

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 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. The plan needs to be revised to identify how all the infrastructure will be paid</p> <p>? There are no partners or industries 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 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.</p> <p>? 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.</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. 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.</p> <p>? 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</p>

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	<p>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.</p> <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.greatermanchester.gov.uk/documents/15613/PFE_JC_July2021_ISSUED.pdf)</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>
<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>Comprehensive updating review against latest available data.</p>
<p>Family Name</p>	<p>Hayes</p>
<p>Given Name</p>	<p>Ian</p>
<p>Person ID</p>	<p>1286387</p>
<p>Title</p>	<p>Other Comments</p>
<p>Type</p>	<p>Web</p>
<p>Soundness - Positively prepared?</p>	<p>Unsound</p>
<p>Soundness - Justified?</p>	<p>Unsound</p>
<p>Soundness - Consistent with national policy?</p>	<p>Unsound</p>
<p>Soundness - Effective?</p>	<p>Unsound</p>
<p>Compliance - Legally compliant?</p>	<p>No</p>
<p>Compliance - In accordance with the Duty to Cooperate?</p>	<p>No</p>
<p>Redacted reasons - Please give us details of why you consider</p>	<p>Legality GMSF to PfE</p>

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>? 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 case, by substance over form, the plan is not legal.</p> <p>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.</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>Legality GMSF to PfE Determination by judicial review.</p>
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.	<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</p>

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	<p>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 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.</p>
<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>Determination by judicial review</p>