

Family Name	Holden
Given Name	Gillian
Person ID	1287181
Title	Stakeholder Submission
Type	Web
Family Name	Holden
Given Name	Gillian
Person ID	1287181
Title	JPA 14: Broadbent Moss
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?	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>This plan is not "Sound"(para. 35 NPPF) due to the close proximity of site allocations JPA 14 and JPA 12 which forces biodiversity and subsequent wildlife to amalgamate. Treating the two sites separately regarding biodiversity and wildlife, is, in itself, a failure to adhere to (para 24 NPPF) Thus ceases to qualify as Postively Prepared (para 35 a) NPPF)</p> <p>The Preliminary Ecological Appraisals for JPAboth sites are inadequate and flawed.</p> <p>Failing to include a myriad of protected and/or endangered species that currenly inhabit</p> <p>These two site allocations.</p> <p>The failure to include these species impacts further, more in depth investigation taking place, as promised in Places for Everyone"s Policy JP Allocation 14 (para. 14)</p> <p>Thus, undermining (para. 13) of the same policy and Decision Making clause of NPPF (para. 43) also, Maintaining effective cooperation clause Of NPPF (para. 24)</p> <p>Building development and disruption of such a large scale on, in or around JPA 14, without much more in depth ecological and biodiversity analysis would have preserve devastating consequences for the wildlife in both sites.</p> <p>In the Current Climate Emergency of such fragility for our planet, it"s our moral duty to protect and preserve all wildlife for future generations.</p> <p>Disruption and Chaos : This is unsound (para 35 NPPF) as it fails to "mitigate noise and air quality" (para 11.134, PfE) caused by 1450 houses and existing creaking infrastructure.</p> <p>The main arteries to and from here are ALREADY gridlocked at least twice daily. The resultant pollution/congestion will kill; carbon neutrality unobtainable</p>

	<p>- this will INCREASE emissions in an era of Climate Catastrophe as endorsed by OMBC.</p> <p>Lack of consultation : These PfE proposals for Broadbent Moss are unsound and not legally compliant. This is not the GMSF and is "substantively different" - Stockport"s removal - and as such needs much wider consultation. No-one around Broadbent Moss (Derker) is aware of this and need their say.</p> <p>Paragraph 3.1 of PfE says "all voices must be heard" yet Covid-19 and a general lack of consultation means key groups (mainly, but not exclusively) those without Internet) have not been given an opportunity to have their say (Equality Act, 2010).</p> <p>PfE is inconsistent with national policy (NPPF, 2019 (d).)</p> <p>Flooding : These PfE proposals for Broadbent Moss are unsound and not legally compliant. This is not the GMSF and is "substantively different" - Stockport"s removal - and as such needs much wider consultation. No-one around Broadbent Moss (Derker) is aware of this and need their say.</p> <p>Paragraph 3.1 of PfE says "all voices must be heard" yet Covid-19 and a general lack of consultation means key groups (mainly, but not exclusively) those without Internet) have not been given an opportunity to have their say (Equality Act, 2010).</p> <p>PfE is inconsistent with national policy (NPPF, 2019 (d).)</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>An in depth ecological and biodiversity analysis of this site allocation. Carried out by recognised, impartial wildlife trusts. That are more focussed on the "value" of our wildlife and not analysing this area from a desk somewhere.</p> <p>RSPB</p> <p>Bat Conservation Trust</p> <p>Lancashire Wildlife Trust</p> <p>Hawk and Owl Trust</p> <p>Amphibian and Reptile Conservation</p> <p>The Woodland Trust</p>