

Places for Everyone Representation 2021

Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	Stakeholder Submission
Type	Web
Include files	PFE1286404_EltonProposal.pdf PFE1286404_LegalCompliance_Redacted.pdf
Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	Our Vision
Type	Web
Include files	PFE1286404_LegalCompliance_Redacted.pdf PFE1286404_EltonProposal.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.	Please see supporting evidence documents uploaded and read them in 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.	Removal of this greenbelt allocation from the plan.
Family Name	Lawson
Given Name	Daniel
Person ID	1286404

Places for Everyone Representation 2021

Title	Our Strategic Objectives
Type	Web
Include files	PFE1286404_EltonProposal.pdf PFE1286404_LegalCompliance_Redacted.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 see supporting evidence documents uploaded and read them in 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.	Removal of this greenbelt allocation from the plan.
Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	Our Spatial Strategy

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Type	Web
Include files	PFE1286404_LegalCompliance_Redacted.pdf PFE1286404_EltonProposal.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.	Please see supporting evidence documents uploaded and read them in 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.	Removal of this greenbelt allocation from the plan.
Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	JP-Strat 1 Core Growth Area
Type	Web
Include files	PFE1286404_EltonProposal.pdf PFE1286404_LegalCompliance_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	NA
Compliance - Legally compliant?	No

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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 supporting evidence documents uploaded and read them in 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.	Removal of this greenbelt allocation from the plan.
Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	JPA 1.2: Simister and Bowlee (Northern Gateway)
Type	Web
Include files	PFE1286404_LegalCompliance_Redacted.pdf PFE1286404_EltonProposal.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
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Redacted modification - Please set out the	Removal of this greenbelt allocation from the plan.

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Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	JP-S 1 Sustainable Development
Type	Web
Include files	PFE1286404_LegalCompliance_Redacted.pdf PFE1286404_EltonProposal.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
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Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Removal of this greenbelt allocation from the plan.
Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	JP-S 2 Carbon and Energy

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Type	Web
Include files	PFE1286404_EltonProposal.pdf PFE1286404_LegalCompliance_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
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Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	JP-S 6 Clean Air
Type	Web
Include files	PFE1286404_LegalCompliance_Redacted.pdf PFE1286404_EltonProposal.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

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Compliance - In accordance with the Duty to Cooperate?	No
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Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Removal of this greenbelt allocation from the plan.
Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	JP-J 1 Supporting Long Term Economic Growth
Type	Web
Include files	PFE1286404_EltonProposal.pdf PFE1286404_LegalCompliance_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Please see supporting evidence documents uploaded and read them in full.
Redacted modification - Please set out the	Use up to date forecasts, not those taken before a worldwide pandemic. As Mr Burnham says (when it suits him) "The world has changed".

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Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	JP-J 2 Employment Sites and Premises
Type	Web
Include files	PFE1286404_LegalCompliance_Redacted.pdf PFE1286404_EltonProposal.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
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Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	As above... Use up to date forecasts, not those taken before a worldwide pandemic. As Mr Burnham says (when it suits him) "The world has changed".
Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	JP-J 3 Office Development

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Type	Web
Include files	PFE1286404_EltonProposal.pdf PFE1286404_LegalCompliance_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
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Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Use up to date forecasts, not those taken before a worldwide pandemic. As Mr Burnham says (when it suits him) "The world has changed".
Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	JP-J 4 Industry and Warehousing Development
Type	Web
Include files	PFE1286404_LegalCompliance_Redacted.pdf PFE1286404_EltonProposal.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

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Compliance - In accordance with the Duty to Cooperate?	No
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Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Use up to date forecasts, not those taken before a worldwide pandemic. As Mr Burnham says (when it suits him) "The world has changed".
Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	JPA 7: Elton Reservoir Area
Type	Web
Include files	PFE1286404_EltonProposal.pdf PFE1286404_LegalCompliance_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	RECLASSIFIED Please see supporting evidence documents uploaded and read them in full.
Family Name	Lawson
Given Name	Daniel

Places for Everyone Representation 2021

Person ID	1286404
Title	JP-D1 Infrastructure Implementation
Type	Web
Include files	PFE1286404_LegalCompliance_Redacted.pdf PFE1286404_EltonProposal.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Please see supporting evidence documents uploaded and read them in 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.	Use up to date forecasts, not those taken before a worldwide pandemic.
Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	JP-D2 Developer Contributions
Type	Web
Include files	PFE1286404_EltonProposal.pdf PFE1286404_LegalCompliance_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound

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Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Please see supporting evidence documents uploaded and read them in full.
Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	Bury - Green Belt Additions
Type	Web
Include files	PFE1286404_LegalCompliance_Redacted.pdf PFE1286404_EltonProposal.pdf
GBA Bury - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below	Bury GBA03 Pigs Lea Brook 1 Bury GBA04 North of Nuttall Park Bury GBA05 Pigs Lea Brook 2 Bury GBA06 Hollins Brook Bury GBA07 Off New Road, Radcliffe Bury GBA08 Hollins Brow Bury GBA09 Hollybank Street, Radcliffe Bury GBA10 Crow Lumb Wood Bury GBA11 Nuttall West, Ramsbottom Bury GBA12 Woolfold, Bury Bury GBA13 Nuttall East, Ramsbottom Bury GBA14 Chesham, Bury Bury GBA15 Broad Hey Wood North Bury GBA16 Lower Hinds
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	NA
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details	Please see supporting evidence documents uploaded and read them in full.

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.	Considering the amount of greenbelt this plan proposes to destroy for ever this is nothing more than a total insult to the people of Bury.
Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	Supporting Evidence
Type	Web
Include files	PFE1286404_EltonProposal.pdf PFE1286404_LegalCompliance_Redacted.pdf
Redacted comment on supporting documents - Please give details of why you consider any of the evidence not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Please see supporting evidence documents uploaded and read them in full.
Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	JPA 8: Seedfield
Type	Web
Include files	PFE1286404_LegalCompliance_Redacted.pdf PFE1286404_EltonProposal.pdf
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.	Please see supporting evidence documents uploaded and read them in 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.	Removal of this greenbelt allocation from the plan.
Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	Other Comments
Type	Web
Include files	PFE1286404_LegalCompliance_Redacted.pdf PFE1286404_EltonProposal.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.	RECLASSIFIED Plan Wide 1) That the question of legality has even been raised at all indicates that there is doubt over legality. Seeking the public's opinion on the legality of switching from the GMSF to PFE and just pushing on counts for nothing. PFE does not appear to be just the GMSF minus Stockport many changes have been made for example new housing calculation methodology has resulted in changes..Legal matters must be settled in court. Until this happens and the legality of PFE properly established, PFE must be considered illegal. 2) I believe that Places for Everyone is unsound for the following reasons

- a). Para 1.63 point 2 of PfE states that “the most up to date information be used in plan making”, The plan is old, it uses 2014 data to predict housing need so the effects of Brexit are not taken into account. The plan also dismisses any potential affects due to Covid. So the plan fails for not being Positively Prepared as the housing and other needs are not objectively assessed.
- b) The plan is not detailed. It contains very little detail on how infrastructure will actually be paid for (see Para 12.16) when it will be delivered, how delivery will be controlled and what partners will be involved. So PfE fails on the grounds of effectiveness and deliverability.
- c) Public consultation has been poor and apparently designed to achieve very low response rates. This consultation is yet another example. A plan can only be justified if it can demonstrate that is has properly consulted the public and other stakeholders. So GMSF/PfE is not Justified on these grounds
- d) The site selection process has been opaque. There has been no information provided as to why some sites were chosen over others, or what alternatives were considered before final site selection. So GMSF/PfE is not Justified on these grounds
- e) Many Greater Manchester Councils have consistently failed to meet existing housing delivery targets. To be effective a plan must actually be deliverable. The plan relies on the cooperation of property developers. Given past delivery failures, there is no indication of how delivery targets will be maintained this time. So GMSF/PfE fails on the grounds of Effectiveness and Delivery
- f) The plan involves modifications to green belt destroying it in some places and creating it in others with no proof of exceptional circumstances as required in the National Planning Policy Framework. So GMSF/PfE is not sound on compliance with National Policy.
- g) PfE is a very generalised plan even though it has been some 5-6 years in the making. If accepted it appears that each local authority needs to come up with its own more detailed Masterplan. There are no outline details given on when these plans would be published, what approval process they would through or how the public will be consulted. It is to be assumed that local developments cannot commence until local masterplans have been approved but this matter is not clarified. So GMSF/PfE fails on the grounds of Effectiveness and Deliverability.
- h) There are no details provided about Duty to Cooperate. Not even for Stockport who have become a neighboring borough after withdrawing from the GMSF.

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.

RECLASSIFIED

Plan Wide

- 1) Legality must be decided in court before “Places for Everyone” can proceed any further.
- 2) Housing need must be re-assessed using latest methodology and the latest (2018) ONS population predictions and the effect of Covid on work patterns and transport needs to be properly taken into account not just dismissed.
- 3) The plan needs to be revised to identify how all the infrastructure will be paid for and which major partners are on board to provide infrastructure and employment and an outline delivery schedule given.
- 4) The public consultations need to be repeated, made understandable and with more background information to enable choices to be made. They should be designed to encourage people to make a contribution not designed to put people off.

	<p>5) The site selection process should be repeated starting from a new call for sites and sites decided using National and GMCA guidelines and carried out with meetings open to the public d. The rationale for the selection of every site and what alternatives were considered must be fully explained. There are already local conspiracy theories involving possible selling out and corruption.</p> <p>6) A strategy to guarantee housing delivery rates must be provided before developments commence. This cannot be left to any local authority that is currently behind on housing targets.</p> <p>7) All local authority contributions within PfE should be examined to ensure they comply with National Policy. Where any part of a local authority contribution to PfE does not comply the local authority must be made to prove that “exceptional circumstances” apply. This especially applies to greenbelt allocation issues.</p> <p>8) It should be made clear exactly what happens at local level if PfE gains approval. If Councils have to produce their own Master Plans what will be the timescales, what accountability will there be?. How will compliance to PfE be monitored? Will development be allowed to proceed before these plans are approved and how will the public be consulted?</p> <p>9) Rather than trying to patch things up for expediency at this late stage, serious consideration should be given to scrapping PfE altogether and just let Councils come up with their own local development plans by December 2023 in line with Government policy. It seems that they will have to do something like this after PfE is approved in any case, even though most have proved incompetent in this respect already.</p>
Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	Other Comments
Type	Web
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Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Type	Web
Include files	PFE1286404_LegalCompliance_Redacted.pdf PFE1286404_EltonProposal.pdf

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Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Lawson
Given Name	Daniel
Person ID	1286404
Title	JP-G 10 Green Belt
Type	Web
Include files	PFE1286404_EltonProposal.pdf PFE1286404_LegalCompliance_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	RECLASSIFIED Please see supporting evidence documents uploaded and read them in 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.	RECLASSIFIED Removal of this greenbelt allocation from the plan.
Family Name	Lawson

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Soundness - Justified?	Unsound

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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>RECLASSIFIED</p> <p>Consultation</p> <p>c) Public consultation has been poor and apparently designed to achieve very low response rates. This consultation is yet another example. A plan can only be justified if it can demonstrate that it has properly consulted the public and other stakeholders. So GMSF/PfE is not Justified on these grounds</p> <p>f) The plan involves modifications to green belt destroying it in some places and creating it in others with no proof of exceptional circumstances as required in the National Planning Policy Framework. So GMSF/PfE is not sound on compliance with National Policy.</p> <p>g) PfE is a very generalised plan even though it has been some 5-6 years in the making. If accepted it appears that each local authority needs to come up with its own more detailed Masterplan. There are no outline details given on when these plans would be published, what approval process they would through or how the public will be consulted. It is to be assumed that local developments cannot commence until local masterplans have been approved but this matter is not clarified. So GMSF/PfE fails on the grounds of Effectiveness and Deliverability.</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>RECLASSIFIED</p> <p>Consultation</p> <p>The public consultations need to be repeated, made understandable and with more background information to enable choices to be made. They should be designed to encourage people to make a contribution not designed to put people off.</p> <p>It should be made clear exactly what happens at local level if PfE gains approval. If Councils have to produce their own Master Plans what will be the timescales, what accountability will there be?. How will compliance to PfE be monitored? Will development be allowed to proceed before these plans are approved and how will the public be consulted?</p>
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Given Name	Daniel
Person ID	1286404
Title	Other Comments
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Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound

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Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No