

Places for Everyone Representation 2021

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| <b>Family Name</b>  | Brown   |
| <b>Given Name</b>   | Andrew  |
| <b>Person ID</b>  | 1287589   |
| <b>Title</b>  | Stakeholder Submission  |
| <b>Type</b>   | Web   |
| <b>Include files</b>  | <a href="#">PFEAndrewBrown_ResponseForm_Redacted.pdf</a><br><a href="#">PFEAndrewBrown_Email_Redacted.pdf</a>   |
| <b>Family Name</b>  | Brown   |
| <b>Given Name</b>   | Andrew  |
| <b>Person ID</b>  | 1287589   |
| <b>Title</b>  | JPA 35: North of Mosley Common  |
| <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>  | Yes   |
| <b>Compliance - In accordance with the Duty to Cooperate?</b>   | Yes   |
| <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>I write regarding the proposed Places For Everyone site allocation of JPA35, land north of Mosley Common.</p> <p>I feel there has been a significant oversight in the drawing up of the allocation of this site based on a number of factors which I seek to outline below.</p> <p>1.Traffic</p> <p>Based on the awful traffic situation in the area and the below points I would like to request that site allocation JPA35 be removed from the masterplan altogether, until such a point as the road infrastructure is improved to meet the demand.</p> <p>1.1. Insufficient highways capacity. Other than the addition of the heavily trafficked East Lancs A580 road, the area around the site allocation is served by roads that are much in the same layout and size as they were in 1850. They have not been sufficiently re-architected to meet the current demands placed upon them</p> |

1.2. Worrying culture in the highways agency. Anecdotal evidence from councillors and the local MP suggests that the highways agency have a worrying culture of not wishing to object to new developments, displaying a shocking normalcy bias in the face of clear endemic traffic and congestion issues in the area.

1.3. Whilst it is appreciated that quantitative traffic surveys have or will be carried out, the qualitative experiences of residents reveal that using the road network around Mosley Common can be an extremely unpleasant experience. Journeys to the M60 junction 13 which should take only 8 minutes from Mosley Common can take over an hour at various parts of the day currently.

1.4. The matter raised at point 1.3 will be further worsened by the proposed site allocations of JPA27 "East of Boothstown" and JPA26 "Hazelhurst Farm" which will add a further 700 houses in the local area, all of which will be likely to utilize the same parts of the road network, namely the A580, J13 and J14 of the M60 and Leigh Road.

1.5. The matters raised at point 1.3 and 1.4 will be further worsened by existing ongoing development of 170 houses at the Bellway Elements estate, as well as an additional 40 houses yet to be built at the Eccleston Homes Garrett Hall/Garret Manor estate.

1.6. Simply adding a left hand filter lane to the A580 will not improve the pre-existing traffic issues in other areas, such as through the centre of Tyldesley, down Mosley Common Road, into Boothstown as well as other junctions of the A580 which will be worsened by the proposed development.

1.7. Speaking as a resident of the Mosley Common area, I can say that I am regularly deterred from leaving my house due to the sheer volume of traffic in the area, especially down Mosley Common Road, Mort Lane and down the historic Manchester Road through Tyldesley. This significantly and negatively impacts my quality of life.

1.8. By creating a new development which is not served by sustainable transport options PfE do not comply with section 104 of the National Planning Policy Framework which states that such options should be available. Merely adding extra buses on the guided busway will not satisfy this requirement.

## 2.The use of Green Belt land over Brownfield sites

I propose that due to the high availability of brownfield sites, that allocating a large area of green belt land does not meet the test of "Soundness". Indeed I would state further that the test of "exceptional circumstances" which are required to remove greenbelt designation from land is not met.

2.1. Wigan Council published its most recent brownfield register in December 2020, showing that brownfield sites across Wigan have the potential to accommodate over 8800 new homes. (Source <https://opendata.wigan.gov.uk/datasets/Wigan::brownfield-3/about> ). With so many possible brownfield sites available, it is unnecessary to pursue a simplistic and reductive approach of large developments of housing estates on green belt land at this time.

2.2. Making use of brownfield sites would allow new homes to be spread throughout the borough in a way which would have much lower impact on infrastructure and amenities.

2.3. In the PfE documents it states that "exceptional circumstances" exist to remove this land from its green belt allocation, however there is no justification given as to why. In a recent PfE videoconference (held on 23/09/21) it was stated that there is no official guidance regarding these "exceptional circumstances" and that in the absence of an official definition, that the dictionary definition must be used, but this is a highly reductive and simplistic way to derive the definition, the simplicity of which only serves the PfE plan and not the public. Good guidance does exist on what constitutes "exceptional circumstances" as follows:

The most common factors used to establish "Exceptional circumstances" for removal of land from greenbelt and why the Mosley Common site does not meet these:

Exceptional Circumstance factor: Unmet need for development.

This exceptional circumstance is not met because as illustrated by Wigan council's own brownfield register there is not an unmet need for development. Sufficient brownfield sites exist to fulfil demand.

Exceptional Circumstance factor: The release is the most sustainable option.

This exceptional circumstance is not met because the area is NOT served well by existing infrastructure. The road network is demonstrably unfit for purpose. GPs surgeries are oversubscribed. Parents are unable to get their children into their first choice of school. The guided busway is over capacity at peak times, resulting in many buses passing commuters by in the morning due to being full. The nearby park and ride is often mostly empty as it is futile attempting to get the bus at normal commuting hours.

Exceptional Circumstance factor: Lack of contribution to green belt purposes.

This exceptional circumstance is not met because this land provides a natural boundary between Wigan and Salford, checking urban sprawl and preserving an area of countryside for locals to use in order to exercise, ride bikes and walk their dogs.

Exceptional Circumstance factor: Creation of defensible boundaries

This exceptional circumstance is not met because whilst it is always possible to create a minuscule defensible boundary at the edge of a housing estate, this does not provide a good enough reason to remove this land from the green belt

Exceptional Circumstance factor: Limited Visual Impact

This exceptional circumstance is not met because as discussed in UKSC 2018/0077 Samuel Smith Brewery v North Yorkshire, by allowing development on this land to be used for contiguous building of houses from Mort Lane all the way to Ellenbrook, there will not be a limited visual impact and such housing will consist of urban sprawl

Exceptional Circumstance factor: Provision of Infrastructure

This exceptional circumstance is not met because as discussed, the current proposed contribution to infrastructure is not sufficient even to satisfy the current population of the area. The area is not well served by shops, leisure facilities, the road network or public transport. Merely adding services to the guided bus way will not sufficiently mitigate this.

Exceptional Circumstance factor: Reuse of brownfield land

This exceptional circumstance is not met because brownfield land within the greenbelt is not primarily being utilised for this site

As the above most common exceptional circumstances have not been met, this land should not be removed from the greenbelt.

3. The overwhelming focus on housing and not on amenities as part of the site allocation

The addition of 1100 homes to a small suburb constitutes the equivalent population of an entire township, yet the proposals to support this new community do not include extra shops, leisure facilities, a post office or a gym. There is also no proposal in the immediate area to improve employment, yet masterplans are supposed to address a number of factors and not just housing.

By proposing a large development of 1100 houses without sufficient amenities to support them, PfE will contradict section 130(f) of the National Planning Policy Framework which states that new developments should have sufficient amenity to support them.

This problem is further compounded by the fact that over 1000 houses are already in the process of being built in the town of Mosley Common, at varying stages of completion. This, including the PfE allocation will increase the population from 11000 people, by 4000 people, over 30%.

4. The lack of revisiting housing demand close to urban centres following Covid-19

4.1. The Manchester wide masterplan PfE needs to be a data and fact led initiative.

4.2. The Covid-19 pandemic throughout 2019-2021 has materially changed the face of the working world. The CIPD, Gartner and the ONS have all published data commenting on the measurable increase in remote working positions since the onset of COVID-19.

4.3. The requirement to locate oneself next to an urban centre for knowledge worker roles has reduced, yet the PfE initiative has not reduced its forecasts at all in light of this huge global shift in ways of working.

4.4. Places for Everyone should materially reconsider the amount of homes needed to be located in the Greater Manchester area, now that these new facts are available.

4.5. The 2014 figures used to calculate the housing demand have frequently been criticised yet PfE are engaging in a huge confirmation bias by not considering new facts.

5. The site allocation is anti-democratic, not supported by our elected members of Parliament.

5.1. The last general election took place in 2019. Residents of the Leigh constituency elected James Grundy MP as their member of parliament, to represent them for the duration until the next general election.

5.2. James Grundy stands on a platform of "brownfield first" development and was elected on this basis.

5.3. Similarly, the democratically elected MP for our neighbouring constituency of Worsley and Eccles South, Barbara Keeley MP, does not support the neighbouring site allocations of JPA26 and JPA27.

5.4. Despite us democratically electing these representatives for our constituencies, one of which said in parliament that they had "Grave concerns about the way the local authority has conducted itself" in relation to the GMSF (now PfE with the removal of Stockport), these plans are now moving forward.

5.5. This is not a party political issue, as James Grundy MP is a member of the Conservative Party, whilst Barbara Keeley MP is a member of the Labour party.

6. The level of consultation with local residents has been poor and not in line with Wigan's "Statement of Community Involvement"

The "Places for everyone, Why are we consulting?" document (<https://placesforeveryone.consultation.ai/#board-3>) states that:

"The process of community involvement for Places for Everyone should be in general accordance with the relevant Local Planning Authority's (LPA) Statement of Community Involvement (SCI)."

Wigan Council's Statement of Community Involvement

([https://www.wigan.gov.uk/Docs/PDF/Council Strategies Plans and Policies/Planning/Local Plan/Wigan Statement of Community Involvement.pdf](https://www.wigan.gov.uk/Docs/PDF/Council%20Strategies%20and%20Policies/Planning/Local%20Plan/Wigan%20Statement%20of%20Community%20Involvement.pdf)) states:

"We will contact you... "The general public" "at the publication stage" "directly by email, or by post when it is the only means available"

Yet Wigan Council has not contacted all local residents by post. Indeed the only direct communication that all residents have received has been from the local MP, informing us that he is not in support of the plan in its current form.

I would therefore like to propose that JPA35 be removed from the site allocation list until such a time as Wigan Council follows its own statement of community involvement to engage in a meaningful, detailed and collaborative way with their local residents to ensure that a suitable cross-section of views have been achieved. Additionally:

6.1. Residents of properties who directly overlook the proposed site allocation, or even are inside the site allocation (the incorrectly labelled "potentially retained farmsteads") have not been directly contacted about the proposed site allocation.

6.2. A local residents group on Facebook shows repeated comments of "I had no idea this was happening until a local action group dropped a leaflet through my door"

6.3. By not engaging widely with local residents, many important viewpoints, facts and opinions will now be missing.

6.4. PfE and Wigan Council cannot ensure the soundness of their plan without a rigorous and in-depth consultation with local residents, yet sadly this has not occurred.

6.5. Whilst I am sure the lack of engagement is merely an oversight, it does rather convey a perception of opacity and disregard by the council.

7. The method of receiving comments via consultation is unusually and prohibitively obstructive

In order to submit feedback about a local site allocation via the PfE website, a resident must complete 11 separate interactions with the website. This has the potential to prevent people adding their thoughts due to the lengthy process.

7.1. There have been many comments from local residents that the lengthy process to submit their constructive thoughts on the site allocation has actually prevented them from submitting their opinions

8. The lack of a rigorous investigation into the geology of the site, especially with regard to the history of mining.

As known by local historians, the site allocated for development was formerly part of an open cast mine, with multiple ladder shafts sunk at various locations across the site. Despite this:

8.1. There appears to have been no detailed investigation of the geology of the site before allocating this site for development. Significant subsidence has been seen on properties in the local area, such as Commons Road, where construction has occurred on previous mines.

8.2. A freedom of information request was submitted to Wigan Council asking them for more details about the flood storage area that is proposed as part of the site allocation and how this could affect the nearby properties that exist within the site allocation. Wigan Council responded stating that they did not have any more details about this. As the flood storage is an integral part of this site, which has the potential not only to affect properties within the site allocation, but existing properties downstream, it is concerning that due diligence has not been performed by the council on this matter.

9. That the number of houses proposed as part of this site allocation would far exceed the overall target required

9.1. Section 7.12 of the "Places For Everyone Joint Development Plan Document" states that Wigan Council has more than enough supply to meet existing and current demand. With this in mind, it is difficult to follow the logic that has been used to state that the exceptional circumstances required to remove land from the greenbelt have been met.

10. That site plans have ignored the houses located directly in the centre of the proposed site allocation

10.1. Four houses exist in the middle of the proposed site allocation. These have been labelled as "Potentially retained farmsteads". They are not farmsteads at all, in fact they have been conventional homes since they were converted over 15 years ago. They are not involved in any farming business whatsoever.

10.2. JPA35 states that the site allocation is ideal for "high density housing" yet the houses in the middle of the site are low density, large houses. It would be a planning folly to directly surround low density housing with high density housing, rather any new properties built close to these existing historic buildings should be matching in size, style and density and the intent for this should be agreed to before the site is allocated.

#### 11. Summary

To sum up my points I believe that a significant oversight has been made in proposing the land north of Mosley Common as a suitable site for development for the following reasons:

11.1. Traffic especially in view of existing ongoing development in the area and nearby which will worsen this

11.2. Lack of proposed contribution to facilities by the new site allocation

11.3. "Places for Everyone" being unable to demonstrate that the exceptional circumstances test has been met to remove this land from the greenbelt

11.4. That the number of houses being built exceeds the demand by PfE's own admission

11.5. That sufficient brownfield sites exist to meet our demand

11.6. That PfE and Wigan Council have not invested enough diligence into their engagement with the local community, even appearing to be out of sync with their own guidance on this matter

11.7. That the process for submitting objections and feedback is unnecessarily and obstructively difficult

11.8. Incorrect or insufficient consideration of key features within the site allocation such as the existing homes (incorrectly labelled as farmsteads)

11.9. Lack of rigour around the important flood mitigation proposal which has only been cursory and of which Wigan Council have stated they have "no details about" following a Freedom of Information request.

There are such glaring errors and oversights in the site allocation proposal that if JPA35 is approved for allocation and moves ahead, I believe that a judicial review should be undertaken, which may have a high likelihood of overturning the decision.

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|  | <p>I would implore you to listen to the experiences of the local residents. The traffic situation around here really is torturous and any plan to bring an extra 1100 homes to the area should have sufficient mitigation in place to address this.</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>I would like to request the following modifications:</p> <ol style="list-style-type: none"> <li>1) That any greenbelt land in the site allocation of JPA35 be removed from the plan until such a point as the 'exceptional circumstances' test can be proven to have been met</li> <li>2) That any greenbelt land in the site allocation of JPA35 be removed from the plan until significant development has been conducted within the identified 8800 property availability in brownfield sites</li> <li>3) That the plan should include mandatory improvements to the local road network, to be implemented as a pre-condition before the site is allocated and certainly before new houses start to be built. That these mandatory improvements should address the chronic congestion in the area.</li> <li>4) That the decision regarding the site allocation of JPA35 be delayed until such a point as Wigan Council have complied with their own guidance in their 'Statement of Community Involvement'</li> <li>5) That properties to be developed within JPA35 around the existing homes in the middle of the site (incorrectly labelled as potentially retained farmsteads, despite being private homes occupied by professionals) are developed to a sympathetic style and density in order to match the historic buildings already present.</li> <li>6) That the site allocation should include appropriate facilities within the site such as shops, leisure facilities, a post office, a gym, a health centre to prevent the need to saturate nearby facilities. If you are going to introduce a small township, you should ensure it has an appropriate centre with shops etc to establish a sense of community.</li> <li>7) That appropriate traffic calming proposals are made to avoid the new estate becoming a rat run for traffic passing from Mort Lane to Walkden</li> <li>8) That proposals are made to ensure that the existing pedestrian rights of way on the site do not become unsightly alleyways sandwiched between tall garden fences, encouraging crime, littering, dog fouling and other anti-social behavior, as can be seen in other nearby developments which have pedestrian rights of way passing through</li> <li>9) That, if the site is not removed from the plan in its entirety that the number of houses be significantly reduced by at least 50% and the size of the site allocation be reduced accordingly so that it matches the size of the allocations in other areas and does not unduly impact the local area</li> <li>10) That a sufficient geological study should be conducted before agreeing the site allocation to confirm that the proposal to store a large amount of floodwater on the site will not impact</li> </ol> |

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existing properties already within the site boundary or properties downstream close to Honksford Brook, which is already known to flood