

Family Name	Godfrey
Given Name	Ian
Person ID	1287553
Title	Stakeholder Submission
Type	Web
Family Name	Godfrey
Given Name	Ian
Person ID	1287553
Title	JPA 35: North of Mosley Common
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?	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>One sentence in the introduction to the risk assessment document tell us everything we need to know about this "plan". It reads:</p> <p>"This report is prepared solely for the benefit of Peel Holdings (Land & Property) Ltd"</p> <p>Everything contained within the so called evidence base for this proposal to allocate a further 1100 homes at JPA 35 : North of Mosley Common is frankly little more than a joke. Most of it has not been updated since the initial GMSF and there are numerous references to studies and reports which are identified as being incomplete. How can any self respecting proposal be submitted without much of the data to back it up?</p> <p>You state throughout documentation that "urban green spaces are vital"...yet ignore your own remarks by creating more urban areas where green spaces already exist! Also completely ignores national guidance on green belt, which says areas should be ADDED to green belt if they meet one or more of 5 tests,,,yet area NORTH OF MOSLEY COMMON MEETS 4 OF THE 5 GREENBELT CRITERIA BY YOUR OWN ASSESSMENT, yet you want to remove it from greenbelt and add 1100 new houses and associated cars? Your own evidence base is against your arguments - how can this be sound and compliant therefore? There are no "special circumstances" evidenced anywhere in your documentation to allow for release of this green belt. Trying to claim you will add greenbelt in other parts of the borough cannot mitigate this devastating loss for this area and its residents.</p> <p>Your own assessments state that this area only meets 2 out of 7 criteria for releasing greenbelt land also, so this can hardly be deemed the special circumstances required to change this. Green belt is there for a reason, your own assessments show the existing greenbelt is necessary in this area so there is clearly no set of special circumstances to release any. Again, this is your own evidence - if any planning inspector (not in the pocket of Peel</p>

Holdings) actually reads any of this, then you must see this for what it is - greedy developers pushing for greenbelt land without justification.

Wigan can meet its housing required (as outlined in your own numbers) without touching this greenbelt land at JPA 35. Other local authorities such as Stockport and Trafford are refusing to release greenbelt land to Greater Manchester for this plan, so why should Wigan release greenbelt in areas where the housing is not required to bump up the numbers from other authorities? It can only come down to the land grabbing Peel once again.

The only evidence cited time and again is the proximity of the busway. Numerous mentions are made of adding an additional stop between Sale Lane and Newarth Road. You could add all the stops you like, but anyone who actually bothers to look at the peak times services towards Manchester (outside of a pandemic!) will find that the buses are almost always full by the time they reach Newearth Road already. Adding another stop just means another 1100 houses of commuters who cannot get on a bus in reality! Despite a claim to assess more capacity, this is impossible in practicality - buses already run at less than 5 minute intervals here at peak time but regularly one has to wait for 4 or so buses to pass before there is one with space at these times. There is no practical provision to increase this capacity to service another 1100 homes, with or without one additional bus stop.

The local road network also has no such capacity to handle such a development. Local roads are gridlocked from soon after 7am each morning in normal times, It takes on average 45 minutes to travel just 2.5 miles from our house down Mort Lane, Mosley Common Road and through Boothstown to the M60 each morning as it stands. This is ridiculous already. Adding 1100 homes to this situation, plus a further unspecified number at the new RHS site (East of Boothstown) will make this are impossible to escape from. This plan alleges to show joined up thinking, yet demonstrates nothing of the sort. Rather, it shows greedy developers pushing for such allocations on the edges of council boundaries, running them together and trying to get away with it as one development (ours) comes under Wigan, yet the Boothstown one comes under Salford. Nowhere is there any mention of the impact each has on the other, yet they are clearly interlinked. Again, if any planner is actually reading this and allowing it - hang your heads in shame.

The plans say there would be an attempt to "mitigate" traffic, yet the reality is the bottleneck at the junction of A580 and Mosley Common Road cannot be modified successfully due to existing housing constraints. This junction causes the traffic to back up all the way back to Mort Lane and beyond, even on a "good day". 1100 more houses cannot be claimed to not significantly add to the situation as claimed, using the busway as justification. Previous developments at Garrett Hall and Parr Bridge have already exacerbated this problem over the last few years, and similar arguments were made in those planning processes, only for the developers to claim after the event that there was nothing that could actually be done to ease this situation. It is clearly impossible to improve, yet your plan makes reference to the fact that the plan cannot even completely mitigate the development now, nor does it intend to rectify the existing issues. Your own assessments state that these junctions are operating "at, or in excess of operational capacity", again your own "evidence" does not support your argument. Any self respecting planning officer cannot keep signing off on more and more developments using the same argument to say that basically it is full already but it's not our job to fix it, and it won't get too much worse - THIS IS NOT EVIDENCE TO SUPPORT THIS FARCE!

The train station at Walkden is over 2 kms away from the nearest point, and as no parking facilities so cannot be used as any kind of justification from a transport perspective either.

Mention is made of extending St Johns Mosley Common school, which again is not practical as it is surrounded by houses already. Part of the current

	<p>traffic problems above already stems from the fact there is no parking provision at the school already - the council are well aware of the existing problems caused on Commonsides Road with school parking. The narrowness of Mosley Common Road running down to the A580 means the school run traffic contributes significantly to the problems with traffic flow. Trying to add to the school is not only impractical but would also undermine your own traffic arguments further. The local schools are full (as are other services such as dentists and doctor, where it is impossible to get appointments for weeks on end) and this ill thought out plan will only add further stress to these local services.</p> <p>The pollution levels caused by this additional traffic and housing has been completely ignored thus far, as has the impact from the huge amount of additional housing added to this area in the last few years. The flooding of Mort Lane and the fields out the back of our house on Dewberry Close has also been ignored. Everytime we have heavy rainfall Mort Lane floods and causes accidents on the blind corner past the Toone works on Mort Lane. Adding such a huge amount of extra housing will leave nowhere for this water to go with all the additional concrete and tarmac. The place is creaking as it is and cannot cope. Your own assessment also identifies Honksford Brook as vital to green space, so again how does removing this green space around it work with your plan as evidence?</p> <p>In conclusion, there is no supporting evidence to support this proposal, which is totally out of keeping with the local infrastructure in place, and what can be realistically added to it. Time and again the evidence actually undermines the so called case for this proposal, but the plans simply ignore the evidence and plough on regardless. Surely any planning inspectorate that is truly independent of the greed and reach of Peel Holdings can see through this charade?</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>Remove the unnecessary and unjustified JPA35 from this unsound plan, as there is no evidence provided to justify it, and in fact the whole evidence base provided undermines rather than supports the case put forward for this development.</p>
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<p>Given Name</p>	<p>Ian</p>
<p>Person ID</p>	<p>1287553</p>
<p>Title</p>	<p>Supporting Evidence</p>
<p>Type</p>	<p>Web</p>
<p>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>	<p>There is no supporting evidence to support this proposal, which is totally out of keeping with the local infrastructure in place at JPA 35 (North of Mosley Common), and what can be realistically added to it. Time and again the evidence actually undermines the so called case for this proposal, but the plans simply ignore the evidence and plough on regardless. Surely any planning inspectorate that is truly independent of the greed and reach of Peel Holdings can see through this charade?</p>