

Places for Everyone Representation 2021

Family Name	Brown
Given Name	Iain
Company / Organisation	Save Crimble Mill Greenbelt Group
Person ID	1286685
Title	Stakeholder Submission
Type	Web
Include files	PFE1286685_Redacted.pdf
Family Name	Brown
Given Name	Iain
Company / Organisation	Save Crimble Mill Greenbelt Group
Person ID	1286685
Title	JPA 21: Crimble Mill
Type	Web
Include files	PFE1286685_Redacted.pdf
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>Legality</p> <p>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.</p> <p>Soundness</p> <p>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.</p>

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	<p>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 - There are no partners or industries identified for employment provision. Major partners for employment provision should be identified.</p> <p>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.</p> <p>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.</p> <p>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</p>
Family Name	Brown
Given Name	Iain
Company / Organisation	Save Crimble Mill Greenbelt Group
Person ID	1286685
Title	Other Comments
Type	Web
Include files	PFE1286685_Redacted.pdf
Redacted general comment - Please add any comments not addressed above	<p>Legal Compliance GMSF to PfE</p> <p>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.</p>
Family Name	Brown
Given Name	Iain
Company / Organisation	Save Crimble Mill Greenbelt Group
Person ID	1286685
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Type	Web

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Include files	PFE1286685_Redacted.pdf
Redacted general comment - Please add any comments not addressed above	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.
Family Name	Brown
Given Name	Iain
Company / Organisation	Save Crimble Mill Greenbelt Group
Person ID	1286685
Title	JP-D1 Infrastructure Implementation
Type	Web
Include files	PFE1286685_Redacted.pdf
Redacted general comment - Please add any comments not addressed above	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. 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
Family Name	Brown
Given Name	Iain
Company / Organisation	Save Crimble Mill Greenbelt Group
Person ID	1286685
Title	JP-J 2 Employment Sites and Premises
Type	Web
Include files	PFE1286685_Redacted.pdf
Redacted general comment - Please add any comments not addressed above	There are no partners or industries identified for employment provision. Major partners for employment provision should be identified.
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Given Name	Iain
Company / Organisation	Save Crimble Mill Greenbelt Group
Person ID	1286685
Title	Other Comments
Type	Web
Include files	PFE1286685_Redacted.pdf
Redacted general comment - Please add any comments not addressed above	Statement of Community Involvement 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.
Family Name	Brown
Given Name	Iain
Company / Organisation	Save Crimble Mill Greenbelt Group

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Person ID	1286685
Title	Supporting Evidence
Type	Web
Include files	PFE1286685_Redacted.pdf
Redacted comment on supporting documents - Please give details of why you consider any of the evidence not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Site Selection</p> <p>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.</p> <p>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.</p>