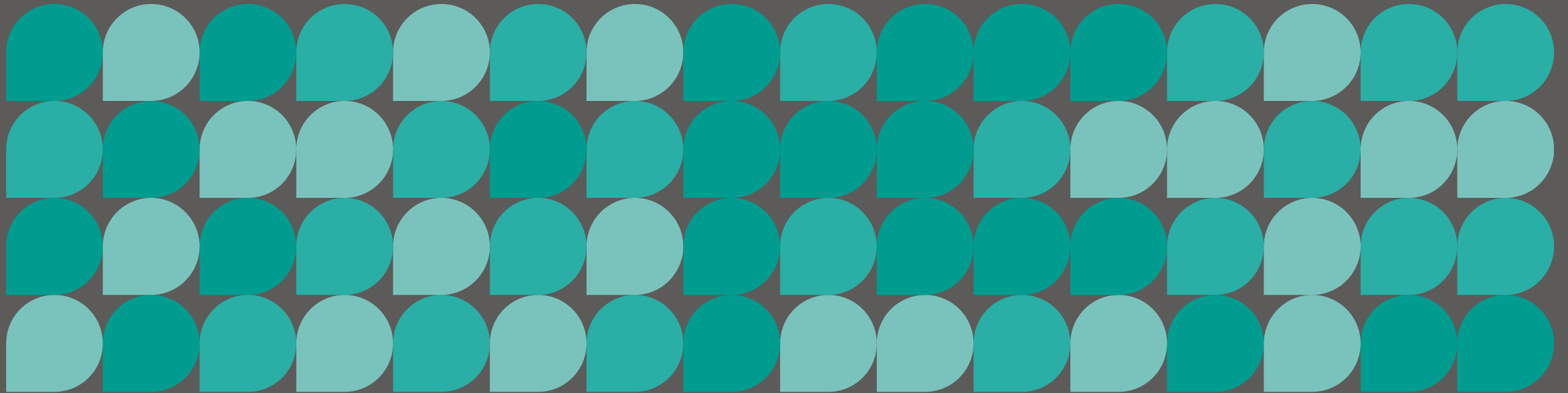


Places for Everyone

What you need to know to make an effective representation



Starting point

- Nine local authorities in Greater Manchester are publishing a [plan](#) they consider to be sound.
- The nine local authorities are – Bolton, Bury, Oldham, Manchester, Rochdale, Salford, Tameside, Trafford and Wigan
- This is the plan which is intended to be submitted to the Secretary of State for examination, following the Regulation 19 consultation
- The starting point for the Inspector is that the plan is legally compliant and sound
- The purpose of your representation is to identify where you think this is not the case
- The Inspector will not consider representations which are not linked to soundness or compliance

Your representation

- Whilst the local authorities will read all of the representations, the Inspector will decide which ones raise matters that she/he wishes to investigate further
- The Inspector needs to understand very clearly which part of the plan your representation refers to, what your concerns are and how you think these can be addressed
- Where appropriate, reference should be made to relevant parts of the [National Planning Policy Framework](#) (“NPPF”) (paragraph numbers) and associated [Planning Practice Guidance](#) (“PPG”) (eg ID: 18a-001-20190723) with an explanation of why you think the policy in question is consistent or inconsistent with it.
- Reference should also be made to specific parts of evidence prepared by the local authorities (with specific page and paragraph numbers).
- There is no need to quote extensive parts of the NPPF, PPG or evidence documents.

What makes a Local Plan ‘legally compliant’

- ✓ Must follow the timetable set out in the Local Development Scheme
- ✓ Must include a Sustainability Appraisal and habitats regulations assessment
- ✓ Consultations carried out as in the Statement of Community Involvement (SCI)
- ✓ Complies with relevant laws
- ✓ Meets the Duty to Co-operate

What makes a local plan sound?

- ✓ **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs²¹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development
- ✓ **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence
- ✓ **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground
- ✓ **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework

Making a submission

- If you wish to make comments seeking a modification to the plan or part of a plan you should set out:
 - in what way you consider the plan or part of the plan is legally non-compliant or unsound.
 - Your comments should be supported by **evidence** wherever possible.
 - It will be helpful if you also say precisely **how** you think the plan should be modified.
- You should provide succinctly all the evidence and supporting information necessary to support your comments and your suggested modification to the plan.
- Any further submissions after the plan has been submitted for examination may only be made if invited by the Inspector, based on the matters, issues and questions he or she identifies.
- Where many share a common view consider making a single submission which represents that view, rather a large number of separate submissions repeating the same points. In such cases the group should indicate **how many** people it is representing and how the comments have been **authorised**

We also need to know how you want your comments dealt with during the examination

- Consider how you would like your comments to be dealt with in the examination:
 - are you content to rely on your written comments
 - Do you wish to take part in hearing session(s)
- Only people who are seeking a change to the plan have a right to be heard at the hearing session(s), if they so request.
- Written and oral comments carry the same weight and will be given equal consideration in the examination process.
- Indicate if you wish to be kept informed about the progress of the Local Plan including when it has been submitted for Examination, when the Inspector's report is published and when the local plan is adopted.

Supporting you to make an effective representation

There is a range of support available to help to navigate all of the information relating to this plan -

- **The Plan**
- **Evidence base** – to support the plan as a whole, thematic policies and strategic allocations
- **Supporting documents** – Topic Papers on specific policy areas including the strategic allocations which bring the evidence together and outlines how it has informed the policies in the plan
- **Online Portal** - links to contextual information as well as the evidence base and supporting information
- **Downloadable form and guidance** – Supporting people who don't want to make a digital response.
- **Frequently Asked Questions** – To help people to make the most informed response possible.
- **Telephone helpline** – Giving people extra support and signposting if they need it.
- **Virtual Exhibition space** – Showing an understanding of the plan, in a safe and Covid secure way.
- **Mapping GM** – An interactive site for people to engage with different aspects of the plan.
- **Document list** - to help people to navigate the documentation to support the plan

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**Completing a
representation
through the paper
based form**

Make your comment precise

Below shows an example question, and a fictional response to give an idea about the level of precision that is useful.



To which part of the plan do your comments relate?	
Paragraph number	
Policy or Strategic Allocation number	Policy HN3 (Housing numbers)
Policies map	
Other(please specify)	



To which part of the plan do your comments relate?	
Paragraph number	
Policy or Strategic Allocation number	
Policies map	
Other(please specify)	All of it

Link representations to policy, guidance and evidence

Below shows an example question, and a fictional response to give an idea about the level of precision that is useful.

Please give details of why you consider this part of Places for Everyone not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.



The housing requirement in the plan is not compliant with national policy as it does not use the standard methodology (Planning Practice Guidance Paragraph 002 Reference ID 2a-002-20190220) or provide details of the exceptional circumstances it is considered support deviation from it Paragraph: 003 Reference ID: 2a-003-20190220



I just don't think it can be. I can't see my neighbouring Local Authority being happy about this - they're not part of Greater Manchester, but this is right on their doorstep.

Let the Inspector know how you want them to change the plan

Below shows an example question, and a fictional response to give an idea about the level of precision that is useful.

Please set out the modification(s) you consider necessary to make this part of Places for Everyone legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 4 above.



The housing requirement in the plan should be calculated using the standard methodology as set out in national guidance, or the exceptional circumstances that exist to justify deviation should be clearly set out



Just don't have one.

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**Completing a
representation
through
www.gmconsult.org**

Make your comment precise

Firstly, on the portal you will be asked to tick one box per column, per row.

These are not mandatory boxes for every section – you just need to complete the ones your representation relates to.

Considering the information provided for please respond to the questions below

	Sound	Unsound
Positively prepared?	<input type="radio"/>	<input type="radio"/>
Justified?	<input type="radio"/>	<input type="radio"/>
Consistent with national policy?	<input type="radio"/>	<input type="radio"/>
	Yes	No
Legally compliant?	<input type="radio"/>	<input type="radio"/>
In accordance with the Duty to Cooperate?	<input type="radio"/>	<input type="radio"/>

Make your comment precise

Below shows an example question, and a fictional response to give an idea about the level of precision that is useful.

Please give details of why you consider not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.



The housing requirement in the plan is not compliant with national policy as it does not use the standard methodology (Planning Practice Guidance Paragraph 002 Reference ID 2a-002-20190220) or provide details of the exceptional circumstances it is considered support deviation from it Paragraph: 003 Reference ID: 2a-003-20



I just don't think it can be. I can't see my neighbouring Local Authority being happy about this - they're not part of Greater Manchester, but this is right on their doorstep.

Make your comment precise

Below shows an example question, and a fictional response to give an idea about the level of precision that is useful.


Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.



The housing requirement in the plan should be calculated using the standard methodology as set out in national guidance, or the exceptional circumstances that exist to justify deviation should be clearly set out



Just don't have one.

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**Completing a
representation via
post or in an email**

The same principles apply

Some people would prefer to make a response via email or post.

This is absolutely fine and will be treated in the same way as those representations made through the portal or on our template form.

However, you should still follow the basic principles –

- in what way you consider the plan or part of the plan is legally non-compliant or unsound.
- Your comments should be supported by **evidence** wherever possible.
- It will be helpful if you also say precisely **how** you think the plan should be modified.

Please note that all representations will be submitted to the Secretary of State electronically

Further information

- You can find the National Planning Policy Framework [here](#) and planning practice guidance [here](#)
- You can find information on our evidence and the steps we have taken to be legally compliant on our website [Places for Everyone](#)

What happens after the consultation?

