

Places for Everyone Representation 2021

<b>Family Name</b>	Chadwick
<b>Given Name</b>	Phil
<b>Person ID</b>	1286590
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Family Name</b>	Chadwick
<b>Given Name</b>	Phil
<b>Person ID</b>	1286590
<b>Title</b>	Our Vision
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<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 (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</p>

	<p>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><b>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.</b></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 areas 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 and is consistent with achievable sustainable development.</p> <p>Places For Everyone does not meet the areas needs, it is wanting to add an additional 2790 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 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 Plan. 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 and based on evidence.</p> <p>Alternatives have not been taken into account, there are 4,744 dwellings available to build on Brownfield land before looking at greenbelt or green spaces, this according to Tameside Council's own Brownfield Land register <a href="https://www.tameside.gov.uk/TamesideMBC/media/Planning/brownfield_land_register.csv">https://www.tameside.gov.uk/TamesideMBC/media/Planning/brownfield_land_register.csv</a></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 polices 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 do not mitigate the issues surrounding climate change, replacing greenbelt with tarmac will result in more flooding.</p>

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<b>Person ID</b>	1286590
<b>Title</b>	JPA 31: Godley Green Garden Village
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
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Chadwick

**Given Name**

Phil

**Person ID**

1286590

**Title**

JPA 32: South of Hyde

**Type**

Web

**Soundness - Positively prepared?**

Unsound

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7. 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.

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 documentation, 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.