

Places for Everyone Representation 2021

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<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFEEVictoriaLimontBrown_Objection_Redacted.pdf</a> <a href="#">PFEEVictoriaLimontBrown_Email_Redacted.pdf</a>
<b>Family Name</b>	Limont-Brown
<b>Given Name</b>	Victoria
<b>Person ID</b>	1287402
<b>Title</b>	JPA 35: North of Mosley Common
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	NA
<b>Soundness - Effective?</b>	NA
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<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 am writing regarding the plans put forward by Places for Everyone (PfE) for development of 1100 houses on the land North of Mosley Common. I feel there has been a significant oversight in several areas within the plans which I have highlighted below:</p> <p>Communication about the development:</p> <p>The only direct communication residents received regarding the development was through the local MP, informing us that he doesn't support the plans. Wigan council have stated on their website that they would contact residents "directly by email, or by post" - there has been no communications from Wigan Council. Places for Everyone also state that they believe in community involvement "the process of community involvement for Places for Everyone should be in general accordance with the relevant local planning authority" - there was no direct communications from PfE, only sporadic posters taped to lampposts.</p> <p>There is a duty to co-operate and the JPA35 proposals should be removed from the site allocation until such time that all parties involved appropriately follow their own guidance and allow for a fair consultation period with an informed residents community.</p> <p>Population Constraints:</p> <p>The current population of Mosley Common is over 11,000, with the addition of the proposed 1100 house development plot the population will have a 20% increase and expand to roughly 13,640 (based on the theory that the average household consists of 2.4 people).</p> <p>Considering the other developments in Mosley Common where building is already underway and houses are proposed to be built within the PfE plans,</p>

the population will have a huge increase - the population expanding by 50% to over 16,091.

- Garret Hall development - 700 houses (building is underway).
- Parr bridge development - 279 houses (building is underway).
- Garret hall farm development - 42 houses (building proposed).
- Land North of Mosley Common - 1100 houses (building proposed).

The area already struggles with the infrastructure not being adequate for the current population of the town and given the already stretched facilities (doctors, schools, transport etc) within the area, even the additional provisions proposed in the PfE plans would not be adequate to support a population of that size.

#### Traffic Issues:

The average household in the UK owns 1.2 cars, a 50% increase in population would result in an increase of over 6,109 cars on the roads around the Mosley Common area - an area which has already been highlighted as having extremely poor traffic conditions and associated pollution. The PfE plans have highlighted they will help with the increase of traffic by:

- "Provide public transport improvements and not wide-scale traffic capacity improvements".
- Contribute to improvements on road junctions on Bridgewater road, Newearth road, Mort lane and Manchester road.
- Provide a new bus stop on the guided busway.

Traffic and bus services are already over subscribed at the current capacity - traffic is bad even at non-peak times during the day. Minor improvements to junctions and an extra bus stop will not be enough to satisfy the issues there are with the current transport concerns. The PfE plans have also explicitly highlighted - "It should be noted that the schemes are not designed to solve pre-existing congestion on the local network".

Further data needs to be collated on the traffic and transport issues within the area before adding more cars to the already struggling system - other site allocations within the PfE plan (Worsley) also have an impact to the Mosley Common road networks and should be considered, however it is stated that: "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. Further detailed work will be necessary".

It should also be highlighted that the traffic checks done for the development are not truly reflective of normal conditions, as they have taken place during covid times where large proportions of the residents have been working from home or on furlough.

#### Green belt loss:

According to the National Planning Policy Framework, Green belt legislation serves five main purposes and building of any kind is generally banned unless it is for exceptional circumstances.

Local Planning Authorities may authorise building work if it is for:

- Agricultural buildings
- Outdoor sport or recreation facilities
- The proportionate extension or alteration of a current structure
- The replacement of a current building for the same use
- Providing much-needed affordable housing

In 2018, the Ministry for Housing, Communities and Local Government (MHCLG) published guidance on protecting green belt land which stated the

"need for development"space for affordable housing is not a sound enough reason on its own to gain approval for construction.

According to Manchester City Council - "Manchester"s definition of affordable housing states that to be classed as affordable a property must cost no more, in rent or mortgage, than 30% of the current average gross household income of a Manchester resident of £27,000 (both earned or through benefits). This equates to up to £675 per month for rent and up to £121,500 (excluding deposit) to buy a home."

However the developments that have already been completed (are completing) within the PfE plans which are located in Mosley Common are over £250,000 - therefor they are not "affordable" by the council"s own definition.

Green belt - exceptional circumstances:

According to the PfE plans, the "Green belt Topic Paper and Case for Exceptional Circumstances to amend Green Belt boundary"(July 2021), outlines the reasons to proceed building on the green belt and adjustment of the boundary.

Paragraph 145 of the National Planning Policy Framework states that "inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances." Therefore, the construction of any new buildings would be considered inappropriate development on Green Belts, and as such, a case would be required for "very special circumstances" which must outweigh the resulting harm to Green Belt land.

The test to meet the "exceptional circumstances" to declassify and build on green belt has not been met. Below outlines justifications from the PfE "Green belt Topic Paper"of how the exceptional circumstances criteria have been met and my challenges as to why these reasons are not applicable:

1.This is an appropriate growth and spatial option having considered other reasonable alternatives.

oThere has been no detail given on any of the "reasonable alternatives" that the PfE development say they have considered. There are several brownfield sites around the area which should be investigated before choosing the easier option of building on greenbelt.

2.In relation to employment, the need to identify sufficient land to meet the overall economic growth strategy of the plan.

oNo additional employment is being created as part of the JPA35 site allocation, therefore this test is not met. Additionally, compliance with criteria which have been specified by the PfE initiative should not be used as an example of "exceptional circumstances" for removal of land from the greenbelt as this is a self serving set of criteria.

3.In relation to housing, additional land beyond that required in absolute terms is necessary to meet local housing needs due to the need for flexibility, balanced and inclusive growth required by the spatial strategy in the PfE, robustness in the face of contingencies, and a Green Belt boundary that will endure beyond the plan period.

oWhilst it may be important to provide a surplus stock of housing this in itself is not a good enough reason to remove land from the greenbelt where alternative development opportunities exist. Additionally, this section also claims that adherence to self specified criteria (the spatial strategy defined by PfE) represents exceptional circumstances. The initiative cannot set its own guidelines and then use adherence to these guidelines to constitute exceptional circumstances.

4.The releases bring forward a set of strategic allocations in the Green Belt in sustainable locations that accord with a rigorous site selection process

and the PfE spatial strategy focus on inclusive growth, delivering much-needed infrastructure to meet a wide range of needs across the conurbation.

oThe site of JPA35 is not a sustainable location for a site allocation due to the following reasons:

- Road network and surrounding junctions are stated to be over capacity.
- Guided busway services are stated to be over capacity and merely adding extra services at peak times will not resolve this.
- No further forms of public transportation exist in the local area.
- Sufficient amenities and "much needed infrastructure" are not proposed as part of the current site allocation plan.

5.Harm caused by releases can be justified against the PfE spatial strategy and steps have been taken to minimise net loss.

oThe "steps that have been taken to minimise loss" as outlined in the PfE plans are to add additional green belt areas, however although these areas are currently not classed as "green belt" they are already green spaces, so it would just be a change of status/classification. The proposed additions are also not equal in size, aspect or amenity and are not within convenient walking range of existing residential areas.

6.A range of opportunities have been identified to help increase the beneficial use of remaining Green Belt, including interventions that meet green infrastructure and biodiversity net gain objectives.

oHaving reviewed the PfE plans, I have seen no indication of proposed improvements to the remaining green belt in the area. They have specifically called out a small piece of land within the development area which will be left as a "nature reserve" however this won't be classed as being in the green belt and this is being left due to its uneven land and flood risk.

The above reasoning given in the PfE "Green belt Topic Paper" does not outweigh the impact the development would have to the area. Also, with availability of brownfield land, I do not agree that the plans meet the test of "soundness" it is required to meet.

Wildlife loss:

The proposed site allocation is made up on numerous fields, trees/woodland areas and river ways - there is an abundance of wildlife that lives within this part of the green belt, including but not limited to -

- Variety of bird species and ducks.
- Owls.
- Bats.
- Deer.
- Rodents (including voles, stoats, mice etc).
- Foxes, hedgehogs, rabbits/hares, squirrels.
- Great Crested Newts - there are several locations in the proposed site allocation which support Great Crested Newt habitats - over the years, great crested newt numbers have been declining and they are now protected by law, officially classed as an endangered species.
- Trees - there are extensive amounts of mature and well-established trees within the area.
- Sheep & Cows - as several the fields are used for farming and agricultural purposes, the idyllic charm of the area will be lost - removing the last of the strong farming heritage that remained within the area.

The proposed plans will illuminate the habits and territories for hundreds of species within the JPA35 site allocation - removing the ability for younger generations within the town to experience and learn about nature.

#### Mental Health Concerns:

As well as physical health, greenspace is associated with positive mental health. It has been proven that people who spent at least two hours in nature per week were consistently more likely to report higher levels of health and well-being compared to people who spent less time in nature (Scientific reports - Spending at least 120 minutes a week in nature is associated with good health and wellbeing | Scientific Reports).

Green spaces are described as being crucial for our well-being and this has become even more clear since the covid 19 lockdowns, with highly developed areas bearing the brunt of inequalities that exist when it comes to accessibility to green space.

Wigan and Salford are impacted by some of the worst mental health rates in the country - green spaces are a lifeline for many giving them access to nature, less air pollution and more space for physical activities. This also helps take some of the demand away from the over stretched NHS services in the area.

The proposed additions to the green belt are also not equal in size, aspect or amenity and are not within convenient walking range of existing residential areas - therefore cutting off residents from any viable green space.

#### Existing Houses:

The PfE plans have ignored the houses which are located directly in the centre of the proposed development site. There are four houses which are located in the middle of the site allocation - they are labelled as "potentially retained farmsteads" - these houses are not farmsteads; they have been conventional homes for over 15 years and are in no way associated with the farming industry.

The plans have stated the new builds will be "high density, affordable housing" but the four properties that are located within the site allocation are low density high value properties, this will mean there will be a jarring contrast of construction styles. Therefore, new properties built next to these historic building should be matching in size, style and density.

It has also been highlighted that as part of the site allocation plans for JPA35, land which is owned by residents is being removed from the greenbelt on existing properties, without consultation with those landowners.

#### Geology Data:

The site allocation area was formally part of an open cast mine, with multiple tunnels and shafts sunk into various locations across the site. Even with this information being widely known, it appears there has been no investigation of the geology of the site before it was allocated for development. There have been significant subsidence issues logged close by (Commonside road) where development has previously been done on old mining land.

#### Lack of support from elected members:

The site allocation plans are not supported by our elected members of parliament, local elected MP James Grundy is against the proposals and believes we should be taking a brownfield first approach to development. Local Labour Councillors: Barry Taylor; Paula Wakefield; Christine Lillian and Joanne Marshall are also against the planned development.

#### Summary

In summary, I believe there has been a significant enough oversight in the plans for the JPA35 site allocation that the progressing of any further planning activities should be stopped - if not indefinitely, then at least until these oversights and issues are addressed appropriately. I believe that if the plans do proceed to go through at this stage then there will be further action to take the plans through a formal judicial review process.

<p><b>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.</b></p>	<p>Further work to identify better land - either brownfield or non green belt, there is enough around the area. If this isn't possible, then we require clear and valid reasons as to why only greenbelt can be used.</p> <p>Better consultation with residents - communications have been poor and i worry that as a result there wont be a reflective amount of objections. Most people we have spoken to in the area had no idea about the planned developments. Peel, the developers and the council have a duty of care and cooperation they should follow - their own policies outline this.</p> <p>Better infrastructure provided - one school and one doctors (or a monetary donation) will not be sufficient to manage the 50% increase in population within the area.</p> <p>Better plans to mitigate travel and transport issues. The plans says that they will not address current issues in the area - well the area is already bursting at the seams so some mitigation needs to be done before and separate to these plans. They cant suggest minor road updates and honestly believe that will be sufficient enough.</p> <p>Provide a clear and viable plan for migrating the huge wildlife population in the area. We are loosing so much from the implementation of these plans.</p> <p>Cut the plans down, there isn't a need for such large areas of housing. There needs to be more green areas interspersed within the plans not only to help with all the points above but also general well being and mental health of residents.</p>
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