

Places for Everyone Representation 2021

Family Name	James
Given Name	Louise
Person ID	1286273
Title	Stakeholder Submission
Type	Web
Include files	PFE1286273_SOSElton.pdf PFE1286273_SOSGeneral.pdf
Family Name	James
Given Name	Louise
Person ID	1286273
Title	JP-G 1 Valuing Important Landscapes
Type	Web
Include files	PFE1286273_SOSGeneral.pdf PFE1286273_SOSElton.pdf
Soundness - Positively prepared?	NA
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	NA
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>PfE indicates that there will be removal of greenbelt protection in some areas, notably Elton Reservoir area. The National Planning policy framework requires "exceptional circumstances" to justify this but this has not been demonstrated therefore this is not legally compliant.</p> <p>The calculation of housing need is unsound. The figures relied upon to predict housing need are from 2014. Since then both Brexit and Covid have had significant impacts on populations, jobs, job locations, working patterns, health priorities, disadvantaged communities all of which should be taken into account.</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>Release of greenbelt requires justification under the 'exceptional circumstances' clause of The National Planning Policy Framework.</p> <p>Housing needs should be reassessed using 2018 ONS predictions and take into account the societal changes resulting from Brexit and Covid which are too significant to ignore</p>
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Title	JP-G 2 Green Infrastructure Network
Type	Web
Include files	PFE1286273_SOSElton.pdf PFE1286273_SOSGeneral.pdf
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	NA
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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.	Release of greenbelt requires justification under the 'exceptional circumstances' clause of The National Planning Policy Framework.
Family Name	James
Given Name	Louise
Person ID	1286273
Title	JP-G 10 Green Belt
Type	Web
Include files	PFE1286273_SOSGeneral.pdf PFE1286273_SOSElton.pdf
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	No

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Compliance - In accordance with the Duty to Cooperate?	NA
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Family Name	James
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Person ID	1286273
Title	JPA 7: Elton Reservoir Area
Type	Web
Include files	PFE1286273_SOSElton.pdf PFE1286273_SOSGeneral.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
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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 SEE SUPPORTING EVIDENCE DOCUMENT AND READ IN FULL PfE indicates that there will be removal of greenbelt protection in some areas, notably Elton Reservoir area. The National Planning policy framework requires "exceptional circumstances" to justify this but this has not been demonstrated therefore this is not legally compliant. The plan uses 2014 figures to assess housing needs. Apart from being 7 years old, the impacts of both Brexit and particularly Covid are significant and cannot be ignored. The impacts are on jobs/work patterns/health priorities.

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	<p>Enhancements to infrastructure are referred to but there is no detail as to how this will be paid for nor is there a detailed plan of when the infrastructure will be delivered.</p> <p>Site selection has not been a transparent process. It is not clear to anyone why the sites chosen or rejected have been.</p> <p>There has been inadequate public consultation on the plan with little effort by the council to engage the public</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>Exceptional Circumstances for the release of green belt needs to be demonstrated under the National Planning Policy Framework</p> <p>The 2018 ONS figures should be used and the changes brought by Brexit and Covid taken into account in assessing housing needs.</p> <p>There needs to be a detailed infrastructure plan. Where is the money coming from? When will it be delivered.</p> <p>The site selection process should be repeated using national and GMCA guidelines with proper public consultation and rationale provided for the choices made.</p> <p>The public consultation should be restarted, done properly with real effort made to engage and inform.</p>
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