

Places for Everyone Representation 2021

Family Name	Chadwick
Given Name	Dawn
Person ID	1287466
Title	Stakeholder Submission
Type	Web
Family Name	Chadwick
Given Name	Dawn
Person ID	1287466
Title	JPA 19: Bamford / Norden
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
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.	There will be too much additional traffic and the roads will be unable to cope at rush hour.
Redacted modification - 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 modification we are seeking is for JPA 19 Bamford/Norden to be removed from the PfE

Places for Everyone Representation 2021

Family Name	Chadwick
Given Name	Phil
Person ID	1286590
Title	Stakeholder Submission
Type	Web
Family Name	Chadwick
Given Name	Phil
Person ID	1286590
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>Consultation on the plan should have been carried out in accordance with Statement of Community Involvement for the nine Local authorities participating in PfE. GMCA should have worked collaboratively with neighbouring authorities and prescribed bodies on strategic and cross boundary matters known as the Duty to Cooperate. The plan should comply with all relevant laws including the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. In addition, there is a statutory duty on local planning authorities to include policies in their Local Plan designed to tackle climate change and its impacts.</p> <p>Furthermore and I may repeat myself a little here on the legality side of things, 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 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 GMCA 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 not, is, the plan is not legal. This can only be established by a proper judicial review. So unless proven otherwise the plan must be considered illegal and not put to Government.</p>
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect	<p>The National Planning Policy Frameworks (NPPF) says is....</p> <p>35. Local plans and spatial developments are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are sound if they are:</p> <p>A) Positively Prepared- providing a strategy which, as a minimum, seeks to meet the objectively assessed needs; and is informed by agreements with other authorities, so</p>

of any legal compliance or soundness matters you have identified above.

unmet need from neighbouring areas is accommodated where it is practical to do so consistent with achievable sustainable development.

Places For Everyone does not meet the areas needs, it is wanting to add an additional houses on the greenbelt in Hyde alone, it does not include all aspects of the areas requirements, there are no plans to build a new High school in the area to accommodate all the extra children and the road infrastructure cannot cope now, let alone the 5000 vehicles. The plan will not create a sustainable community in the area, as the destruction of the greenbelt and tarmacking it over is against the Greater Manchester Clean Air Plan. You cannot destroy the greenbelt on one hand and then complain Tameside does not have clean air.

B) Justified - an appropriate strategy, taking into account the reasonable alternatives based on evidence.

Alternatives have not been taken into account, there are 4,744 dwellings available to be built on Brownfield land before looking at greenbelt or green spaces, this according to Tameside Council's own Brownfield Land register

https://www.tameside.gov.uk/TamesideMBC/media/Planning/brownfield_land_register

Because of this, I do not feel the plan is supported by all the evidence that is needed.

C) Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the framework and other statements of national planning policy where relevant.

The proposals will cause untold damage to the environment and climate and allow the quality of life for future generations to be diminished if this plan goes ahead. The proposals do not mitigate the issues surrounding climate change, replacing greenbelt with tarmac will lead to in more flooding.

D) Effective - deliverable over the plan period, and based on effective joint working on boundary strategic matters that have been dealt with rather than deferred, as evidenced in the statement of common ground.

The proposal can not be achieved within the plan timescale, Tameside Council are already delayed in submitting the separate plan for the submission for Godley Green Garden V by SIX months! The planning department is an unmitigated disaster, the only factors that will prevent it being achieved, is Tameside Council themselves.

Furthermore and I may repeat myself a little here on the Soundness side of things, but the factors to consider are:

1. 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) ONA population predictions and take into account the effect of Covid on work patterns.

2. 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.

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

4. There has been poor public consultation, a lack of accessible information and little engagement 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.

5. 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 considering alternatives.

6. 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 pro

	<p>developers. There is no indication of how delivery targets will be maintained. A strategic 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> <p>7. PfE shows removal of greenbelt protection for some areas and creation of greenbelts for others. There is no proof of exceptional circumstances required in the National Planning Policy Framework to justify this.</p> <p>8. 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>9. 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 a neighbour 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>10. A change in the methodology for Manchester City Council was resulted in a 35% uplift for the Manchester City Council area.</p> <p>The revised Local Housing Need methodology states that the 35% uplift is to be met in the district and not redistributed (see Places for Everyone Joint Committee document dated 20th July 2021, author Paul Dennett, Page 15 section 2.2 (ii))</p> <p>https://sccdemocracy.salford.gov.uk/mgConvert2PDF.aspx?ID=38690</p> <p>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>
Family Name	Chadwick
Given Name	Phil
Person ID	1286590
Title	JPA 30: Ashton Moss West
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>Consultation on the plan should have been carried out in accordance with Statement of Community Involvement for the nine Local authorities participating in PfE. GMCA should have worked collaboratively with neighbouring authorities and prescribed bodies on strategic and cross boundary matters known as the Duty to Cooperate. The plan should comply with all relevant laws including the Planning and Compulsory Purchase Act 2004 and the Planning and Country Planning (Local Planning) (England) Regulations 2012. In addition, there is a statutory duty on local planning authorities to include policies in their Local Plan designed to tackle climate change and its impacts.</p> <p>Furthermore and I may repeat myself a little here on the legality side of things, 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</p>

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A) Positively Prepared- providing a strategy which, as a minimum, seeks to meet the objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so consistent with achievable sustainable development.

Places For Everyone does not meet the areas needs, it is wanting to add an additional 5000 houses on the greenbelt in Hyde alone, it does not include all aspects of the areas requirements, there are no plans to build a new High school in the area to accommodate all the extra children and the road infrastructure cannot cope now, let alone the 5000 vehicles. The plan will not create a sustainable community in the area, as the destruction of the greenbelt and tarmacking it over is against the Greater Manchester Clean Air Strategy. You cannot destroy the greenbelt on one hand and then complain Tameside does not have clean air.

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https://www.tameside.gov.uk/TamesideMBC/media/Planning/brownfield_land_register

Because of this, I do not feel the plan is supported by all the evidence that is needed.

C) Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the framework and other statements of national planning policy where relevant.

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D) Effective - deliverable over the plan period, and based on effective joint working on boundary strategic matters that have been dealt with rather than deferred, as evidenced in the statement of common ground.

The proposal can not be achieved within the plan timescale, Tameside Council are already delayed in submitting the separate plan for the submission for Godley Green Garden V by SIX months! The planning department is an unmitigated disaster, the only factors that will prevent it being achieved, is Tameside Council themselves.

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1. 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) ONA population predictions and take into account the effect of Covid on work patterns.
2. 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.

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

4. There has been poor public consultation, a lack of accessible information and little engagement 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.

5. 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.

6. Several of the authorities involved have consistently failed to meet housing delivery targets. An effective plan must be deliverable. The plan relies on the cooperation of private developers. There is no indication of how delivery targets will be maintained. A strategic 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.

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

8. 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.

9. 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 a neighbour 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.

10. 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 by the district and not redistributed (see Places for Everyone Joint Committee document dated 20th July 2021, author Paul Dennett, Page 15 section 2.2 (ii))
<https://sccdemocracy.salford.gov.uk/mgConvert2PDF.aspx?ID=38690>
 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	Chadwick
Given Name	Phil
Person ID	1286590
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

<p>Compliance - Legally compliant?</p>	<p>No</p>
<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>Consultation on the plan should have been carried out in accordance with Statement of Community Involvement for the nine Local authorities participating in PfE. GMCA should have worked collaboratively with neighbouring authorities and prescribed bodies on strategic and cross boundary matters known as the Duty to Cooperate. The plan should comply with all relevant laws including the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. In addition, there is a statutory duty on local planning authorities to include policies in their Local Plan designed to tackle climate change and its impacts.</p> <p>Furthermore and I may repeat myself a little here on the legality side of things, 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 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 yes, the plan is not legal. This can only be established by a proper judicial review. So unless proven otherwise the plan must be considered illegal and not put to Government.</p>
<p>Redacted modification - 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.</p>	<p>The National Planning Policy Frameworks (NPPF) says is....</p> <p>35. Local plans and spatial developments are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are sound if they are:</p> <p>A) Positively Prepared- providing a strategy which, as a minimum, seeks to meet the objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so consistent with achievable sustainable development.</p> <p>Places For Everyone does not meet the areas needs, it is wanting to add an additional 5000 houses on the greenbelt in Hyde alone, it does not include all aspects of the areas needs requirements, there are no plans to build a new High school in the area to accommodate all the extra children and the road infrastructure cannot cope now, let alone the 5000 extra vehicles. The plan will not create a sustainable community in the area, as the destruction of the greenbelt and tarmacking it over is against the Greater Manchester Clean Air Strategy. You cannot destroy the greenbelt on one hand and then complain Tameside does not have clean air.</p> <p>B) Justified - an appropriate strategy, taking into account the reasonable alternatives based on evidence.</p> <p>Alternatives have not been taken into account, there are 4,744 dwellings available to be built on Brownfield land before looking at greenbelt or green spaces, this according to Tameside Council's own Brownfield Land register https://www.tameside.gov.uk/TamesideMBC/media/Planning/brownfield_land_register</p> <p>Because of this, I do not feel the plan is supported by all the evidence that is needed.</p> <p>C) Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the framework and other statements of national planning policy where relevant.</p> <p>The proposals will cause untold damage to the environment and climate and allow the quality of life for future generations to be diminished if this plan goes ahead. The proposals</p>

mitigate the issues surrounding climate change, replacing greenbelt with tarmac will result in more flooding.

D) Effective - deliverable over the plan period, and based on effective joint working on boundary strategic matters that have been dealt with rather than deferred, as evidenced in the statement of common ground.

The proposal can not be achieved within the plan timescale, Tameside Council are already delayed in submitting the separate plan for the submission for Godley Green Garden V by SIX months! The planning department is an unmitigated disaster, the only factors that will prevent it being achieved, is Tameside Council themselves.

Furthermore and I may repeat myself a little here on the Soundness side of things, but the factors to consider are:

1. 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) ONA population predictions and take into account the effect of Covid on work patterns.

2. 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.

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

4. There has been poor public consultation, a lack of accessible information and little engagement 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.

5. 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 consideration of alternatives.

6. Several of the authorities involved have consistently failed to meet housing delivery targets. An effective plan must be deliverable. The plan relies on the cooperation of private developers. There is no indication of how delivery targets will be maintained. A strategic 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.

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8. 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.

9. 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.

10. 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 document 20th July 2021, author Paul Dennett, Page 15 section 2.2 (ii))

<https://sccdemocracy.salford.gov.uk/mgConvert2PDF.aspx?ID=38690>

Places for Everyone Representation 2021

	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	Chadwick
Given Name	Phil
Person ID	1286590
Title	JPA 32: South of Hyde
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>Consultation on the plan should have been carried out in accordance with Statement of Community Involvement for the nine Local authorities participating in PfE. GMCA should have worked collaboratively with neighbouring authorities and prescribed bodies on strategic and cross boundary matters known as the Duty to Cooperate. The plan should comply with all relevant laws including the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. In addition, there is a statutory duty on local planning authorities to include policies in their Local Plan designed to tackle climate change and its impacts.</p> <p>Furthermore and I may repeat myself a little here on the legality side of things, 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 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 not, is the plan not legal. This can only be established by a proper judicial review. So unless proven otherwise the plan must be considered illegal and not put to Government.</p>
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