

Places for Everyone Representation 2021

Family Name	Judge
Given Name	Rachel
Person ID	1287409
Title	Stakeholder Submission
Type	Web
Include files	PFE1287409_Simister.pdf PFE1287409_GeneralResponse.pdf
Family Name	Judge
Given Name	Rachel
Person ID	1287409
Title	Our Vision
Type	Web
Include files	PFE1287409_Simister.pdf PFE1287409_GeneralResponse.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 or public consultation from the very beginning. Any consultations that have taken place have been an active deterrent asking far too many intrusive questions of residents to put them off completing them. Also, the consultations have been designed in such a way that they are difficult to respond to especially for residents with limited I.T skills or digital access. Local councils have not properly publicised plans to ensure a place for everyone plan is communicated to everyone. The plan should have been designed by the residents for the residents to address our actual housing requirements over the next 15 years. The above demonstrates a clear lack of community involvement which goes against the council constitution and makes the preparation of this plan unsound.</p> <p>Legal Compliance</p>

?It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before "Places for Everyone" can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change." So, is "not insignificant" the same as "substantial", if it is, the plan is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government.

Soundness

?The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and 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 be revised to identify how all the infrastructure will be paid

?There are no partners or industries identified for employment provision. Major partners for employment provision should be identified.

?There has been poor public consultation, a lack of accessible information and little spent by councils in generating awareness. Interest in the plan has mainly been generated by local protest groups. The public consultations should be repeated, providing clear, understandable information. They should be designed to encourage rather than discourage public input.

?The site selection process has been opaque with no explanation as to why some sites in the "call for 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 representation should be held and minutes should be published. The rationale for the selection/rejection of every site should be available including considered alternatives.

?Several of the authorities involved have consistently failed to meet housing delivery targets. An effective a plan must be deliverable. The plan relies on the cooperation of property developers. There is no indication of how delivery targets will be maintained. A strategy to guarantee housing delivery rates must be provided. This cannot be left to any local authority that is currently behind on housing targets. Clear delivery plans for infrastructure should be included.

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	<p>?PfE shows removal of greenbelt protection for some areas and creation of greenbelt in others. There is no proof of exceptional circumstances required in the National Planning Policy Framework to justify this.</p> <p>?In addition to PfE each authority needs to come up with its own local plan. No details have been given about when these plans will be available.</p> <p>?There are no details of how Duty to Cooperate will be achieved. Following their withdrawal Stockport will effectively become a neighbouring borough. However, it is not acceptable to limit neighbouring boroughs to Stockport since each of the authorities in the plan is also neighbouring to other authorities outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn with Darwen, 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% uplift for the Manchester City Council area. The revised Local Housing Need methodology states that the 35% uplift is to be met within the district and not redistributed (see Places for Everyone Joint Committee documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021_ISSUED.pdf) This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.</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.	This plan needs to go back to Regulation 18 of the Town and Country planning act and be positively prepared with proper public engagement and consultation.
Family Name	Judge
Given Name	Rachel
Person ID	1287409
Title	Our Strategic Objectives
Type	Web
Include files	PFE1287409_Simister.pdf PFE1287409_GeneralResponse.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

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	<p>6. Promote the sustainable movement of people, goods and information</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>9. Ensure access to physical and social infrastructure</p> <p>10. Promote the health and wellbeing of communities</p>
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 to explain why 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 to explain why this plan fails on all the above points
Family Name	Judge
Given Name	Rachel
Person ID	1287409
Title	Our Spatial Strategy
Type	Web
Include files	PFE1287409_Simister.pdf PFE1287409_GeneralResponse.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound

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Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	GMCA made the decision to move a poorly prepared plan forward to the publication stage of the Town and Country planning Act even though major changes have been made to the plan since its last round of consultation. For example Stockport withdrew from what was the GMSF and Manchester City council has had a 35% uplift applied to their housing targets to be met within that specific area. This means the plan has changed significantly and therefore requires going back to proper consultation for residents 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 Greater Manchester.
Family Name	Judge
Given Name	Rachel
Person ID	1287409
Title	JPA 1.2: Simister and Bowlee (Northern Gateway)
Type	Web
Include files	PFE1287409_Simister.pdf PFE1287409_GeneralResponse.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.	see supporting evidence documents uploaded and read them in full
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in	REMOVAL OF THIS SITE ALLOCATION FROM THE PLAN

**respect of any legal compliance or soundness matters
you have identified above.**