

## Places for Everyone Representation 2021

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|---|--|
| <b>Family Name</b>  | Flemming Consulting Ltd  |
| <b>Given Name</b>   | Sophia   |
| <b>Company / Organisation</b>   | Sophia Flemming Consulting Ltd                                   |
| <b>Person ID</b>  | 1286745  |
| <b>Title</b>  | Stakeholder Submission   |
| <b>Agent Company / Organisation</b>   | Satplan Ltd  |
| <b>Type</b>   | Web  |
| <b>Include files</b>  | <a href="#">PFE1286745.pdf</a>                                   |
| <b>Family Name</b>  | Flemming Consulting Ltd  |
| <b>Given Name</b>   | Sophia   |
| <b>Company / Organisation</b>   | Sophia Flemming Consulting Ltd                                   |
| <b>Person ID</b>  | 1286745  |
| <b>Title</b>  | Other Comments   |
| <b>Agent Company / Organisation</b>   | Satplan Ltd  |
| <b>Type</b>   | Web  |
| <b>Include files</b>  | <a href="#">PFE1286745.pdf</a>                                   |
| <b>Soundness - Positively prepared?</b>                                       | NA   |
| <b>Soundness - Justified?</b>   | NA   |
| <b>Soundness - Consistent with national policy?</b>                           | NA   |
| <b>Soundness - Effective?</b>   | NA   |
| <b>Compliance - Legally compliant?</b>  | NA   |
| <b>Compliance - In accordance with the Duty to Cooperate?</b>                 | NA   |
| <b>Redacted general comment - Please add any comments not addressed above</b> | Additional Site - Oldham<br>See attached documents.              |
| <b>Family Name</b>  | Flemming Consulting Ltd  |
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| <b>Company / Organisation</b>   | Sophia Flemming Consulting Ltd                                   |
| <b>Person ID</b>  | 1286745  |
| <b>Title</b>  | JP-H 1 Scale Distribution and Phasing of New Housing Development |
| <b>Agent Company / Organisation</b>   | Satplan Ltd  |
| <b>Type</b>   | Web  |
| <b>Include files</b>  | <a href="#">PFE1286745.pdf</a>                                   |
| <b>Soundness - Positively prepared?</b>                                       | NA   |

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| <b>Soundness - Justified?</b>   | NA  |
| <b>Soundness - Consistent with national policy?</b>   | NA  |
| <b>Soundness - Effective?</b>   | NA  |
| <b>Compliance - Legally compliant?</b>  | NA  |
| <b>Compliance - In accordance with the Duty to Cooperate?</b>                                 | NA  |
| <b>Redacted general comment - Please add any comments not addressed above</b>                 | <p>3.1. The Places for Everyone Consultation is accompanied by several supporting documents and appendices. Having reviewed the evidence base documents, it is noted that GMCA have primarily derived its housing need using the standard methodology provided in the NPPG for calculating the Local Housing Need (LHN).</p> <p>3.2. The calculation of housing need makes an adjustment to take account of affordability. If insufficient new homes are provided across Greater Manchester to meet this need, there is a risk that affordability levels will worsen, and people will not have access to suitable accommodation that meets their needs. The construction of new housing is a critical part of the economy and the need for Greater Manchester to boost their supply of deliverable housing Sites is vital given the delay to the Joint Plan since 2015.</p> <p>3.5 The publication draft of the PfE is not ambitious and will not make the significant contribution that is needed to reduce affordable housing need and provide much needed housing across Greater Manchester. It is our firm view this Plan could be more ambitious in its housing growth and it does not seek to maximise the opportunity for economic and social development across the boroughs.</p> |
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| <b>Company / Organisation</b>   | Sophia Flemming Consulting Ltd  |
| <b>Person ID</b>  | 1286745   |
| <b>Title</b>  | Supporting Evidence   |
| <b>Agent Company / Organisation</b>   | Satplan Ltd   |
| <b>Type</b>   | Web   |
| <b>Include files</b>  | <a href="#">PFE1286745.pdf</a>  |
| <b>Redacted comment on supporting documents - Please give details of why you consider any</b> | <p>Growth and Spatial Options</p> <p>3.3. The Growth and Spatial Options Paper (Reference 02.01.10) sets out the growth options</p>   |

**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.**

which were assessed as part of GMSF 2015, 2019 and 2020.

3.4. The preparation of the GMSF was guided by NPPF which continued to make it clear that

strategic policies, such as those in the GMSF 2019, should provide for the objectively

assessed needs for housing and other uses unless there is sufficient justification to restrict the

overall scale and or the adverse impacts would outweigh the benefits.

3.5. GMSF 2020 assessed the following 3 Growth Options to identify the preferred Growth

Option in the GMSF 2020:

- Option 1: Business as usual
- Option 2: Meeting GM's Local Housing Need (LHN) and employment land Objectively Assessed Needs.
- Option 3: Higher Growth scenario, going above GM's LHN and Employment land needs.

3.1 Based on the assessment carried out in 2020, Option Two was chosen as the preferred

growth option for the GMSF 2020 which sought to provide 179,078 dwellings over the plan

period of 2020-2037. Option 3 which assessed a high growth scenario was discounted.

We are of the view that this option is a reasonable alternative, and it is common practice by

other North-West Authorities (and across other regions), that Local Authorities apply the 20%

buffer across the whole plan period to allow for flexibility and choice in the housing market.

This helps to ensure that housing is deliverable and developable across a longer time period.

3.2 In addition, many authorities have used the Local Housing Need figure as a starting point

but have also sought to increase their housing targets through other economic growth

strategies to establish a higher level of need than the standard method suggests. The supply

of housing land should be boosted significantly and diversified through additional

deliverable Sites, which are not burdened by significant infrastructure requirements or

viability constraints

3.3 As part of the Places for Everyone Plan, the growth and spatial options for the plan were revisited

to check if any material changes had arisen since the GMSF 2020 to suggest that

other reasonable alternative(s) to the growth and spatial options should be considered to

deliver the Plan's Vision and Objectives. Paragraph 8.1 details the considerations including

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the impact of Stockport's withdrawal on the housing and employment growth needs and the land supply. The paper concludes within paragraph 8.2 that despite Stockport's withdrawal, the work carried out in relation to the GMSF Growth and Spatial Options remains valid in relation to the preparation of the PfE 2021. Put simply, the withdrawal of Stockport has resulted in a reduction in the OAN of the PfE Plan area and similarly a reduction in the overall land supply of the nine districts making up the PfE 2021 Plan area. The PfE now seeks to deliver a minimum of 164,880 net additional dwellings over the period 2021-37, or an annual average of around 10,305.

3.4 The GMCA has previously acknowledged that Stockport was not meeting all its OAN in the GMSF 2020, and therefore other authorities sought to meet its requirement within the Plan. Given Stockport significant delay in preparing its Local Plan, the simple removal of Stockport LHN requirements from the PfE presents a real risk to the availability and choice of Sites to deliver much needed housing which are now being removed from the Plan.

3.5 The publication draft of the PfE is not ambitious and will not make the significant contribution that is needed to reduce affordable housing need and provide much needed housing across Greater Manchester. It is our firm view this Plan could be more ambitious in its housing growth and it does not seek to maximise the opportunity for economic and social development across the boroughs.

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| <b>Family Name</b>                                  | Flemming Consulting Ltd        |
| <b>Given Name</b>                                   | Sophia                         |
| <b>Company / Organisation</b>                       | Sophia Flemming Consulting Ltd |
| <b>Person ID</b>                                    | 1286745                        |
| <b>Title</b>  | JPA 12: Beal Valley            |
| <b>Agent Company / Organisation</b>                 | Satplan Ltd                    |
| <b>Type</b>   | Web                            |
| <b>Include files</b>                                | <a href="#">PFE1286745.pdf</a> |
| <b>Soundness - Positively prepared?</b>             | NA                             |
| <b>Soundness - Justified?</b>                       | NA                             |
| <b>Soundness - Consistent with national policy?</b> | NA                             |
| <b>Soundness - Effective?</b>                       | NA                             |

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| <b>Compliance - Legally compliant?</b>  | NA  |
| <b>Compliance - In accordance with the Duty to Cooperate?</b>                 | NA  |
| <b>Redacted general comment - Please add any comments not addressed above</b> | <p>We would question the deliverability of the Site.</p> <p>There are significant contamination and ground condition issues and costs associated with this site within most of the perceived developable area.</p> <p>There are known access issues and the Site is technically challenging.</p> <p>4.21. Based on the Sites highlighted above, we consider there is a realistic prospect that many of the proposed allocations will not deliver the quantum of housing envisaged within the life-span of the summary</p> |
| <b>Family Name</b>  | Flemming Consulting Ltd   |
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| <b>Company / Organisation</b>   | Sophia Flemming Consulting Ltd  |
| <b>Person ID</b>  | 1286745   |
| <b>Title</b>  | JPA 13: Bottom Field Farm (Woodhouses)  |
| <b>Agent Company / Organisation</b>   | Satplan Ltd   |
| <b>Type</b>   | Web   |
| <b>Include files</b>  | <a href="#">PFE1286745.pdf</a>  |
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| <b>Soundness - Consistent with national policy?</b>                           | NA  |
| <b>Soundness - Effective?</b>   | NA  |
| <b>Compliance - Legally compliant?</b>  | NA  |
| <b>Compliance - In accordance with the Duty to Cooperate?</b>                 | NA  |
| <b>Redacted general comment - Please add any comments not addressed above</b> | <p>We understand that Site capacity has now reduced from 260 to 30 dwellings and the PRow through the Site is a significant constraint to deliverability timeframes.</p> <p>4.21. Based on the Sites highlighted above, we consider there is a realistic prospect that many of the proposed allocations will not deliver the quantum of housing envisaged within the life-span of the summary</p>   |
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| <b>Person ID</b>  | 1286745   |
| <b>Title</b>  | JPA 14: Broadbent Moss  |

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| <b>Soundness - Effective?</b>   | NA  |
| <b>Compliance - Legally compliant?</b>  | NA  |
| <b>Compliance - In accordance with the Duty to Cooperate?</b>                 | NA  |
| <b>Redacted general comment - Please add any comments not addressed above</b> | <p>We would question the deliverability of the Site.</p> <p>There are significant contamination and ground condition issues and costs associated with this site within most of the perceived developable area.</p> <p>There are known access issues and the Site is technically challenging. Whilst it is estimated 500 dwellings will be delivered post the plan period, it is likely in reality to be significantly more than envisaged given technical constraints.</p> <p>4.21. Based on the Sites highlighted above, we consider there is a realistic prospect that many of the proposed allocations will not deliver the quantum of housing envisaged within the life-span of the summary</p> |
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| <b>Given Name</b>   | Sophia  |
| <b>Company / Organisation</b>   | Sophia Flemming Consulting Ltd  |
| <b>Person ID</b>  | 1286745   |
| <b>Title</b>  | JPA 15: Chew Brook Vale (Robert Fletchers)  |
| <b>Agent Company / Organisation</b>   | Satplan Ltd   |
| <b>Type</b>   | Web   |
| <b>Include files</b>  | <a href="#">PFE1286745.pdf</a>  |
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| <b>Compliance - In accordance with the Duty to Cooperate?</b>                 | NA  |
| <b>Redacted general comment - Please add any comments not addressed above</b> | <p>Significant costs associated with demolition of the existing buildings on Site and subsequent remediation. Landownership and rights of access also question its deliverability.</p> <p>4.21. Based on the Sites highlighted above, we consider there is a realistic prospect that many of the proposed allocations will not deliver the quantum of housing envisaged within the life-span of the summary</p>                                   |
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| <b>Given Name</b>   | Sophia  |
| <b>Company / Organisation</b>   | Sophia Flemming Consulting Ltd  |
| <b>Person ID</b>  | 1286745   |
| <b>Title</b>  | JPA 17: Land South of Coal Pit Lane (Ashton Road)   |
| <b>Agent Company / Organisation</b>   | Satplan Ltd   |
| <b>Type</b>   | Web   |
| <b>Include files</b>  | <a href="#">PFE1286745.pdf</a>  |
| <b>Soundness - Positively prepared?</b>                                       | NA  |
| <b>Soundness - Justified?</b>   | NA  |
| <b>Soundness - Consistent with national policy?</b>                           | NA  |
| <b>Soundness - Effective?</b>   | NA  |
| <b>Compliance - Legally compliant?</b>  | NA  |
| <b>Compliance - In accordance with the Duty to Cooperate?</b>                 | NA  |
| <b>Redacted general comment - Please add any comments not addressed above</b> | <p>Our clients Site historically was included in this wider allocation. The contents of this representation provides the justification to include the Site to provide greater choice and deliver affordable housing.</p> <p>4.21. Based on the Sites highlighted above, we consider there is a realistic prospect that many of the proposed allocations will not deliver the quantum of housing envisaged within the life-span of the summary</p> |