Family Name	Simpson
Given Name	Julia
Person ID	1286900
Title	Stakeholder Submission
Туре	Web
Family Name	Simpson
Given Name	Julia
Person ID	1286900
Title	JPA 2: Stakehill
Туре	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
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.	You are trying to make this sound so appealing when in reality its an absolute travesty and a nightmare for us. The old plan GMSF and the new proposed PfE is in doubt whether they can be treated as the same plan. The legality of this plan must be decided in a court of law before "Places for Everyone" can proceed any further down the line. It has been taken for granted that the old plan and new plan can just be put forward. Whilst the old plan the GMSF may have been put forward as potentially 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 major 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, 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.
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	The plan uses old 2014 data to assess housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population for it to be sound and correct and take into account the huge effect of Covid on working patterns which we all know too well. Where is all the money coming from to fund these changes? We already pay way too much council tax.

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or soundness matters you have identified above.	Who are these huge companies that keep being promised are going to set up massive warehouses in the area, no names have EVER been mentioned.
	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/callfor 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.
Family Name	Simpson
Given Name	Julia
Person ID	1286900
Title	JPA 3.1: Medipark
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 key reason this allocation should be removed from PfE is its ALL GREEN BELT LAND which is protected by national planning policy.
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 uses old data from 2014 to predict housing and totally ignores the potential impact of Covid-19 and Covid has changed everything and how many people now work from home,
	There are so many vehicles on the road now that the thought of having hundreds others is horrendous. There is simply not enough infrastructure.
	Very poor public consultation and very little public awareness, any interest in the plans has been generated by local protest groups. We need much more public consultations where we can have our say.