Family Name	Howard
Given Name	Scott
Person ID	1285907
Title	Stakeholder Submission
Туре	Web
Family Name	Howard
Given Name	Scott
Person ID	1285907
Title	JPA 35: North of Mosley Common
Туре	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.	Can I first please refer you to key issues from the Consultation that were previously raised and summarised in the Transport Locality Assessment - Wigan (Section 4.1.1
	All of the issues highlighted within this previous round of consultation are valid. I have summarised the reasons why I believe that this allocation is unsound and should be removed from the proposed PfE:
	- Greenbelt: I believe that the allocation would conflict with the at least 2 of the 5 purposes of greenbelt
	(a) to check the unrestricted sprawl of large built-up areas;
	(b) to prevent neighbouring towns merging into one another;
	The plans do not take into account committed development in Salford and in particular in Walkden (off Hilton Lane). Therefore this would contradict the two checks made above.

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- Biodiversity: Does this allocation require that the biodiversity NET GAIN (10%) is made? (the proposed delivery of this scheme is envisaged to take place after it is envisaged net gain will come into policy following Environment Bill consultation)
- Out of date documents: For example the "indicative masterplan" does not include TWO Rowland Homes developments (one of them being Finch Park) in Mosley Common and Astley. Both are developed (one partially) and Peel and Wigan Council will be fully aware of this. Additionally, it does not include the proposed development off Garrett Lane (conversion of grade listed farm house into flats and dwellings)
- -Transport: There is a fundamental issue with existing transport conditions in Mosley Common and the Worsley area (M28) and wider. The conducted Transport Assessment concluded "Based on the information contained within the Locality Assessment Report, it is concluded that the traffic impacts of the allocation would not be severe. Whilst the modelling work does indicate that some junctions will experience capacity issues, they are not significantly worse than those experienced in the reference case situation and are not directly attributable to the North of Mosley Common allocation." THIS IS NOT TRUE.

As shown in the Topic Paper "For North of Mosley Common, the transport assessment examined the capacity of thirteen junctions within close proximity to the allocation, and demonstrates that the majority are operating at, or exceeding operational capacity, in both the "Reference Case" and "with PfE" scenarios during network peak periods."

How can this be mitigated?!? It states that "However, at a cumulative

level with other PfE allocations, it has not been possible to mitigate the entire PfE impact due to land constraints or costs associated with major infrastructure

works. Fundamentally, the detailed reports and topic paper state highway mitigation needs to be provided. There has been no evidence that any highway "solutions"(?) would be DELIVERABLE and resolve the issue currently or from the proposed allocation.

The policy recognises " the A577/A580 junction is regularly congested at peak times, therefore the development will be required to contribute significantly towards the delivery of highway capacity improvements at this junction and other junctions as applicable" WHAT improvements would adequately mitigate the development? Will they be in (and operational) prior to the commencement of development?

Within the Transport Locality Assessment - Wigan, it states within Table 4, by 2040 (fully developed scenario) that the HIGH SIDE CASE shows AM peak departures at 383 vehicles (or PCUs to be particular) with PM peak hour arrivals being 345. The allocation is for 1,200 DWELLINGS. A four bedroom property, according to Wigan"s parking standards requires 2 spaces per dwelling. This is completely under stating the number of vehicles that would be coming in and out of the development site.

Environment: What would be the proposed plan for existing mature trees and hedgerows on the site allocation? Would they be maintained?

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	And finally, Education: This is quite a selective point but I cannot comprehend HOW St John"s Mosley Common could be extended given the land constraints of the site and the current known parking issues. This comment is in relation to the following: "primary education facilities will be required on-site, as a new school and/or as an expansion to St John"s Mosley Common Primary School which lies adjacent to the site."
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.	As stated in my response above, the site allocation in its current form, cannot be acceptable. A revised allocation with a significantly reduced number of dwellings coupled with evidenced highway mitigation could be revisited and put out to local residents so they will have the opportunity to review again.