Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	Stakeholder Submission
Туре	Web
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	Our Vision
Туре	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	Legal Compliance - 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"

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. 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 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.

Soundness

- 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.
- 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 funded.
- 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 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.

- 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. 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 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.

- 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 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.

We have concerns that it is not appropriate to proceed to Regulation 19 Consultation and Examination because the Places for Everyone plan will not have substantially the same effect as GMSF2020 for a number of reasons, including the following:

- A new committee in GMCA was set up to take the new plan forward, so the overseeing body is now different.
- Significant changes to the content of the plan have been necessary following the departure of Stockport Council from GMSF.
- Changes have been required due to the 35% increase in housing numbers for Manchester City Council.
- The evidence documents have required significant updating.
- The Covid pandemic and Brexit have resulted in changes in society and commerce, which may be

long term with regard to requirements for housing, commercial premises and brownfield land supply. The PfE document acknowledges this in the statement: ".. it is recognised that the country is still in a state of flux". These factors will change the effect of the plan.

- If PfE 2021 genuinely addresses the changes that have occurred since GMSF 2020 was drafted, as it claims, then it would indeed need to have a substantially different effect and so, by its own criteria, would need another round of Regulation 18 consultation.
- . Not legally compliant with regard to the Duty to cooperate with Stockport Council

The Statement of Common Ground dated August 2021 states that Stockport Council had not yet identified any unmet need. Similarly, paragraph 8.4 in the PfE 2021 Growth and Spatial Options Paper notes that an adjustment, based on the 2021 OAN for Stockport has been made to the figure originally assessed as part of the GMSF 2020 preparation, to take account of Stockport"s withdrawal from the Plan and that a potential alternative/addition to this option could have been to propose to meet some of Stockport"s need in the PfE Plan area. It also notes that "Given the embryonic stage reached in the preparation of Stockport"s local plan, Stockport Council has not currently established whether or not it will have any surplus/unmet need and if so, what alternatives it has considered for meeting

this unmet need. Therefore, it is not possible to identify what such an option might look like in relation to the PfE 2021 and consequently it is not considered to be a reasonable alternative to the proposed growth in PfE 2021."

In July 2021, Stockport Council announced that using the Government"s standard methodology for calculating housing need produces a figure of 18,581 from 2021 to 2038. A supply of sites for 11,097 dwellings has been identified in the latest assessments, meaning that there is a shortfall of sites for 7,484 dwellings. In GMSF some of Stockport"s housing need was to be met by other boroughs in GM. The Stockport Local Plan is expected to undergo Regulation 18 consultation in autumn 2021, while PfE is

currently undergoing Regulation 19 consultation with the result that the two plans are out of step. It seems highly likely from the published data, that Stockport Council will have an unmet housing need. We also understand that Stockport Council enquired in March 2021 whether the other nine districts in GM were willing to accommodate some of Stockport Council"s housing and employment need in PfE, as had been proposed in the former GMSF plan. The published draft of PfE does not make any allowance to accommodate any of Stockport"s unmet need. Therefore, we believe that the opportunity for the nine boroughs in PfE to share some of Stockport"s housing need has not been adequately explored and the Duty to Cooperate has not been fulfilled.

Early stages of public consultation in 2014 and 2015 were inadequate in reaching a representative audience and evaluating alternative options.

Re: Places for Everyone, page 19, paragraph 1.60

"Four consultations have taken place in relation to the GMSF. The first, in November 2014 was on the scope of the plan and our initial evidence base, the second in November 2015, was on the vision, strategy and strategic growth options, and the third, on a Draft Plan in October 2016."

Comments

Out of a population of 2.7 million, 143 people took part in the 2015 consultation, many of whom represented housing development companies. Only 41 respondents answered the question about preference of 3 options, one of which proposed less development and required no loss of Green Belt. Key decisions were made based on responses from an extremely small and unrepresentative sample of people and the views of developers were given greater weight than those of residents in the analysis of the results.

The current Regulation 19 consultation on the PfE plan has been better advertised and notices have been posted on lampposts around the region. No such widespread, accessible publicity was under taken for a key early stage in the development of GMSF/PfE, which is an optimal stage for public involvement so that they have a say in how their region develops.

In addition it is six years since this consultation took place so the eligible population will now be very different and young people who will be affected

by the impact of the plan for a large proportion of their lives had no opportunity for a say in it.

We believe that the early stages of consultation on the plan were flawed and now too far out of date to be relevant. Therefore, the plan is unsound.

The plan does not meet the requirements for sustainable development

Re: Places for Everyone, Page 41, Objective 7: Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region.

Comments

Land is an increasingly precious resource with competing demands for housing, commercial buildings, transport, carbon sequestration, food production, rural jobs, energy production, water storage, water absorption and recreation.

In order to comply with the statutory duty to include policies designed to tackle climate change and its impacts and in order to provide sustainable development, the plan for GM will need to give the appropriate weight to all those needs. As well as outlining the benefits of the provision of housing, employment land and transport, the plan and supporting documents need to provide careful evaluation of the precise impact of the proposals on:

- Increased carbon emissions and air pollution due to increased urbanisation.
- Effects of transport proposals on carbon emissions and air pollution.
- Opportunities for improved carbon sequestration via amended practices in agriculture, forestry and

moorland and peat bog management.

- Opportunities for alternative energy production from green field and Green Belt sites.
- Effect of the proposal on the rural economy, rural jobs and the ability to produce local food.
- The impact of loss of green space on the mental and physical health of residents and the resultant

cost of increased needs for health care.

While the use of green field and Green Belt sites may provide an easy route for providing additional housing, commercial space and transport routes, by definition it also removes this land from opportunities to mitigate negative impacts of population growth, urbanisation and climate change. Residents in the wider region, including Woodford, and the country as a whole will suffer from negative impacts on the factors outlined above.

We refer to the representation by Mark Burton of Steady State Manchester, which includes detailed assessment of land uses and the impact on carbon emissions and human health, as examples of the type of analysis that needs to be conducted.

Without a full, detailed evaluation, including proposals for mitigation of any negative impacts, the plan is unsound because it cannot be determined to be consistent with national policies in enabling the delivery of sustainable development, or compliant with national policies on climate change.

The plan fails to meet the needs of all parts of a very diverse region

Re: Places for Everyone, Page 40, Objective 3: Playing our part in ensuring a thriving and productive economy in all parts of Greater Manchester.

Comments

As currently written, the PfE plan addresses the needs of a so-called "city region". However, Greater Manchester is much more than a "city" region. It is a very diverse region, which includes cities, town, villages, hamlets, farmland of a range of types, hills, valleys, lakes, waterways, moorland and peat bogs. Many residents live and work in rural communities and depend

on the rural economy. They do not identify as being part of a city and their needs have been overlooked in this plan. In order to comprehensively address the needs of the region, a joint Local Plan should support a prosperous rural economy and sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities. We note that the relevant figure to consider in respect of Green Belt loss is the gross figure, because new Green Belt additions proposed in PfE were already green sites.

The PfE plan completely fails to address the needs of rural communities. Loss of Green Belt and green field land will have a direct negative impact on the rural economy, effectively representing loss of "business space". It has not been positively prepared and is therefore unsound.

6. Places for Home, Places for Everyone, page 133, paragraphs 7.1 to 8.0 Comments

There is significant concern about the consistency and validity of the calculations of housing need and supply and the resulting proposals among erudite residents and planning professionals. Put very simply it would appear that there is sufficient land supply (enough for 170,000 homes) to meet the predicted need as calculated using the Government's standard methodology (164,881 homes) over the plan period. It appears that a very high buffer has been added to provide flexibility.

There is also significant uncertainty about housing needs, patterns of work and economic growth in the future following the Covid pandemic, Brexit and the urgent need to adapt to climate change. The PfE plan itself states: ".. it is recognised that the country is still in a state of flux".

Given these uncertainties, we suggest that exceptional circumstances do not exist to release Green Belt at the start of the plan period. Much greater flexibility is required in order to avoid unnecessary release of Green Belt land.

We suggest that no Green Belt is released until it has been shown to be required and that this is reviewed every 5 years at the plan review stages. This would still ensure a 5-year housing land supply and would allow a brownfield first policy to be pursued.

An alternative route would be to avoid allocation of sites in PfE and to leave this task to each of the nine individual authorities to tackle in their individual local plans.

Policy JP-H 1 Scale, Distribution and Phasing of New Housing Development, page 141

The Government's Standard Method is based on Office of National Statistic 2014 population data and aims to achieve 300,000 new homes per year, but more up to date population data show substantially reduced needs.

When asked about the need to use the figures produced by the standard methodology, Government Housing Ministers have replied that it is just a starting point and it is for Local Authorities to decide on the right figure for their authority.

Given the high level of uncertainty about future needs, the importance of green field and Green Belt land for uses which mitigate climate change and the level of opposition among residents to loss of green spaces, it would seem more prudent to avoid any release of Green Belt at the start of the plan period, but to review the plan every 5 years and only release if it is necessary.

Redacted modification
- Please set out the modification(s) you

The Examination should not proceed and the PfE plan should go through a Regulation 18 Consultation.

consider necessary to make this section of the plan legally compliant	The plan should be withdrawn from the Examination so that further discussions about meeting Stockport Council's unmet housing needs can take place.
and sound, in respect of any legal compliance or soundness matters you have identified	The plan should be withdrawn from the Examination so that full and transparent public engagement can take place with a wide cross section of the public on the impact of different options for the plan in the changed world we now live in.
above.	The impacts of changes in land uses on human health and carbon emissions should be fully and professionally evaluated. These aspects should be given more weight in the decisions on any potential loss of green field and Green Belt land and the plan should be rewritten accordingly, in order to comply with national legislation.
	The plan should be revised to include objectives and policies which support rural communities and the rural economy. These aspects should be given more weight in the decisions on any potential loss of green field and Green Belt land.
	The plan should be revised such that no Green Belt is released at the start of the plan period and only released if required at review every 5 years, allowing implementation of a brownfield first policy.
	This policy should be amended such that no Green Belt is released at the start of the plan period and only released if required at review every 5 years, allowing implementation of a brownfield first policy.
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	Our Strategic Objectives
Туре	Web
Our strategic objectives	1. Meet our housing need
- Considering the	2. Create neighbourhoods of choice
information provided for our strategic objectives,	3. Ensure a thriving and productive economy in the districts involved
please tick which of	4. Maximise the potential arising from our national and international assets
these objectives your written comment refers	5. Reduce inequalities and improve prosperity
to:	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

	1 lades for Everyone Representation 2021
Redacted reasons - Please give us details of why you consider the	All information provided above
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.	
Redacted modification	All information provided above
- 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.	
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	Our Spatial Strategy
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	No
Duty to Cooperate?	
Redacted reasons - Please give us details	Land is an increasingly precious resource with competing demands for housing, commercial buildings, transport, carbon sequestration, food
of why you consider the	
consultation point not to be legally compliant,	and recreation.
is unsound or fails to	In order to comply with the statutory duty to include policies designed to tackle climate change and its impacts and in order to provide sustainable
comply with the duty to	development, the plan for GM will need to give the appropriate weight to all
co-operate. Please be as precise as possible.	those needs. As well as outlining the benefits of the provision of housing, employment land and transport, the plan and supporting documents need to provide careful evaluation of the precise impact of the proposals on:
	- Increased carbon emissions and air pollution due to increased urbanisation.
	- Effects of transport proposals on carbon emissions and air pollution.
	- Opportunities for improved carbon sequestration via amended practices in agriculture, forestry and
	moorland and peat bog management.

- Opportunities for alternative energy production from green field and Green Belt sites.
- Effect of the proposal on the rural economy, rural jobs and the ability to produce local food.
- The impact of loss of green space on the mental and physical health of residents and the resultant

cost of increased needs for health care.

While the use of green field and Green Belt sites may provide an easy route for providing additional housing, commercial space and transport routes, by definition it also removes this land from opportunities to mitigate negative impacts of population growth, urbanisation and climate change. Residents in the wider region, including Woodford, and the country as a whole will suffer from negative impacts on the factors outlined above.

We refer to the representation by Mark Burton of Steady State Manchester, which includes detailed assessment of land uses and the impact on carbon emissions and human health, as examples of the type of analysis that needs to be conducted.

Without a full, detailed evaluation, including proposals for mitigation of any negative impacts, the plan is unsound because it cannot be determined to be consistent with national policies in enabling the delivery of sustainable development, or compliant with national policies on climate change.

Modification requested

The impacts of changes in land uses on human health and carbon emissions s

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

Duty to Cooperate?

The impacts of changes in land uses on human health and carbon emissions should be fully and professionally evaluated. These aspects should be given more weight in the decisions on any potential loss of green field and Green Belt land and the plan should be rewritten accordingly, in order to comply with national legislation.

above.	
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-Strat 1 Core Growth Area
Туре	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	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
to be legally compliant, is unsound or fails to
co-operate. Please be as precise as possible.

There is significant concern about the consistency and validity of the calculations of housing need and supply and the resulting proposals among erudite residents and planning professionals. Put very simply it would appear that there is sufficient land supply (enough for 170,000 homes) to meet the predicted need as calculated using the Government's standard methodology (164,881 homes) over the plan period. It appears that a very high buffer has been added to provide flexibility.

There is also significant uncertainty about housing needs, patterns of work and economic growth in the future following the Covid pandemic, Brexit and the urgent need to adapt to climate change. The PfE plan itself states: ".. it is recognised that the country is still in a state of flux".

Given these uncertainties, we suggest that exceptional circumstances do not exist to release Green Belt at the start of the plan period. Much greater flexibility is required in order to avoid unnecessary release of Green Belt land.

We suggest that no Green Belt is released until it has been shown to be required and that this is reviewed every 5 years at the plan review stages. This would still ensure a 5-year housing land supply and would allow a brownfield first policy to be pursued.

An alternative route would be to avoid allocation of sites in PfE and to leave this task to each of the nine individual authorities to tackle in their individual local plans.

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

Redacted reasons -

Please give us details

The plan should be revised such that no Green Belt is released at the start of the plan period and only released if required at review every 5 years, allowing implementation of a brownfield first policy.

As currently written, the PfE plan addresses the needs of a so-called "city region". However, Greater Manchester is much more than a "city" region. It

above.	
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-Strat 2 City Centre
Туре	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

of why you consider the is a very diverse region, which includes cities, town, villages, hamlets,

consultation point not to be legally compliant, is unsound or fails to	farmland of a range of types, hills, valleys, lakes, waterways, moorland and peat bogs. Many residents live and work in rural communities and depend on the rural economy. They do not identify as being part of a city and their
comply with the duty to co-operate. Please be as precise as possible.	needs have been overlooked in this plan. In order to comprehensively address the needs of the region, a joint Local Plan should support a prosperous rural economy and sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities. We note that the relevant figure to consider in respect of Green Belt loss is the gross figure, because new Green Belt additions proposed in PfE were already green sites.
	The PfE plan completely fails to address the needs of rural communities. Loss of Green Belt and green field land will have a direct negative impact on the rural economy, effectively representing loss of "business space". It has not been positively prepared and is therefore 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.	The plan should be revised to include objectives and policies which support rural communities and the rural economy. These aspects should be given more weight in the decisions on any potential loss of green field and Green Belt land.
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-Strat 3 The Quays
Туре	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
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 see all points above for where I have answered unsound
Redacted modification - Please set out the	Please see above

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.	
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-Strat 4 Port Salford
Туре	Web
Soundness - Positively prepared?	
Soundness - Justified?	
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
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 see above for points where I have answered 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.	Please see above
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-Strat 5 Inner Areas
Туре	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	The plans do not look at current deprivation and the reasons for the deprivation.
of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to	I live in a village within Rochdale. We do not have a A&E and we do not have a maternity ward. I can not get me or my family in a local NHS dentist and I cannot get appointments on the day needed with my local GP. Before the pandemic I waited in the urgent care unit for 8 hours before I was able to see someone. This massively constitutes to the deprivation of the area.
co-operate. Please be as precise as possible.	I need a car to work and I find hours of my day stuck in traffic as part of my role I need to travel across the north west. These plans are only adding to this and again will do nothing to support the local community.
	The plans do not give realistic analysis of the environmental impact on the area, the pollution is already a worry and the plans will add to it.
	Many of our areas are deprived, the green belt in our area was so important during the pandemic, I love taking my son round the green belt areas and letting him learn about the wildlife this will be taken from him and his future
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.	The plans need to address current deprived areas and the infrastructure
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-Strat 6 Northern Areas
Туре	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

1 lades for Everyone Representation 2021	
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons -	Comments
Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to	Land is an increasingly precious resource with competing demands for housing, commercial buildings, transport, carbon sequestration, food production, rural jobs, energy production, water storage, water absorption and recreation.
comply with the duty to co-operate. Please be as precise as possible.	In order to comply with the statutory duty to include policies designed to tackle climate change and its impacts and in order to provide sustainable development, the plan for GM will need to give the appropriate weight to all those needs. As well as outlining the benefits of the provision of housing, employment land and transport, the plan and supporting documents need to provide careful evaluation of the precise impact of the proposals on: - Increased carbon emissions and air pollution due to increased urbanisation. - Effects of transport proposals on carbon emissions and air pollution. - Opportunities for improved carbon sequestration via amended practices in
	agriculture, forestry and
	moorland and peat bog management.
	- Opportunities for alternative energy production from green field and Green Belt sites.
	- Effect of the proposal on the rural economy, rural jobs and the ability to produce local food.
	- The impact of loss of green space on the mental and physical health of residents and the resultant
	cost of increased needs for health care.
	While the use of green field and Green Belt sites may provide an easy route for providing additional housing, commercial space and transport routes, by definition it also removes this land from opportunities to mitigate negative impacts of population growth, urbanisation and climate change. Residents in the wider region, including Woodford, and the country as a whole will suffer from negative impacts on the factors outlined above.
	We refer to the representation by Mark Burton of Steady State Manchester, which includes detailed assessment of land uses and the impact on carbon emissions and human health, as examples of the type of analysis that needs to be conducted.
	Without a full, detailed evaluation, including proposals for mitigation of any negative impacts, the plan is unsound because it cannot be determined to be consistent with national policies in enabling the delivery of sustainable development, or compliant with national policies
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.	The impacts of changes in land uses on human health and carbon emissions should be fully and professionally evaluated. These aspects should be given more weight in the decisions on any potential loss of green field and Green Belt land and the plan should be rewritten accordingly, in order to comply with national legislation.
Family Name	Lawford
Given Name	Janine

	· ·
Person ID	1286844
Title	JP-Strat 7 North East Growth Corridor
Туре	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	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 funded.
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.	My family has an increase a year of □600 of national insurance to pay for health and social care. There are significant threats in rises to council tax and gas, electricity have significantly risen. If proposals are to come from tax payers we are already at breaking point
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.	To give a honest account as to how the above will be paid for.
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-Strat 8 Wigan Bolton Growth Corridor
Туре	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

Places for Everyone Representation 2021	
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 same as above, current deprivation and infrastructure needs to be improved first
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 above
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-Strat 9 Southern Areas
Туре	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Sound
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.	All my points above apply however it would be best to spread the housing need across the whole GM region and not just the north
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	As above

or soundness matters you have identified above.	
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-Strat 10 Manchester Airport
Туре	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.	All my points above apply particularly lack of information as to where the funding is coming from
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.	A full detailed account taking into consideration all my points already raised and particularly details of funding which should not be with the tax payer
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-Strat 11 New Carrington
Туре	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Sound
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 all above points however do agree on more focus to the areas in south Manchester instead of the north. More affordable homes need to be built in this area
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
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-Strat 12 Main Town Centres
Туре	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
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.	These are the most deprived areas in GM and I agree funding to improve the areas is welcomed and wanted however building the level of housing proposed is not the answer please see all points raised above

	Places for Everyone Representation 2021
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 see above
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-Strat 13 Strategic Green Infrastructure
Туре	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.	Please see all points above. The plans are prising building in all the green areas in my town so I do not see how it has been considered. If all plans were to go ahead GM would have no green areas. This is the most sad and shocking aspect to the plans. England is a beautiful country but the plans want to turn it into a concrete jungle car park. In my local area we regularly see a wide range of wild life these will all be killed and their homes will be destroyed
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.	Realistic and honest account of the impact the plans will have on GM green belt and wildlife
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-Strat 14 A Sustainable and Integrated Transport Network

Туре	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.	Please see above as to lack of information on funding
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 above
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-S 1 Sustainable Development
Туре	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	In order to comply with the statutory duty to include policies designed to tackle climate change and its impacts and in order to provide sustainable development, the plan for GM will need to give the appropriate weight to all

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. those needs. As well as outlining the benefits of the provision of housing, employment land and transport, the plan and supporting documents need to provide careful evaluation of the precise impact of the proposals on:

- Increased carbon emissions and air pollution due to increased urbanisation.
- Effects of transport proposals on carbon emissions and air pollution.
- Opportunities for improved carbon sequestration via amended practices in agriculture, forestry and

moorland and peat bog management.

- Opportunities for alternative energy production from green field and Green Belt sites.
- Effect of the proposal on the rural economy, rural jobs and the ability to produce local food.
- The impact of loss of green space on the mental and physical health of residents and the resultant

cost of increased needs for health care.

While the use of green field and Green Belt sites may provide an easy route for providing additional housing, commercial space and transport routes, by definition it also removes this land from opportunities to mitigate negative impacts of population growth, urbanisation and climate change. Residents in the wider region, including Woodford, and the country as a whole will suffer from negative impacts on the factors outlined above.

We refer to the representation by REDACTED TEXT of Steady State Manchester, which includes detailed assessment of land uses and the impact on carbon emissions and human health, as examples of the type of analysis that needs to be conducted.

Without a full, detailed evaluation, including proposals for mitigation of any negative impacts, the plan is unsound because it cannot be determined to be consistent with national policies in enabling the delivery of sustainable development, or compliant with national policies on climate change.

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.

The impacts of changes in land uses on human health and carbon emissions should be fully and professionally evaluated. These aspects should be given more weight in the decisions on any potential loss of green field and Green Belt land and the plan should be rewritten accordingly, in order to comply with national legislation

abovo.	
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-S 2 Carbon and Energy
Туре	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.	These plans do not take into consideration the amount of car pollution these plans will bring to the area. In my local area there is a proposal of 1100 house in a small radius this could potentially bring 2200 more cars in the area
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.	All the points above and the traffic and amount of cars which will increase in local areas need to be considered
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-S 3 Heat and Energy Networks
Туре	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.	My current area has had many floods and power cuts the infrastructure cannot meet the current needs
Redacted modification - Please set out the	The plans need to look at current issues in local areas

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.	
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-S 4 Resilience
Туре	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.	Although the plans specify how they meet these needs there is no detail other than them saying they are met. There is no Justification. Within plans there is no details as to enough schooling places for children my areas schools are already full
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.	Honest and realistic detailed plans as to how the above will be met
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-S 5 Flood Risk and Water Environment
Туре	Web

	Places for Everyone Representation 2021
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.	Already detailed my response to this in other answers
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 abive
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-S 6 Clean Air
Туре	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	Already answered this in previous answers. How will building 1100 houses in Rochdale reduce pollution, this could be an increase of 2200 cars and more!

to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	
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.	Realistic and detailed plans to consider the amount of cars that will be increased on the roads of GM
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-S 7 Resource Efficiency
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.	All of my above answers answer this question
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
Family Name	Lawford

Given Name	Janine
Person ID	1286844
Title	JP-J 1 Supporting Long Term Economic Growth
Туре	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.	Plans do not take into consideration the pandemic or Brexit, there is a record amount of jobs being advertised i meld work in health and social care and we are only 60% recruited there are a number of education and job opportunities here already
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.	Brexit and the pandemic need to be considered in plans
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-J 2 Employment Sites and Premises
Туре	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

Places for Everyone Representation 2021	
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.	Brexit and the pandemic need to be considered and plans do not take into consideration
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
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-J 3 Office Development
Туре	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.	Brexit and the pandemic need to be considered this also does not take into consideration the commute into the city centre and town centres
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the	As above

plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-J 4 Industry and Warehousing Development
Туре	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.	Brexit and the pandemic need to be considered and are not detailed in current plans
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.	Brexit and the pandemic need to be detailed in proposals
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Туре	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound

	Places for Everyone Representation 2021
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.	Comments There is significant concern about the consistency and validity of the calculations of housing need and supply and the resulting proposals among erudite residents and planning professionals. Put very simply it would appear that there is sufficient land supply (enough for 170,000 homes) to meet the predicted need as calculated using the Government"s standard methodology (164,881 homes) over the plan period. It appears that a very high buffer has been added to provide flexibility.
as precise as possible.	There is also significant uncertainty about housing needs, patterns of work and economic growth in the future following the Covid pandemic, Brexit and the urgent need to adapt to climate change. The PfE plan itself states: " it is recognised that the country is still in a state of flux".
	Given these uncertainties, we suggest that exceptional circumstances do not exist to release Green Belt at the start of the plan period. Much greater flexibility is required in order to avoid unnecessary release of Green Belt land.
	We suggest that no Green Belt is released until it has been shown to be required and that this is reviewed every 5 years at the plan review stages. This would still ensure a 5-year housing land supply and would allow a brownfield first policy to be pursued.
	An alternative route would be to avoid allocation of sites in PfE and to leave this task to each of the nine individual authorities to tackle in their individual local plans
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.	The plan should be revised such that no Green Belt is released at the start of the plan period and only released if required at review every 5 years, allowing implementation of a brownfield first policy.
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-H 2 Affordability of New Housing
Туре	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.	Most of the houses planned in my local area are 3-4 bedroom houses which are not affordable these are also not spread out equally across GM
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.	Plans proposed do not actually detail the need all points above need to be considered too
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-H 3 Type Size and Design of New Housing
Туре	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 -	as evidenced by the statement of common ground.
Please give us details	Are the right homes being planned for?
of why you consider the consultation point not to be legally compliant, is unsound or fails to	On housing alone, the plan states that there are xxxxx people on waiting lists for homes. Most of these people cannot get a mortgage so will have to rent an "affordable" property.
comply with the duty to	The Plan aims to deliver 30,000 homes for social/affordable rent over the

	Places for Everyone Representation 2021
	"garden village approach". Is this what is needed? Are □350,000 -500,000 homes affordable? Does it help young people/families get their own home?
	Will it protect what we already have?
	It tells us it will, but how can bulldozing Green Belt and green fields for new development instead of regenerating/redeveloping Brownfield land and loosing part of our natural environment, make things better?
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.	The above questions need to be considered and detailed
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-H 4 Density of New Housing
Туре	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.	Completely disagree with statements above in Rochdale if all plans went ahead there would be no green belt land
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	A detailed account of all green belt proposals should be detailed it should also look at what green belt land would be left

above.

Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-G 1 Valuing Important Landscapes
Туре	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.	All my previous answers cover this section
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
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-G 2 Green Infrastructure Network
Туре	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

	Places for Everyone Representation 2021
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.	All my previous answers address this the proposals talk about green areas but they do not detail the amount of green spaces which will be taken
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
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-G 3 River Valleys and Waterways
Туре	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
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.	All other points to be considered
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the	As above

plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified	
above. Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-G 4 Lowland Wetlands and Mosslands
Туре	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Sound
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.	Area the proposed Green Belt addition behind Cardinal Langley School is already green fields - so just calling it Green Belt makes no difference. Public Footpaths will go through new housing estate. Building 1,681 new homes and additional industrial units will add to the local carbon footprint. This will add to Climate Change not reduce or mitigate its effects. Rochdale Council has declared a Climate Emergency and yet proposes to build on Green Belt.
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.	All other recommendations to be considered
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-G 5 Uplands

	<u> </u>
Туре	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.	
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.	
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-G 6 Urban Green Space
Туре	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	Plans do not go far enough I detailing how we reduce risk of risks

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. 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
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-G 7 Trees and Woodland
Туре	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	Loss of Green Belt is a once and for all event. Once its gone, we won"t get it back. Government data says the number of households in Rochdale Borough will rise by just over 7,000 between 2021 and 2037. Rochdale has a Strategic
to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be	Housing Land supply for 7,997 homes (This is just 51 homes less than the Government says Rochdale must find land for over 16 years - that"s 3 per year).
as precise as possible.	But the PfE plan for Rochdale is to build 11,434 homes. Government data says Rochdale"s population will increase by 19,073 between 2021 and 2037.
	The figures tell us that each home will be occupied by 2.73 people - but the PfE plan uses an occupancy rate of just over 1 person per house.
	Does this make sense? Many of these extra homes would be on Green Belt land.
	[Currently in GM "there are 2.8 million people living in 1.2 million homes" - that"s 2.34 people per house] ["The Plan looks ahead 16 years to accommodate 164,880 new homes. This will be achieved by delivering the urban land supply (170,385) and 20,391 (2021/37 supply) new homes from new allocations"- An extra, so-called buffer, 16%].

Government data says the population of Greater Manchester (excluding Stockport) will rise by 158,194. Using these figures, the PfE plan will build 190,776 homes - more than one for each man, woman, and child! How is this extra 20% justified? National policy suggests a buffer of between 5 to 10%. Without using Green Belt, Rochdale has enough land to build the homes it needs. The PfE plan has no need to use Green Belt either. The need to reduce food miles because of the proposed loss of local agricultural land, the jobs & businesses they support, and the effects of BREXIT are all factors that indicate that the PfE plan is unsound Redacted modification The above points need to be considered - 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. I awford **Family Name Given Name** Janine Person ID 1286844 JP-G 8 Standards for Greener Places **Title** Web **Type** Soundness - Positively Unsound prepared? Soundness - Justified? Unsound Soundness - Consistent Unsound with national policy? Soundness - Effective? Unsound No Compliance - Legally compliant? No Compliance - In accordance with the **Duty to Cooperate?** Redacted reasons -The plans for "green factor" do not go far enough and do not consider the Please give us details amount of green spaces being taken up 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. Redacted modification The above needs to be considered - 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.	
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-G 9 A Net Enhancement of Biodiversity and Geodiversity
Туре	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.	All of my previous answers cover this
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
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-G 10 Green Belt
Туре	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.	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.
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.	Proof of exceptional Circumstances
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-G 11 Safeguarded Land
Туре	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.	
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
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-P1 Sustainable Places
Туре	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	(164,881 homes) over the plan period. It appears that a very high buffer has
co-operate. Please be as precise as possible.	There is also significant uncertainty about housing needs, patterns of work and economic growth in the future following the Covid pandemic, Brexit and the urgent need to adapt to climate change. The PfE plan itself states: " it is recognised that the country is still in a state of flux".
	Given these uncertainties, we suggest that exceptional circumstances do not exist to release Green Belt at the start of the plan period. Much greater flexibility is required in order to avoid unnecessary release of Green Belt land.
	We suggest that no Green Belt is released until it has been shown to be required and that this is reviewed every 5 years at the plan review stages. This would still ensure a 5-year housing land supply and would allow a brownfield first policy to be pursued.
	An alternative route would be to avoid allocation of sites in PfE and to leave this task to each of the nine individual authorities to tackle in their individual local plans.

	, ,
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.	The plan should be revised such that no Green Belt is released at the start of the plan period and only released if required at review every 5 years, allowing implementation of a brownfield first policy.
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-P2 Heritage
Туре	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.	Not preserving and sustaining our beautiful wildlife
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
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-P3 Cultural Facilities
	ı

	· ·
Туре	Web
Soundness - Positively prepared?	NA
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	Yes
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.	Agree with this part of proposals
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
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-P4 New Retail and Leisure Uses in Town Centres
Туре	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	Yes
Redacted reasons - Please give us details of why you consider the	This is needed but details on funding needs to be detailed

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. 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
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-P5 Education Skills and Knowledge
Туре	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.	No proposals to match the amount of school both primary and secondary to the amount of building
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

Places for Everyone Representation 2021

Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JP-P6 Health
Туре	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.	Already answered this the health of the population is dependent on the NHS and resources in the area there is not enough to deal with current population of towns
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
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JPA 19: Bamford / Norden
Туре	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

	Places for Everyone Representation 2021
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the	Rochdale is a deprived area and the plans do not reflect the current infrastructure I have already detailed my concerns we have no A&E, not able to get a NHS dentist place, no GP appointments, no maternity wards.
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.	I am permanently stuck in traffic, Frequent motorway accidents/closures cause chaos on local roads (Broadway already very busy). from the narrow Thornham New Road. 3,200+ at All-in-One. There have been deaths & serious accidents on Rochdale rd/Slattocks roundabout which are unlikely to have been prevented by the traffic control measures proposed.
us product us possible.	Getting to work/school/supermarkets/hospitals etc will be more difficult.
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.	Plans need to detail issues concerning the above
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JPA 20: Castleton Sidings
Туре	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.	The access to and from the area would cause a number of issues in local area. I live within a mile and traffic is already bad. Heywood road is a small street and could not cope with the increase
Redacted modification - Please set out the modification(s) you consider necessary to	The above needs to be considered

make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JPA 21: Crimble Mill
Туре	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.	The area is a beautiful spot I regularly walk here with family there is a lot of wildlife which would be killed again all my points to the infrastructure still apply
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 above
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JPA 22: Land North of Smithy Bridge
Туре	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.	Hollingsworth lake is one of our greatest beauty spots people travel from miles. During the pandemic it the saviour to many families these proposals want to turn it into an urban jungle. Traffic in this area Is already ridiculous
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 all points of infrastructure
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JPA 23: Newhey Quarry
Туре	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	All points regarding to infrastructure need to be considered

comply with the duty to co-operate. Please be as precise as possible.	
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
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	JPA 24: Roch Valley
Туре	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.	Minutes to get from one end to the other this would prevent the two sides of
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 above
Family Name	Lawford
Given Name	Janine

Person ID	1286844
Title	JPA 25: Trows Farm
Туре	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.	With the proposals of Castleton sidings and Trows farm that is an increase of 750 houses in a mile radius with potentially 1500 more cars. It would be a massive increase on the area. Again Castleton"s infrastructure cannot deal with this amount of housing. Furthermore there is a lot of wildlife in this spot I spotted wild fears there only last week. There is also a risk of flooding due to the layout of the land
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.	All previous points to be considered
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	Other Comments
Туре	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

Places for Everyone Representation 2021

Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	Other Comments
Туре	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
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	Other Comments
Туре	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
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	Other Comments
Туре	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

Places for Everyone Representation 2021

Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	Other Comments
Туре	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
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	Other Comments
Туре	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
Family Name	Lawford
Given Name	Janine
Person ID	1286844
Title	Supporting Evidence
Туре	Web