

Places for Everyone: Joint Development Plan Document – Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford, Wigan.

Publication Stage August 2021

Guidance Notes for Comments

Introduction

The Publication Places for Everyone: Joint Development Plan Document (PfE 20201) is published by the Greater Manchester Combined Authority (GMCA) on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, in order for comments to be made prior to submission. The comments will be considered alongside the published plan following its submission to the Secretary of State, who will appoint a Planning Inspector(s) to undertake an Independent Examination of the Plan. The Planning and Compulsory Purchase Act 2004 (as amended) (PCPA) states that the purpose of the examination is to consider whether the plan complies with legal requirements, the duty to co-operate and is “sound”.

Comments can be submitted in more than one way, but please don't respond with the same comments more than once. Our preferred method is via our online consultation portal (<https://www.gmconsult.org/>) and information is available via the portal to help you respond. However, we have also produced a downloadable form for those who would prefer to respond in that way. The form is in two parts – Part A for personal details and Part B for your comments. Additional sheets may be used to provide additional information. Please complete a separate Part B sheet for each set of comments you wish to make.

Part A – Personal / Agent Details (Question 1)

Please note that it is not possible for comments to be considered anonymously. Comments and names will be published on the GMCA's website and included as part of the PfE 2021 submission to the Secretary of State. Please supply an email address if you have one as it will allow us to contact you electronically which is our preferred method. Please note that all comments will be held by GMCA and made available in accordance with our privacy policy. For further information concerning the Places for Everyone privacy notice please visit the GMCA website.

Part B – Comments (Question 2)

Please specify which section of the PfE 2021 your comments relate to, for example, paragraph number, policy number, policies map or other.

Legal Compliance, Soundness and Duty to Co-Operate (Questions 3 & 4)

Legal Compliance

The Inspector(s) will first check that the plan meets the legal requirements under s20(5)(a) and the duty to cooperate under s20(5)(c) of the PCPA before moving on to test for soundness.

You should consider the following before making comments on legal compliance:

- The joint plan should be included in the current Local Development Scheme (LDS) for the nine districts and the key stages should have been followed. If the joint plan is not in the current LDS it should not have been published for comments. Each district's LDS is available on their individual website.
- For each district, the process of community involvement for the joint plan should be in general accordance with that district's Statements of Community Involvement (SCI). The SCI sets out the LPA's strategy for involving the community in the preparation and revision of Development Plan Documents.

- The Plan should comply with the Town and Country Planning (Local Planning) (England) Regulations 2012 (the Regulations). The documents prescribed in the Regulations must be made available on the website. The various persons and organisations set out in the Regulations and any persons who have requested to be notified must also be notified.
- A Sustainability Appraisal (SA) /Integrated Assessment is also required to be made available when the plan is published. This should identify the process by which the SA has been carried out, the baseline information used to inform the process, and the outcomes of that process. The SA is a tool for appraising the plan to ensure it reflects social, environmental and economic factors.

Soundness

Soundness is explained in paragraph 35 of the National Planning Policy Framework (NPPF). The Inspector(s) has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- **Positively prepared:** This means that the plan should, as a minimum, provide a strategy which seeks to meet objectively assessed needs, and is informed by agreement 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:** The plan should be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
- **Effective:** The plan should be deliverable over its 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:** the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF and other statements of national planning policy, where relevant.

The tests of soundness will be considered having regard to the scope of the PFE 2021. Importantly, some issues will be addressed in individual district local plans.

If you think the content of the plan is not sound because it does not include a policy on a particular issue, you should go through the following steps before making comments:

- is the issue with which you are concerned already covered specifically by national planning policy?
- is the issue with which you are concerned already covered by another policy in this plan?
- if the policy is not covered elsewhere, in what way is the plan unsound without the policy?
- if the plan is unsound without the policy, what should the policy say?

Duty to Co-operate

- The duty to co-operate came into force on 15 November 2011 and any plan submitted for examination on or after this date will be examined for compliance. Evidence of how this duty has been complied with should be made available.
- The PCPA establishes that non-compliance with the duty to co-operate cannot be rectified after the submission of the plan. Therefore, the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector(s) has no choice but to recommend non- adoption of the plan.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this section to set out your comments.

General Advice (Questions 5 - 9)

If you wish to make comments seeking a modification to the plan or part of a plan you should set out clearly in what way you consider the plan or part of the plan is legally non-compliant or unsound, having regard as appropriate to the soundness criteria set out above. 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. 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 groups or individuals share a common view on the plan, it would be very helpful to make a single submission which represents that view, rather than 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.

Please consider carefully how you would like your comments to be dealt with in the examination: whether you are content to rely on your written comments, or whether 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. In considering this, please note that written and oral comments carry the same weight and will be given equal consideration in the examination process.

Please indicate if you wish to be kept informed about the progress of the joint plan including when it has been submitted for Examination, when the Inspector's report is published and when the local plan is adopted. Please tick all three if you wish to be notified about all three stages.

All comments must be submitted no later than **Sunday 3rd October 2021**. All comments received during this stage will be submitted to and considered by the appointed independent Planning Inspector(s). The examination process is likely to include public hearings. The Inspector(s) will determine the most appropriate procedure to adopt to hear those who wish to participate at this stage. If you would like to appear and speak at the hearings, please state this and explain in the space provided why you consider it is necessary that you participate.

Please sign and date the form.

Please submit all comments:

Via email to: placesforeveryone@greatermanchester-ca.gov.uk

Post to: Planning and Housing team,

 Greater Manchester Combined Authority,
 Broadhurst House,
 56 Oxford Street,
 Manchester
 M1 6EU

Alternatively, you can complete your representation **online** at:

<https://www.gmconsult.org/>