

Places for Everyone Representation 2021

Family Name	Chandler
Given Name	Matthew
Person ID	1286970
Title	Stakeholder Submission
Type	Web
Include files	PFEMatthewChandler_Email_Redacted.pdf Letter re_ Places for Everyone_Redacted.pdf
Family Name	Chandler
Given Name	Matthew
Person ID	1286970
Title	JP-G 2 Green Infrastructure Network
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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>GM Allocation 49 (North of Mosley Common). Green Belt Assessment Appendix J 07.01.21 page 42 identifies area as in Flood Risk zones 2 and 3, stating there is "opportunity" to combine approaches, but no further requirement or proposal is made of flood risk management or wider management of water resource, e.g. capture, reuse, landscape design, requirements for building etc.</p> <p>GM Allocation 49 (North of Mosley Common). Green Belt Assessment Appendix J 07.01.21 page 45 largely on identifies "potential" for improvements in access, there is no commitment or mandate on most of the proposals.</p> <p>Document 07.01.02 "Embedding Green Infrastructure Principles" is largely aspirational, self-assessment frameworks that are liable to be ignored, by-passed or de-prioritised in practice.</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>Identifying possibilities that remain optional for developers or local authorities to implement at an unspecified time in the future is inadequate. The design stage has to be the time at which improvements are mandated as a condition of approval.</p> <p>The Principles described in 07.01.02 are not embedded by this document. Embedding requires binding commitment to implement the outcomes, not simply consider them.</p>
Family Name	Chandler
Given Name	Matthew

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Person ID	1286970
Title	JP-P1 Sustainable Places
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	NA
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.	There is no evidence in the supporting documentation of fulfillment of the Public Sector Equalities Duty (Equalities Act 2010). The policy JP-P1 makes broad and positive statements about inclusivity and considering the needs of a wide spectrum of individual needs. These policies are not reflected in transport documentation, the Places for People supporting documents deal exclusively with historic environment considerations. There is no assessment of the impact on groups within existing housing adjacent to development 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.	An Equalities Impact Assessment for each development site should be completed.
Family Name	Chandler
Given Name	Matthew
Person ID	1286970
Title	JP-P3 Cultural Facilities
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA

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Family Name	Chandler
Given Name	Matthew
Person ID	1286970
Title	JP-P5 Education Skills and Knowledge
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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 development at Mosley Common North does not include any extension of education facilities, i.e. primary school provision, in an area that already has over-subscribed schools and many parents have to drive children to school.
Family Name	Chandler
Given Name	Matthew
Person ID	1286970
Title	JP-P6 Health
Type	Web
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?	NA
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	<p>The development at Mosley Common North does not include any provision for primary health care facilities, e.g. a new general practice surgery, a pharmacy.</p> <p>There is no assessment of air pollution impact for existing residents and in new developments. The Mosley Common North development removes green field space which can currently serves as a carbon sink.</p>

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.	<p>Reference to existing health services capacity and accessibility needs to be considered before concluding that services are within acceptable geographic range.</p> <p>Air quality assessments are required, with impact on health for local residents and mandated actions to mitigate.</p>
Family Name	Chandler
Given Name	Matthew
Person ID	1286970
Title	JP-C3 Public Transport
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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>Document 09.01.16 page B29-B30 proposes that the solution to overcrowding on the busway routes at peak time is to buy more buses, having previously noted that at peak times there are buses running every 4 minutes. There is no consideration of what the maximum throughput on the busway can realistically be (noting of course that on the busway vehicles cannot overtake/pass).</p> <p>Document 09.01.16 page B30 and elsewhere: there is no consideration of overcrowding on existing commuter time services. The improvements at Walkden Station may be promised, but that has been the case for many years.</p> <p>Document 09.01.16 section 6.1.7 seems to conclude that bus routes that operate an hourly service or even every 30mins are in some way sufficient. This is manifestly unsound, an hourly service is of marginal use to commuters or any other users who have any kind of time bound journey (e.g. a medical appointment) to make. There are no proposals for increasing frequency, capacity or cleanliness (green vehicles) of local services.</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	The transport policy needs to identify how to increase capacity alongside the busway route.

or soundness matters you have identified above.	
Family Name	Chandler
Given Name	Matthew
Person ID	1286970
Title	JP-C4 Streets for All
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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>Document 09.01.16 section 8.1.11 onwards. There is no consideration of air quality or noise pollution impact from increased traffic.</p> <p>Document 09.01.16 section 9.1.7 attempts to absolve the planning process from solving the problem of a significant increase in traffic in the locality, by arguing that only once the road network becomes more constrained will people change travel habits. That is a shockingly laissez-faire approach and wholly inconsistent with the high-minded ideals of headline policy.</p> <p>Document 09.01.16 section 12.1.15 concludes that the Ellenbrook/A580 junction will be over capacity, but makes no proposal to resolve other than "further consideration of mitigation". That is insufficient.</p> <p>Document 09.01.16 section 12.1.28 suggests the Bridgewater Road / Mosley Common junction would be operating with reserve capacity. Given the modelling for the Mosley Common / A580 junction and current queuing here this seems implausible</p> <p>Document 09.01.16 section 13.1.14 suggests the Bridgewater Road/Newearth Road roundabout would be resolved by removing green space to create a bigger roundabout. The problem at this roundabout is AM traffic queuing from the Ellenbrook / A580 junction. A bigger roundabout will not solve that, Table 13 shows that that junction remains significantly over capacity.</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.	The road network is not capable of absorbing the amount of extra car journeys the North Mosley Common development would create as currently configured.
Family Name	Chandler
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Person ID	1286970
Title	JP-C5 Walking and Cycling Network
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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>Document 09.01.16 section 6.1.11 ignores the fact that shops and facilities at the southern end of the catchment (in Boothstown) are across the A580 and down a steep hill. There is no reflection on capacity of stated facilities - a small shop may serve existing communities, but may not be able to service the needs of a significantly increased catchment. Disability access is not addressed.</p> <p>Document 09.01.16 section 6.1.14 does not consider school capacity. A school may be in walking distance, but that is irrelevant if it is already full.</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.	Inclusion of local shops / facilities required to be included within the North Mosley Common development.
Family Name	Chandler
Given Name	Matthew
Person ID	1286970
Title	JPA 35: North of Mosley Common
Type	Web
Include files	Letter re_ Places for Everyone_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA

Compliance - In accordance with the Duty to Cooperate?	NA
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>There is no provision of new community facilities: shops, schools, community venues, places of worship, within the development. Existing facilities in the areas are simply assumed to have adequate capacity to absorb all the extra demand.</p> <p>The environmental impact is not adequately considered or provided for - water management, green buildings, alternative energy sources, air pollution, noise pollution all receive minimal to no consideration or mandated actions. On critical areas the proposals simply identify "opportunities" and "potential" for improvements, they do not make commitment or mandate exemplary standards.</p> <p>The transport solution for 1100 new homes is to make some minor junction improvements and buy extra buses for the busway route. There is no proper consideration of providing new cycle routes for commuting, no additional rail capacity, no additional buses other than the busway, no effort to deprioritise cars, no discussion of improving uptake of ULEV.</p> <p>There is no Equality Impact Assessment on the proposed development to demonstrate how this will serve the needs of diverse communities in the existing locality and the new development. Provision of housing suitable for the elderly or physically disabled, access to services for those with limited mobility, health impact assessments on increased traffic pollution are all missing. There is no commitment in the documentation to address these shortcomings.</p>
Family Name	Chandler
Given Name	Matthew
Person ID	1286970
Title	Other Comments
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	NA
Family Name	Chandler
Given Name	Matthew
Person ID	1286970
Title	JP-S 6 Clean Air
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound

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Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA