

Places for Everyone Representation 2021

<b>Family Name</b>	Keeley
<b>Given Name</b>	Barbara
<b>Person ID</b>	1286796
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Family Name</b>	Keeley
<b>Given Name</b>	Barbara
<b>Person ID</b>	1286796
<b>Title</b>	Our Vision
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	See comments below on strategic objectives
<b>Family Name</b>	Keeley
<b>Given Name</b>	Barbara
<b>Person ID</b>	1286796
<b>Title</b>	Our Strategic Objectives
<b>Type</b>	Web
<b>Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:</b>	7. Ensure that districts involved are more resilient and carbon neutral 8. Improve the quality of our natural environment and access to green spaces 10. Promote the health and wellbeing of communities
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	NA

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<b>Soundness - Consistent with national policy?</b>	NA
<b>Soundness - Effective?</b>	NA
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>Strategic objective 7 - Ensure that districts involved are more resilient and carbon neutral</p> <p>In and around Worsley and Eccles South local roads, infrastructure and transport capacity struggle even at existing demand levels. The loss of green space and the large-scale development that the Places for Everyone document proposes for the constituency will exacerbate these congestion problems. There are few solutions which have been put forward to try to tackle the current congestion and they have not been effective.</p> <p>The local road and motorway network is already at the point of gridlock at peak times and when sports or other events affect the network. The introduction of a "Smart Motorway"scheme on the M60 along the Worsley and Eccles stretches of the road has not resolved the acute problems we now have with traffic congestion. The M60 is a critical part of the North West transport network in England. However the mix of local traffic and through traffic, together with the design of this section of the motorway, exacerbates congestion and environmental problems.</p> <p>Our local road network is often gridlocked, the air quality is very poor and there is low confidence in much of our local public transport. It is unclear to me as to what funding, if any, will be made available to update existing transport infrastructure or to create the new transport infrastructure needed to meet the aims of Places for Everyone</p> <p>Plans to encourage people to commute via public transport are welcome, but for this to work the confidence of commuters must be regained. For now, many people do not have that confidence and would rather travel by car.</p> <p>There are strong concerns in Worsley and Eccles South that further development will make current levels of traffic congestion much worse.</p> <p>I have serious concerns about the lack of consideration being given to the impact that proposed new housing developments could have on local services, including on demand for school places and on GP practices in Worsley and Eccles South.</p> <p>General demand on our local medical practices is already high. I have raised concerns on a number of occasions about increasing demands caused by the number of extra people moving into the catchment area of local GP practices. GPs tell me there are no extra resources available to manage the demand.</p> <p>New housing developments across my constituency are already placing additional pressure on both our local GP services and our schools. Over the last few years I have raised objections to planning applications which I consider inappropriate for the area. In my objections I have routinely highlighted concerns about the impact additional housing could have on local services. This includes the impact they could have on the services provided by GP surgeries to patients.</p> <p>I believe that, as it stands, Places for Everyone fails to consider the impact that sizeable developments could have on local health services and other local services. It appears that little or no analysis has been made of the impact of these developments on local health services and infrastructure.</p>

Releasing four precious areas of Green Belt land in my constituency is a short-sighted approach which ignores the wishes of local people and the practical issues with worsening traffic congestion and overstretched rail services.

While I welcome plans to introduce more affordable housing to ensure local people are able to get on to the housing ladder, I do not consider the need for affordable homes as sufficient justification for removing these areas of land from the Green Belt. Further, much of the new housing recently built in my constituency has been of aspirational housing not affordable housing.

In its current form, these proposals would add great strain to our already overstretched local infrastructure and run counter to aims to tackle serious environmental concerns, including tackling poor air quality.

Air pollution causes 40,000-50,000 early deaths a year nationally and Government Ministers have described the high levels of air pollution in the UK as a "public health emergency".

In 2018, the World Health Organisation designated Salford as having the second highest levels of air pollution in the country. The mortality figure for Salford attributable to air pollution is as high as 6% which is higher than the average for England of 5.6% and much higher than in some other parts of the country. Friends of the Earth has backed this up with research.

Removing JPA26, JPA27, JPA28 and JPA29 from the greenbelt and developing the land there for housing and warehousing would not make Worsley and Eccles South more resilient.

I cannot support the aims of this plan to be carbon neutral when Places for Everyone wants to develop precious peatland in Irlam which should be recognised and valued for its carbon sequestration properties.

The vision of this strategy should be clearer, it should focus on regenerating our brownfield sites. This is achievable in Salford, as more than enough brownfield sites have already been identified to meet the quota set by Place for Everyone.

Green spaces offer many benefits to people who live near them and visit them, to the places they are set in, to the nature that they host and often, to the local economy. These areas of land are important assets and I would urge the Combined Authority to think again on the proposals that could see us lose areas of Green Belt land in Worsley and Eccles South.

Strategic objective 8 - Improve the quality of our natural environment and access to green spaces

The adoption of the Places for Everyone document in its current form would result in four sites being removed from the Green Belt in Salford. All four of these sites in Salford which are to be removed from the Green Belt and allocated for development lie within my constituency of Worsley & Eccles South.

Salford is an urban city and the green spaces on the outskirts of the city are precious to local people. They have many benefits including for health, well-being, recreation and the environment.

Green spaces provide a longer-term positive effect on life satisfaction and are good for people's well-being. A study from researchers at Exeter University found that living in an urban area with green spaces has a long-lasting positive impact on people's mental well-being. Researchers found that moving to a green space had a sustained positive effect:

"□on average, individuals have both lower mental distress and higher well-being when living in urban areas with more green space. Although effects at the individual level were small, the potential cumulative benefit at the community level highlights the importance of policies to protect and promote urban green spaces for well-being".

The pandemic has shown us that in an increasingly urbanised world, our access to nature is dwindling and it is often the most socio-economically deprived people who face the biggest barriers.

The evidence of positive effects from nature includes studies on specific psychological conditions such as depression, anxiety and mood disorder. Access to nature has also been found to improve sleep and reduce stress, increase happiness and reduce negative emotions, promote positive social interactions and even help generate a sense of meaning to life. Being in green environments boosts various aspects of thinking, including attention, memory and creativity, in people both with and without depression.

Besides mental health benefits, we know that healthy natural spaces provide us with a whole range of essential "ecosystem services" for free, from clean air and water to nutrient recycling, flood defence and pollination. Ideally, in designing or reconfiguring urban environments, we should aim to maximise the benefits for biodiversity too.

In January 2018 the Government published a report called, "A Green Future: Our 25 Year Plan to Improve the Environment" which says:

"Urban residents prize the parks, woods, street trees and footpaths that make their district an attractive place. People in greener surroundings have longer and healthier lives. Green infrastructure brings wider benefits, including sequestering carbon, absorbing noise, cleansing pollutants, absorbing surface water and reducing high temperatures. The number and condition of green spaces has declined. We risk losing more good quality green spaces ... preserving and creating green spaces in towns is more important than ever."

It is particularly important to note that this Green Belt land is used for walking, running and recreation. This is an important usage in an area like Salford which has current issues with physical inactivity.

I believe that removing Green Belt status from JPA26, JPA27, JPA28 and JPA29 will not improve the quality of our natural environment and our access to green spaces.

Strategic objective 10 - Promote the health and wellbeing of communities

Salford is an urban city and the green spaces on the outskirts of the city are precious to local people. They have many benefits including for health, well-being, recreation and the environment.

It is particularly important to note that this Green Belt land is used for walking, running and recreation. This is an important usage in an area like Salford which has current issues with physical inactivity.

Physical inactivity accounts for an increasing proportion of deaths and disability across the city. It is also associated with high health-care costs and lost productivity. Regular physical activity is a safeguard against a range of chronic diseases, such as type 2 diabetes, cardiovascular diseases and some cancers.

A recent survey by Natural England has found that access to green areas tends to be income-based which was highlighted during the pandemic when children from low-income families spent less time outside in green spaces during the pandemic than children from higher-income families.

By removing greenbelt status from land at JPA26, JPA27, JPA28 and JPA29 the end result will be more people, more cars and more pollution.

Air pollution causes 40,000-50,000 early deaths a year nationally and Government Ministers have described the high levels of air pollution in the UK as a "public health emergency".

In 2018, the World Health Organisation designated Salford as having the second highest levels of air pollution in the country. The mortality figure for Salford attributable to air pollution is as high as 6% which is higher than the

average for England of 5.6% and much higher than in some other parts of the country. Friends of the Earth has backed this up with recent research.

The main pollutants of concern in Salford are nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>). The main source of pollution in the city is transport. Long term exposure to nitrogen dioxide can have significant negative health effects. Nitrogen emissions affect lung function and increase the risk of respiratory problems. They may exacerbate asthmas and increase susceptibility to infections.

The GMCA 2019 Air Quality Annual Status Report (ASR) reports that Manchester, Salford and Tameside had the highest level of mortality attributable to particulate air pollution in 2018. It is estimated that there were approximately 1,107 attributable deaths due to exposure to man-made PM<sub>2.5</sub>.

The report also points out that Salford M60 motorway which runs through Worsley and Eccles South was one of three sites in Greater Manchester which either exceeded or measured the NO<sub>2</sub> annual mean objective of 40 µg/m<sup>3</sup> in 2019. These three sites alone also exceeded the NO<sub>2</sub> annual mean objective in 2018.

The reported level of the respiratory illness Chronic Obstructive Pulmonary Disease in Salford is worse than the average in England. 2.6% of the registered population in Salford has Chronic Obstructive Pulmonary Disease which is higher than the England average of 1.9%.

In 2013 the Highways Agency (now Highways England) had to shelve plans for all-lane running on the M60 between junctions 8 and 18. This was due to the existing high levels of pollution and resultant poor air quality around that part of the M60.

In its consultation documentation the Highways Agency said:

"...our environmental assessment concluded that creating this improvement would result in an increase in traffic using the motorway which would then have a detrimental effect on air quality. Poor air quality is a concern for the UK and across much of Europe...There are UK and European standards designed to protect human health and sensitive ecological habitats which we cannot ignore; as a result we are unable to take this proposal of making the hard shoulder available to traffic on this section at this time."

Clearly, any increase in traffic pollution levels would be harmful to local people in the residential areas of Worsley, Boothstown and Irlam. While I support actions to reduce air pollution through measures such as more environmentally friendly public transport measures, this action alone will not solve the problem.

Given the severity of the problems we currently face with air pollution exceedances and the potential impact this could have on the health of local residents, it does not seem sensible to bring forward proposals to add to the volume of traffic congestion and to threaten the future of our green spaces.

If these plans do not change I will maintain my strong opposition and I would like to reserve the right for either me, or my representative, to appear at any Inquiry into Places for Everyone to object in person.

<b>Family Name</b>	Keeley
<b>Given Name</b>	Barbara
<b>Person ID</b>	1286796
<b>Title</b>	JP-Strat 4 Port Salford
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound

<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>This policy removes important land from the greenbelt. It is deeply unpopular with local people.</p> <p>This document provides unacceptably weak assurances about the funding for and development of the rail link, canal berths, and highway improvements needed for these developments and yet it also says that the works on this site will not be commenced until this transport infrastructure is complete and operational</p> <p>This document provides unacceptably weak assurances about the ongoing maintenance and full operation of this transport infrastructure</p> <p>The 2016 draft GMSF said that this "site will still generate significant additional traffic, and it will be necessary to provide a new motorway junction and link road for this to be accommodated" it further went on to specify that development of this site was:</p> <p>"Not be commenced until:</p> <p>A) At least 75% of the proposed floorspace on the existing Port Salford site to the south of the A57 has been completed;</p> <p>B) The following infrastructure, in no order of priority, has been completed and is operational:</p> <p>i) The rail link from the Manchester-Liverpool line into the existing Port Salford site to the south of the A57;</p> <p>ii) The new wharves on the Manchester Ship Canal within the existing Port Salford site;</p> <p>iii) A new junction on the M62 to the north-east of Irlam; and iv) A link road between the new M62 junction and the A57"</p> <p>The revised Places for Everyone document does not include this specification, instead saying that this site should: "Not be commenced until the rail link, highway improvements, canal berths and container terminal associated with the permitted Port Salford scheme to the south of the A57 have been completed and are operational and there is a clear commitment to the ongoing maintenance and full operation of this transport infrastructure"</p> <p>Local residents are sceptical about these assurances and I share that scepticism, having checked the current status with Salford City Council officers.</p> <p>I understand there is no committed funding for the rail link and no operator identified to run it. It would be the responsibility of Peel Holdings to identify the funding and the timescale is said to be 5 years of more.</p> <p>The container terminal and lifting cranes for the terminal (and funding of up to £35 million) would not happen until after the rail link is in place in 5 years or more and it would be up to Peel Holdings to find the funding.</p> <p>In terms of the canal berths, I understand the Ship Canal is part-owned by a Dutch Company. They and Peel would have to make the operational and financial arrangements for this, and this has not been done.</p>

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	<p>Finally, I understand that there is no funding committed or firm plan for the highway improvements needed (Described as WG1S2) . These improvements are needed for new slip roads onto the M60 to make sure that heavy goods traffic from Port Salford does not swamp local roads. It is 9-10 years since the modelling was originally done for these roads and the cost of these highway improvements is now put at £150 million.</p> <p>No such sum of money has been committed by Government and it would also require a 20% contribution from the local authority or the GM Combined Authority. I understand that there is no commitment to fund this 20% sum (£30 million) towards the highway improvements. I heard these improvements described as potentially being "a monster you can't fund".</p> <p>The lack of detailed plans or committed funding for any part of this transport infrastructure to serve developments at Port Salford is a major reason for my objecting to this proposal.</p> <p>The Places for Everyone document admits that there is likely to be an impact on the landscape from this proposed allocation and this will come at the expense of losing greenbelt. The plans on which this depends are too shaky and insecure to warrant the loss of our important Green Belt land.</p> <p>As I have outlined in my objections to JPA28 it is very important to retain Green Belt land and to protect the moss land in Irlam.</p>
<b>Family Name</b>	Keeley
<b>Given Name</b>	Barbara
<b>Person ID</b>	1286796
<b>Title</b>	JP-S 2 Carbon and Energy
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>JPA28 proposes removing precious peatland from the greenbelt and building hundreds of houses on it.</p> <p>I do not believe that the Places for Everyone proposals respect the value of this peatland and its ability to sequester carbon, in the effort for Greater Manchester to become carbon neutral by 2038.</p> <p>This peatland must be preserved in its entirety and not removed from the greenbelt for development.</p>
<b>Family Name</b>	Keeley
<b>Given Name</b>	Barbara
<b>Person ID</b>	1286796
<b>Title</b>	JP-G 1 Valuing Important Landscapes
<b>Type</b>	Web

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<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>I do not believe that this plan is valuing important landscapes in Worsley &amp; Eccles South. The plan proposes removing Green Belt status from four areas for the development of houses and warehousing including:</p> <p>JPA26 was identified by the Greater Manchester Landscape Character and Sensitivity Assessment 201826 to fall within the landscape character area "Historic Parks and Wooded Estates Farmland - Worsley and Egerton". The site borders the Worsley Woods Site of Biological Importance (SBI) on the western boundary and therefore this SBI may come under increased pressure from the proposed development. The site is also located within the Great Manchester Wetlands Nature Improvement Area that extends across Salford, Wigan and Warrington.</p> <p>JPA27 is part of the Great Manchester Wetlands Nature Improvement Area and also part of the Carbon Landscape Partnership Area.</p> <p>JPA28 allows the removal of 66.5 hectares of existing Green Belt from mossland and peatland. The site is located on the edge of Chat Moss. It is within the Great Manchester Wetlands Nature Improvement Area and also within the Carbon Landscape HLF Landscape Partnership area. It is an area that is recognised as supporting a range of biodiversity both in its own right and as part of a wider wetland area.</p> <p>JPA29 allows the removal of 124.2 hectares of existing Green Belt comprising mosslands and farmland. The entire site is within the Great Manchester Wetlands Nature Improvement Area and apart from a small strip alongside the A57 the site is also within the Carbon Landscape HLF Landscape Partnership area. It is an area that is recognised as supporting a range of biodiversity both in its own right and as part of a wider wetland area.</p>
<b>Family Name</b>	Keeley
<b>Given Name</b>	Barbara
<b>Person ID</b>	1286796
<b>Title</b>	JP-G 4 Lowland Wetlands and Mosslands
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA



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<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>JPA28 proposes removing precious peatland from the greenbelt and building hundreds of houses on it.</p> <p>Known as "Chat Moss"the land at JPA28 covers approximately 30% of Salford (2,750 hectares). It contains the largest area of grade 1 and 2 farmland and the largest woodland in Greater Manchester.</p> <p>It is also a source of significant wildlife interest such as a wealth of farmland birds and remnants of lowland bog habitat which is a rare and declining habitat which can only be found on peat.</p>
<b>Family Name</b>	Keeley
<b>Given Name</b>	Barbara
<b>Person ID</b>	1286796
<b>Title</b>	JP-G 6 Urban Green Space
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>The adoption of the Places for Everyone document in its current form would result in four sites being removed from the Green Belt in Salford. All four of these sites in Salford which are to be removed from the Green Belt and allocated for development lie within my constituency of Worsley &amp; Eccles South.</p> <p>Salford is an urban city and the green spaces on the outskirts of the city are precious to local people. They have many benefits including for health, well-being, recreation and the environment.</p> <p>Green spaces provide a longer-term positive effect on life satisfaction and are good for people"s well-being. A study from researchers at Exeter University found that living in an urban area with green spaces has a long-lasting positive impact on people"s mental well-being. Researchers found that moving to a green space had a sustained positive effect:</p> <p>"□on average, individuals have both lower mental distress and higher well-being when living in urban areas with more green space. Although effects at the individual level were small, the potential cumulative benefit at the community level highlights the importance of policies to protect and promote urban green spaces for well-being".</p> <p>The pandemic has shown us that in an increasingly urbanised world, our access to nature is dwindling and it is often the most socio-economically deprived people who face the biggest barriers.</p> <p>The evidence of positive effects from nature includes studies on specific psychological conditions such as depression, anxiety and mood disorder. Access to nature has also been found to improve sleep and reduce stress,</p>

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	<p>increase happiness and reduce negative emotions, promote positive social interactions and even help generate a sense of meaning to life. Being in green environments boosts various aspects of thinking, including attention, memory and creativity, in people both with and without depression.</p> <p>Besides mental health benefits, we know that healthy natural spaces provide us with a whole range of essential "ecosystem services" for free, from clean air and water to nutrient recycling, flood defence and pollination. Ideally, in designing or reconfiguring urban environments, we should aim to maximise the benefits for biodiversity too.</p> <p>In January 2018 the Government published a report called, "A Green Future: Our 25 Year Plan to Improve the Environment" which says:</p> <p>"Urban residents prize the parks, woods, street trees and footpaths that make their district an attractive place. People in greener surroundings have longer and healthier lives. Green infrastructure brings wider benefits, including sequestering carbon, absorbing noise, cleansing pollutants, absorbing surface water and reducing high temperatures. The number and condition of green spaces has declined. We risk losing more good quality green spaces ... preserving and creating green spaces in towns is more important than ever."</p> <p>It is particularly important to note that this Green Belt land is used for walking, running and recreation. This is an important usage in an area like Salford which has current issues with physical inactivity.</p> <p>I believe that removing Green Belt status from JPA26, JPA27, JPA28 and JPA29 will not improve the quality of our natural environment and our access to green spaces.</p>
<b>Family Name</b>	Keeley
<b>Given Name</b>	Barbara
<b>Person ID</b>	1286796
<b>Title</b>	JP-G 10 Green Belt
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>The adoption of this plan in its current form would result in four sites which have local importance being removed from the Green Belt in Salford.</p> <p>Green Belt land is precious in Salford as it provides the green lungs for an urban city. It is vital that these green spaces are preserved in a city that has high levels of air pollution, low levels of physical activity and poor health outcomes. The Green Belt is afforded strong protection from development by the saved Unitary Development Plan and the National Planning Policy Framework. I believe that these four sites should also continue to be preserved by the Places for Everyone plan.</p> <p>I have heard the views of many of my constituents and I know that there is a great deal of anger over these plans to develop local Green Belt land. I agree with my constituents.</p>

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	<p>I have real concerns about proposals in this plan which earmark substantial areas of Green Belt land for large development and commercial space. This Green Belt land is cherished by local communities and the impact of extra traffic and air pollution, together with the loss of the recreation space brought about by new developments, will be damaging to the people of Salford.</p> <p>JPA26 proposes development on land that was identified by the Greater Manchester Landscape Character and Sensitivity Assessment 201826 to fall within the landscape character area "Historic Parks and Wooded Estates Farmland - Worsley and Egerton". The site borders the Worsley Woods Site of Biological Importance (SBI) on the western boundary and therefore this SBI may come under increased pressure from the proposed development. The site is also located within the Great Manchester Wetlands Nature Improvement Area that extends across Salford, Wigan and Warrington.</p> <p>JPA27 proposes development on 29.1 hectares of greenfield site comprising open agricultural land, and mature woodland (Alder Wood) and hedgerows.</p> <p>JPA28 proposes development on the largest area of grade 1 and 2 farmland and the largest woodland in Greater Manchester.</p> <p>Salford has enough Brownfield sites to satisfy the housing need outlined in this plan and Green Belt land is so particularly important to the city of Salford.</p>
<b>Family Name</b>	Keeley
<b>Given Name</b>	Barbara
<b>Person ID</b>	1286796
<b>Title</b>	JPA 26: Land at Hazelhurst Farm
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>This policy removes important land from the greenbelt. It is deeply unpopular with local people.</p> <p>I object to JPA26 on the grounds that:</p> <ul style="list-style-type: none"> <li>-This proposal removes important land from the greenbelt in the urban city of Salford.</li> <li>-The suggested access points to and from this site are unsuitable and would mean that up to 800 extra vehicles would be using Hazelhurst Road which is already unsuitable for extra vehicles and also Worsley Road and the East Lancs Road which are already heavily congested.</li> <li>-The additional noise and environmental pollution this would cause is unacceptable. the East Lancs Road is a designated Air Quality Management Area (AQMA). The motorways surrounding Worsley add enormous amounts of air pollution to this area every day.</li> <li>-The ecological impacts that development on this land would bring are unacceptable. Hazelhurst Farm and the lands adjacent to it are areas of biological importance and would be adversely affected by development.</li> </ul>

-The public transport in Worsley is poor. There is no train or tram service and the bus services are limited. There are no bus services along Hazelhurst Road which makes access to GP surgeries, hospitals, shops and schools very difficult.

-This development would put added pressure on an education system already under pressure. The closest primary school, Broadoak Primary Primary School is already over-subscribed.

-This land should remain Greenbelt land so that it is protected from development and so it can remain a natural buffer between built up areas and providing natural space for local people.

The INRIX 2017 Global Traffic Scorecard showed that the route from central Salford (Blackfriars Road) to Worsley Road was the 10th most congested road outside of London.

Many people move to Worsley because it has good network links with the M60, M602 and M62 motorways and the East Lancashire Road which connects Manchester city centre and Liverpool city centre. Therefore, Worsley attracts commuters who work all over the North West and who drive to work. It would be fair to assume that if 400 new homes were built here, it could result in over 800 extra vehicles on these roads, adding to the congestion.

The options for two access roads to this site have not been announced yet but they would all impact heavily on local roads.

The East Lancashire Road immediately adjacent to Hazelhurst Farm and Worsley Road has been designated an Air Quality Management Area (AQMA) by the Department for Environment, Food and Rural Affairs.

Although JPA26 states that the development at Hazelhurst Farm would be designed "to encourage the use of nearby public transport services, in particular the Leigh-Salford-Manchester bus rapid transit service" the reality is that, pre-Covid I received many complaints from constituents in Worsley that these Vantage buses are full by the time they get to the Worsley Park and Ride bus stop.

Pre-Covid, people waiting at bus stops on the East Lancashire Road were forced to wait for 4, 5 or more buses to pass before there was a bus with space for extra passengers. It is not sensible to suggest that the Guided Bus service would become an alternative to using the car for this proposed development at Worsley with the capacity problems that the service suffers.

I also receive many complaints about the bus services in the Worsley area. Constituents complain to me about delays and cancellations in bus services and the need to take multiple buses to reach a particular destination. The commercial viability of one service (the X34) was so affected by the delays on Worsley Road that, 18 months after it was commissioned, it had to be re-routed via the A580 East Lancashire Road.

JPA26 envisages a greater use of public transport but from the evidence above this will be difficult for this location. The nearest train station is one mile away from this location and connects to Salford Central in the city centre. It will then take another train connection or another mile walk to reach Manchester city centre. High Speed Rail 2 will only be accessible by a time-consuming journey to Manchester Piccadilly or Wigan which will probably take longer than the projected travel time to London on the new high speed rail line.

There are insufficient firm plans to increase the infrastructure around this site. The proposal that "if a need for more school places is demonstrated then a one form primary school could be located on the Site with a reduction on the number of residential units to circa 400 units" [4.0 Development implications, Worsley Transport Supporting Statement] is not firm enough to ensure that there are adequate school places for the families who will be

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	<p>living on this development. Broadoak Primary School which is the closest primary school to this site is currently oversubscribed each year.</p> <p>There are not adequate plans to increase provisions for GP and dental services which are vital.</p> <p>The removal of this site from the greenbelt means that the ecological importance of these lands would be lost. Salford is an urban city and we need to retain these pockets of greenbelt to act as the lungs for our city. These lands host wildlife and birdlife, they are an essential resource for recreation and dog-walkers.</p> <p>I believe that it is unfair to develop areas of green space, which are highly valued by the local community, in an otherwise urban environment in Salford in order to meet ambitious targets set for the whole of Greater Manchester.</p> <p>I cannot see how JPA26, which will build on greenbelt land, will work to create a sustainable and greener environment for people living in Worsley.</p>
<b>Family Name</b>	Keeley
<b>Given Name</b>	Barbara
<b>Person ID</b>	1286796
<b>Title</b>	JPA 27: Land East of Boothstown
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>This policy removes important land from the greenbelt. It is deeply unpopular with local people.</p> <p>I object to JPA27 on the grounds that:</p> <ul style="list-style-type: none"> <li>-This proposal removes important land from the greenbelt in the urban city of Salford.</li> <li>-The roads in Boothstown can simply not cope with any extra pressure placed on them by up to 600 extra cars from this proposed development. The road network here is at capacity with no plan to resolve these current gridlock problems.</li> <li>-The additional noise and environmental pollution this would cause is unacceptable. the East Lancs Road is a designated Air Quality Management Area (AQMA). The motorways surrounding Worsley add enormous amounts of air pollution to this area every day.</li> <li>-The ecology in this area should be protected - particularly Alderwood - and there will be a great impact on the RHS Garden Bridgewater during the construction phase.</li> <li>-The public transport system in Boothstown is extremely poor. There is no train or tram system. The bus network has been cut severely in recent years meaning that the only viable way to travel to local amenities and commute to work is by car.</li> </ul>

-This development would put immense pressure on the school education system as all of the local primary schools are already over-subscribed. There are no secondary schools within walking distance to Boothstown.

-In addition to the lack of a suitable road network, access to most other services, including doctors and dentists are very busy.

In the last five years 500 new homes have been built in the Boothstown area and the added congestion and pressure on local amenities has caused considerable anger to local residents. Local roads are a standstill from early in the morning. I believe that the plan to designate this land for development is short-sighted and will cause irreparable damage to Boothstown.

JPA26 states that primary access for this development will be at Occupation Road, which is the new purpose built road for access to RHS Bridgewater. In an area of low density, high quality housing it is sensible to estimate that each household will have at least 2 cars but possibly 3 or 4 cars at each household. This new site could therefore generate around 600 cars or more travelling in and out of this estate every day, using the same road that hundreds of thousands of other people will be using to visit RHS Bridgewater.

This small road will then undoubtedly create a bottle neck where Occupation Road meets Leigh Road, which is the main route through Boothstown. Each morning Leigh Road (and its subsidiary roads) are gridlocked from 6.45am each day due to the sheer volume of vehicles which already use this route. Leigh Road leads directly on to the East Lancashire Road in one direction and in the opposite direction, the three motorways M60, M602 and M62. HGVs often use this road as a cut through between the two major routes. My constituents have told me that they fear developing the land to the east of Boothstown will result in congestion being made worse. Local roads in the area will simply not be able to accommodate additional traffic from this proposed development and this could bring traffic in the area to a complete standstill for many hours each day.

Moreover, I do not believe that a housing estate next to the RHS Bridgewater site would enhance the natural beauty of this site and I suggest that rather, it would impinge on the natural setting of this RHS site.

We already have significant problems with air pollution in the constituency due to traffic volumes and to traffic congestion on the three motorways, (the M60, the M62, and the M602) and the local road network. The Clean Air Greater Manchester plan confirms that Worsley Brow, to which Leigh Road feeds into is expected to have NO2 levels in breach of legal limits if no action is taken. The air pollution from HGV vehicles constructing the RHS Garden and the lorries needed to build 300 houses will be followed by further air pollution caused by visitors and the extra 600 cars to this area. All this extra traffic could lead to more congestion and the build-up of dangerous levels of air pollution.

The nearest train station to Boothstown is two miles away. The nearest bus stop for the Guided Bus is one mile away. Buses would not help to improve accessibility during peak hours as they would be stuck in the gridlocked traffic.

As the local MP, I have campaigned for years for better public transport and when I have raised the issue of bus services being cut in Boothstown I have been told by Transport for Greater Manchester that these are "commercial decisions" taken by the bus companies themselves.

Above all, similar to Worsley, many of the people who would live in the development are likely to work outside Boothstown and to commute within the North West region. Expecting new residents to use bicycles or public transport instead of cars is unrealistic in this area.

JPA27 does not mention any extra infrastructure which will be put in place for education or GP provision for these extra households where it is

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	<p>reasonable to consider that there may be over 1200 new residents. Constituents often tell me that their GP service is fully booked for weeks before they can make an appointment.</p> <p>I cannot see how JPA27, which will build on greenbelt land, will work to create a sustainable and greener environment for people living in Boothstown.</p>
<b>Family Name</b>	Keeley
<b>Given Name</b>	Barbara
<b>Person ID</b>	1286796
<b>Title</b>	JPA 28: North of Irlam Station
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>This policy removes important land from the greenbelt. It is deeply unpopular with local people.</p> <p>I object to JPA28 because:</p> <ul style="list-style-type: none"> <li>-Chat Moss is a green lung in the urban city of Salford.</li> <li>-Peatlands are vital to global efforts to combat climate change as well as wider sustainable development goals. This peatland should not be developed, it should be protected and restored as a carbon soaking wetland which would help our fight against climate change.</li> <li>-Chat Moss is a unique habitat for many species of wildlife. We cannot allow these ecosystems to be lost forever.</li> <li>-I have stated repeatedly that I believe this land should be used in a sustainable way and, given the need for locally-sourced food and fuel, it would be more productive and efficient to use this land as agricultural land.</li> <li>-Aside from the agricultural benefits, Chat Moss is also a valuable area of countryside to those living in the surrounding urban towns. It serves as a great space for informal recreation.</li> <li>-I do not believe that the access points to and from the proposed development are suitable for the number of vehicles that would be added to the roads - 800 houses would mean around 1,600 more cars on the roads in Irlam and Cadishead.</li> <li>-The road infrastructure in Irlam and Cadishead is already congested at peak hours and especially on match days at the AJ Bell Stadium.</li> <li>-The train services at Irlam are overcrowded and services are frequently cancelled. This is not a viable option for over 1,000 new residents to use the train service to commute to work.</li> <li>-There is no new infrastructure proposed in the Plan to help with these issues. Nor are there proposals to mitigate the impact of the high number of new residents in Irlam in terms of GP surgeries, schools and other local facilities.</li> </ul>

This land has significant depths of peat and it is vital that this land is protected so that the carbon sequestration through the restoration of peat-based habitats, woodland management and tree-planting is protected. We should not be allowing pockets of this land to be lost for development.

The UN Environment Programmes says that: "Peatlands are one of the greatest allies and potentially one of the quickest wins in the fight against climate change. By conserving and restoring peatlands globally, we can reduce emissions and revive an essential ecosystem that provides many services, including their role as a natural carbon sink."

I believe that we should be focusing our efforts on making the best use of this land in a sustainable way and, given the need for locally-sourced food and fuel, it would be more productive and efficient to use this land as agricultural land.

The Green Belt land in Irlam and Cadishead is Grade 1 Agricultural land. The best and most versatile land is defined as Grades 1, 2 and 3a and is the land which is most flexible, productive and efficient in response to inputs and which can best deliver food and non-food crops for future generations. This means it is excellent quality land which has either no or very minor limitations for agricultural use. A range of agricultural and horticultural crops can be grown on this land and yields are high and less variable than on land of lower quality.

The moss land is a tract of countryside of great value to those living in surrounding urban communities. In addition to its agricultural importance, it has great potential for informal recreation for those living in Salford. This land is also important for nature conservation and particularly for birdlife.

The loss of this land would set a worrying precedent. Although the Places for Everyone Document states that remaining areas of moss land would be protected and preserved, local people are sceptical of that claim.

The access points to and from the proposed development are suitable for the number of vehicles that would be added to the roads - 800 houses would mean around 1,600 more cars on the roads in Irlam and Cadishead.

When there is a match or event at the AJ Bell Stadium the roads are already gridlocked with traffic stretching back to the M60 motorway.

As the local MP, I receive many complaints about the train services at Irlam Station. Constituents have written to me to tell me that the train service is "appalling" and a "daily nightmare". I have received multiple reports that the services "do not have enough carriages" which leads to "unsafe travel conditions" as the trains are "dangerously overcrowded" and there have been days when "hundreds of people who couldn't fit then wait hours for the next running train". The trains used for that service are described as "filthy" and services are "frequently cancelled due to no drivers being available". For example, on one day five consecutive services from Manchester to Irlam were cancelled during peak hours leaving only one service running; on another day, a third of all services from Irlam to Manchester were cancelled. It is also worth noting complaints that train fares have increased and there is only a "temperamental" ticket machine at Irlam train station.

I do not believe that this is an acceptable service for people in Irlam and Cadishead. The Office of Rail and Road estimates that in 2019-20 there were around 359,522 passengers who entered or exited a train at Irlam Station. It remains an unmanned station with a poor reputation train services which are erratic and too often overcrowded. It is certainly not reasonable to say, as the Places for Everyone plan does, that Irlam train station "provides easy access to the huge range of employment and leisure opportunities".

With this number of new homes, extra amenities would be needed such as GP surgeries and schools. I have serious concerns about the provision of



	<p>GP services. There are increasing difficulties in recruiting GP staff and in February 2019 the British Medical Journal reported that "Chronic shortages of staff in critical areas such as general practice are jeopardising the NHS's long-term plan to strengthen primary and community care in England".</p> <p>JPA28 proposed development will definitely stretch local education spaces.</p> <p>This building work would surround St Theresa's RC Primary School and Irlam &amp; Cadishead College causing more air and noise pollution for young students. The minor roads through which construction lorries would be travelling may not be able to withstand the HGVs and diggers trundling through on a large-scale building project, such as this one, which would take years to complete. Astley Road, Cromwell Road and MacDonald Road would all be used by construction vehicles and this could cause further congestion and disruption to local residents and damage the surface of the roads.</p> <p>This policy must also be seen in the context of the expansion at Port Salford which is one mile away on the single road that leads in and out of Irlam and Cadishead. The HGVs and construction vehicles and later, transit vehicles, which will be arriving at and leaving Port Salford will add a great strain on the local road network.</p> <p>I cannot see how JPA28, which would build on greenbelt peatland, works to create a sustainable and greener environment for people living in Irlam and Cadishead.</p>
<b>Family Name</b>	Keeley
<b>Given Name</b>	Barbara
<b>Person ID</b>	1286796
<b>Title</b>	JPA 29: Port Salford Extension
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>This policy removes important land from the greenbelt. It is deeply unpopular with local people.</p> <p>I object to JPA29 on the grounds that:</p> <ul style="list-style-type: none"> <li>-This proposal removes important land from the greenbelt in the urban city of Salford.</li> <li>-Port Salford's expansion would increase the existing industrial areas down Barton Moss to the east of the M62 and onto the moss land.</li> <li>-This document provides unacceptably weak assurances that works to this site would not be commenced until the rail link and other highway improvements have been completed are operational.</li> <li>-This document provides unacceptably weak assurances about the ongoing maintenance and full operation of this transport infrastructure</li> <li>-</li> </ul>

The 2016 draft GMSF said that this "site will still generate significant additional traffic, and it will be necessary to provide a new motorway junction and link road for this to be accommodated" it further went on to specify that development of this site was:

"Not be commenced until:

A) At least 75% of the proposed floorspace on the existing Port Salford site to the south of the A57 has been completed;

B) The following infrastructure, in no order of priority, has been completed and is operational:

i) The rail link from the Manchester-Liverpool line into the existing Port Salford site to the south of the A57;

ii) The new wharves on the Manchester Ship Canal within the existing Port Salford site;

iii) A new junction on the M62 to the north-east of Irlam; and iv) A link road between the new M62 junction and the A57"

The revised Places for Everyone document does not include this specification, instead saying that this site should: "Not be commenced until the rail link, highway improvements, canal berths and container terminal associated with the permitted Port Salford scheme to the south of the A57 have been completed and are operational and there is a clear commitment to the ongoing maintenance and full operation of this transport infrastructure"

Local residents are sceptical about these assurances and I share that scepticism having checked with Salford City Council officers.

I understand there is no committed funding for the rail link and no operator identified to run it. It would be the responsibility of Peel Holdings to identify the funding and the timescale is said to be 5 years or more.

The container terminal and lifting cranes for the terminal (and funding of up to £35 million) would not happen until after the rail link is in place in 5 years or more and it would be up to Peel Holdings to find the funding.

In terms of the canal berths, I understand the Ship Canal is part-owned by a Dutch Company. They and Peel would have to make the operational and financial arrangements for this, and this has not been done.

Finally, I understand that there is no funding committed or firm plan for the highway improvements needed (Described as WG1S2). These improvements are needed for new slip roads onto the M60 to make sure that heavy goods traffic from Port Salford does not swamp local roads. It is 9-10 years since the modelling was originally done for these roads and the cost of these highway improvements is put at £150 million.

No such sum of money has been committed by Government and it would also require a 20% contribution from the local authority or the GM Combined Authority. I understand that there is no commitment to fund this 20% sum (£30 million) towards the highway improvements. I heard these improvements described as potentially being "a monster you can't fund".

The lack of detailed plans or committed funding for any part of this transport infrastructure to serve developments at Port Salford is a major reason for my objecting to this proposal.

The Places for Everyone document admits that there is likely to be an impact on the landscape from this proposed allocation and this will come at the expense of losing greenbelt. The plans on which this depends are too shaky and insecure to warrant the loss of our important Green Belt land.

As I have outlined in my objections to JPA28 it is very important to retain Green Belt land and to protect the moss land in Irlam.