

Places for Everyone Representation 2021

Family Name	Smith
Given Name	Brenda
Person ID	1286357
Title	Stakeholder Submission
Type	Web
Family Name	Smith
Given Name	Brenda
Person ID	1286357
Title	JPA 35: North of Mosley Common
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
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.	<p>Negative and detrimental impact on Green belt and wildlife.</p> <p>Traffic situation will be exacerbated as will be pollution and poor air quality. Mosley Common Rd is unsuitable for the present amount of traffic, the road is narrow and the problem is increased due to residents having to park out side their homes. This creates a bottle neck outside Eddie"s motor spares and St John"s School.The junction with the East Lancs has already been identified as over used. The recent developments at Parr Bridge has increased the traffic, another possible 1000 cars will make the area a traffic and pollution nightmare!</p> <p>Trying to cross Mosley Common Rd is dangerous especially if you want to access the play area. There is nowhere you cross safely. You have to take your life and that of your childrens in your hands. Traffic turning right into Glendale Rd and traffic turning right into Bridgewater Rd block pedestrians vision. It"s so dangerous as cars dont seem to expect pedestrians will be crossing and will take chances by undertaking ! Many times I have found myself in dangerous situations just trying to cross the road to access the bus stop. Public transport is woefully inadequate, the Guided Bus Way is fine if you work along its route. People who are unfortate enough to work in other areas are poorly served ,however the congestion factor I"m sure comes into it as bus companies must find it hard to run an efficient service.This is a diabolical situation for people to have to cope with that public transport doesn"t serve major employers in the area like Salford Royal Hospital. Patients have to rely on taxis by the way.</p> <p>I would also like to express my concerns about the lack of recreational facilities in the area. We have only one small childrens park with one slide and 6 swings suitable for toddlers and young children for all these families. It"s just not good enough. There are no obvious plans for facilities like shops , cinemas, bowling allies ,skate parks or out door gyms .</p>

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I also note there was no mention of providing new facilities for nursery, primary or secondary education!

Also another point to consider is the impact on an already creaking health service, which will be overwhelmed.

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	Stakeholder Submission
Type	Web
Include files	PFE1287055_SOSWalshaw.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSGeneral.pdf PFE1287055_Objection.pdf PFE1287055_SimisterLegality.pdf
Family Name	Smith
Given Name	C
Person ID	1287055
Title	Our Vision
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSGeneral.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.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>It is questionable whether PfE and the GMSF can effectively be treated as the same. Legality must be decided in court before "Places for Everyone" can proceed any further. It is not clear 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 compliant (complies with Regulation 18 of the Town and Country Planning regulations), therefore possibly proceed to final public consultation and submission under Regulation 18 (stage) PfE legality is not established. If there is any substantial difference in scope between GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. For PfE to be legal, "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms. In 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 decision. Until proven otherwise the plan must be considered illegal and not put to Government for consideration.</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid</p>

	<p>There are no partners or industries identified for employment provision. Major partners provision should be identified.</p> <p>There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information designed to encourage rather than discourage public input.</p> <p>The site selection process has been opaque with no explanation as to why some sites "were excluded from the plan.</p> <p>https://mappinggm.org.uk/call-forsites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public should be held and minutes should be published. The rationale for the selection/rejection should be available including considered alternatives.</p> <p>Several of the authorities involved have consistently failed to meet housing delivery targets. An effective plan must be deliverable. The plan relies on the cooperation of private developers. There is no indication of how delivery targets will be maintained. A strategy for housing delivery rates must be provided. This cannot be left to any local authority that is left behind on housing targets. Clear delivery plans for infrastructure should be included. PfE shows removal of greenbelt protection for some areas and creation of greenbelts for others. There is no proof of exceptional circumstances required in the National Planning Framework to justify this.</p> <p>In addition to PfE each authority needs to come up with its own local plan. No details about when these plans will be available.</p> <p>There are no details of how Duty to Cooperate will be achieved. Following their withdrawal 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 areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.</p> <p>A change in the methodology for Manchester City Council was resulted in a 35% uplift for the City Council area. The revised Local Housing Need methodology states that the 35% uplift is met within the district and not redistributed (see Places for Everyone Joint Committee Report 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021) This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.</p>
Family Name	Smith
Given Name	C
Person ID	1287055
Title	Our Strategic Objectives
Type	Web
Include files	PFE1287055_SOSWalshaw.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSGeneral.pdf PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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 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

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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
Family Name	Smith
Given Name	C
Person ID	1287055
Title	Our Spatial Strategy
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSGeneral.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.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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There are no partners or industries identified for employment provision. Major partners provision should be identified.

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

The site selection process has been opaque with no explanation as to why some sites "were excluded from the plan.

https://mappinggm.org.uk/callforsites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public should be held and minutes should be published. The rationale for the selection/rejection should be available including considered alternatives.

Several of the authorities involved have consistently failed to meet housing delivery targets, a plan must be deliverable. The plan relies on the cooperation of property developers, an indication of how delivery targets will be maintained. A strategy to guarantee housing must be provided. This cannot be left to any local authority that is currently behind on targets. Clear delivery plans for infrastructure should be included.

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

In addition to PfE each authority needs to come up with its own local plan. No details about when these plans will be available.

There are no details of how Duty to Cooperate will be achieved. Following their withdrawal will effectively become a neighbouring borough. However, it is not acceptable to limit other boroughs to Stockport since each of the authorities in the plan is also neighbouring to areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-Strat 1 Core Growth Area
Type	Web
Include files	PFE1287055_SOSWalshaw.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSGeneral.pdf PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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>It is questionable whether PfE and the GMSF can effectively be treated as the same must be decided in court before "Places for Everyone" can proceed any further. It is transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) PfE is established. If there is any substantial difference in scope between the GMSF and PfE it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a significant plan have seen some form of change." So, is "not insignificant" the same as "substantially different" a plan is not legal. This can only be established by a proper judicial review. So until proper judicial review the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid</p> <p>There are no partners or industries identified for employment provision. Major partners and industries for provision should be identified.</p> <p>There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information and consultation designed to encourage rather than discourage public input.</p> <p>The site selection process has been opaque with no explanation as to why some sites were excluded from the plan. https://mappinggm.org.uk/callforsites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public should be held and minutes should be published. The rationale for the selection/rejection of sites should be available including considered alternatives.</p> <p>Several of the authorities involved have consistently failed to meet housing delivery targets and a plan must be deliverable. The plan relies on the cooperation of property developers and an indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on delivery. Clear delivery plans for infrastructure should be included.</p> <p>PfE shows removal of greenbelt protection for some areas and creation of greenbelt areas. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this.</p> <p>In addition to PfE each authority needs to come up with its own local plan. No details are provided about when these plans will be available.</p> <p>There are no details of how Duty to Cooperate will be achieved. Following their withdrawal from the plan will effectively become a neighbouring borough. However, it is not acceptable to limit the plan to Stockport since each of the authorities in the plan is also neighbouring to areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.</p> <p>A change in the methodology for Manchester City Council was resulted in a 35% uplift for the City Council area. The revised Local Housing Need methodology states that the 35% uplift should be met within the district and not redistributed (see Places for Everyone Joint Committee Report 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchester.gov.uk/documents/s15613/PFE_JC_July2021_ISS_UED.pdf) This represents a significant difference between the previous spatial framework the Greater Manchester Spatial Framework and the joint development plan Places for Everyone.</p>
Family Name	Smith

Places for Everyone Representation 2021

Given Name	C
Person ID	1287055
Title	JP-Strat 6 Northern Areas
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSGeneral.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.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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	<p>must be provided. This cannot be left to any local authority that is currently behind on Clear delivery plans for infrastructure should be included.</p> <p>PfE shows removal of greenbelt protection for some areas and creation of greenbelt. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this.</p> <p>In addition to PfE each authority needs to come up with its own local plan. No details about when these plans will be available.</p> <p>There are no details of how Duty to Cooperate will be achieved. Following their withdrawal will effectively become a neighbouring borough. However, it is not acceptable to limit other boroughs to Stockport since each of the authorities in the plan is also neighbouring to areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.</p> <p>A change in the methodology for Manchester City Council was resulted in a 35% uplift for the City Council area. The revised Local Housing Need methodology states that the 35% uplift was met within the district and not redistributed (see Places for Everyone Joint Committee Report 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchester.gov.uk/documents/s15613/PFE_JC_July2021_ISS_UED.pdf This represents a significant difference between the previous spatial framework the Greater Manchester Spatial Framework and the joint development plan Places for Everyone.</p>
Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-Strat 7 North East Growth Corridor
Type	Web
Include files	PFE1287055_SOSWalshaw.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSGeneral.pdf PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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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The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population take into account the effect of Covid on work patterns.

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

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

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In addition to PfE each authority needs to come up with its own local plan. No details are provided about when these plans will be available.

There are no details of how Duty to Cooperate will be achieved. Following their withdrawal, the plan will effectively become a neighbouring borough. However, it is not acceptable to limit the plan to neighbouring boroughs to Stockport since each of the authorities in the plan is also neighbouring to areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-Strat 13 Strategic Green Infrastructure
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSGeneral.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.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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	met within the district and not redistributed (see Places for Everyone Joint Committee 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchester.gov.uk/documents/s15613/PFE_JC_July2021_ISS_UED.pdf This represents a significant difference between the previous spatial framework the Greater Manchester Spatial Framework and the joint development plan Places for Everyone.
Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-S 1 Sustainable Development
Type	Web
Include files	PFE1287055_SOSWalshaw.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSGeneral.pdf PFE1287055_Objection.pdf PFE1287055_SimisterLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	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.	<p>It is questionable whether PfE and the GMSF can effectively be treated as the same. This must be decided in court before "Places for Everyone" can proceed any further. It is a significant transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if established. If there is any substantial difference in scope between the GMSF and PfE, it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a significant number of sites in the plan have seen some form of change." So, is "not insignificant" the same as "substantially different"? If the plan is not legal. This can only be established by a proper judicial review. So until proper legal advice is sought, the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid for.</p> <p>There are no partners or industries identified for employment provision. Major partners for employment provision should be identified.</p> <p>There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information and a process designed to encourage rather than discourage public input.</p> <p>The site selection process has been opaque with no explanation as to why some sites were excluded from the plan.</p> <p>https://mappinggm.org.uk/callforsites/#os_maps_outdoor/16/53.6380/-2.3228 The pr</p>

Places for Everyone Representation 2021

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-S 2 Carbon and Energy
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSGeneral.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.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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comply with the duty to co-operate. Please be as precise as possible.

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Family Name

Smith

Given Name

C

Person ID

1287055

Title

JP-S 3 Heat and Energy Networks

Type

Web

Include files

[PFE1287055_SOSWalshaw.pdf](#)
[PFE1287055_SOSElton.pdf](#)
[PFE1287055_SOSGeneral.pdf](#)

	PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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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Places for Everyone Representation 2021

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-S 4 Resilience
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSGeneral.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.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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Places for Everyone Representation 2021

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-S 5 Flood Risk and Water Environment
Type	Web
Include files	PFE1287055_SOSWalshaw.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSGeneral.pdf PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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>It is questionable whether PfE and the GMSF can effectively be treated as the same must be decided in court before "Places for Everyone" can proceed any further. It is transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) PfE is established. If there is any substantial difference in scope between the GMSF and PfE it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a substantial plan have seen some form of change." So, is "not insignificant" the same as "substantially different" a plan is not legal. This can only be established by a proper judicial review. So until proper judicial review the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid</p> <p>There are no partners or industries identified for employment provision. Major partners and industries for provision should be identified.</p> <p>There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information and consultation designed to encourage rather than discourage public input.</p> <p>The site selection process has been opaque with no explanation as to why some sites were excluded from the plan. https://mappinggm.org.uk/callforsites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public should be held and minutes should be published. The rationale for the selection/rejection of sites should be available including considered alternatives.</p> <p>Several of the authorities involved have consistently failed to meet housing delivery targets and a plan must be deliverable. The plan relies on the cooperation of property developers and an indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on delivery. Clear delivery plans for infrastructure should be included.</p> <p>PfE shows removal of greenbelt protection for some areas and creation of greenbelt areas. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this.</p> <p>In addition to PfE each authority needs to come up with its own local plan. No details are provided about when these plans will be available.</p> <p>There are no details of how Duty to Cooperate will be achieved. Following their withdrawal from the plan will effectively become a neighbouring borough. However, it is not acceptable to limit the plan to Stockport since each of the authorities in the plan is also neighbouring to areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.</p> <p>A change in the methodology for Manchester City Council was resulted in a 35% uplift for the City Council area. The revised Local Housing Need methodology states that the 35% uplift should be met within the district and not redistributed (see Places for Everyone Joint Committee Report 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchester.gov.uk/documents/s15613/PFE_JC_July2021_ISS_UED.pdf) This represents a significant difference between the previous spatial framework the Greater Manchester Spatial Framework and the joint development plan Places for Everyone.</p>
Family Name	Smith

Places for Everyone Representation 2021

Given Name	C
Person ID	1287055
Title	JP-S 6 Clean Air
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSGeneral.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.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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Places for Everyone Representation 2021

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-S 7 Resource Efficiency
Type	Web
Include files	PFE1287055_SOSWalshaw.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSGeneral.pdf PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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	Smith
Given Name	C
Person ID	1287055
Title	JP-J 1 Supporting Long Term Economic Growth
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSGeneral.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.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>It is questionable whether PfE and the GMSF can effectively be treated as the same must be decided in court before "Places for Everyone" can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) PfE is not established. If there is any substantial difference in scope between the GMSF and PfE it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a number of the plan have seen some form of change." So, is "not insignificant" the same as "substantial"? If a plan is not legal. This can only be established by a proper judicial review. So until a proper judicial review the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid</p> <p>There are no partners or industries identified for employment provision. Major partners and industries for provision should be identified.</p> <p>There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information designed to encourage rather than discourage public input.</p> <p>The site selection process has been opaque with no explanation as to why some sites were excluded from the plan. https://mappinggm.org.uk/callforsites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public should be held and minutes should be published. The rationale for the selection/rejection of sites should be available including considered alternatives.</p> <p>Several of the authorities involved have consistently failed to meet housing delivery targets. A plan must be deliverable. The plan relies on the cooperation of property developers. A clear indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on delivery. Clear delivery plans for infrastructure should be included.</p> <p>PfE shows removal of greenbelt protection for some areas and creation of greenbelt. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this.</p> <p>In addition to PfE each authority needs to come up with its own local plan. No details are provided about when these plans will be available.</p> <p>There are no details of how Duty to Cooperate will be achieved. Following their withdrawal from the plan will effectively become a neighbouring borough. However, it is not acceptable to limit the plan to Stockport since each of the authorities in the plan is also neighbouring to areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.</p> <p>A change in the methodology for Manchester City Council was resulted in a 35% uplift for the City Council area. The revised Local Housing Need methodology states that the 35%</p>

Places for Everyone Representation 2021

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-J 2 Employment Sites and Premises
Type	Web
Include files	PFE1287055_SOSWalshaw.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSGeneral.pdf PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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>It is questionable whether PfE and the GMSF can effectively be treated as the same plan. This must be decided in court before "Places for Everyone" can proceed any further. It is a significant transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if it was established. If there is any substantial difference in scope between the GMSF and PfE, it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a significant number of sites in the plan have seen some form of change." So, is "not insignificant" the same as "substantially different"? If the plan is not legal. This can only be established by a proper judicial review. So until a proper judicial review the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid for.</p> <p>There are no partners or industries identified for employment provision. Major partners for employment provision should be identified.</p> <p>There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information and a process designed to encourage rather than discourage public input.</p> <p>The site selection process has been opaque with no explanation as to why some sites were excluded from the plan.</p> <p>https://mappinggm.org.uk/callforsites/#os_maps_outdoor/16/53.6380/-2.3228 The pr</p>

Places for Everyone Representation 2021

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-J 3 Office Development
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSGeneral.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.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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comply with the duty to co-operate. Please be as precise as possible.

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The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population 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 identify how all the infrastructure will be paid

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Family Name

Smith

Given Name

C

Person ID

1287055

Title

JP-J 4 Industry and Warehousing Development

Type

Web

Include files

[PFE1287055_SOSWalshaw.pdf](#)
[PFE1287055_SOSElton.pdf](#)
[PFE1287055_SOSGeneral.pdf](#)

	PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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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Places for Everyone Representation 2021

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSGeneral.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.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>It is questionable whether PfE and the GMSF can effectively be treated as the same. This must be decided in court before "Places for Everyone" can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if established. If there is any substantial difference in scope between the GMSF and PfE it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a significant number of the plan have seen some form of change." So, is "not insignificant" the same as "substantial"? If the plan is not legal. This can only be established by a proper judicial review. So until proper legal advice is given the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid for.</p> <p>There are no partners or industries identified for employment provision. Major partners and industries for employment provision should be identified.</p>

Places for Everyone Representation 2021

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-H 2 Affordability of New Housing
Type	Web
Include files	PFE1287055_SOSWalshaw.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSGeneral.pdf PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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	Smith

Places for Everyone Representation 2021

Given Name	C
Person ID	1287055
Title	JP-H 3 Type Size and Design of New Housing
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSGeneral.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
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Compliance - Legally compliant?	No
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Places for Everyone Representation 2021

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-H 4 Density of New Housing
Type	Web
Include files	PFE1287055_SOSWalshaw.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSGeneral.pdf PFE1287055_Objection.pdf PFE1287055_SimisterLegality.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
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The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population take into account the effect of Covid on work patterns.

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

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

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

The site selection process has been opaque with no explanation as to why some sites were excluded from the plan.

https://mappinggm.org.uk/callforsites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with the public should be held and minutes should be published. The rationale for the selection/rejection of sites should be available including considered alternatives.

Several of the authorities involved have consistently failed to meet housing delivery targets. 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 must be provided. This cannot be left to any local authority that is currently behind on its targets. Clear delivery plans for infrastructure should be included.

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

In addition to PfE each authority needs to come up with its own local plan. No details are provided about when these plans will be available.

There are no details of how Duty to Cooperate will be achieved. Following their withdrawal, the plan will effectively become a neighbouring borough. However, it is not acceptable to limit the plan to Stockport since each of the authorities in the plan is also neighbouring to areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.

A change in the methodology for Manchester City Council was resulted in a 35% uplift for the City Council area. The revised Local Housing Need methodology states that the 35% uplift is met within the district and not redistributed (see Places for Everyone Joint Committee Report 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchester.gov.uk/documents/s15613/PFE_JC_July2021_ISS_UED.pdf) This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the joint development plan Places for Everyone.

Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-G 1 Valuing Important Landscapes
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSGeneral.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.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>It is questionable whether PfE and the GMSF can effectively be treated as the same must be decided in court before "Places for Everyone" can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) PfE is not established. If there is any substantial difference in scope between the GMSF and PfE it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a number of the plan have seen some form of change." So, is "not insignificant" the same as "substantially different" plan is not legal. This can only be established by a proper judicial review. So until proper judicial review the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population projections and must take into account the effect of Covid on work patterns.</p> <p>There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid</p> <p>There are no partners or industries identified for employment provision. Major partners and industries for provision should be identified.</p> <p>There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information designed to encourage rather than discourage public input.</p> <p>The site selection process has been opaque with no explanation as to why some sites were excluded from the plan. https://mappinggm.org.uk/callforsites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public should be held and minutes should be published. The rationale for the selection/rejection of sites should be available including considered alternatives.</p> <p>Several of the authorities involved have consistently failed to meet housing delivery targets. A plan must be deliverable. The plan relies on the cooperation of property developers and a clear indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on delivery. Clear delivery plans for infrastructure should be included.</p> <p>PfE shows removal of greenbelt protection for some areas and creation of greenbelt areas. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this.</p> <p>In addition to PfE each authority needs to come up with its own local plan. No details are provided about when these plans will be available.</p> <p>There are no details of how Duty to Cooperate will be achieved. Following their withdrawal from the plan will effectively become a neighbouring borough. However, it is not acceptable to limit the plan to Stockport since each of the authorities in the plan is also neighbouring to areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.</p> <p>A change in the methodology for Manchester City Council was resulted in a 35% uplift for the City Council area. The revised Local Housing Need methodology states that the 35%</p>

Places for Everyone Representation 2021

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-G 2 Green Infrastructure Network
Type	Web
Include files	PFE1287055_SOSWalshaw.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSGeneral.pdf PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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>It is questionable whether PfE and the GMSF can effectively be treated as the same. This must be decided in court before "Places for Everyone" can proceed any further. It is a significant transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if established. If there is any substantial difference in scope between the GMSF and PfE, it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a significant number of sites in the plan have seen some form of change." So, is "not insignificant" the same as "substantially different"? If the plan is not legal. This can only be established by a proper judicial review. So until proper judicial review the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid</p> <p>There are no partners or industries identified for employment provision. Major partners for employment provision should be identified.</p> <p>There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information and a process designed to encourage rather than discourage public input.</p> <p>The site selection process has been opaque with no explanation as to why some sites were excluded from the plan. https://mappinggm.org.uk/callforsites/#os_maps_outdoor/16/53.6380/-2.3228 The pr</p>

Places for Everyone Representation 2021

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-G 3 River Valleys and Waterways
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSGeneral.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.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	<p>It is questionable whether PfE and the GMSF can effectively be treated as the same. This must be decided in court before "Places for Everyone" can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant (with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) F</p>

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

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Family Name

Smith

Given Name

C

Person ID

1287055

Title

JP-G 4 Lowland Wetlands and Mosslands

Type

Web

Include files

[PFE1287055_SOSWalshaw.pdf](#)
[PFE1287055_SOSElton.pdf](#)
[PFE1287055_SOSGeneral.pdf](#)

	<p>PFE1287055_Objection.pdf PFE1287055_SimisterLegality.pdf</p>
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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Places for Everyone Representation 2021

	<p>There are no details of how Duty to Cooperate will be achieved. Following their withdrawal the plan will effectively become a neighbouring borough. However, it is not acceptable to limit the plan to Stockport since each of the authorities in the plan is also neighbouring to areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.</p> <p>A change in the methodology for Manchester City Council was resulted in a 35% uplift for the City Council area. The revised Local Housing Need methodology states that the 35% uplift is met within the district and not redistributed (see Places for Everyone Joint Committee Report 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchester.gov.uk/documents/s15613/PFE_JC_July2021_ISS_UED.pdf) This represents a significant difference between the previous spatial framework the Greater Manchester Spatial Framework and the joint development plan Places for Everyone.</p>
Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-G 5 Uplands
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSGeneral.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.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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Places for Everyone Representation 2021

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-G 6 Urban Green Space
Type	Web
Include files	PFE1287055_SOSWalshaw.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSGeneral.pdf PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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	Smith

Places for Everyone Representation 2021

Given Name	C
Person ID	1287055
Title	Other Comments
Type	Web
Include files	PFE1287055_SOSGeneral.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.pdf PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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	Smith
Given Name	C
Person ID	1287055
Title	JP-G 7 Trees and Woodland
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSGeneral.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.pdf
Soundness - Positively prepared?	Unsound
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Soundness - Consistent with national policy?	Unsound
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Several of the authorities involved have consistently failed to meet housing delivery targets. A plan must be deliverable. The plan relies on the cooperation of property developers. An indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on delivery. Clear delivery plans for infrastructure should be included.

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

In addition to PfE each authority needs to come up with its own local plan. No details of when these plans will be available.

There are no details of how Duty to Cooperate will be achieved. Following their withdrawal, the plan will effectively become a neighbouring borough. However, it is not acceptable to limit the plan to Stockport since each of the authorities in the plan is also neighbouring to other boroughs outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.

A change in the methodology for Manchester City Council was resulted in a 35% uplift for the City Council area. The revised Local Housing Need methodology states that the 35% uplift should be met within the district and not redistributed (see Places for Everyone Joint Committee Report 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchester.gov.uk/documents/s15613/PFE_JC_July2021_ISS_UED.pdf) This represents a significant difference between the previous spatial framework the Greater Manchester Spatial Framework and the joint development plan Places for Everyone.

Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-G 8 Standards for Greener Places
Type	Web
Include files	PFE1287055_SOSWalshaw.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSGeneral.pdf PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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>It is questionable whether PfE and the GMSF can effectively be treated as the same must be decided in court before "Places for Everyone" can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if established. If there is any substantial difference in scope between the GMSF and PfE, it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a number of sites in the plan have seen some form of change." So, is "not insignificant" the same as "substantially different" if the plan is not legal. This can only be established by a proper judicial review. So until a proper judicial review the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid for.</p> <p>There are no partners or industries identified for employment provision. Major partners and industries for employment provision should be identified.</p> <p>There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information and consultation designed to encourage rather than discourage public input.</p> <p>The site selection process has been opaque with no explanation as to why some sites were excluded from the plan. https://mappinggm.org.uk/callforsites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public should be held and minutes should be published. The rationale for the selection/rejection of sites should be available including considered alternatives.</p> <p>Several of the authorities involved have consistently failed to meet housing delivery targets and a plan must be deliverable. The plan relies on the cooperation of property developers and should include an indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on delivery. Clear delivery plans for infrastructure should be included.</p> <p>PfE shows removal of greenbelt protection for some areas and creation of greenbelt areas. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this.</p> <p>In addition to PfE each authority needs to come up with its own local plan. No details of when these plans will be available.</p> <p>There are no details of how Duty to Cooperate will be achieved. Following their withdrawal from the plan will effectively become a neighbouring borough. However, it is not acceptable to limit the plan to Stockport since each of the authorities in the plan is also neighbouring to</p>

Places for Everyone Representation 2021

	<p>outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn Wigan neighbours St Helens and Trafford neighbours Cheshire area.</p> <p>A change in the methodology for Manchester City Council was resulted in a 35% uplift for City Council area. The revised Local Housing Need methodology states that the 35% met within the district and not redistributed (see Places for Everyone Joint Committee 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchester.gov.uk/documents/s15613/PFE_JC_July2021_ISS UED.pdf This represents a significant difference between the previous spatial framework the Greater Manchester Spatial Framework joint development plan Places for Everyone.</p>
Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-G 9 A Net Enhancement of Biodiversity and Geodiversity
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSGeneral.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.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>It is questionable whether PfE and the GMSF can effectively be treated as the same must be decided in court before "Places for Everyone" can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if established. If there is any substantial difference in scope between the GMSF and PfE assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a plan have seen some form of change." So, is "not insignificant" the same as "substantially different" if a plan is not legal. This can only be established by a proper judicial review. So until proper judicial review the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid</p> <p>There are no partners or industries identified for employment provision. Major partners for employment provision should be identified.</p> <p>There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local pro</p>

public consultations should be repeated, providing clear, understandable information designed to encourage rather than discourage public input.

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

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-G 10 Green Belt
Type	Web
Include files	PFE1287055_SOSWalshaw.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSGeneral.pdf PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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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<p>Family Name</p>	<p>Smith</p>
<p>Given Name</p>	<p>C</p>
<p>Person ID</p>	<p>1287055</p>

Places for Everyone Representation 2021

Title	JP-G 11 Safeguarded Land
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSGeneral.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.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>It is questionable whether PfE and the GMSF can effectively be treated as the same must be decided in court before "Places for Everyone" can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if established. If there is any substantial difference in scope between the GMSF and PfE, it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a plan have seen some form of change." So, is "not insignificant" the same as "substantial"? A plan is not legal. This can only be established by a proper judicial review. So until proper judicial review the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid</p> <p>There are no partners or industries identified for employment provision. Major partners and industries for employment provision should be identified.</p> <p>There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information and feedback designed to encourage rather than discourage public input.</p> <p>The site selection process has been opaque with no explanation as to why some sites were excluded from the plan. https://mappinggm.org.uk/callforsites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public should be held and minutes should be published. The rationale for the selection/rejection of sites should be available including considered alternatives.</p> <p>Several of the authorities involved have consistently failed to meet housing delivery targets. A plan must be deliverable. The plan relies on the cooperation of property developers and a clear indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on delivery. Clear delivery plans for infrastructure should be included.</p>

Places for Everyone Representation 2021

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-P1 Sustainable Places
Type	Web
Include files	PFE1287055_SOSWalshaw.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSGeneral.pdf PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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>It is questionable whether PfE and the GMSF can effectively be treated as the same. This must be decided in court before "Places for Everyone" can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if established. If there is any substantial difference in scope between the GMSF and PfE it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a number of the plan have seen some form of change." So, is "not insignificant" the same as "substantial"? If a plan is not legal. This can only be established by a proper judicial review. So until a proper review the plan must be considered illegal and not put to Government. Soundness</p>

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

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

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

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

The site selection process has been opaque with no explanation as to why some sites were excluded from the plan.

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

In addition to PfE each authority needs to come up with its own local plan. No details are provided about when these plans will be available.

There are no details of how Duty to Cooperate will be achieved. Following their withdrawal, the plan will effectively become a neighbouring borough. However, it is not acceptable to limit the plan to Stockport since each of the authorities in the plan is also neighbouring to areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.

A change in the methodology for Manchester City Council was resulted in a 35% uplift for the City Council area. The revised Local Housing Need methodology states that the 35% uplift should be met within the district and not redistributed (see Places for Everyone Joint Committee Report 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchester.gov.uk/documents/s15613/PFE_JC_July2021_ISS_UED.pdf) This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the joint development plan Places for Everyone.

Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-P2 Heritage
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSGeneral.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.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>It is questionable whether PfE and the GMSF can effectively be treated as the same must be decided in court before "Places for Everyone" can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) PfE is not established. If there is any substantial difference in scope between the GMSF and PfE it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a number of the plan have seen some form of change." So, is "not insignificant" the same as "substantial"? If a plan is not legal. This can only be established by a proper judicial review. So until a proper judicial review the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid</p> <p>There are no partners or industries identified for employment provision. Major partners and industries for provision should be identified.</p> <p>There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information designed to encourage rather than discourage public input.</p> <p>The site selection process has been opaque with no explanation as to why some sites were excluded from the plan. https://mappinggm.org.uk/callforsites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public should be held and minutes should be published. The rationale for the selection/rejection of sites should be available including considered alternatives.</p> <p>Several of the authorities involved have consistently failed to meet housing delivery targets. A plan must be deliverable. The plan relies on the cooperation of property developers and a clear indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on delivery. Clear delivery plans for infrastructure should be included.</p> <p>PfE shows removal of greenbelt protection for some areas and creation of greenbelt areas. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this.</p> <p>In addition to PfE each authority needs to come up with its own local plan. No details are provided about when these plans will be available.</p> <p>There are no details of how Duty to Cooperate will be achieved. Following their withdrawal from the plan will effectively become a neighbouring borough. However, it is not acceptable to limit the plan to Stockport since each of the authorities in the plan is also neighbouring to areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.</p> <p>A change in the methodology for Manchester City Council was resulted in a 35% uplift for the City Council area. The revised Local Housing Need methodology states that the 35%</p>

Places for Everyone Representation 2021

	met within the district and not redistributed (see Places for Everyone Joint Committee 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchester.gov.uk/documents/s15613/PFE_JC_July2021_ISS_UED.pdf This represents a significant difference between the previous spatial framework the Greater Manchester Spatial Framework and the joint development plan Places for Everyone.
Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-P3 Cultural Facilities
Type	Web
Include files	PFE1287055_SOSWalshaw.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSGeneral.pdf PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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>It is questionable whether PfE and the GMSF can effectively be treated as the same. This must be decided in court before "Places for Everyone" can proceed any further. It is a significant transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant (with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if established. If there is any substantial difference in scope between the GMSF and PfE, it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a significant number of sites in the plan have seen some form of change." So, is "not insignificant" the same as "substantially different"? If the plan is not legal. This can only be established by a proper judicial review. So until a proper judicial review the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid for.</p> <p>There are no partners or industries identified for employment provision. Major partners for employment provision should be identified.</p> <p>There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information and a process designed to encourage rather than discourage public input.</p> <p>The site selection process has been opaque with no explanation as to why some sites were excluded from the plan. https://mappinggm.org.uk/callforsites/#os_maps_outdoor/16/53.6380/-2.3228 The pr</p>

Places for Everyone Representation 2021

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-P4 New Retail and Leisure Uses in Town Centres
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSGeneral.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.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

Smith

Given Name

C

Person ID

1287055

Title

JP-P5 Education Skills and Knowledge

Type

Web

Include files

[PFE1287055_SOSWalshaw.pdf](#)
[PFE1287055_SOSElton.pdf](#)
[PFE1287055_SOSGeneral.pdf](#)

	PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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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Places for Everyone Representation 2021

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-P6 Health
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.pdf PFE1287055_SOSGeneral.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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Places for Everyone Representation 2021

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-P7 Sport and Recreation
Type	Web
Include files	PFE1287055_SOSGeneral.pdf PFE1287055_SOSWalshaw.pdf PFE1287055_SOSElton.pdf PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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	Smith

Places for Everyone Representation 2021

Given Name	C
Person ID	1287055
Title	JPA 7: Elton Reservoir Area
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.pdf PFE1287055_SOSGeneral.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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Places for Everyone Representation 2021

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JPA 8: Seedfield
Type	Web
Include files	PFE1287055_SOSGeneral.pdf PFE1287055_SOSWalshaw.pdf PFE1287055_SOSElton.pdf PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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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Family Name	Smith
Given Name	C
Person ID	1287055
Title	JPA 9: Walshaw
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.pdf PFE1287055_SOSGeneral.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>It is questionable whether PfE and the GMSF can effectively be treated as the same must be decided in court before "Places for Everyone" can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) PfE is not established. If there is any substantial difference in scope between the GMSF and PfE it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a number of the plan have seen some form of change." So, is "not insignificant" the same as "substantial"? If a plan is not legal. This can only be established by a proper judicial review. So until a proper judicial review the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid</p> <p>There are no partners or industries identified for employment provision. Major partners and industries for provision should be identified.</p> <p>There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information designed to encourage rather than discourage public input.</p> <p>The site selection process has been opaque with no explanation as to why some sites were excluded from the plan. https://mappinggm.org.uk/callforsites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public should be held and minutes should be published. The rationale for the selection/rejection of sites should be available including considered alternatives.</p> <p>Several of the authorities involved have consistently failed to meet housing delivery targets. A plan must be deliverable. The plan relies on the cooperation of property developers and a clear indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on delivery. Clear delivery plans for infrastructure should be included.</p> <p>PfE shows removal of greenbelt protection for some areas and creation of greenbelt areas. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this.</p> <p>In addition to PfE each authority needs to come up with its own local plan. No details are provided about when these plans will be available.</p> <p>There are no details of how Duty to Cooperate will be achieved. Following their withdrawal from the plan will effectively become a neighbouring borough. However, it is not acceptable to limit the plan to Stockport since each of the authorities in the plan is also neighbouring to areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.</p> <p>A change in the methodology for Manchester City Council was resulted in a 35% uplift for the City Council area. The revised Local Housing Need methodology states that the 35%</p>

Places for Everyone Representation 2021

	met within the district and not redistributed (see Places for Everyone Joint Committee 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchester.gov.uk/documents/s15613/PFE_JC_July2021_ISS UED.pdf This represents a significant difference between the previous spatial framework the Greater Manchester Spatial Framework and the joint development plan Places for Everyone.
Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-D1 Infrastructure Implementation
Type	Web
Include files	PFE1287055_SOSGeneral.pdf PFE1287055_SOSWalshaw.pdf PFE1287055_SOSElton.pdf PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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>It is questionable whether PfE and the GMSF can effectively be treated as the same. This must be decided in court before "Places for Everyone" can proceed any further. It is a significant transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if established. If there is any substantial difference in scope between the GMSF and PfE, it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a significant number of sites in the plan have seen some form of change." So, is "not insignificant" the same as "substantially different"? If the plan is not legal. This can only be established by a proper judicial review. So until proper legal advice is sought, the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid for.</p> <p>There are no partners or industries identified for employment provision. Major partners for employment provision should be identified.</p> <p>There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information and a process designed to encourage rather than discourage public input.</p> <p>The site selection process has been opaque with no explanation as to why some sites were excluded from the plan. https://mappinggm.org.uk/callforsites/#os_maps_outdoor/16/53.6380/-2.3228 The pr</p>

Places for Everyone Representation 2021

	<p>repeated using National and GMCA guidelines for site selection. Meetings with public should be held and minutes should be published. The rationale for the selection/rejection should be available including considered alternatives.</p> <p>Several of the authorities involved have consistently failed to meet housing delivery targets, a plan must be deliverable. The plan relies on the cooperation of property developers, an indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on targets. Clear delivery plans for infrastructure should be included.</p> <p>PfE shows removal of greenbelt protection for some areas and creation of greenbelt, there is no proof of exceptional circumstances required in the National Planning Policy Framework for this.</p> <p>In addition to PfE each authority needs to come up with its own local plan. No details about when these plans will be available.</p> <p>There are no details of how Duty to Cooperate will be achieved. Following their withdrawal 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 areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn, Wigan neighbours St Helens and Trafford neighbours Cheshire area.</p> <p>A change in the methodology for Manchester City Council was resulted in a 35% uplift for the City Council area. The revised Local Housing Need methodology states that the 35% uplift was met within the district and not redistributed (see Places for Everyone Joint Committee Report 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchester.gov.uk/documents/s15613/PFE_JC_July2021_ISS_UED.pdf This represents a significant difference between the previous spatial framework the Greater Manchester Spatial Framework and the joint development plan Places for Everyone.</p>
Family Name	Smith
Given Name	C
Person ID	1287055
Title	JP-D2 Developer Contributions
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.pdf PFE1287055_SOSGeneral.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	<p>It is questionable whether PfE and the GMSF can effectively be treated as the same. This must be decided in court before "Places for Everyone" can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) F</p>

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

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Family Name

Smith

Given Name

C

Person ID

1287055

Title

Bury - Green Belt Additions

Type

Web

Include files

[PFE1287055_SOSGeneral.pdf](#)
[PFE1287055_SOSWalshaw.pdf](#)
[PFE1287055_SOSElton.pdf](#)

Places for Everyone Representation 2021

	PFE1287055_Objection.pdf PFE1287055_SimisterLegality.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?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
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Family Name	Smith
Given Name	C
Person ID	1287055
Title	Supporting Evidence
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_Objection.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSWalshaw.pdf PFE1287055_SOSGeneral.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>It is questionable whether PfE and the GMSF can effectively be treated as the same plan. This must be decided in court before 'Places for Everyone' can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant (with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if established. If there is any substantial difference in scope between the GMSF and PfE it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states 'The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a plan have seen some form of change.' So, is 'not insignificant' the same as 'substantial' if it 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</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p>

Places for Everyone Representation 2021

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Family Name	Smith
Given Name	C
Person ID	1287055
Title	Other Comments
Type	Web
Include files	PFE1287055_SOSGeneral.pdf PFE1287055_Objection.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
Family Name	Smith
Given Name	C
Person ID	1287055
Title	Other Comments
Type	Web
Include files	PFE1287055_Objection.pdf PFE1287055_SOSGeneral.pdf
Soundness - Positively prepared?	Unsound
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Family Name	Smith
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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	Smith
Given Name	C
Person ID	1287055
Title	Other Comments

Places for Everyone Representation 2021

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Include files	PFE1287055_SimisterLegality.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSGeneral.pdf PFE1287055_SOSWalshaw.pdf PFE1287055_Objection.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	Smith
Given Name	C
Person ID	1287055
Title	JPA 1.2: Simister and Bowlee (Northern Gateway)
Type	Web
Include files	PFE1287055_SimisterLegality.pdf PFE1287055_SOSWalshaw.pdf PFE1287055_SOSElton.pdf PFE1287055_SOSGeneral.pdf PFE1287055_Objection.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
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Places for Everyone Representation 2021

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