

Places for Everyone Representation 2021

Family Name	Godfrey
Given Name	Kath
Person ID	1287022
Title	Stakeholder Submission
Type	Web
Family Name	Godfrey
Given Name	Kath
Person ID	1287022
Title	Our Vision
Type	Web
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	Godfrey
Given Name	Kath
Person ID	1287022
Title	Our Strategic Objectives
Type	Web
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	8. Improve the quality of our natural environment and access to green spaces
Soundness - Positively prepared?	Sound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
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.	Unable to check the other boxes. My main concern is the effectiveness of the strategy in delivering environmental improves and "biodiversity net gain"
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.	My concerns are a lack of quantitative, or clear, spatially defined commitments to improvement of the natural environmental, and the fact that this plan seems to reflect a continuing decline in green space rather than any increase, despite stated commitments to net gain of 10%. Based on issues at significant green sites such as Cutacre "Country Park" (actually this designation has not been awarded and this prospect seems unlikely under current circumstances) where there have been serious safety concerns due to lack of management, a lack of community engagement, and apparent failure to adhere to commitments made in the planning stages, I am also concerned about the level of ongoing monitoring and accountability which is not discussed in any sort of detail in this plan.
Family Name	Godfrey
Given Name	Kath
Person ID	1287022
Title	JP-Strat 8 Wigan Bolton Growth Corridor
Type	Web
Soundness - Positively prepared?	NA
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.	I assume the policy is compliant although I am not qualified to comment on this, but I believe there have been failures to acknowledge the needs of the community in its development. The proposed Hulton Park Ryder Cup development is a particular example of this: Widely opposed by the local community who already have no less than 7 golf courses within a 5 mile radius, and with concerns about the traffic and disturbance this would create. This area has locally important heritage features and provides significant wildlife benefits which could be substantially enhanced at relatively low cost, providing a regionally significant community greenspace. The proposals instead represent the exclusion of both wildlife and the local
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect	As stated, where the interests exist, I'm sure that most proposals can be justified to satisfy legal compliance, however that doesn't mean that they are in the interests of the community. The opportunity to provide valuable community green space and wildlife habitat at Hulton Park (especially in light of the pressures on the Cutacre site) is one that shouldn't be wasted.

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of any legal compliance or soundness matters you have identified above.	
Family Name	Godfrey
Given Name	Kath
Person ID	1287022
Title	JPA 37: West of Gibfield
Type	Web
Soundness - Positively prepared?	NA
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 loss of such a substantial area of wildlife habitat, cannot be justified, especially in the context of the recent creation of the Logistics North site less than 3 miles away. This area offers the opportunity to fulfil the stated aspirations to improve wildlife habitats and increase access to greenspace. The proposals will instead create significant additional pressure on already over congested roads in the area, creating further pressure on the ever-diminishing, local, natural environment.
Family Name	Godfrey
Given Name	Kath
Person ID	1287022
Title	JP-D2 Developer Contributions
Type	Web
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
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	My concerns here are the lack of definitive commitments associated with each site. Based on previous failures of developers to deliver fully on similar commitments (e.g. at the Cutacre site - failure to engage the community and failure to deliver fully on the habitat development or to implement monitoring

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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.	and adequate follow up) and the lack of reference to monitoring in this strategy it is a concern that implied (but unspecified) community and particularly ecological benefits will not be delivered.
Family Name	Godfrey
Given Name	Kath
Person ID	1287022
Title	Wigan - Green Belt Additions
Type	Web
GBA Wigan - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below	Wigan GBA46 Hope Carr Nature Reserve, Leigh Wigan GBA47 Crow Orchard Road, Standish Wigan GBA49 Coppull Lane, Wigan
Soundness - Positively prepared?	Sound
Soundness - Justified?	Unsound
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.	<p>I am not qualified to respond to whether these sites are compliant as described above but would assume that they are, however in terms of effectiveness I see no benefit to the addition of these areas as this provides no additional protection nor any net biodiversity gain, and would appear to be merely an exercise to increase the overall greenbelt statistic. For example:</p> <p>GBA46 - a nature reserve is already recognised as requiring protection, hence its LNR status, therefore it already shares a similar degree of protection/vulnerability to greenbelt.</p> <p>GBA47 - a motorway slip road central reservation does not warrant green belt protection - there is no likelihood of it being developed and its value to wildlife (though not negligible) is restricted by the environmental conditions.</p> <p>GBA49 - the Places for Everyone Strategy would suggest that riparian corridors should be protected on the basis of the ecosystem service they provide, therefore what additional protection does this designation to greenbelt convey?</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	The designation of greenbelt land is only effective if it directly protects from future development or includes commitments to enhance existing land to increase biodiversity. The Places for Everyone Strategy states aspirations to improve greenbelt and increase habitat provision but none of the 6 additions proposed in the Wigan area achieve this. I would suggest that in order to achieve any meaningful increase in greenspace it is necessary to identify areas of currently degraded land of equivalent area to that proposed for development, and implement restoration works to enhance these as functioning wildlife habitats. This should be funded entirely by the developers responsible for appropriating greenspace/greenbelt elsewhere.

**you have identified
above.**