

Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	Stakeholder Submission
Type	Web
Include files	PFE1287302.pdf
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	Our Vision
Type	Web
Include files	PFE1287302.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>The vision for Greater Manchester has been desktop planned without proper engagement or public consultation from the very beginning. Any consultations that have taken place have been an active deterrent asking far too many intrusive questions of residents to put them off completing them. Also, the consultations have been designed in such a way that they are difficult to respond to especially for residents with limited I.T skills or digital access. Local councils have not properly publicised plans to ensure a place for everyone plan is communicated to everyone. The plan should have been designed by the residents for the residents to address our actual housing requirements over the next 15 years. The above demonstrates a clear lack of community involvement which goes against the council constitution and makes the preparation of this plan unsound.</p> <p>Legal Compliance</p> <p>-It is questionable whether PfE and the GMSF can effectively be treated as the same 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</p>

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 paid

-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.

-A change in the methodology for Manchester City Council was resulted in a 35% uplift for the Manchester City Council area. The revised Local Housing Need methodology states that the 35% uplift

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	<p>is to be met within the district and not redistributed (see Places for Everyone Joint Committee documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchester.gov.uk/documents/15613/PFE_JC_July2021_ISSUED.pdf This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.</p>
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	This plan needs to go back to Regulation 18 of the Town and Country planning act and be positively prepared with proper public engagement and consultation.
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	Our Strategic Objectives
Type	Web
Include files	PFE1287302.pdf
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	<ol style="list-style-type: none"> 1. Meet our housing need 2. Create neighbourhoods of choice 3. Ensure a thriving and productive economy in the districts involved 4. Maximise the potential arising from our national and international assets 5. Reduce inequalities and improve prosperity 6. Promote the sustainable movement of people, goods and information 7. Ensure that districts involved are more resilient and carbon neutral 8. Improve the quality of our natural environment and access to green spaces 9. Ensure access to physical and social infrastructure 10. Promote the health and wellbeing of communities
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Please take the time to read in full the supporting documents I have provided to you to explain why this plan fails on all the above points.

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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.	Please take the time to read in full the supporting documents I have provided to you to explain why this plan fails on all the above points.
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	Our Spatial Strategy
Type	Web
Include files	PFE1287302.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.	GMCA made the decision to move a poorly prepared plan forward to the publication stage of the Town and Country planning Act even though major changes have been made to the plan since its last round of consultation. For example Stockport withdrew from what was the GMSF and Manchester City council has had a 35% uplift applied to their housing targets to be met within that specific area. This means the plan has changed significantly and therefore requires going back to proper consultation for residents directly affected to comment further.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	As above the plan needs to go back to proper consultation with the residents of Greater Manchester.
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 1 Core Growth Area
Type	Web
Include files	PFE1287302.pdf
Soundness - Positively prepared?	Unsound
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
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 2 City Centre
Type	Web
Include files	PFE1287302.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
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 3 The Quays
Type	Web
Include files	PFE1287302.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
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 4 Port Salford
Type	Web
Include files	PFE1287302.pdf
Soundness - Positively prepared?	Unsound

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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	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 5 Inner Areas
Type	Web
Include files	PFE1287302.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
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 6 Northern Areas
Type	Web
Include files	PFE1287302.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
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 7 North East Growth Corridor
Type	Web
Include files	PFE1287302.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	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 8 Wigan Bolton Growth Corridor
Type	Web
Include files	PFE1287302.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
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 9 Southern Areas
Type	Web
Include files	PFE1287302.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
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 10 Manchester Airport
Type	Web

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Include files	PFE1287302.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
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 11 New Carrington
Type	Web
Include files	PFE1287302.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
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 12 Main Town Centres
Type	Web
Include files	PFE1287302.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
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 13 Strategic Green Infrastructure

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Type	Web
Include files	PFE1287302.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
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 14 A Sustainable and Integrated Transport Network
Type	Web
Include files	PFE1287302.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
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JPA 7: Elton Reservoir Area
Type	Web
Include files	PFE1287302.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	Elton Reservoir Proposal (JPA-7) -The PfE indicates in Para 1.63 point 2 that the most up to date information be used in plan making, so being the most recent Bury's

fails to comply with the duty to co-operate. Please be as precise as possible.

Housing Development Needs Assessment 2020 must be taken into consideration: <https://www.bury.gov.uk/index.aspx?articleid=15866>

-The site selection process for Bury has been especially opaque. Little information has been given about why other more apparently suitable sites were rejected, or what alternatives were considered. Bury Council admitted in a Freedom of Information response that site selection was decided at a series of informal meetings with no list of attendees or minutes available. This site choice cannot be justified as the most appropriate when no reasonable alternatives appear to have been examined. The Elton Reservoir site does not meet the selection criteria laid down in the NPPF or the GMCA guidelines: <https://www.bury.gov.uk/index.aspx?articleid=16330> Radcliffe the location of Elton Reservoir has the least expensive housing in Bury but was selected in preference to sites in other areas where affordable housing is required.

-Para 11.105 p 264 states: " The allocation [Elton Reservoir] is almost entirely surrounded by the existing urban area" Filling this green belt site in will contribute to creating urban sprawl contrary to compliance with National Policy NPPF para 134 parts a,c and e.

-Para 11.105 p 264 states: "Although the allocation has the capacity to deliver a total of around 3,500 new homes, it is anticipated that around 1,900 of these will be delivered within the plan period. Nevertheless, it is considered necessary to release the site in full at this stage given that the scale of the proposed development means that it will need to be supported by significant strategic infrastructure and this level of investment needs the certainty that the remaining development will still be able to come forward beyond the plan period". Such gross over release of greenbelt is entirely contrary to National Guidelines, which regards greenbelt as a precious resource not to be squandered. JPA7 fails to identify the source of infrastructure funding, indeed shortfalls are expected see para 12.16 of PfE. Site owners Peel are not specifically mentioned as being a contributor to the infrastructure funding. Questions should be asked regarding the reasons for Bury Council offering up a huge amount of greenbelt at Elton Reservoir that is not required during the plan period (and may never be required) instead of retaining it in accordance with National Policy.

-The Elton site apparently cost Peel £27M (as detailed in the site allocation topic paper) for approx. 260 hectares (£104K per hectare) as greenbelt. Allowing a conservative price uplift of around 60 times for green belt conversion to development land, the land for the initial 1900 site becomes worth around £875M. Adding in the land for the totally unjustified additional housing beyond the plan period adds approx. another £750 M. The implication being that unless Peel get the whole £1.325 Billion up front they can't offer any upfront funding for the infrastructure. Infrastructure that would not be needed if the development does not go ahead. Peel have indicated that they will possibly build some homes but will definitely split the site into lots to be developed by other developers so they (Peel) would avoid contributions this way. It would be left to Bury to extract the funding from other as yet unknown developers. Bury have a very poor reputation for obtaining developer contributions for infrastructure and developers always try to wriggle out of any obligations. It seems Peel have duped Bury Council into ignoring National Policy and granting them a huge financial bonus with no commitment to do anything.

-Site wildlife, flood risk and other surveys have been carried out by consultancies on behalf of and paid for by developers rather than

entirely independent wildlife organisations or the Department of the Environment so must be considered potentially biased. This is particularly important at Elton Reservoir as there are currently problems with the reservoir wall which are being addressed by the Canal and Rivers trust. These measures may be suitable for providing some protection to open fields but are they suitable to protect homes from flooding if there is a breach? Such surveys should be entirely independent of benefiter influence.

-As part of the infrastructure a new secondary school for Radcliffe is mentioned. A new secondary free school for Radcliffe is already planned funded by the Government. The proposed new school will not even cater for existing Radcliffe pupil numbers. Since the proposed school is indicated on the site already reserved for the free school we must assume PfE document refers to the school already planned. Regeneration for Radcliffe the location of the Elton Reservoir development is also mentioned as part of the infrastructure funding. A regeneration plan for Radcliffe is already in place. Bury Council have applied for Government levelling up funding and have stated that even if the application does not succeed the regeneration will go ahead using existing Council money. Bury Council have stated that regeneration and the new school for Radcliffe are not dependent on PfE going ahead. Any mention/implication that PfE will contribute to providing a new secondary school (unless it is a second school) and regeneration for Radcliffe must be removed from JPA-7.

-Bury Council have consistently failed to meet housing delivery targets and are now in presumption. To be effective a plan must actually be deliverable. The plan relies heavily on the cooperation of property developers. There is no indication of how they will be made to keep up with targets and what sanctions will apply if they don't. At a Council meeting held on 9/9/21 the Leader of Bury Council Eammon O'Brien confirmed that it was "unlikely" that the proposed building rates for all developments in Bury (as laid out in JPA7 Elton Reservoir Topic Paper PfE 2021, section 27.8 page 52) would be met as they were "unrealistic". So the plan cannot be considered to be effective. So the plan fails the effectiveness test for Soundness.

-As part of the overall plan Bury have modified green belt boundaries and allocations in such a way to make it appear that less Greenbelt is being sacrificed. So the loss of the Elton Reservoir site greenbelt has been partially offset by creating extensive greenbelt in other areas without justifying exceptional circumstances. This is not in accordance with National Policy.

-PfE puts the majority of housing in the West of Bury (Elton Reservoir site) while locating the jobs on the East side of Bury on the M66 Northern Gateway corridor completely the other side of an already congested Bury. The proposed new link road will not help this problem as it links one congested area to another.

-PfE para 1.42 states: "The majority of development between 2021 and 2037 (the "plan period") will be on land within the urban area, most of which is brownfield land" PfE favours a brownfield first policy wherever possible as does National Policy. Bury Council have informed the public in Bury that they will implement a brownfield first policy; however, they are going for immediate green belt release (see JPA7 Elton Reservoir Topic Paper PfE 2021, section 27.9 page 52). When questioned at a council meeting on 9/9/21 the Leader of the Councillor Eammon O'Brien clarified this statement by saying that for anything the council themselves build they would

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	adopt a brownfield first policy but claimed that the council have no control over the actions of private developers, in reality they do, as they could limit the release of green belt sites in accordance with National Policy NPPF 134 part e.
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 JPA 7 allocation Elton Reservoir from the plan
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-D1 Infrastructure Implementation
Type	Web
Include files	PFE1287302.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.	Due to the size of the greenbelt sites allocated within the plan it is highly unlikely that the infrastructure can be provided in good time to bring these sites forward within the plan period. This would make the plan deliverable within the plan period hence making it 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.	Smaller sites should be considered that would come forward faster like brownfield sites that already have substantial infrastructure provided close by.
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-D2 Developer Contributions
Type	Web
Include files	PFE1287302.pdf

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.	It is very well documented that once a site is approved for development it can be reviewed at a later date with a viability assessment. Local councils have very little control after a site has been approved for houses and it is common practice for a developer to change the number of homes on the site, density, type and number that are classed as affordable. In some extreme cases a developer can state inflated development costs and no section 106 payments will come forward.
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.	Local council authorities need to enter into more housing partnership projects and develop the land they own instead of selling it and losing control. Salford Council has now created it's own housing building company that will deliver affordable homes on land they own and other councils should follow suit.
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	Bury - Green Belt Additions
Type	Web
Include files	PFE1287302.pdf
GBA Bury - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below	<p>Bury GBA03 Pigs Lea Brook 1</p> <p>Bury GBA04 North of Nuttall Park</p> <p>Bury GBA05 Pigs Lea Brook 2</p> <p>Bury GBA06 Hollins Brook</p> <p>Bury GBA07 Off New Road, Radcliffe</p> <p>Bury GBA08 Hollins Brow</p> <p>Bury GBA09 Hollybank Street, Radcliffe</p> <p>Bury GBA10 Crow Lumb Wood</p> <p>Bury GBA11 Nuttall West, Ramsbottom</p> <p>Bury GBA12 Woolfold, Bury</p> <p>Bury GBA13 Nuttall East, Ramsbottom</p> <p>Bury GBA14 Chesham, Bury</p> <p>Bury GBA15 Broad Hey Wood North</p> <p>Bury GBA16 Lower Hinds</p>
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.	Net greenbelt additions have been nothing but a play on numbers to promote the plan as protecting more greenspace. A lot of the new greenbelt additions are currently not viable for building. This is simply an exercise to take away the protection of greenbelt from usable open greenspaces and apply them elsewhere in the borough to give the impression that the overall net greenbelt percentage loss is less.
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.	Leave the greenbelt boundaries unchanged and present the true loss of greenbelt land in any further proposals.
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	Supporting Evidence
Type	Web
Include files	PFE1287302.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.	<p>Legal Compliance</p> <p>-It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before 'Places for Everyone' can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states 'The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change.' So, is 'not insignificant' the same as 'substantial', if it is, the plan is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government.</p> <p>Soundness</p> <p>Soundness</p> <p>-The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.</p>

-There is little detail on how the required infrastructure will be paid for. The plan needs to be revised to identify how all the infrastructure will be paid

-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.

-A change in the methodology for Manchester City Council was resulted in a 35% uplift for the Manchester City Council area. The revised Local Housing Need methodology states that the 35% uplift is to be met within the district and not redistributed (see Places for Everyone Joint Committee documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii)

https://democracy.greatermanchester.gov.uk/documents/15613/PFE_JC_JUL2021_ISSUED.pdf
This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.