

<b>Family Name</b>	Powell
<b>Given Name</b>	Robyn
<b>Person ID</b>	1286655
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1286655_Objection.pdf</a>
<b>Family Name</b>	Powell
<b>Given Name</b>	Robyn
<b>Person ID</b>	1286655
<b>Title</b>	JP-H 1 Scale Distribution and Phasing of New Housing Development
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1286655_Objection.pdf</a>
<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>	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>The way in which exceptional need is being used to justify utilisation of the green belt in Greater Manchester is neither exceptional nor is there a need. Furthermore, the assessment criteria used in determining the suitability of land parcels is flawed as its contention has been how can we include the strategic parcels as opposed to why they should be retained as serving green-belt purposes under NPPF, contrary to the NPPF ambition to favour retention of Greenbelt [para 140] "Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified."</p> <p>In terms of exceptional need. Clause 7.12 of the Joint Development Plan document tells us there is no need (exceptional or otherwise) to warrant inclusion of additional greenbelt.</p> <p>"Table 7.1 illustrates that, in numerical terms, the existing supply of potential housing sites identified in the districts" strategic housing land availability assessments and small sites is adequate to meet the overall identified need."</p> <p>It should be noted that the resultant table, 7.1 shows a total land supply of 190,792., but importantly 178,342 prior to GM allocations.</p> <p>On the demand side of the LHN equation, and noting that the latest evidence based requirements are being ignored (as 2014 ONS figures are still being used, contrary to the NPPF requirements for up to date evidence), Places for Everyone Housing Topic Paper tells us in Table 3.1 the baseline need (pre-adjustments for affordability and median income) is 8,227. Even using the 2014 ONS, out of date figure, this is based on a 10 year forwards look, as the volumes decrease after Year 10 in the ONS projections, so guidance is to truncate the data set ("fix the evidence"). This is contrary to the NPPF legislation and is a manifesto policy direction overriding the legislative NPPF framework requirement to be up to date and evidence based.</p>

The resultant unadjusted requirement over 16 years is 131,632. This is comfortably within the projected housing supply GM has of ~178,000, but we still need to assess the impacts for affordability and apply the "cities and urban uplift" that the government invented because too many houses were needed in Berkshire, again contrary to the evidence base.

This raises the supply required by 2,078 per annum, which creates a 20% buffer against the baseline need.

In summary, GM can comfortably exceed its baseline ONS 2014 need of 131,632 from existing projected Land Supplies with a buffer of some 46,710 based on existing land supply.

GM can comfortably and with good planning expected by residents of our council employees, meet the adjusted need of 164,880 from its existing land supply and still retain a buffer of 13,462. We are adding in additional allocations because the local authorities can't plan properly, within their evidenced supply.

This retained buffer would be even higher, should the LHN requirements projections match the evidence in ONS figures from 2016 or 2018.

I contend that the plan is not evidence based as required by para 31 of the NPPF "The preparation and review of all policies should be underpinned by relevant and up-to-date evidence." As the 2014 ONS figures are not up-to-date.

The supporting viability evidence (NPPF para 58] is so out of date that it is reasonable to conclude it no longer serves its primary purpose as "current, up to date" evidence. Simply re-dating documents as a desktop exercise, does not mean that the underlying evidence has not changed.

The plan is not Justified under para 35 b) as reasonable alternatives to GM Allocation 43 have not been given due weight, under the assessment of Greenbelt purpose in 2016 - see next section. Undue weight has been given to its suitability for development than its suitability as green-belt.

The plan is not justified against GMCA's Site Selection criteria [03.04.01 Site Selection Background Paper], where it states "Where a single district has sufficient land supply to meet its own LHN and this would not impact on the overall objective of inclusive growth, it was not necessary to release Green Belt" - Noting that this criterion seems to have applied to none of the districts in GMCA, Wigan can more than meet its LHN from existing SHLAA Land Supply inclusive of growth targets. Wigan's LHN (after government prescribed uplift to ONS 2014 out of date figures) is 872 [06 01 02 Table 3.3]. Over a 17 year period that equates to 14,824. Wigan's current SHLAA is 17,996 without any greenbelt allocations [The Plan, Table 7.1]. That's 121% of requirement, without the allocations. So Wigan is more than capable of both meeting and exceeding both its need and meeting inclusive growth objectives without any greenbelt allocations, bearing in mind the base LHN is already adjusted upwards ~20% under the governments formula.

#### Selection of Greenbelt Parcels within Wigan

Within Places for Everyone, Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary, clause 1.21 states "It is widely recognised that a buffer on the housing supply is needed of at least 10% and is essential to meet the proposed phasing and to enable sufficient flexibility as required by Paragraph 73 of the NPPF." There is no acknowledgement as to where this is covered in law nor who widely recognises it. It takes no account of the adjustment that's already been made to the baseline figure from ONS of 131,632 which under planning guidance already contains an uplift approaching 20% to arrive at the 164,880 revised baseline.

Even taking that into account GM still retains a buffer approaching 10% without any additional site allocations. Consequentially, the additional site

allocations represent the combined authority's inability to plan properly and are clearly overstated in both their need and whether it is remotely exceptional.

The site selection process has been significantly flawed and has been driven by undue pressure from certain large-scale landowners and has also contained elements of political interference (Wigan Council were put on a "three-line whip" contrary to guidance on issues of planning).

As part of the 2016 release of the Greater Manchester Spatial Framework, Greater Manchester Authorities made an assessment of possible Green Belt parcels of land and their suitability as greenbelt [Document Reference: Greater Manchester Greenbelt Assessment - FINAL REPORT - prepared by LUC, July 2016].

At that juncture, the land parcel now referred to within the Spatial Framework as GM Allocation 43, North of Mosley Common was referred to as land parcel WG80.

The study notes the following: [Paragraph 1.2] The overall aim of the Study was to assess the extent to which the land within the Greater Manchester Green Belt performs against the purposes of Green Belts, as set out in paragraph 80 of the National Planning Policy Framework (NPPF):

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

[Paragraph 1.3] The NPPF attaches great importance to Green Belts and stresses that their essential characteristics are "openness and permanence". It also advises that, once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of a local plan.

Land parcel WG80, was assessed as performing a strong greenbelt function against the other 142 possible candidates (including the border parcels), within Wigan. To give some notion of the importance of this parcel of land as greenbelt, only 9 parcels achieved strong greenbelt purpose in 4 out of 5 categories and none achieved 5, out of the 142 considered - so 133 land parcels in Wigan have less importance in their alignment to greenbelt purpose than WG80 [GM Allocation 43].

Purpose 1a - Does the parcel exhibit evidence of existing urban sprawl and consequent loss of openness?

Rating - Strong (highest greenbelt alignment rating)

Assessment Comments: The parcel is adjacent to Tyldesley, Walkden and Worsley. There are existing urbanising features within parcel including the small settlement of New Manchester to the south-east, and small scale industry to the north-west adjacent to the A5082 road. There is a strong sense of openness within the parcel because of farmland and woodland land cover. The parcel plays a strong role in checking the unrestricted sprawl of Tyldesley and Worsley.

Purpose 1b - Does the parcel protect open land from the potential for urban sprawl to occur

Rating - Strong (highest greenbelt alignment rating)

Assessment Comments: The parcel is adjacent to Tyldesley, Walkden and Worsley. There are some barrier features within the parcel such as a number of minor water course, small water bodies, inventory woodland, field boundaries and public rights of way. None of these prevent urban sprawl

from occurring within the parcel. The parcel plays some role in inhibiting development along boundary roads east of the A5082, A577 and north of Commonsides Road. The parcel also plays a strong role in inhibiting development along internal minor roads to the east including New City Road, City Road, Lower Row, Shudemill Road and the access road to farmsteads to the east of Sale Lane.

Purpose 2 Rating - Does the parcel prevent the merging or erosion of the visual or physical gap between neighbouring settlements?

Rating - Strong (highest greenbelt alignment rating)

Assessment Comments: The parcel forms part of a critical gap between the settlements of Walkden to the north-east, Boothstown and Ellenbrook to the south, Worsley to the east and Tyldesley to the south-west. The parcel plays an essential role in preventing the merging or erosion of the visual and physical gap between the settlements.

Purpose 3 Rating - Does the parcel have the characteristics of countryside and/or connect to land with the characteristics of countryside?

Assessment Rating - Strong (highest greenbelt alignment rating)

Assessment Comments: There is limited encroachment with the parcel being generally free of urbanised built development and comprising of mostly open pastoral fields. Development within the parcel is set against the A5082 to the east where there are a small number of commercial units and also at New Manchester to the west where there are a number of terraced properties. There are also playing fields and a cemetery to the south-west. There are views towards the busy traffic at the A5082 to the west of the parcel. The landscape within this parcel however remains predominantly unspoilt by urbanising influences located inside and outside of its boundaries due to the presence of tree cover particularly on the south-east edge. It has an intact and rural in character and displays characteristics of the countryside.

As a consequence of this assessment, whose purpose was [Paragraph 2.1] "to assess the extent to which the land within the Greater Manchester Green Belt performs against the purposes of Green Belts, as set out in paragraph 80 of the National Planning Policy Framework (NPPF)", GMCA and the Greater Manchester Spatial Framework is ignoring its own evidence base in respect of this parcel of land being included within the GM Allocations. There are at least 133 sites out of 142 in Wigan that play a less important greenbelt function than GM Allocation 43.

Furthermore, Wigan and the Greater Manchester Spatial Framework does not need any greenbelt allocations to meet their assessed housing need as stated within Greater Manchester Spatial Framework Publication Plan 2020, Section 7 which discusses the existing Housing Land Supply in Paragraph 7.12, "Table 7.1 illustrates that, in numerical terms, the existing supply of potential housing sites identified in the districts" strategic housing land availability assessments, small sites and empty properties is adequate to meet the overall identified need".

I contend on this basis that the plan is not prepared in line with NPPF paragraph 35 and is unsound. The plan is not justified (NPPF para 35 (b)) as reasonable alternatives to GM Allocation 43 have not been considered on a basis that uses proportionate consideration of the evidence base and taking into account the reasonable alternatives.

There are no exceptional circumstances that merit the inclusion of GM Allocation 43 and none have been demonstrated. What has been demonstrated is a preference, not supported by the evidence base. This is contrary to NPPF paragraph 136 "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans."

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	As the GMSF is nether evidenced nor justified. When Wigan Planning inspectors were consulting on this part of the Plan in 2016/17. I raised these concerns direct with the planning officer and the response I was given was "[X Landowner] own most of it, and what [X Landowner] wants, [X Landowner] gets, the Council can't afford a costly case against them."
<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>	Removal of greenbelt allocations
<b>Family Name</b>	Powell
<b>Given Name</b>	Robyn
<b>Person ID</b>	1286655
<b>Title</b>	JP-H 3 Type Size and Design of New Housing
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1286655_Objection.pdf</a>
<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>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Family Name</b>	Powell
<b>Given Name</b>	Robyn
<b>Person ID</b>	1286655
<b>Title</b>	JP-H 4 Density of New Housing
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1286655_Objection.pdf</a>
<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>	No



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<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Family Name</b>	Powell
<b>Given Name</b>	Robyn
<b>Person ID</b>	1286655
<b>Title</b>	JPA 35: North of Mosley Common
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1286655_Objection.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
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contained elements of political interference (Wigan Council were put on a "three-line whip" contrary to guidance on issues of planning).

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The study notes the following: [Paragraph 1.2] The overall aim of the Study was to assess the extent to which the land within the Greater Manchester Green Belt performs against the purposes of Green Belts, as set out in paragraph 80 of the National Planning Policy Framework (NPPF):

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[Paragraph 1.3] The NPPF attaches great importance to Green Belts and stresses that their essential characteristics are "openness and permanence". It also advises that, once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of a local plan.

Land parcel WG80, was assessed as performing a strong greenbelt function against the other 142 possible candidates (including the border parcels), within Wigan. To give some notion of the importance of this parcel of land as greenbelt, only 9 parcels achieved strong greenbelt purpose in 4 out of 5 categories and none achieved 5, out of the 142 considered - so 133 land parcels in Wigan have less importance in their alignment to greenbelt purpose than WG80 [GM Allocation 43].

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Rating - Strong (highest greenbelt alignment rating)

Assessment Comments: The parcel is adjacent to Tyldesley, Walkden and Worsley. There are existing urbanising features within parcel including the small settlement of New Manchester to the south-east, and small scale industry to the north-west adjacent to the A5082 road. There is a strong sense of openness within the parcel because of farmland and woodland land cover. The parcel plays a strong role in checking the unrestricted sprawl of Tyldesley and Worsley.

Purpose 1b - Does the parcel protect open land from the potential for urban sprawl to occur

Rating - Strong (highest greenbelt alignment rating)

Assessment Comments: The parcel is adjacent to Tyldesley, Walkden and Worsley. There are some barrier features within the parcel such as a number of minor water course, small water bodies, inventory woodland, field boundaries and public rights of way. None of these prevent urban sprawl from occurring within the parcel. The parcel plays some role in inhibiting development along boundary roads east of the A5082, A577 and north of Commonsie Road. The parcel also plays a strong role in inhibiting development along internal minor roads to the east including New City Road,



City Road, Lower Row, Shudemill Road and the access road to farmsteads to the east of Sale Lane.

Purpose 2 Rating - Does the parcel prevent the merging or erosion of the visual or physical gap between neighbouring settlements?

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Purpose 3 Rating - Does the parcel have the characteristics of countryside and/or connect to land with the characteristics of countryside?

Assessment Rating - Strong (highest greenbelt alignment rating)

Assessment Comments: There is limited of encroachment with the parcel being generally free of urbanised built development and comprising of mostly open pastoral fields. Development within the parcel is set against the A5082 to the east where there are a small number of commercial units and also at New Manchester to the west where there are a number of terraced properties. There are also playing fields and a cemetery to the south-west. There are views towards the busy traffic at the A5082 to the west of the parcel. The landscape within this parcel however remains predominantly unspoilt by urbanising influences located inside and outside of its boundaries due to the presence of tree cover particularly on the south-east edge. It has an intact and rural in character and displays characteristics of the countryside.

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## Places for Everyone Representation 2021

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<b>Given Name</b>	Robyn
<b>Person ID</b>	1286655
<b>Title</b>	Other Comments
<b>Type</b>	Web
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<b>Soundness - Justified?</b>	Unsound
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<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA