

Places for Everyone Representation 2021

<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	Our Vision
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before "Places for Everyone" can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan

(PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change." So, is "not insignificant" the same as "substantial", if it is, the plan is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government.

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

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

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

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	<p>In addition to PfE each authority needs to come up with its own local plan. No details have been given about when these plans will be available.</p> <p>There are no details of how Duty to Cooperate will be achieved. Following their withdrawal Stockport will effectively become a neighbouring borough. However, it is not acceptable to limit neighbouring boroughs to Stockport since each of the authorities in the plan is also neighbouring to other authorities outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn with Darwen, Wigan neighbours St Helens and Trafford neighbours Cheshire area.</p> <p>A change in the methodology for Manchester City Council was resulted in a 35% uplift for the Manchester City Council area. The revised Local Housing Need methodology states that the 35% uplift is to be met within the district and not redistributed (see Places for Everyone Joint Committee documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) <a href="https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021_ISSUED.pdf">h?ps://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021_ISSUED.pdf</a>) 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>
<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	Our Strategic Objectives
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:</b>	<p>1. Meet our housing need</p> <p>8. Improve the quality of our natural environment and access to green spaces</p> <p>9. Ensure access to physical and social infrastructure</p> <p>10. Promote the health and wellbeing of communities</p>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	NA
<b>Soundness - Consistent with national policy?</b>	NA
<b>Soundness - Effective?</b>	NA
<b>Compliance - Legally compliant?</b>	No

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<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	Our Spatial Strategy
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a>
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<b>Family Name</b>	Smith
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<b>Title</b>	JP-Strat 1 Core Growth Area
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
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<b>Family Name</b>	Smith
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<b>Person ID</b>	1287055
<b>Title</b>	JP-Strat 6 Northern Areas
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
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<b>Person ID</b>	1287055
<b>Title</b>	JP-Strat 7 North East Growth Corridor
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
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	Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.
<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	JP-S 1 Sustainable Development
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before "Places for Everyone" can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change." So, is "not insignificant" the same as "substantial", if it is, the plan is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.</p>

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<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	JP-S 2 Carbon and Energy
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
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<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	JP-S 3 Heat and Energy Networks
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
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<b>Person ID</b>	1287055
<b>Title</b>	JP-S 4 Resilience
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
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<b>Compliance - Legally compliant?</b>	No
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<b>Person ID</b>	1287055
<b>Title</b>	JP-S 5 Flood Risk and Water Environment
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
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<b>Title</b>	JP-S 6 Clean Air
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a>
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Places for Everyone Representation 2021

	Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.
<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	JP-S 7 Resource Efficiency
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before "Places for Everyone" can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change." So, is "not insignificant" the same as "substantial", if it is, the plan is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.</p>

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<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	JP-J 1 Supporting Long Term Economic Growth
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
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<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	JP-J 2 Employment Sites and Premises
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
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<b>Person ID</b>	1287055
<b>Title</b>	JP-J 3 Office Development
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
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<b>Title</b>	JP-J 4 Industry and Warehousing Development
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
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<b>Person ID</b>	1287055
<b>Title</b>	JP-H 1 Scale Distribution and Phasing of New Housing Development
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a>
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Places for Everyone Representation 2021

	Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.
<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	JP-H 2 Affordability of New Housing
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before "Places for Everyone" can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change." So, is "not insignificant" the same as "substantial", if it is, the plan is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.</p>

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Places for Everyone Representation 2021

	Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.
<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	JP-H 3 Type Size and Design of New Housing
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
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<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	JP-H 4 Density of New Housing
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
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<b>Title</b>	JP-G 1 Valuing Important Landscapes
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
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<b>Title</b>	JP-G 2 Green Infrastructure Network
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
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<b>Title</b>	JP-G 3 River Valleys and Waterways
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
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	Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.
<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	JP-G 4 Lowland Wetlands and Mosslands
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before "Places for Everyone" can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change." So, is "not insignificant" the same as "substantial", if it is, the plan is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.</p>

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<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	JP-G 5 Uplands
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
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<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	JP-G 6 Urban Green Space
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
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<b>Person ID</b>	1287055
<b>Title</b>	JP-G 7 Trees and Woodland
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
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<b>Person ID</b>	1287055
<b>Title</b>	JP-G 8 Standards for Greener Places
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
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<b>Family Name</b>	Smith
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<b>Person ID</b>	1287055
<b>Title</b>	JP-G 9 A Net Enhancement of Biodiversity and Geodiversity
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
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	Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.
<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	JP-G 10 Green Belt
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before "Places for Everyone" can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change." So, is "not insignificant" the same as "substantial", if it is, the plan is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.</p>

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<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	JP-G 11 Safeguarded Land
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
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<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	JP-P1 Sustainable Places
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
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<b>Title</b>	JP-P2 Heritage
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
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<b>Title</b>	JP-P3 Cultural Facilities
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
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<b>Title</b>	JP-P4 New Retail and Leisure Uses in Town Centres
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a>
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Places for Everyone Representation 2021

	Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.
<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	JP-P5 Education Skills and Knowledge
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before "Places for Everyone" can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change." So, is "not insignificant" the same as "substantial", if it is, the plan is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.</p>

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<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	JP-P6 Health
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
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<b>Person ID</b>	1287055
<b>Title</b>	JP-P7 Sport and Recreation
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
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<b>Person ID</b>	1287055
<b>Title</b>	JPA 7: Elton Reservoir Area
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
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<b>Person ID</b>	1287055
<b>Title</b>	JPA 8: Seedfield
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
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<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a>
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Places for Everyone Representation 2021

	Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.
<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	JP-D1 Infrastructure Implementation
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before "Places for Everyone" can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change." So, is "not insignificant" the same as "substantial", if it is, the plan is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.</p>

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

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Places for Everyone Representation 2021

	Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.
<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	JP-D2 Developer Contributions
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before "Places for Everyone" can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change." So, is "not insignificant" the same as "substantial", if it is, the plan is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.</p>



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Places for Everyone Representation 2021

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<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	Bury - Green Belt Additions
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>GBA Bury - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below</b>	<p>Bury GBA03 Pigs Lea Brook 1</p> <p>Bury GBA04 North of Nuttall Park</p> <p>Bury GBA05 Pigs Lea Brook 2</p> <p>Bury GBA06 Hollins Brook</p> <p>Bury GBA07 Off New Road, Radcliffe</p> <p>Bury GBA08 Hollins Brow</p> <p>Bury GBA09 Hollybank Street, Radcliffe</p> <p>Bury GBA10 Crow Lumb Wood</p> <p>Bury GBA11 Nuttall West, Ramsbottom</p> <p>Bury GBA12 Woolfold, Bury</p> <p>Bury GBA13 Nuttall East, Ramsbottom</p> <p>Bury GBA14 Chesham, Bury</p> <p>Bury GBA15 Broad Hey Wood North</p> <p>Bury GBA16 Lower Hinds</p>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No

<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before "Places for Everyone" can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change." So, is "not insignificant" the same as "substantial", if it is, the plan is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government. Soundness</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.</p> <p>There is little detail on how the required infrastructure will be paid for. The plan needs to be revised to identify how all the infrastructure will be paid</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 spent by councils in generating awareness. Interest in the plan has mainly been generated by local protest groups. The public consultations should be repeated, providing clear, understandable information. They should be designed to encourage rather than discourage public input.</p> <p>The site selection process has been opaque with no explanation as to why some sites in the "call for sites" were excluded from the plan.</p> <p><a href="https://mappinggm.org.uk/callforsites/#os_maps_outdoor/16/53.6380/-2.3228">https://mappinggm.org.uk/callforsites/#os_maps_outdoor/16/53.6380/-2.3228</a> The process should be repeated using National and GMCA guidelines for site selection. Meetings with public representation should be held and minutes should be published. The rationale for the selection/rejection of every site should be available including considered alternatives.</p> <p>Several of the authorities involved have consistently failed to meet housing delivery targets. An effective a plan must be deliverable. The plan relies on the cooperation of property developers. There is no indication of how delivery targets will be maintained. A strategy to guarantee housing delivery rates must be provided. This cannot be left to any local authority that is currently behind on housing targets. Clear delivery plans for infrastructure should be included.</p>

Places for Everyone Representation 2021

	<p>PfE shows removal of greenbelt protection for some areas and creation of greenbelt in others. There is no proof of exceptional circumstances required in the National Planning Policy Framework to justify this.</p> <p>In addition to PfE each authority needs to come up with its own local plan. No details have been given about when these plans will be available.</p> <p>There are no details of how Duty to Cooperate will be achieved. Following their withdrawal Stockport will effectively become a neighbouring borough. However, it is not acceptable to limit neighbouring boroughs to Stockport since each of the authorities in the plan is also neighbouring to other authorities outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn with Darwen, Wigan neighbours St Helens and Trafford neighbours Cheshire area.</p> <p>A change in the methodology for Manchester City Council was resulted in a 35% uplift for the Manchester City Council area. The revised Local Housing Need methodology states that the 35% uplift is to be met within the district and not redistributed (see Places for Everyone Joint Committee documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) <a href="https://democracy.greatermanchester.ca.gov.uk/documents/s15613/PFE_JC_July2021_ISSUED.pdf">h?ps://democracy.greatermanchester.ca.gov.uk/documents/s15613/PFE_JC_July2021_ISSUED.pdf</a> 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>
<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	Supporting Evidence
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a>
<b>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.</b>	<p>It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before 'Places for Everyone' can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that</p>

Regulation 18 is Automatically satisfied for PfE. Para 1.23 states 'The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change.' So, is 'not insignificant' the same as 'substantial', if it is, the plan is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government. Soundness  
The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.

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Places for Everyone Representation 2021

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<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	Other Comments
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	JPA 1.2: Simister and Bowlee (Northern Gateway)
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSWalshaw.pdf</a>

Places for Everyone Representation 2021

	<a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	Other Comments
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
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<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	Other Comments

Places for Everyone Representation 2021

<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SOSWalshaw.pdf</a> <a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
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<b>Compliance - Legally compliant?</b>	No
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<b>Family Name</b>	Smith
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<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Smith
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Places for Everyone Representation 2021

<b>Title</b>	Other Comments
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_Objection.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
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<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	Other Comments
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_Objection.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
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<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Smith
<b>Given Name</b>	C
<b>Person ID</b>	1287055
<b>Title</b>	Other Comments
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287055_SOSWalshaw.pdf</a>

Places for Everyone Representation 2021

	<a href="#">PFE1287055_SOSElton.pdf</a> <a href="#">PFE1287055_SOSGeneral.pdf</a> <a href="#">PFE1287055_SimisterLegality.pdf</a> <a href="#">PFE1287055_Objection.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No