

Family Name	Wadsworth
Given Name	Am
Person ID	1287352
Title	Stakeholder Submission
Type	Web
Family Name	Wadsworth
Given Name	Am
Person ID	1287352
Title	Our Vision
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before "Places for Everyone" can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change." So, is "not insignificant" the same as "substantial", if it is, the plan is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government.</p> <p>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</p>

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

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

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

*Several of the authorities involved have consistently failed to meet housing delivery targets. An effective a plan must be deliverable. The plan relies on the cooperation of property developers. There is no indication of how delivery targets will be maintained. A strategy to guarantee housing delivery rates must be provided. This cannot be left to any local authority that is currently behind on housing targets. Clear delivery plans for infrastructure should be included.

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

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

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

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

Family Name	Wadsworth
Given Name	Am
Person ID	1287352
Title	JPA 31: Godley Green Garden Village
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

<p>Compliance - In accordance with the Duty to Cooperate?</p>	<p>No</p>
<p>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>	<p>This development clearly does not meet the area"s needs. The introduction of 2500 houses, equates potentially to 5000 more cars on the road when it has not yet been possible to solve the traffic problem in the immediate and neighbouring areas of Mottram, Hollingworth, Glossop and Tintwistle. You only have to look at Glossop to see what overdevelopment has done to that town and the knock on effect to the neighbouring villages. The bypass is a watered down version of the plans that have been worked on for 50 years and will do nothing to alleviate the problems in this area.</p> <p>There has not been appropriate consideration of alternatives. Obviously it can be more expensive to build on brownfield taking into consideration making land safe for housing, but the cost of losing the greenbelt is priceless. The amount of proposed new greenbelt land in compensation is an insult.</p> <p>The local wildlife is not being taken into consideration, and the businesses that use the greenbelt land will have their livelihoods taken away. Flooding is already an issue in this area and further concreting over the greenbelt for housing will do nothing to alleviate this problem. The effect on the environment and climate from the extra 2500 houses will also be unable to be mitigated.</p> <p>It is not clear if Tameside MBC has worked in cooperation with neighbouring authorities, particularly when Stockport is not a party to "Places for Everyone". Indeed, residents of Woodley are objecting to Tameside"s South Of Hyde plans as they fear being on the border of this development will mean an increase on demand for schools, GPs and train transport in their area. It is disconcerting that Tameside MBC have been planning/submitting applications for this development to happen as though it is a given.</p>