

Places for Everyone Representation 2021

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|---|--------------------------|
| Family Name | Colbourne |
| Given Name | Andrea |
| Person ID | 1286725 |
| Title | Stakeholder Submission |
| Type | Web |
| Family Name | Colbourne |
| Given Name | Andrea |
| Person ID | 1286725 |
| 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 |
| Family Name | Colbourne |
| Given Name | Andrea |
| Person ID | 1286725 |
| 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.

GMCA should have worked collaboratively with neighbouring authorities and prescribed bodies on strategic and cross boundary matters, know as the duty to co-operate.

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.

Furthermore 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 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.

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The plan should comply with all relevant laws including the Planning and Compulsory Purchase ACT 2004 and the Town and Country Planning Act (local planning) regs 2012.

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What the National Planning Policy Frameworks (NPPF) says its

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:

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.

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 and then complain Tameside does not have clean air.

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

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

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

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 result in more flooding.

D) 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.

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 Village, by SIX months! The planning department is an unmitigated disaster, the only factors that will prevent it being achieved, is Tameside Council themselves.

Things 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) ONS 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 spent 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 a plan must be deliverable. The plan relies on the cooperation of property developers. There is no indication of how delivery targets will be maintained. A strategy to 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 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)

(Public Pack)Agenda Document for Places for Everyone Joint Committee, 20/07/2021 09:30 (oldham.gov.uk)

This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.

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Places for Everyone Representation 2021

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| Given Name | Andrea |
| Person ID | 1286725 |
| Title | JPA 31: Godley Green Garden Village |
| Type | Web |
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| Soundness - Justified? | Unsound |
| Soundness - Consistent with national policy? | Unsound |
| Soundness - Effective? | Unsound |
| Compliance - Legally compliant? | No |
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| Family Name | Colbourne |
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| Person ID | 1286725 |
| Title | JPA 32: South of Hyde |
| Type | Web |
| Soundness - Positively prepared? | Unsound |
| Soundness - Justified? | Unsound |
| Soundness - Consistent with national policy? | Unsound |
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