

Places for Everyone Representation 2021

Family Name	Bolton
Given Name	Adrian
Person ID	1286600
Title	Stakeholder Submission
Type	Web
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Given Name	Adrian
Person ID	1286600
Title	JPA 2: Stakehill
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>Legal Compliance</p> <p>-- I consider it 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 should not put to Government.</p> <p>Soundness</p> <p>-- The plan uses 2014 data to predict housing need and ignores the potential significant 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.</p> <p>-- There is little detail on how the required infrastructure will be funded. The plan needs to be revised to identify how all the infrastructure will be funded.</p> <p>-- Partners or industries are not 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 spent by councils in generating awareness. Interest in the plan has</p>

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 significance of PfE should be subject to local referendum.

-- 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 plan must be deliverable. The plan relies on the co-operation of property developers who have no mandate to satisfy demand as this will result in lower house prices and hence reduced profits for shareholders.

-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.

-- 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.

-- 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.

-There are no details of how Duty to Co-operate 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.

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.

1. Not Legally Compliant to proceed to Regulation 19

I have concerns that it is not appropriate to proceed to Regulation 19 Consultation and Examination because the Places for Everyone plan will not have substantially the same effect as GMSF2020 for a number of reasons, including the following:

-- A new committee in GMCA was set up to take the new plan forward, so the overseeing body is now different.

-- Significant changes to the content of the plan have been necessary following the departure of Stockport Council from GMSF.

-- Changes have been required due to the 35% increase in housing numbers for Manchester City Council.

-- The evidence documents have required significant updating.

-- The Covid pandemic and Brexit have resulted in changes in society and commerce, which may be long term with regard to requirements for housing, commercial premises and brownfield land supply. The PfE document acknowledges this in the statement: '.. it is recognised that the country is still in a state of flux'. These factors will change the effect of the plan.

-- If PfE 2021 genuinely addresses the changes that have occurred since GMSF 2020 was drafted, as it claims, then it would indeed need to have a substantially different effect and so, by its own criteria, would need another round of Regulation 18 consultation.

Modification requested

The Examination should not proceed and the PfE plan should go through a Regulation 18 Consultation.

2. Not legally compliant with regard to the Duty to cooperate with Stockport Council

The Statement of Common Ground dated August 2021 states that Stockport Council had not yet identified any unmet need. Similarly, paragraph 8.4 in the PfE 2021 Growth and Spatial Options Paper notes that an adjustment, based on the 2021 OAN for Stockport has been made to the figure originally assessed as part of the GMSF 2020 preparation, to take account of Stockport's withdrawal from the Plan and that a potential alternative/addition to this option could have been to propose to meet some of Stockport's need in the PfE Plan area. It also notes that 'Given the embryonic stage reached in the preparation of Stockport's local plan, Stockport Council has not currently established whether or not it will have any surplus/unmet need and if so, what alternatives it has considered for meeting

this unmet need. Therefore, it is not possible to identify what such an option might look like in relation to the PfE 2021 and consequently it is not considered to be a reasonable alternative to the proposed growth in PfE 2021.'

In July 2021, Stockport Council announced that using the Government's standard methodology for calculating housing need produces a figure of 18,581 from 2021 to 2038. A supply of sites for 11,097 dwellings has been identified in the latest assessments, meaning that there is a shortfall of sites for 7,484 dwellings. In GMSF some of Stockport's housing need was to be met by other boroughs in GM. The Stockport Local Plan is expected to undergo Regulation 18 consultation in autumn 2021, while PfE is currently undergoing Regulation 19 consultation with the result that the two plans are out of step. It seems highly likely from the published data, that Stockport Council will have an unmet housing need. We also understand that Stockport Council enquired in March 2021 whether the other nine districts in GM were willing to accommodate some of Stockport Council's housing and employment need in PfE, as had been proposed in the former GMSF plan. The published draft of PfE does not make any allowance to accommodate any of Stockport's unmet need. Therefore, we believe that the opportunity for the nine boroughs in PfE to share some of Stockport's housing need has not been adequately explored and the Duty to Cooperate has not been fulfilled.

Modification requested

The plan should be withdrawn from the Examination so that further discussions about meeting Stockport Council's unmet housing needs can take place.

3. Early stages of public consultation in 2014 and 2015 were inadequate in reaching a representative audience and evaluating alternative options.

Re: Places for Everyone, page 19, paragraph 1.60

'Four consultations have taken place in relation to the GMSF. The first, in November 2014 was on the scope of the plan and our initial evidence base, the second in November 2015, was on the vision, strategy and strategic growth options, and the third, on a Draft Plan in October 2016.'

Comments

Out of a population of 2.7 million, 143 people took part in the 2015 consultation, many of whom represented housing development companies. Only 41 respondents answered the question about preference of 3 options, one of which proposed less development and required no loss of Green Belt. Key decisions were made based on responses from an extremely small and unrepresentative sample of people and the views of developers were given greater weight than those of residents in the analysis of the results.

The current Regulation 19 consultation on the PfE plan has been better advertised and notices have been posted on lampposts around the region. No such widespread, accessible publicity was under taken for a key early stage in the development of GMSF/PfE, which is an optimal stage for public involvement so that they have a say in how their region develops.

In addition it is six years since this consultation took place so the eligible population will now be very different and young people who will be affected by the impact of the plan for a large proportion of their lives had no opportunity for a say in it.

We believe that the early stages of consultation on the plan were flawed and now too far out of date to be relevant. Therefore, the plan is unsound.

Modification requested

The plan should be withdrawn from the Examination so that full and transparent public engagement can take place with a wide cross section of the public on the impact of different options for the plan in the changed world we now live in.

4. The plan does not meet the requirements for sustainable development

Re: Places for Everyone, Page 41, Objective 7: Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region.

Comments

Land is an increasingly precious resource with competing demands for housing, commercial buildings, transport, carbon sequestration, food production, rural jobs, energy production, water storage, water absorption and recreation.

In order to comply with the statutory duty to include policies designed to tackle climate change and its impacts and in order to provide sustainable development, the plan for GM will need to give the appropriate weight to all those needs. As well as outlining the benefits of the provision of housing, employment land and transport, the plan and supporting documents need to provide careful evaluation of the precise impact of the proposals on:

- Increased carbon emissions and air pollution due to increased urbanisation.
- Effects of transport proposals on carbon emissions and air pollution.
- Opportunities for improved carbon sequestration via amended practices in agriculture, forestry and moorland and peat bog management.
- Opportunities for alternative energy production from green field and Green Belt sites.
- Effect of the proposal on the rural economy, rural jobs and the ability to produce local food.
- The impact of loss of green space on the mental and physical health of residents and the resultant cost of increased needs for health care.
- Increased pressure from additional numbers of households on reduced resources such as open space/ green-belt.
- Pressure on wildlife by reduction in greenbelt and loss of wildlife corridors.
- Loss of ponds of which 90% have disappeared during the 20th century.

While the use of green field and Green Belt sites may provide an easy route for providing additional housing, commercial space and transport routes, by definition it also removes this land from opportunities to mitigate negative impacts of population growth, urbanisation and climate change. Residents in the wider region, including Woodford, and the country as a whole will suffer from negative impacts on the factors outlined above.

We refer to the representation by Mark Burton of Steady State Manchester, which includes detailed assessment of land uses and the impact on carbon

emissions and human health, as examples of the type of analysis that needs to be conducted.

Without a full, detailed evaluation, including proposals for mitigation of any negative impacts, the plan is unsound because it cannot be determined to be consistent with national policies in enabling the delivery of sustainable development, or compliant with national policies on climate change.

Modification requested

The impacts of changes in land uses on human health and carbon emissions should be fully and professionally evaluated. These aspects should be given more weight in the decisions on any potential loss of green field and Green Belt land and the plan should be rewritten accordingly, in order to comply with national legislation.

5. The plan fails to meet the needs of all parts of a very diverse region

Re: Places for Everyone, Page 40, Objective 3: Playing our part in ensuring a thriving and productive economy in all parts of Greater Manchester.

Comments

As currently written, the PfE plan addresses the needs of a so-called 'city region'. However, Greater Manchester is much more than a 'city' region. It is a very diverse region, which includes cities, town, villages, hamlets, farmland of a range of types, hills, valleys, lakes, waterways, lakes and ponds, moorland and peat bogs. Many residents live and work in rural communities and depend on the rural economy. They do not identify as being part of a city and their needs have been overlooked in this plan. In order to comprehensively address the needs of the region, a joint Local Plan should support a prosperous rural economy and sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities, whilst protecting the natural environment for the benefit of all.

I note that the relevant figure to consider in respect of Green Belt loss is the gross figure, because new Green Belt additions proposed in PfE were already green sites.

The PfE plan completely fails to address the needs of rural communities. Loss of Green Belt and green field land will have a direct negative impact on the rural economy, effectively representing loss of 'business space'. It has not been positively prepared and is therefore unsound.

Modification requested

The plan should be revised to include objectives and policies which support rural communities and the rural economy. These aspects should be given more weight in the decisions on any potential loss of green field and Green Belt land.

6. Places for Home, Places for Everyone, page 133, paragraphs 7.1 to 8.0

Comments

There is significant concern about the consistency and validity of the calculations of housing need and supply and the resulting proposals among erudite residents and planning professionals. Put very simply it would appear that there is sufficient land supply (enough for 170,000 homes) to meet the predicted need as calculated using the Government's standard methodology (164,881 homes) over the plan period. It appears that a very high buffer has been added to provide flexibility.

There is also significant uncertainty about housing needs, patterns of work and economic growth in the future following the Covid pandemic, Brexit and the urgent need to adapt to climate change. The PfE plan itself states: '.. it is recognised that the country is still in a state of flux'.

Given these uncertainties, we suggest that exceptional circumstances do not exist to release Green Belt at the start of the plan period. Much greater flexibility is required in order to avoid unnecessary release of Green Belt land.

I suggest that no Green Belt is released until it has been shown to be required and that this is reviewed every 5 years at the plan review stages. This would still ensure a 5-year housing land supply and would allow a brownfield first policy to be pursued.

An alternative route would be to avoid allocation of sites in PfE and to leave this task to each of the nine individual authorities to tackle in their individual local plans.

Modification requested

The plan should be revised such that no Green Belt is released at the start of the plan period and only released if required at review every 5 years, allowing implementation of a brownfield first policy.

7. Policy JP-H 1 Scale, Distribution and Phasing of New Housing Development, page 141

The Government's Standard Method is based on Office of National Statistics 2014 population data and aims to achieve 300,000 new homes per year, but more up to date population data show substantially reduced needs.

When asked about the need to use the figures produced by the standard methodology, Government Housing Ministers have replied that it is just a starting point and it is for Local Authorities to decide on the right figure for their authority.

Given the high level of uncertainty about future needs, the importance of green field and Green Belt land for uses which mitigate climate change and promote well-being, and the level of opposition among residents to loss of green spaces, it would seem more prudent to avoid any release of Green Belt at the start of the plan period, but to review the plan every 5 years and only release if it is necessary.

Modification requested

This policy should be amended such that no Green Belt is released at the start of the plan period and only released if required at review every 5 years, allowing implementation of a brownfield first policy.

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