

Places for Everyone Representation 2021

Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	Stakeholder Submission
Type	Web
Include files	PFE1286827_Redacted.pdf
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	Our Vision
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-Strat 4 Port Salford
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	Yes
Redacted reasons - Please give us details of why you consider the consultation point not	Port Salford fails to allow connection to the Carrington Area. A new bridge across the Manchester Ship Canal should be considered.

to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	
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.	Allow for the construction of a new bridge over the ship canal.
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-Strat 9 Southern Areas
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
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.	I see no reason to release Green Belt areas for development, especially where these are located on mossland. Local character will be destroyed. There is a complete and utter incompatibility in seeking "to identify opportunities to protect and enhance the natural and historic environments" if these are to be built on?
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.	Retain existing Green Belt boundaries and add additional areas of Green Belt when they are of natural and historic environments.

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Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-Strat 11 New Carrington
Type	Web
Include files	PFE1286827_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
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-Strat 13 Strategic Green Infrastructure
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
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.	This is totally at variance with JP - Strat 11, making either or both policies unsound and ineffective. It is impossible to protect lowland wetlands and mosslands if the intention is build on the second-largest mossland in Greater Manchester.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the	Reconsider JPA 33

plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-Strat 14 A Sustainable and Integrated Transport Network
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
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.	The local bus routes to the Dunham area have been reduced with no likely reinstatement announced. This policy is inconsistent if the reality is that bus services are being reduced in extent and number.
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 policy needs a considerable amount more work.
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-S 1 Sustainable Development
Type	Web
Include files	PFE1286827_Redacted.pdf

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Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
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.	It is unsustainable as it involves the destruction of several areas of lowland peat moss and the potential loss of still more areas through the disruption of drainage systems and groundwater levels. I believe there is adequate brownfield land available to accommodate currently-proposed housing needs (which do not take into account the effects of Brexit, Covid or the influx of Hong Kong citizens)
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.	I believe the plan should entirely remove any concepts of developing on mossland and instead propose the active restoration of mossland wherever possible, thus restoring invaluable carbon sinks and massively increasing biodiversity.
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-S 2 Carbon and Energy
Type	Web
Include files	PFE1286827_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	The plan involves removing several areas of lowland peat moss. This is inconsistent with Government policy and stated intentions.

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.	
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.	Remove any proposals for developing peat mossland.
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-S 3 Heat and Energy Networks
Type	Web
Include files	PFE1286827_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.	It is completely inconsistent with the removal of peatlands, which will entail the production of massive quantities of CO ₂ e as the peat dries out.
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	It would surely make more sense to restore the mossland as a superb carbon sink?

you have identified above.	
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-S 4 Resilience
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
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.	I believe it to be ineffective. Councils cannot afford the maintain existing Green Infrastructure, why would they be able to maintain more in future?
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.	I believe this policy needs to be extended to 'retrofit' existing areas, with maps being prepared indicating important potential links; these could be created at some point in future, when land is available?
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-S 5 Flood Risk and Water Environment
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound

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Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-S 6 Clean Air
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
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.	JPA 33 in Trafford is advocating building new roads across mossland, but these roads will increase pollution and decrease air quality at a number of points both within the JPA 33 area and outside, adversely affecting schools and housing areas.
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.	Look more carefully at links with adjacent Local Authorities and establish current traffic levels and proposed traffic loads, relating these to current atmospheric pollution and the possible increases at certain points.
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-S 7 Resource Efficiency

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Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-J 4 Industry and Warehousing Development
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
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.	Warehousing should clearly be located where there are good transport links, but it needs to be acknowledged that workers in then come for wider areas and the impacts of increased traffic flows has not, in the case of JPA 33, been taken into account. While I am sure that employment in Trafford will increase, employees will be drawn in from wider areas, outside Trafford, travelling along roads already overloaded and with a poor bus service with no plans to improve it.
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound

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Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
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.	Covid 19 and Brexit have not been taken into account. These are major impacts and all avenues should be explored before even considering removing Green Belt.
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.	I suggest a review of brownfield sites and of the viability of commercial and office areas. We should not be demolishing buildings until their viability for conversion has been considered.
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-H 2 Affordability of New Housing
Type	Web
Include files	PFE1286827_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	This is not realistic if volume builders believe they cannot delivery any affordable housing on land which has no extra-over costs to develop (see PINS reference:

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to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	APP/Q4245/W/19/3243720). All developers will cite insuperable site problems which prevent them from delivering affordable housing. Developing of peatlands is simply inviting them to use an excuse?
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.	Do not develop on peatlands or areas of difficult ground unless the difficulties have been established and the costs indicated prior to development and even then only on the basis that the percentage of affordable homes is fixed by agreement with the Planning Authority.
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-H 3 Type Size and Design of New Housing
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-H 4 Density of New Housing
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes

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Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-G 1 Valuing Important Landscapes
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
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.	This is a very broad-brush LCA and should be supplemented by more local LCAs - for instance by Parish, which will reveal greater depth of LCA and should be used to formulate development plans.
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-G 2 Green Infrastructure Network
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes

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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.	Again, very broad-brushed and should be supplemented by more detailed local studies - again possibly Parish by Parish (or similar level) which would reveal connectivity issues often requiring urgent addressing.
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-G 3 River Valleys and Waterways
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-G 4 Lowland Wetlands and Mosslands
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	Yes
Redacted reasons - Please give us details	Completely ineffective as Trafford JPA 33 is totally inconsistent - as is Salford Council's JPA 28. This Policy is fatally flawed from the outset. The policy

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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.	clauses are great and the ambition is to be applauded, but it is impossible to comply with these clause and at the same time develop the same areas?
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.	Remove all Policies impinging development of any kind into peat of mossland.
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-G 5 Uplands
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-G 6 Urban Green Space
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes

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Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-G 7 Trees and Woodland
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
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.	This should be secondary to JP-G4 as the carbon sink provided by mossland is between 4 and 10 times more effective than the equivalent area of woodland.
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-G 8 Standards for Greener Places
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes

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Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-G 9 A Net Enhancement of Biodiversity and Geodiversity
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
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.	Completely ineffective as Trafford JPA 33 is totally inconsistent - as is Salford Council's JPA 28. This Policy is fatally flawed from the outset. The policy clauses are great and the ambition is to be applauded, but it is impossible to comply with these clause and at the same time develop the same areas?
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-G 10 Green Belt
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
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,	Please see attached document.4.

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is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-P1 Sustainable Places
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
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>JPA 33 does not comply with any of Clause 1, particularly in respect of land in Warburton, located within a historic deer park, on top of archaeology, adjacent to medieval fish ponds and ancient woodland and, most importantly, within the core of the historic Warburton Parish which has a largely untouched medieval landscape. I believe this renders the policy as completely ineffective.</p> <p>Similarly, the large expanse of Carrington Moss has a very distinctive character which should be preserved at all costs and should be restored to what it was before agricultural "improvements" on the 1840s. This used to be a grouse moor, with very many species of now rare plants and birds and could become so again at relatively low cost.</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.	Remove JPA 33
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-P2 Heritage
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Unsound

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Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
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.	As with JP-P1 above, this is fatally flawed in that it is completely inconsistent.
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.	Remove Policy JPA 33
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-P3 Cultural Facilities
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Beckmann
Given Name	Edward
Person ID	1286827

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Title	JP-P4 New Retail and Leisure Uses in Town Centres
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-P5 Education Skills and Knowledge
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
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.	JPA 33 proposed some 5,000 houses but does not allocate any areas for additional schools. The additional traffic generated by employment areas and new housing will render at least some of the existing educational facilities to being unhealthy because of atmospheric pollution. Currently education facilities in and around the area are substantially oversubscribed and the difficulties are increasing. There would need to be substantial areas of land provided for schools which JPA 33 does not allocate.
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	Remove JPA 33

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you have identified above.	
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-P6 Health
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-C1 An Integrated Network
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
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.	JPA 33 creates jobs and houses which would be accessed by non-sustainable transport from outside the GM area (Warrington) and this has not been given adequate consideration and is contrary to JP-C 1
Redacted modification - Please set out the modification(s) you	Reconsider JPA 33

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.	
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-C2 Digital Connectivity
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-C4 Streets for All
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
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	This policy is not being complied with in rural areas of Trafford causing considerable problems, both socially and in terms of safety. I am not sufficiently convinced that it can be delivered.

comply with the duty to co-operate. Please be as precise as possible.	
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.	More consideration needs to be given to rural roads in Trafford, to traffic flows and safety. The plan needs further consideration.
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-C5 Walking and Cycling Network
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
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.	This policy does not include retrospective improvement works to existing highways, some of which are highly dangerous for cyclists and pedestrians.
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.	Add a clause about retrospective improvement works, including traffic speed controls etc.
Family Name	Beckmann

Places for Everyone Representation 2021

Given Name	Edward
Person ID	1286827
Title	JP-C6 Freight and Logistics
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-C7 Transport Requirements of New Developments
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JPA 33 New Carrington
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound

<p>Compliance - Legally compliant?</p>	<p>NA</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>I am unsure if JPA 33 is legally compliant. However, I believe it is unsound. It does not comply with the NPPF Para. 8 clause c) specifically in mitigating and adapting to climate change. A large proportion of JPA 33 is sited on moss land (with peat deposits recorded as up to 6m deep in 1995). JPA 33 does not comply with NPPF Para. 11 clause b) ii where the "adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole." JPA 33 clearly is contrary to clause d) as the moss land is "irreplaceable habitat".</p> <p>JPA 33 is contrary to NPPF Para. 20 clause d) "conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation." It is clear that removal of peat is diametrically against climate change mitigation, further, if the removal leads to the decomposition (through drying out) of remaining areas of peat in Carrington Moss after development this will have a massive climate impact.</p> <p>GMSF Policy JP-P 2 Heritage states,</p> <p>"Through this Plan we will proactively manage and work with partners to positively conserve,</p> <p>sustain and enhance its historic environment and heritage assets and their settings."</p> <p>and</p> <p>"This knowledge should be used to inform the positive integration of our heritage by:</p> <ol style="list-style-type: none"> 1. Setting out a clear vision that recognises and embeds the role of heritage in place-making; 2. Utilising the heritage significance of a site or area in the planning and design process, <p>providing opportunities for interpretation and local engagement;</p> <ol style="list-style-type: none"> 3. Integrating the conservation and enhancement of heritage assets and their settings, with creative contextual architectural responses that contribute to their significance and sense of place; 4. Delivering positive benefits that sustain and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing" <p>at the same time it states,</p> <p>"Development proposals should identify assets of archaeological interest and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets."</p> <p>Despite this Policy, JPA 33 seeks to develop a substantial part of Warburton, at least 50% of the development on the site of a medieval / post-medieval deer park, evidence for which is clearly submitted as part of JPA 33. This evidence also formed part of the evidence submitted by GMAS for Planning Application 98031/OUT/19- Residential development of up to 400 dwellings, including the creation of new points of access, provision of formal and informal open space, ancillary landscaping, car parking and highway and drainage</p>

works, Land To The East And West Warburton Lane, Warburton, WA13 9TT I suggest this evidence is overwhelming against any development in the Warburton area.

This is further confirmed by the New Local Plan, Policy HE1 - Historic Environment

HE1.1 Development shall be designed to preserve and where possible enhance the significance of heritage assets and their settings, and make a positive contribution to local character, distinctiveness and sense of place.

HE1.2 The Council will encourage development proposals that find appropriate new and sustainable uses for heritage assets or retain them in viable uses consistent with their conservation.

HE1.3 Any development that would cause harm to the significance of a heritage asset or its setting will be considered in accordance with the development plan and national policy, and where relevant the statutory duties in the Planning Acts together with case law. It must be convincingly demonstrated that the harm cannot reasonably be avoided and public benefits arising from the development are sufficient to outweigh the harm caused.

This is still further supported by the Adopted Core Strategy and the current UDP policies, which although "old" are still viable policies.

The evidence submitted regarding the Deer Park shows clearly that it extends up to Red Brook in the north, encompassing part of JPA33. The evidence submitted by GMAA in Appendices 6 (F) p12 2.18 and 7 The tithe maps etc. and HEA GMA45 report 2020/4 p13 4.4.2. and HEA GMA45 Appendix 3 (Built heritage) map on p32 / 117 shows the deer park boundary (itself a Heritage Asset) and various other identified assets, including those south of Red Brook and within the New Carrington site.

Importantly, the Deer Park boundary to Red Brook is an area of Ancient Woodland which would be irreparably damaged if the Deer Park area adjacent were to be developed. Previous proposals included building a bridge across Red Brook, through the Ancient Woodland and through the adjoining Deer Park pale.

It is worth noting that the full extent of the deer park is easily distinguished on a map, and that the present road system defines its eastern, southern and part of its western sides. Evident in Warburton and characteristic of very many deer parks are, for example, the remains of the park pale (a perimeter ditch (and often a bank) with a paling fence and hedge on top) with curved corners (to avoid deer being trapped in angular corners when being chased), the many small copses mainly associated with small ponds and the immediately adjacent ancient woodland to the north. The former manor house, Warburton Park Farm, stands in the centre of the deer park, while Onion Farm (Listed 3797.1.0) was an entrance lodge on the eastern side and almost certainly a keeper's cottage and venison hanging-room. Associated with Onion Farm and a little way to the east is a pinfold, possibly used as a holding pen, prior to releasing deer to be hunted in the park. Monument 2244.1.0 Burial Mound (possible) is probably more likely to be a pillow mound, clearly once moated and the remnant of a warren for keeping rabbits, again very characteristic of a deer park.

It should be noted that the Warburton Deer Park, despite being to the north side of the Parish of Warburton, is the core of the village and all the development of the village has historically been around the perimeter of the Deer Park and the adjacent Warburton Moss. Development within the Deer Park will destroy the settings of very many listed buildings and structures, as would development to the east.

The development of the Warburton Deer Park is contrary to NPPF paragraph 8. c) and possibly the last bit of b) where it mentions about supporting communities" cultural wellbeing. NPPF paragraph 189 mentions about an

	<p>irreplaceable resource and that these should be conserved in a manner appropriate to their significance.</p> <p>JPA 33 appears to fail with the duty of co-operate. NPPF Para. 16 clause c states that Plans should; "be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees" This does not seem to be the case, Parish Councils do not appear to have been involved at all and the effective engagement I would class as hardly existing.</p> <p>New development will certainly not integrate with the existing communities of Carrington, Partington and Sale West, nor will it "enhancing the quality of places and their local character, including through good quality design, enhanced green infrastructure (and access to it)". The proposals effectively destroy the quality and character of these places and good quality design will be not possible when the developments costs of building on mossland is considered. There will certainly be no affordable housing. Building on areas of historic landscape and adjacent to ancient woodland is exceptionally damaging and entirely contrary to other proposed policies.</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>I do not believe JPA 33 is sound, so much so that I see no alternative but to abandon the proposals. It would be much wiser and in compliance with the general principles of the NPPF to consider large-scale restoration of Carrington Moss, as parts of Chat Moss (north of the Mersey) have been restored.</p> <p>In respect of the elements of JPA33 within Warburton, it has been obvious for a considerable time that these should revert back to Green Belt. The practice has always been that Green Belt boundaries should align with natural boundaries in the landscape. Those elements of JPA33 within Warburton are clearly breaching the natural boundary of the Red Brook valley with its ancient woodland and deer park pale leaving any development exposed to distant views with little intervening landscape mitigation possible.</p>
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	JP-D1 Infrastructure Implementation
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
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,	JPA 33 appears to assume that transport infrastructure to the west (into Warrington) is capable of taking additional traffic. It is already struggling and this is affecting the lives of local people and society.

is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	
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.	An alternative crossing to the Warburton high level toll bridge is urgently required. This should be a bridge capable of taking HGVs and should be to the east of Partington, serving Port Salford.
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	Other Comments
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	Other Comments
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA

Places for Everyone Representation 2021

Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	Other Comments
Type	Web
Include files	PFE1286827_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Beckmann
Given Name	Edward
Person ID	1286827
Title	Supporting Evidence
Type	Web
Include files	PFE1286827_Redacted.pdf