

Family Name	Gaskell
Given Name	Sheila
Person ID	1286993
Title	Stakeholder Submission
Type	Web
Family Name	Gaskell
Given Name	Sheila
Person ID	1286993
Title	Our Vision
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>- It is questionable whether PfE and the GMSF can effectively be treated as the same plan. 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.</p> <p>Soundness</p> <p>Soundness</p> <p>- 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.</p> <p>- There is little detail on how the required infrastructure will be paid for.</p> <p>- There are no partners or industries identified for employment provision.</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 mainly been generated by local protest groups.</p>

Places for Everyone Representation 2021

	<ul style="list-style-type: none"> - 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. - Several of the authorities involved have consistently failed to meet housing delivery targets. An effective 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. - 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 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. - 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. 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.</p>	<p>Reassess housing need based on more recent data I.e 2018 ONS population predictions.</p> <p>Identify how all infrastructures will be paid for</p> <p>Identify major partners for employment provision</p> <p>Repeat public consultation but this time make it easy for local residents to respond rather than making it so complicated it discourages people</p> <p>Make available the rationale for selection/rejection of every site including considered alternatives</p>
<p>Family Name</p>	<p>Gaskell</p>
<p>Given Name</p>	<p>Sheila</p>
<p>Person ID</p>	<p>1286993</p>
<p>Title</p>	<p>JPA 9: Walshaw</p>
<p>Type</p>	<p>Web</p>
<p>Soundness - Positively prepared?</p>	<p>Unsound</p>
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<p>Compliance - Legally compliant?</p>	<p>No</p>

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>Sufficient evidence has not been put forward to justify release of green belt in this location. The harm rating for removing this site from the green belt is moderate. Building to meet targets should take place on areas of less importance in terms of green belt. Proposals are contrary to the five purposes of green belt as set out in paragraph 38 of the NPPF I.e.</p> <ol style="list-style-type: none"> 1. Development as proposed in Walshaw will cause unrestricted sprawl of an already largely built-up area. During lockdown, we were all encouraged to walk and interact with nature to maintain good mental well being. REDACTED TEXT. Approximately 75% of my walk has a field on one side, sometimes two. The proposals will mean that 0% of the same walk will see any green fields. 2. The proposals will lead to the merger of currently distinct neighbourhoods of Elton, Walshaw and Woolfold - merging all these distinct neighbourhoods into one. 3. These proposals contravene one of the purposes of green belt “to assist in safeguarding the countryside from encroachment”. The only way of achieving this is to leave this piece of land undeveloped to preserve the intrinsic value of the countryside. 4. Finally, Bury and Greater Manchester as a whole has a considerable number of deliverable brownfield sites which are badly in need of regeneration. Development here will undermine regeneration efforts in the town centre. <p>The plan is therefore not consistent with National Policy as this area is an important piece of greenbelt land which is performing the functions as set out in paragraph 38 Of the NPPF. The greenbelt assessment admits that moderate harm will be caused to the greenbelt in this location through development. There is also not robust evidence that alternative sites have been tested. The plan does not justify why this site should be developed ahead of other sites.</p> <p>The NPPF defines deliverability in relation to housing sites as: “sites for housing should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within 5 years.”</p> <p>Deliverable</p> <p>With regards to JP Allocation 9 the policy includes the following: 1,250 dwellings; New Highways infrastructure a through road and offsite highways upgrades; major public transport investment; new cycling and walking routes; 25% affordable housing provision; a new one form entry primary school; financial contributions to a secondary school; new local centre, retail, health clinic and community facilities; High quality green and blue infrastructure; Biodiversity Net Gain; Reduced flood risk through SUDS; Protection and Enhancement of heritage assets. There is no evidence that this level of policy ask is deliverable on site and will not render the site unviable. Therefore the site is not deliverable.</p> <p>Availability - The site is in multiple ownerships, there does not appear to be any evidence that land agreements between landowners are in place to enable the whole site to be delivered. The site is therefore not available.</p> <p>Suitability</p> <p>The site is in the Greenbelt and will harm the countryside. It will cause the merging of several settlements. Part of the site falls within a special landscape area. Heritage assets will be harmed by the proposals. Therefore the site is not suitable.</p>

Achievable

There is insufficient evidence that the scheme is achievable – the ground report notes potential contamination from previous use of the site. An intrusive investigation has not been carried out. Without a Phase 2 ground investigation it is very difficult to ascertain what the foundation solution may be, what mitigation is required for contamination and potential made ground. These abnormal costs may render the site unviable.

There is no evidence regarding the off site highways works required, the impact upon the local road network and the deliverability of the proposed improvements. The proposed scheme will have a major impact upon local road infrastructure which may not be able to cope and will result in severe residual cumulative impacts and potentially unacceptable impacts upon road safety which will be in conflict with paragraph 11 of the NPPF.

There is no evidence of viability testing of the scheme, this is a major housing scheme with significant infrastructure requirements. Given the level of policy contributions required (25% affordable) and so on there are major question marks over the viability of the scheme.

No planning application has been submitted on the site – there is no detailed worked up scheme and therefore the achievability of the site has not been proved.

There is no evidence that the site can deliver the number of dwellings required over the plan period. Using typical build out rates applicable for volume house builders at an average delivery rate of 0.75 dwellings per week over the plan period the site will only deliver approximately 486 dwellings. Even with 3 outlets on the site delivering 75 units per year the realistic delivery allowing for the local plan to be adopted and planning permission to be granted over the plan period would only be 1010. This would also result in a lower revenue for the housebuilders due to increased competition driving down sales prices and impacting viability further.

The site is not available, suitable or achievable (or viable) and therefore in accordance with the NPPF is demonstrably not deliverable.

Therefore in its current form the plan is demonstrably unsound.

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. Delete this site from the plan
2. Replace with smaller deliverable sites on non green belt land