously been successful in the District.</p>
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant</b>	A wider approach, such as that promoted in the 2016/17 North Bolton Strategic Opportunity Area would be appropriate.

<b>and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	
<b>Given Name</b>	Rosedale Property Holdings Limited
<b>Company / Organisation</b>	Rosedale Property Holdings Limited
<b>Person ID</b>	1286650
<b>Title</b>	JP-D1 Infrastructure Implementation
<b>Agent Company / Organisation</b>	Wharfeside Planning
<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>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<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>	Even in the Policy there is stated uncertainty regarding infrastructure delivery and the need for further support, as yet unspecified. It is difficult to understand how the Plan can be submitted on the assumption that it is sound in these circumstances.
<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>	In current uncertainties there is a specific need for a Strategic Plan to set out a range of possibilities for bringing forward development to meet changing/evolving needs, depending on circumstances.