

Places for Everyone Representation 2021

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| Family Name | Judge |
| Given Name | Peter |
| Person ID | 1287588 |
| Title | Stakeholder Submission |
| Type | Web |
| Include files | PFE1287588.pdf |
| Family Name | Judge |
| Given Name | Peter |
| Person ID | 1287588 |
| Title | JPA 1.1 Heywood / Pilsworth (Northern Gateway) |
| Type | Web |
| Include files | PFE1287588.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. | See supporting document |
| 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. | See supporting document |
| Family Name | Judge |
| Given Name | Peter |
| Person ID | 1287588 |
| Title | JPA 1.2: Simister and Bowlee (Northern Gateway) |

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| Family Name | Judge |
| Given Name | Rachel |
| Person ID | 1287409 |
| Title | Stakeholder Submission |
| Type | Web |
| Include files | PFE1287409_Simister.pdf PFE1287409_GeneralResponse.pdf |
| Family Name | Judge |
| Given Name | Rachel |
| Person ID | 1287409 |
| Title | Our Vision |
| Type | Web |
| Include files | PFE1287409_GeneralResponse.pdf PFE1287409_Simister.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. | <p>The vision for Greater Manchester has been desktop planned without proper engagement and consultation from the very beginning. Any consultations that have taken place have been a deterrent asking far too many intrusive questions of residents to put them off completing the consultations have been designed in such a way that they are difficult to respond to for residents with limited I.T skills or digital access. Local councils have not properly published the plan to ensure a place for everyone plan is communicated to everyone. The plan should have been developed by the residents for the residents to address our actual housing requirements over the long term. The above demonstrates a clear lack of community involvement which goes against the spirit of the constitution and makes the preparation of this plan unsound.</p> <p>Legal Compliance</p> <p>?It is questionable whether PfE and the GMSF can effectively be treated as the same thing. 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 (in accordance 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 "substantially different"? If the plan is not legal. This can only be established by a proper judicial review. So until a proper judicial review the plan must be considered illegal and not put to Government.</p> <p>Soundness</p> |

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?The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.

?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 for.

?There are no partners or industries identified for employment provision. Major partners for employment provision should be identified.

?There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local press. Public consultations should be repeated, providing clear, understandable information and a process designed to encourage rather than discourage public input.

?The site selection process has been opaque with no explanation as to why some 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 the public should be held and minutes should be published. The rationale for the selection/rejection of sites 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 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 its targets. Clear delivery plans for infrastructure should be included.

?PfE shows removal of greenbelt protection for some areas and creation of greenbelts. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this.

?In addition to PfE each authority needs to come up with its own local plan. No details are provided 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 the plan to Stockport boroughs 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.

?A change in the methodology for Manchester City Council was resulted in a 35% up in housing need for Manchester City Council area. The revised Local Housing Need methodology states that housing need is to be met within the district and not redistributed (see Places for Everyone Joint Consultation documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021) This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.

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.

This plan needs to go back to Regulation 18 of the Town and Country planning act as it was prepared with proper public engagement and consultation.

Family Name

Judge

Given Name

Rachel

Person ID

1287409

Title

Our Strategic Objectives

Places for Everyone Representation 2021

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| Type | Web |
| Include files | PFE1287409_Simister.pdf PFE1287409_GeneralResponse.pdf |
| Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to: | <ol style="list-style-type: none"> 1. Meet our housing need 2. Create neighbourhoods of choice 3. Ensure a thriving and productive economy in the districts involved 4. Maximise the potential arising from our national and international assets 5. Reduce inequalities and improve prosperity 6. Promote the sustainable movement of people, goods and information 7. Ensure that districts involved are more resilient and carbon neutral 8. Improve the quality of our natural environment and access to green spaces 9. Ensure access to physical and social infrastructure 10. Promote the health and wellbeing of communities |
| Soundness - Positively prepared? | Unsound |
| Soundness - Justified? | NA |
| Soundness - Consistent with national policy? | NA |
| Soundness - Effective? | NA |
| 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. | Please take the time to read in full the supporting documents I have provided to you this plan fails on all the above points. |
| 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. | Please take the time to read in full the supporting documents I have provided to you this plan fails on all the above points |
| Family Name | Judge |
| Given Name | Rachel |
| Person ID | 1287409 |
| Title | Our Spatial Strategy |
| Type | Web |

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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. | GMCA made the decision to move a poorly prepared plan forward to the publication s and Country planning Act even though major changes have been made to the plan s of consultation. For example Stockport withdrew from what was the GMSF and Manche has had a 35% uplift applied to their housing targets to be met within that specific are the plan has changed significantly and therefore requires going back to proper consulta directly affected to comment further |
| 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. | As above the plan needs to go back to proper consultation with the residents of Grea |
| Family Name | Judge |
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| Person ID | 1287409 |
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| <p>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> | <p>see supporting evidence documents uploaded and read them in full</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>REMOVAL OF THIS SITE ALLOCATION FROM THE PLAN</p> |