

Places for Everyone Representation 2021

Family Name	Hayes
Given Name	Clare
Person ID	1286873
Title	Stakeholder Submission
Type	Web
Include files	PFE1286873_Redacted.pdf
Family Name	Hayes
Given Name	Clare
Person ID	1286873
Title	Our Vision
Type	Web
Include files	PFE1286873_Redacted.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.	The area is not fit for purpose.
Family Name	Hayes
Given Name	Clare
Person ID	1286873
Title	Our Spatial Strategy
Type	Web
Include files	PFE1286873_Redacted.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
Family Name	Hayes
Given Name	Clare
Person ID	1286873
Title	JP-G 1 Valuing Important Landscapes
Type	Web
Include files	PFE1286873_Redacted.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
Family Name	Hayes
Given Name	Clare
Person ID	1286873
Title	JP-G 2 Green Infrastructure Network
Type	Web
Include files	PFE1286873_Redacted.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
Family Name	Hayes
Given Name	Clare
Person ID	1286873
Title	JP-G 3 River Valleys and Waterways
Type	Web
Include files	PFE1286873_Redacted.pdf

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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
Family Name	Hayes
Given Name	Clare
Person ID	1286873
Title	JP-G 4 Lowland Wetlands and Mosslands
Type	Web
Include files	PFE1286873_Redacted.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
Family Name	Hayes
Given Name	Clare
Person ID	1286873
Title	JP-G 5 Uplands
Type	Web
Include files	PFE1286873_Redacted.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
Family Name	Hayes

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Given Name	Clare
Person ID	1286873
Title	JP-G 6 Urban Green Space
Type	Web
Include files	PFE1286873_Redacted.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
Family Name	Hayes
Given Name	Clare
Person ID	1286873
Title	JP-G 7 Trees and Woodland
Type	Web
Include files	PFE1286873_Redacted.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
Family Name	Hayes
Given Name	Clare
Person ID	1286873
Title	JP-G 8 Standards for Greener Places
Type	Web
Include files	PFE1286873_Redacted.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
Family Name	Hayes
Given Name	Clare
Person ID	1286873
Title	JP-G 9 A Net Enhancement of Biodiversity and Geodiversity
Type	Web
Include files	PFE1286873_Redacted.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
Family Name	Hayes
Given Name	Clare
Person ID	1286873
Title	JP-G 10 Green Belt
Type	Web
Include files	PFE1286873_Redacted.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
Family Name	Hayes
Given Name	Clare
Person ID	1286873
Title	JP-G 11 Safeguarded Land
Type	Web
Include files	PFE1286873_Redacted.pdf

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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
Family Name	Hayes
Given Name	Clare
Person ID	1286873
Title	JPA 34 M6 Junction 25
Type	Web
Include files	PFE1286873_Redacted.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
Family Name	Hayes
Given Name	Clare
Person ID	1286873
Title	JPA 35: North of Mosley Common
Type	Web
Include files	PFE1286873_Redacted.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
Family Name	Hayes

Places for Everyone Representation 2021

Given Name	Clare
Person ID	1286873
Title	JPA 36: Pocket Nook
Type	Web
Include files	PFE1286873_Redacted.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
Family Name	Hayes
Given Name	Clare
Person ID	1286873
Title	JPA 37: West of Gibfield
Type	Web
Include files	PFE1286873_Redacted.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
Family Name	Hayes
Given Name	Clare
Person ID	1286873
Title	Supporting Evidence
Type	Web
Include files	PFE1286873_Redacted.pdf
Redacted comment on supporting documents - Please give details of why you consider any of the evidence not to be legally compliant, is unsound or fails to	<p>I can't see how the Labour Councillor for Tyldesley, Stephen Hellier, can actually live in Yorkshire and properly represent the people of Tyldesley? Not only that he is the Chairman of Wigan Planning Committee!</p> <p>Dear Sirs</p> <p>Re: Submission of Representations in relation to the Places for Everyone Joint Development Plan Publication Draft 2021</p>

comply with the duty to co-operate. Please be as precise as possible.

JPA35, land north of Mosley Common.

I refer to the JPA35, land north of Mosley Common. and in particular the land to build 1100 dwellings (the Proposed Development).

I am a resident in an area affected by the JPA35 and the Proposed Development.

The test for soundness set out in the National Planning Policy Framework (the Framework) is whether the JPA35 is:

- Positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective- deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common group; and
- Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Framework.

I wish to make the following representations with respect to the JPA35 in relation to the Proposed Development:

1. Increased Traffic Congestion - the JPA35 in relation to the Proposed Development is not consistent with national policy. I refer to paragraphs 104 and 105 of the Framework. The JPA35 does not take into account the impact of the Proposed Development on the transport networks in my area. The area around the Proposed Development already suffers from heavy traffic congestion:

a. the A572 and Bridgewater Road and Mosley Common Road is at maximum capacity and there are no plans in place to address the issues arising from the current volume of traffic using this road;

b. the surrounding roads to the A572 and the Proposed Development (Ellenbrook Road, Walkden Road, Worsley Road and Barton Road) are also subject to heavy traffic flow on a regular basis. Both the A572 and the surrounding roads are also used by traffic accessing the amenities at RHS Bridgewater.

The addition of 110 dwellings will only lead to an increase in the traffic congestion in an area in which the transport network is already under considerable strain.

In terms of public transport services, Worsley and Boothstown are not well connected. The main public transport services are the buses on the East Lancashire Road (a service which is already oversubscribed). Bus services within Boothstown itself have been seriously curtailed in recent years.

2. Increased Air and Noise Pollution: the JPA35 in relation to the Proposed Development is not consistent with national policy. I refer to paragraphs 93, 104(d) and 105 of the Framework. Due to the close proximity of the M60 and the existing heavy traffic flow on the A572, our area has a high level of air and noise pollution. The Green Belt land in our area acts as an important buffer for the air and noise pollution.

3. Lack of Suitable Infrastructure: the JPA35 in relation to the Proposed Development is not consistent with national policy. I refer to paragraph 93 of the Framework. The JPA35 does not address how the use of shared spaces, community facilities and other local services (for example, GPs, dentists, schools, etc) will be enhanced to sustain the increase in population due to the Proposed Development. In particular, the local schools in this

area are already oversubscribed so children will have to travel greater distances to access both primary and secondary education.

4. Destruction of Open Space: the JPA35 in relation to the Proposed Development is not consistent with national policy. I refer to paragraph 99 of the Framework. The site of the Proposed Development is existing open space and none of the following apply:

- a. an assessment has not been undertaken which clearly shows that the open space is surplus to requirements. The open space is close to many heritage sites and also RHS Bridgewater and the Framework acknowledges that an open spaces purpose may simply be as an area of local countryside;
- b. it has not been demonstrated that the loss of Green Belt resulting from the Proposed Development would be replaced by equivalent or better provision for the community in this area in terms of quantity and quality in a suitable location; and
- c. the Proposed Development is not for alternative sports and recreation provision.

5. Destruction of the Green Belt: the JPA35 in relation to the Proposed Development is not consistent with national policy. I refer to paragraphs 137, 140, 141, 147 and 149 of the Framework. The JPA35 does not recognise the importance of the site of the Proposed Development to prevent urban sprawl. The Framework states that there must be exceptional circumstances which justify the alteration of the boundaries of Green Belt land. In this case there are no exceptional circumstances and furthermore the Proposed Development is an inappropriate development. I also note that there are alternative brownfield sites available in this area which can be used for development.

6. Negative Impact on Local Ecology: the JPA35 in relation to the Proposed Development is not consistent with national policy. I refer to paragraphs 120(b) and 174(b) of the Framework. Alderwood forms part of the site of the Proposed Development. It is a quiet rural environment which is used for physical and mental wellbeing activities.

7. Other Representations: please see the Annex to this letter.

I wish to participate in the Examination in Public and to be kept informed of the progress of JPA35.

Yours faithfully,

Clare Hayes

25 Bridgewater Road

Mosley Common

M28 1AD

Family Name	Hayes
Given Name	Ian
Person ID	1286387
Title	Stakeholder Submission
Type	Web
Family Name	Hayes
Given Name	Ian
Person ID	1286387
Title	JP-J 1 Supporting Long Term Economic Growth
Type	Web
Soundness - Positively prepared?	NA
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	NA
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 plan uses 2014 data to predict housing need and ignores the potential impact Covid-19. Housing need must be re-assessed using the latest (2018) ONS population 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. The plan needs to identify how all the infrastructure will be paid</p> <p>? There are no partners or industries identified for employment provision. Major partner provision should be identified.</p> <p>? There has been poor public consultation, a lack of accessible information and little in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information designed to encourage rather than discourage public input.</p> <p>? The site selection process has been opaque with no explanation as to why some sites were excluded from the plan.</p> <p>https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228</p> <p>The process should be repeated using National and GMCA guidelines for site selection public representation should be held and minutes should be published. The rationale selection/rejection of every site should be available including considered alternatives</p> <p>? Several of the authorities involved have consistently failed to meet housing delivery effective a plan must be deliverable. The plan relies on the cooperation of property d is no indication of how delivery targets will be maintained. A strategy to guarantee h rates must be provided. This cannot be left to any local authority that is currently beh targets. Clear delivery plans for infrastructure should be included.</p> <p>? PfE shows removal of greenbelt protection for some areas and creation of greenbel is no proof of exceptional circumstances required in the National Planning Policy Fra this.</p> <p>? In addition to PfE each authority needs to come up with its own local plan. No details about when these plans will be available.</p>

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	<p>? There are no details of how Duty to Cooperate will be achieved. Following their withdrawal, the area will effectively become a neighbouring borough. However, it is not acceptable to limit the plan to Stockport since each of the authorities in the plan is also neighbouring to areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and 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% increase in housing need in the Manchester City Council area. The revised Local Housing Need methodology states that the need is to be met within the district and not redistributed (see Places for Everyone Joint Development Plan documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchester-ca.gov.uk/documents/s15613/PFE_JC_July2021)</p> <p>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.	Comprehensive updating review against latest available data.
Family Name	Hayes
Given Name	Ian
Person ID	1286387
Title	Other Comments
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>Legality GMSF to PfE</p> <p>? It is questionable whether PfE and the GMSF can effectively be treated as the same plan. This must be decided in court before "Places for Everyone" can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if it was established. If there is any substantial difference in scope between the GMSF and PfE, it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a significant number of the plan have seen some form of change." So, is "not insignificant" the same as "substantial"? In this case, by substance over form, the plan is not legal.</p>

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	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.
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.	Legality GMSF to PfE Determination by judicial review.
Family Name	Hayes
Given Name	Ian
Person ID	1286387
Title	JPA 7: Elton Reservoir Area
Type	Web
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
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.	It is questionable whether PfE and the GMSF can effectively be treated as the same plan. This must be decided in court before "Places for Everyone" can proceed any further. It is assumed that the difference between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable and does not require a significant re-write. While the GMSF may have been established as legally compliant (under Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) PfE is not yet established. If there is any substantial difference in scope between the GMSF and PfE, it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a significant number of the plan have seen some form of change." So, is "not insignificant" the same as "substantial"? If the case by substance over form, 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.
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.	Determination by judicial review