

<b>Classification:</b> Open	<b>Decision Type:</b> Key
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<b>Report to:</b>	Cabinet	<b>Date:</b> 07 September 2022
<b>Subject:</b>	Places for Everyone – updated evidence on housing supply and request for a main modification to the plan	
<b>Report of</b>	Leader and Cabinet Member for Strategic Growth and Skills	

### Summary

This report provides an update in respect of the Places for Everyone Joint Development Plan (PfE).

In particular, it provides details on the Borough’s updated housing land supply, which has significantly increased since PfE was submitted to Government in February 2022.

In the light of the updated housing supply evidence, there is an opportunity to reduce the amount of Green Belt land that is needed to meet Bury’s proposed PfE housing target without impacting on the overall strategy of the submitted Plan. Following an appraisal of the existing PfE sites, it is recommended that a request is made to the Planning Inspectorate to make a Main Modification to the plan involving the removal of the Walshaw site.

### Recommendation(s)

That Members:

- 1) Note the findings of the updated evidence on Bury’s housing land supply as set out in the Strategic Housing Land Availability Assessment (April 2022);
- 2) Note the conclusions of an assessment of options for addressing issues arising from the updated housing supply evidence; and
- 3) Authorise Officers to request a Main Modification to PfE involving the removal of the proposed housing allocation at Walshaw.

### Reasons for recommendation(s)

To ensure that the Examination of PfE takes account of the most up-to-date evidence on housing supply and pursues a sound approach to the future provision of housing in Bury.

### Alternative options considered and rejected

The recommendation set out in this report is fundamentally underpinned by the emergence of new evidence that shows an increase in opportunities for new housing in sustainable locations within the existing urban area that were not apparent at PfE submission stage.

In accordance with the NPPF and the need to make effective use of land, it has been necessary to consider this new supply within the context of the PfE's approach to housing in Bury.

The inclusion of this newly identified supply whilst maintaining the PfE's current proposed site allocations would lead to Bury having an overall housing supply that would be significantly in excess of the PfE target. As such, the review of the housing supply has considered options to reduce the extent of the housing supply buffer.

The recommended approach seeks to reduce Bury's housing land supply through the removal of a proposed PfE site allocation. An alternative means of reducing the buffer is to maintain the supply but to propose an increase to Bury's PfE housing target. Consideration of the options for reducing the buffer is set out in the main body of this report (paras 4.7 to 4.14).

The consideration of options for reducing housing supply and minimising the impact of the Green Belt is contained within the site options appraisal (summarised in Section 5 of this report).

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## **1. Background**

- 1.1 Members will be aware that there is a statutory requirement for local authorities to have an up-to-date development plan in place that identifies sufficient land to accommodate new homes and jobs for a growing population.
- 1.2 Places for Everyone (PfE) is a joint development plan for sustainable growth in the nine participating Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) and will, once adopted, form a key part of Bury's statutory development plan. In particular, the plan:
  - Sets out how the participating districts should develop up to the year 2037;
  - identifies the amount of new housing, office and industrial and warehousing development that will be delivered and the main areas in which this will be focused;

- identifies the important environmental assets which will be protected and enhanced;
  - allocates sites for employment and housing required outside of the urban area;
  - supports the delivery of key infrastructure, such as transport and utilities; and
  - defines a new Green Belt boundary for the nine boroughs.
- 1.3 Bury's participation in the preparation of the PfE joint plan brings significant benefits, most notably:
- A spatial strategy that has led to Bury having a housing target that is 76% of our Local Housing Need;
  - provision for a large-scale employment opportunity (Northern Gateway – Heywood/Pilsworth), which has the potential to be genuinely transformational and be a fundamental driver in rebalancing the Greater Manchester economy by significantly boosting the competitiveness of the north of the sub-region;
  - enabling the delivery of key strategic infrastructure to support new growth and development; and
  - providing an accelerated route to enable Bury to progress towards getting an up-to-date plan in place by the Government deadline of December 2023 (and providing important new policies to determine planning applications).
- 1.4 Members will recall that on 21 July 2021 approval was given to the Publication draft of PfE and to invite representations on that document over an eight-week period in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This eight-week period ran from 9 August 2021 until 3 October 2021.
- 1.5 On 28 July 2021 Full Council approved the formal Submission of PfE, its supporting evidence and representations received to the Secretary of State for Examination.
- 1.6 Pursuant to Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, PfE together with all the supporting documents, background evidence, and representations received during the final stage of public consultation, was submitted to Government on 14 February 2022.
- 1.7 A team of Planning Inspectors have now been appointed to examine the soundness of the plan. The Inspectors have recently set out a provisional programme and lists of participants for the Examination Hearings and the Matters, Issues and Questions that they wish to explore in greater depth.

## 2. Local Housing Need and PfE target

- 2.1 The National Planning Policy Framework (NPPF) specifies that plans should be informed by the Government's standard methodology for calculating housing needs. This national methodology gives Bury a Local Housing Need (LHN) for 9,456 homes over the plan period (591 homes per year).
- 2.2 However, the strategy proposed in the submitted PfE gives Bury a lower target of 7,228 homes (an average of 452 homes per year). This equates to 76% of Bury's LHN.

## 3. Updated housing supply

- 3.1 The NPPF also specifies that strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a Strategic Housing Land Availability Assessment (SHLAA). A SHLAA is a technical exercise to determine the quantity and suitability of land potentially available for housing development. The purpose is to provide a robust indication of housing capacity at local authority level.
- 3.2 The approach to housing within the submitted PfE was underpinned by the 2020 land supply which represented the best available evidence at the time. All nine districts have subsequently updated their housing land supply and there is now an updated supply with a 2022 base date.

### Housing supply - PfE Submission

- 3.3 Bury's 2020 SHLAA was used to inform the existing position on housing supply in Bury within the submitted PfE. This 2020 information showed that Bury had enough land to accommodate 3,776 homes within the urban area - falling significantly short of the plan's target of 7,228 homes for Bury.
- 3.4 Based on the 2020 SHLAA, the extent of Bury's supply shortfall necessitated the identification of additional housing sites that the PfE proposes to release from the Green Belt in order to meet the plan target, as set out in Table 1 below:

**Table 1 – PfE proposals for new housing in Bury**

PfE Policy	Site	No. of homes within the plan period
JPA1.1	Castle Road, Unsworth (Northern Gateway)	200
JPA1.2	Simister/Bowlee (Northern Gateway)	1,350
JPA7	Elton Reservoir	1,900

		(further 1,600 post plan)
JPA8	Seedfield	140
JPA9	Walshaw	1,250
	<b>Total</b>	<b>4,840</b>

3.5 Together, the 2020 existing supply and the proposed housing within the plan period on Green Belt sites were considered to have the capacity to deliver around 8,616 units in Bury.

3.6 This supply gave a 19% buffer on top of the PfE target for housing in Bury (7,228 homes). The average buffer across the 9 districts was 16%. Buffers are a standard requirement in development plans to provide flexibility in the event that sites do not come forward as envisaged over the plan period.

### **Housing supply – 2022 update**

3.7 Bury's housing supply position has now been updated following the completion of the 2022 SHLAA. The 2022 SHLAA includes additional sources of supply emerging from other recently completed plans and acquisitions, notably:

- The new Bury Town Centre masterplan;
- the acquisition of the Mill Gate; and
- Radcliffe Strategic Regeneration Framework.

3.8 A report to Cabinet on 9 March 2022 sought approval for a new masterplan for Bury town centre. This report highlighted that the masterplan identifies residential opportunities in Bury town centre beyond what had previously been envisaged, reflecting the new opportunity for residential development that has arisen from the potential redevelopment of part of the Mill Gate estate.

3.9 The Cabinet report stated that this newly identified housing supply would be reflected in the annual update of the SHLAA following a more detailed review of capacity for housing within the town centre and that any identified additional capacity for housing may help to minimise the amount of Green Belt release in the Borough.

3.10 This assessment of the additional supply has now been undertaken in conjunction with the 2022 SHLAA and this has concluded that all of the additional housing sites are suitable, available and achievable for residential development within the plan period. Importantly, all the additional sites that have been identified are in Council control and the Council is committed to securing the delivery of new residential development in a timely manner.

This provides a significant degree of confidence on delivering the housing targets within the plan period.

- 3.11 Taking account of the additional sources of housing supply, the updated SHLAA now shows that Bury now has enough land to accommodate 4,843 homes within the urban area (plus 140 within the existing supply at Seedfield) – an increase of 1,067 from the 2020 position that was used to inform the submitted PfE. Nevertheless, this updated supply figure still falls substantially short of the PfE target of 7,228 homes.
- 3.12 Together, the 2022 existing supply and the submitted PfE housing sites within the plan period are estimated to have the capacity to deliver 9,683 units. This would result in a 34% buffer on top of Bury’s PfE housing target.
- 3.13 Table 2 summarises the change in circumstances arising from the 2022 SHLAA update compared to the position at PfE submission:

**Table 2 – Bury’s housing position 2020 and 2022**

SHLAA date	PfE housing target	Existing supply	PfE additional supply	Total supply	Buffer
<b>2020</b>	7,228	3,776	4,840	8,616	19%
<b>2022</b>	7,228	4,843	4,840	9,683	34%

#### **4. Implications for PfE**

- 4.1 The additional sources of supply that have recently emerged were not foreseen at the point at which PfE was submitted.
- 4.2 The NPPF (paragraph 119) specifies that planning policies should promote an effective use of land in meeting the need for homes and other uses in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.
- 4.3 Furthermore, the NPPF (paragraph 141) also specifies that Green Belt boundaries should only be altered where **exceptional circumstances** are fully evidenced and justified and that before concluding that exceptional circumstances exist, there is a need to fully examine all other reasonable options for meeting its identified need for development and that, in doing so, makes as much use as possible of suitable brownfield sites and underutilised land.
- 4.4 The newly identified supply consists of previously-developed land in sustainable town centre locations that have good access to public transport, local amenities and services. Fundamentally, therefore, it is good planning practice to consider whether this increased supply has implications for PfE.

- 4.5 As shown in Table 2, maintaining Bury's submitted PfE housing allocations alongside the increased existing housing supply would lead to an overall supply that would be 34% higher than Bury's PfE housing target. It is considered that a buffer of 34% is very high (especially given that this is more than double the submitted PfE's average of 16%) and that this position would significantly weaken the case for exceptional circumstances to justify the release of all five of Bury's current PfE housing allocations from the Green Belt.
- 4.6 As such, it is considered necessary to examine options to reduce the extent of the buffer. There are two ways in which this could be achieved:
- By maintaining an increased housing supply and increasing the PfE housing target for Bury; or
  - By reducing the housing supply and maintaining the submitted PfE housing target.

#### **Increasing the housing target**

- 4.7 Maintaining a 19% buffer within PfE, with the updated housing supply, would mean that Bury's total housing target in the plan would have to increase from 7,228 to 8,137 units. This equates to an additional 909 houses over the plan period, increasing the annual housing target from 452 to 509. This would mean that Bury would meet 86% of the national LHN target – instead of 76% as is currently the case.
- 4.8 Maintaining an increased housing supply and increasing Bury's PfE target could be considered to be a reasonable approach given that Bury would be meeting 86% of its LHN. It could also be argued that this approach would be consistent with the PfE's strategy to boost northern competitiveness by supporting higher levels of new housing in the northern districts to assist in achieving a more balanced pattern of growth across Greater Manchester.
- 4.9 However, it is important to take into account the implications of this approach for the wider PfE strategy and particularly the fact that this would lead to a plan-wide PfE housing target that was higher than the collective LHN for the nine districts. In effect, increasing Bury's target would mean that PfE was planning for more housing than was needed across the nine districts – an approach that is considered to be inappropriate given the proposed release of Green Belt and one that would fundamentally affect the plan's strategy.

#### **Reducing the housing supply**

- 4.10 Throughout the preparation of the GMSF/PfE, one of the Council's key objectives has been to minimise the impact on Green Belt and a number of sites within Bury have been removed from the plan during previous draft stages, where there was an opportunity to do so.

- 4.11 It is considered that the most sustainable approach towards reducing the buffer would be to maintain the existing PfE housing target but to reduce Bury's housing supply. This approach would also align with:
- the PfE's strategy for housing targets to meet the collective LHN for the plan area;
  - the PfE's brownfield preference policy; and
  - the Council's continued commitment to prioritising the development of brownfield land.

4.12 Furthermore, this approach would also be consistent with the NPPF requirement to also fully examine all other reasonable options for meeting development needs and making as much use as possible of suitable brownfield sites and underutilised land before concluding that exceptional circumstances exist to justify the release of Green Belt.

### **Recommended approach to reducing the buffer**

4.13 With such a large land supply and buffer against the PfE's housing target for Bury, it is not considered that exceptional circumstances can be demonstrated to support all current allocations that involve Green Belt release. As such, it is considered that the housing supply should be reduced.

4.14 As stated previously, paragraph 119 of the NPPF specifies that planning policies should promote an effective use of land in meeting the need for homes and other uses in a way that makes as much use as possible of previously-developed or 'brownfield' land. Given that the additional identified housing supply is on previously-developed sites in sustainable town centre locations and is considered to be suitable, available and achievable for residential development within the plan period, it is considered appropriate that options for reducing the supply should focus on those sites that are proposed to be released from the Green Belt in the submitted PfE to meet the proposed target.

4.15 This approach would be consistent with several PfE Objectives, particularly those to create neighbourhoods of choice (Objective 2); to promote the sustainable movement of people, goods and information (Objective 6); and to help to ensure that Greater Manchester is a more resilient and carbon neutral city-region (Objective 7).

4.16 It would also be consistent with a number of Objectives within the PfE Integrated Appraisal Framework, particularly:

- Objective 9 – to promote sustainable modes of transport; and
- Objective 17 – to ensure that land resources are allocated and used in an efficient and sustainable manner to meet the housing and employment needs of GM, whilst reducing land contamination.

## 5. Site options appraisal

- 5.1 Any proposed modification to Bury's sites will need to be robustly justified in planning terms as part of the Examination and will be subject to scrutiny, debate and challenge. This will include a thorough review of the housing supply evidence and whether the numbers would be deliverable within the plan period (something that is being challenged across the nine districts).
- 5.2 The evidence supporting PfE demonstrates that all Bury's proposed housing allocations represent suitable and deliverable opportunities for new housing. This remains the case and there is no new evidence to suggest otherwise.
- 5.3 Regardless, given the increased supply and the excessive buffer, it is not considered that an Inspector would conclude that exceptional circumstances exist to support the removal of all five of Bury's housing sites from the Green Belt. As a result, it is necessary to consider the options for reducing the extent of Green Belt release and, in doing so, to fundamentally consider whether exceptional circumstances still exist to support any or all of the proposed Green Belt releases.
- 5.4 In assessing the options, there needs to be a balanced approach that considers the planning merits of each of Bury's proposed housing allocations that are currently included in PfE, taking account of key elements of the PfE's evidence base and other key considerations, namely:
- **Environmental Effects** – Consideration of the environmental impacts highlighted in the PfE Integrated Assessment and Habitats Regulations Assessment;
  - **Green Belt Assessment** – The Greater Manchester Green Belt Harm Assessment considers the impact that the proposed developments would have on each of the five purposes of Green Belt;
  - **Site selection** – A process designed to identify the most sustainable locations for residential and employment development that can achieve the PfE's Vision, Objectives and Spatial Strategy and meet the housing and employment land needs across the nine districts;
  - **Consultation responses** – Consideration of consultation responses submitted in relation to each site under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations to determine whether any of the options considered would be in line with representations made, or not. A summary of the key issues raised in relation to each site can be found in Appendix 3.
- 5.5 The appraisal is concentrated on the three large residential sites in the Borough (Simister/Bowlee, Elton Reservoir, and Walshaw), given the extent of Green Belt reduction needed to sufficiently reduce the supply and buffer is much greater than could be delivered on the two smaller sites (Seedfield and Castle Road [Northern Gateway]). Also, in relation to these two smaller sites:

- **Seedfield:** Paragraph 149 of the National Planning Policy Framework (NPPF) identifies a range of instances where new development in the Green Belt can be considered to be appropriate. This includes limited infilling or the partial or complete redevelopment of previously developed land (such as the Seedfield site) provided that this does not result in unacceptable impacts on the openness of the Green Belt. This site is in Council ownership and the Council is already working with a developer to bring the brownfield part of the site forward outside of the development plan process. This means that even if the site is removed from the PfE supply, the housing numbers would still need to be included within the existing supply.
- **Castle Road (Northern Gateway):** The PfE proposes that around 200 units could be allocated in this location as part of the wider employment-led development at the Northern Gateway site. The Northern Gateway provides the main opportunity to boost the competitiveness of the northern districts - a key objective of PfE's strategy. The delivery of the residential component on this part of the Northern Gateway site will help to deliver part of the wider infrastructure into the site. It is important, therefore, that the Castle Road site is retained as a vital component of the wider Heywood/Pilsworth (Northern Gateway) site. In any event, the removal of this site alone would mean that the revised buffer would still be considered excessive (31%) and would still require a further reduction from the three strategic sites.

5.6 For the reasons above, the options appraisal focuses on Bury's three strategic housing sites:

- JPA1.2 – Simister/Bowlee (1,350 homes);
- JPA7 – Elton Reservoir (3,500 homes); and
- JPA9 – Walshaw (1,250 homes).

5.7 Appendix 1 to this report sets out the full site options appraisal of these sites against the factors highlighted in paragraph 5.4 above. The following paragraphs summarise the key findings from this appraisal.

#### **Environmental effects**

5.8 The environmental considerations within the PfE Integrated Assessment (IA) are set out under Objectives 10 to 18 of the IA Framework i.e:

- Objective 10 - Improve air quality.
- Objective 11 - Conserve and enhance biodiversity, green infrastructure and geodiversity assets.
- Objective 12 - Ensure communities, developments and infrastructure are resilient to the effects of expected climate change.

- Objective 13 - Reduce the risk of flooding to people and property.
- Objective 14 - Protect and improve the quality and availability of water resources.
- Objective 15 - Increase energy efficiency, encourage low carbon generation and reduce greenhouse gas emissions.
- Objective 16 - Conserve and/or enhance landscape, townscape, heritage assets and their setting and the character of GM.
- Objective 17 - Ensure that land resources are allocated and used in an efficient and sustainable manner to meet the housing and employment needs of GM, whilst reducing land contamination.
- Objective 18 - Promote sustainable consumption of resources and support the implementation of the waste hierarchy.

- 5.9 The conclusions of the IA for each of the three sites against the above objectives and their associated assessment criteria is detailed in Appendix 4 of this report.
- 5.10 These show that, in terms of the environmental effects, the Walshaw site is considered to have more positive benefits (14) than Simister/Bowlee (12) and Elton Reservoir (8). In terms of negative results, the site at Walshaw was considered to have less negative impacts (3) than Simister/Bowlee (4) and Elton (5).
- 5.11 The appraisal has also taken account of the Habitats Regulations Assessment (HRA) that has been undertaken to consider the potential impacts of PfE on European Protected Sites. The HRA does not identify any conclusions that are specific to the three sites but it has assessed the potential cumulative impacts of proposed development within PfE as a whole. This shows that there are potentially minor air pollution impacts on European designated sites. However, mitigation strategies are currently being developed to address these impacts.

### **Green Belt harm**

- 5.12 In relation to harm to the Green Belt, the release of any of the sites will clearly cause some harm both in terms of the impact on the purposes of Green Belt and the impact on adjoining areas of Green Belt.
- 5.13 However, the Greater Manchester Green Belt Harm Assessment does show that there are perceived differences in the degree of harm that would result from the release of each site with the release of Walshaw having the least impact and Simister/Bowlee the highest.

### **Site selection**

- 5.14 The site selection process includes an assessment of sites against a series of criteria, namely:

- Criterion 1 - Land which has been previously developed and/or land which is well served by public transport;
- Criterion 2 - Land that is able to take advantage of the key assets and opportunities that genuinely distinguish Greater Manchester from its competitors;
- Criterion 3 - Land that can maximise existing economic opportunities which have significant capacity to deliver transformational change and / or boost the competitiveness and connectivity of Greater Manchester and genuinely deliver inclusive growth;
- Criterion 4 - Within 800 metres of a main town centre boundary or 800m from the other town centres' centroids;
- Criterion 5 – Have a direct significant impact on delivering urban regeneration;
- Criterion 6 – Where transport investment (by the developer) and the creation of significant new demand (through appropriate development densities), would support the delivery of long-term viable sustainable travel options and delivers significant wider community benefits; and
- Criterion 7 – Deliver significant local benefits by addressing a major local problem/issue.

5.15 Whilst all three sites are justified in relation to this process, it does show that Elton Reservoir and Simister/Bowlee offer the greatest opportunity to provide significant and strategic benefits – not just for the wider Bury area but also for the wider conurbation. These strategic benefits include the delivery of major transport infrastructure such as a strategic link road and public transport hub/Metrolink stop (Elton Reservoir) and the delivery of significant strategic improvements to public transport infrastructure to help with the delivery of the wider Northern Gateway site (Simister/Bowlee).

5.16 In addition, both the Elton Reservoir and Simister/Bowlee sites would both bring regeneration benefits to the wider area with the Elton Reservoir site assisting with on-going regeneration efforts in Inner Radcliffe and Radcliffe town centre area and Simister/Bowlee helping to deliver significant jobs and housing to boost the competitiveness of northern and eastern parts of Greater Manchester in what is currently an area with significant pockets of deprivation, low skills and worklessness.

5.17 Conversely, whilst the site at Walshaw would deliver some local benefits, these are not considered to be of a nature that would offer strategic benefits to the wider Borough, or indeed the wider conurbation. The site is not located in an area that has the potential to provide significant investment in public transport (i.e. no existing Metrolink or plans for an extension to this location, or little opportunity for new high frequency bus corridors). This is

largely because of the site’s geographical location in the north of the Borough, which has a more restricted road network.

- 5.18 Whilst the Walshaw site would be suitable for release if required to meet the proposed housing target (as the submitted PfE demonstrates), the benefits that would arise from the Walshaw site are not considered to be as strategically significant as the other two large sites proposed in the more sustainable part of the Borough.
- 5.19 Table 3 sets out the key benefits that would be delivered in conjunction with the proposed housing sites and which are integral to the site selection process.

**Table 3 – Summary of key benefits associated with housing sites**

Benefit	PfE Site		
	Simister/ Bowlee	Elton Reservoir	Walshaw
New Metrolink stop	Potential	✓	X
New/existing Metrolink line	Potential	✓	X
Bus improvements	✓	✓	✓
Strategic highway improvements	X	✓	X
Improved facilities for cycling and walking	✓	✓	✓
Social and physical regeneration	✓	✓	X

- 5.20 Appendix 2 includes a series of plans to provide a visual representation of the key benefits associated with each of the sites.

### Consultation responses

- 5.21 The Regulation 19 consultation on the publication PfE generated a number of responses relating specifically to the Simister/Bowlee, Elton Reservoir and Walshaw sites. The Elton Reservoir and Walshaw sites generated the highest number of site-specific responses (331 and 329 respectively) with Simister/Bowlee generating 205 responses.
- 5.22 The majority of the representation submitted were objecting to the release of the sites from the Green Belt and their proposed allocation for housing.

### Conclusions of site appraisal and recommended approach

- 5.23 As stated previously, the evidence submitted as part of the PfE demonstrates that all of Bury’s proposed housing allocations fundamentally represent suitable and deliverable opportunities for new housing.

- 5.24 The conclusions of the site appraisal need to be fundamentally considered within the context of whether exceptional circumstances still exist for justifying the removal of each of the sites from the Green Belt and, in doing so, there needs to be a balanced approach that considers the merits of each site and whether these are sufficient to justify such circumstances.
- 5.25 The evidence shows that the environmental effects associated with each site are broadly similar, although the Integrated Assessment indicates that the site at Walshaw presents more benefits and less negative outcomes than the other two sites. In addition, the Habitats Regulations Assessment does not provide any site-specific conclusions. Ultimately, however, the effect of retaining any of the sites within the Green Belt will be wholly positive.
- 5.26 It is clear that the removal and retention within the Green Belt of any of the sites would clearly address the objections submitted in response to the PfE Regulation 19 consultation.
- 5.27 Of the three sites, the evidence shows that the development of the Walshaw site would result in the least harm to the Green Belt. Nevertheless, there would be some degree of harm to the Green Belt for all sites.
- 5.28 As specified previously, the purpose of the PfE site selection process is to identify the most sustainable locations for residential and employment development that can achieve the PfE Vision, Objectives and Spatial Strategy and meet the housing and employment land needs across the nine districts and this process has been critical in identifying sites that would best help to deliver the plan's overall strategy.
- 5.29 It is clear from the site selection process that both the Simister/Bowlee and Elton Reservoir sites would offer the greatest opportunity to provide significant and strategic benefits for the wider Borough including the associated delivery of major transport infrastructure and social and physical regeneration benefits and this is considered to amount to exceptional circumstances to justify the release of these sites from the Green Belt. In comparison, it is considered that whilst the site at Walshaw would deliver some local benefits, these are not considered to be of a scale and nature that would offer strategic benefits to the wider Borough.
- 5.30 Although the site appraisal shows that the Walshaw site would have a lesser environmental effect and harm to the Green Belt, on balance, it is considered that the scale and nature of the benefits associated with each of the sites is of fundamental importance – not just in terms of benefits to the site itself but also to the wider area.
- 5.31 On this basis, it is considered that exceptional circumstances remain for removing the Simister/Bowlee and the Elton Reservoir sites from the Green Belt, but that exceptional circumstances no longer exist for the removal of land at Walshaw from the Green Belt and that a Main Modification should be requested that retains this land within the Green Belt.

- 5.32 The buffer could potentially be reduced to an appropriate level by removing supply from a number of the proposed sites. However, the delivery of the strategic benefits associated with both the Elton and the Simister/Bowlee sites is largely reliant on the scale of development proposed and the effect that this has on the ability to directly fund the infrastructure and/or support the business case for infrastructure investment.

### **Implications of removing the Walshaw site**

- 5.33 The removal of the Walshaw site would reduce Bury's housing supply by 1,250 units, giving a total supply of 8,433 over the plan period. This would therefore reduce the extent of the buffer to 17%, which is more reflective of the 16% average across the plan area in the submitted plan.
- 5.34 Although the removal of the Walshaw site would represent a significant change to the plan in relation to Bury's allocations, the proposal for this Main Modification would not result in a change to Bury's or any other districts' housing target within PfE.
- 5.35 The conclusions of the site options appraisal reflects relevant evidence supporting PfE and considers this as part of a planning balance to determine the recommended approach. The conclusions of the site options appraisal and the proposed change to the plan would not undermine this evidence or the wider approach elsewhere in the plan. In addition, the overall spatial strategy presented in the PfE Plan would remain unchanged.

## **6. Next Steps**

- 6.1 Throughout the Examination of PfE, the Inspectors will explore the potential for Main Modifications to resolve any soundness and legal compliance issues. Section 20(7C) of the Planning and Compulsory Purchase Act requires the Inspector to recommend Main Modifications if asked to do so by the Local Planning Authority, provided that these modifications are necessary to make the plan sound and legally compliant.
- 6.2 If Members approve the recommendation to request a Main Modification to the Plan, this request would be made through a statement prepared in response to Matters, Issues and Questions relating to the proposed Walshaw allocation that have been issued by the Inspectors undertaking the PfE Examination.
- 6.3 The proposed Main Modification would then be subject to debate during the Examination Hearing Sessions which are scheduled to commence on 1 November 2022 with discussion around Bury's site allocations currently scheduled to take place on 24 January 2023.
- 6.4 As stated above, the Inspectors can only recommend Main Modifications if they are necessary to make the submitted Plan sound and/or legally compliant.

- 6.5 Any potential Main Modifications will be subject to public consultation (at least six weeks) before the Inspectors can recommend them in their report, and, in some cases, they may also require further sustainability appraisal and Habitats Regulations Assessment.
- 6.6 Assuming that the Inspectors conclude that PfE is capable of adoption, whether with or without modifications, the ultimate decision to adopt must be taken by each of the Full Councils of the nine participating local authorities.

## **7. Risks**

- 7.1 Given that PfE is currently the subject of Examination, it is likely that there will be extensive debate regarding the plan's approach and there will inevitably be inherent risks that the Inspectors overseeing the Examination may not agree with the general PfE approach to housing or to Bury's proposed Main Modification.
- 7.2 The PfE's approach to housing is already facing significant challenge from a wide range of stakeholders, developers, groups and organisations. These challenges will be considered at depth during the Examination of the plan.
- 7.3 Similarly, it is highly likely that any request for Main Modifications will be subject to challenge during the Examination in terms of whether the proposed modification is necessary to make the plan sound and/or legally compliant.
- 7.4 It is anticipated that the key areas of challenge to the PfE's approach to housing will be as follows:
- Challenge to the deliverability of the existing supply - The Examination of the PfE plan will include significant challenge from the development industry, with a considerable number of objections submitted in relation to the capacity, deliverability and viability of the existing supply/brownfield sites as well as what is seen to be the plan's over-reliance on sites within the core of the conurbation and on the apartment market.
  - Challenge to the housing targets and deliverability of other allocations - The housing targets and the proposed allocations within the plan will face challenge at the Examination. The development industry, in particular, want to see the plan increase its housing targets and the number of allocated sites. There is a risk that the Inspectors may agree with this suggested approach to increased housing targets. This could potentially lead to an increased housing target for Bury which the Inspectors may consider to be a more appropriate way of reducing Bury's buffer rather than through a reduction in the supply.
  - Legal challenge to the plan - Following the Examination of the plan, there may be a legal challenge to the plan.

## 8. Conclusion

8.1 The recommendations are contained at the front of this report.

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### **Links with the Corporate Priorities:**

Places for Everyone will form part of Bury's statutory development plan. It will set out statutory policies and strategic site allocations that will guide future growth and development in the Borough. A key part of the plan is to rebalance the Greater Manchester economy by significantly boosting the economic output from the north through the delivery of new housing and employment that will benefit both Bury and its residents. The 'Let's Do It' strategy specifically refers to Places for Everyone as having a key role to play in the delivery of its objectives and priorities.

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### **Equality Impact and Considerations:**

Please refer to the attached EIA. There are no negative impacts on equality and a positive impact recorded.

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### **Environmental Impact and Considerations:**

Whilst the inclusion of the site at Walshaw and the policy requirements set out in the accompanying policy (JPA9) are considered to have largely positive carbon impacts when considered against the Integrated Appraisal framework (Objective 15), the retention of the site in the Green Belt will have overall positive environmental effects.

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### **Assessment and Mitigation of Risk:**

<b>Risk / opportunity</b>	<b>Mitigation</b>
The risks associated with the recommended approach are set out in Section 7 of this report	To ensure that the PfE Inspectors are provided with robust evidence to support the Council's proposals for a Main Modification to the plan.

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### **Legal Implications:**

This report is seeking Cabinet approval for officers to request a modification to the submitted Places for Everyone Plan (PFE). This plan has been submitted for examination which will commence in November 2022.

S 19 of the Planning and Compulsory Purchase Act 2004 sets out that Authority must have a development plan that includes policies designed to secure the

development and use of land in the local planning authority's area and these must be kept up to date. All policies must have regard to national planning policies and ensure that there is an appraisal of the sustainability of the proposals.

The PFE is a joint development plan document. This report contains links to the earlier decision making reports on this matter.

It is incumbent on the Authority to have a clear rationale for any proposed changes at each stage. This report sets out for Members the environmental effects of each option so this may be assessed before reaching a decision.

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### **Financial Implications:**

This report does not commit the Council to any financial decisions but seeks to establish a strategic planning policy framework for the plan area, including Bury. Implementing any schemes aligned to the framework will be subject to decision making at that time which will include a full assessment of the financial implications including affordability that will take into account costs and additional revenue income that may be generated.

Should the request to make a Main Modification to the Plan involving the removal of the Walshaw site form part of the Inspectors' final reported recommendations, the site would remain within the Green Belt and would no longer have development potential. Part of this site is in Council ownership and the potential for a capital receipt from the site would therefore be lost, however this site is not part of any current plans and so there will be no impact on the current Medium Term Financial Strategy.

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### **Background papers:**

*Please list any background documents to this report and include a hyperlink where possible.*

- [Places for Everyone Joint Development Plan](#)
- [Bury Strategic Housing Land Availability Assessment \(April 2022\)](#)
- [Integrated Appraisal of the Greater Manchester Spatial Framework 2020 \[doc ref: 02.01.03\]](#)
- [Habitats Regulations Assessment \[doc refs: 02.02.01 and 02.02.02\]](#)
- [Greater Manchester Green Belt Harm Assessment \[doc ref: 07.01.09\]](#)
- [Site Selection Background Paper \[doc ref: 03.04.01\]](#)
- [Cabinet Report – Publication of PFE \(21 July 2021\) \(Item CA.111\)](#)

- [Council Report – Submission of PfE \(28 July 2021\) \(Item C.6\)](#)
- [Cabinet Report – Bury Town Centre Masterplan \(9 March 2022\) \(Item CA.235\)](#)

**Please include a glossary of terms, abbreviations and acronyms used in this report.**

Term	Meaning
PfE	Places for Everyone – a joint development plan being prepared by nine of the ten GM districts.
SHLAA	Strategic Housing Land Availability Assessment - A SHLAA is a technical exercise to determine the quantity and suitability of land potentially available for housing development.
LHN	Local Housing Need – the number of new houses required over a given period, calculated by using the Government’s standard methodology.

## Appendix 1 – Site Options Appraisal

<b>Simister/Bowlee (Northern Gateway) (Policy JPA1.2)</b>	
PfE proposes that the Simister/Bowlee site will deliver around 1,550 homes across Bury and Rochdale (1,350 within Bury).	
<b>Environmental Effects</b>	<p>The Integrated Assessment of the plan includes a number of objectives and assessment criteria within the IA framework that are environmentally focussed. The conclusions of the IA in respect of the Simister/Bowlee site are set out in more detail in Appendix 4.</p> <p>A Habitats Regulations Assessment (HRA) has been undertaken to consider the potential impacts of PfE on European Protected Sites. However, the HRA does not provide any site-specific conclusions.</p> <p>Ultimately, however, the environmental effect of retaining this site within the Green Belt will be wholly positive.</p> <p>Further information on the Integrated Appraisal and HRA of the plan can be found <a href="#">here</a>.</p>
<b>Green Belt Assessment</b>	<p>In general, the assessment concludes that the release of land including the Simister/Bowlee site from the Green Belt would have a 'high' overall impact on Green Belt purposes but that the impact on adjacent Green Belt would be 'moderate'.</p> <p>The assessment of Green Belt harm of the site allocations can be found <a href="#">here</a>.</p>
<b>Site Selection</b>	<p>The PfE Site selection process considers that the Simister/Bowlee site meets the following site selection criteria:</p> <p><u>Criteria 3 (land that can maximise existing opportunities which have significant capacity to deliver transformational changes and/or boost the competitiveness and connectivity of Greater Manchester and genuinely deliver inclusive growth):</u></p> <ul style="list-style-type: none"> <li>▪ The allocation has the capacity to deliver development at a transformative scale and significantly change the economic growth potential of the wider area.</li> </ul> <p><u>Criteria 5 (land which would have a significant impact on delivering urban regeneration):</u></p> <ul style="list-style-type: none"> <li>▪ The allocation offers the opportunity to deliver significant jobs and housing to boost the competitiveness of northern and eastern parts of Greater Manchester in what is currently an area with significant pockets of deprivation, low skills and worklessness.</li> </ul> <p><u>Criteria 6 (land where transport investment (by the developer) and the creation of significant new demand (through appropriate development densities), would support the delivery of long term viable sustainable travel options and delivers significant wider community benefits):</u></p>

	<ul style="list-style-type: none"> <li>▪ The development of this site is integral to the delivery of significant strategic improvements to public transport infrastructure in this area. These improvements are designed to help with the delivery of the wider Northern Gateway site, including the nationally significant employment-led opportunity at Heywood/Pilsworth that will attract high quality business, jobs and investment.</li> <li>▪ The transport improvements include proposals for an express bus corridor network in the area to facilitate public transport connectively to the Northern Gateway site. There are also proposals to create a new Metrolink connection to Middleton, with the line likely to be close to this residential site. Introducing new housing in this location will help the business case for investment in these strategic public transport interventions.</li> <li>▪ In addition, the development will be required to incorporate a network of safe and convenient cycling and walking routes through the allocation.</li> <li>▪ The new transport infrastructure will ensure that this site will form part of a much-improved sustainable location and will be located in an area that will have significant new opportunities to access new employment opportunities by active travel and public transport.</li> <li>▪ The Simister/Bowlee site therefore occupies a strategically important location, not only in terms of being well-connected to the proposed employment opportunities at Heywood/Pilsworth but also in terms of assisting in the delivery of wider strategic transport infrastructure.</li> </ul> <p><u>Criteria 7 (land that would deliver significant local benefits by addressing a major local problem/issue):</u></p> <ul style="list-style-type: none"> <li>▪ The allocation would help to rebalance the Greater Manchester economy by significantly boosting the economic output from the north of the conurbation.</li> <li>▪ The allocation would help with wider infrastructure investment that would help to generate a significant number of new job opportunities in an area that is accessible to some of Greater Manchester's most deprived communities.</li> <li>▪ The allocation would help to bring forward a significant amount of new employment land in Bury which would address longstanding problems associated with an inadequate supply in this district.</li> <li>▪ The allocation would provide deliverable sites for housing in the north of Greater Manchester where there is an opportunity to capitalise on an existing high end market housing area and/or provide an opportunity to diversity the housing market, contributing to the competitiveness of the north.</li> </ul>
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**Consultation Responses**

The Regulation 19 consultation on PfE generated 205 responses relating to the Simister/Bowlee site.

The majority of the representation submitted were objecting to the release of the site from the Green Belt and its proposed allocation for housing.

On this basis, the removal of the site and retention within the Green Belt would clearly address the objections submitted.

The key issues raised are summarised in Appendix 3 of this report.

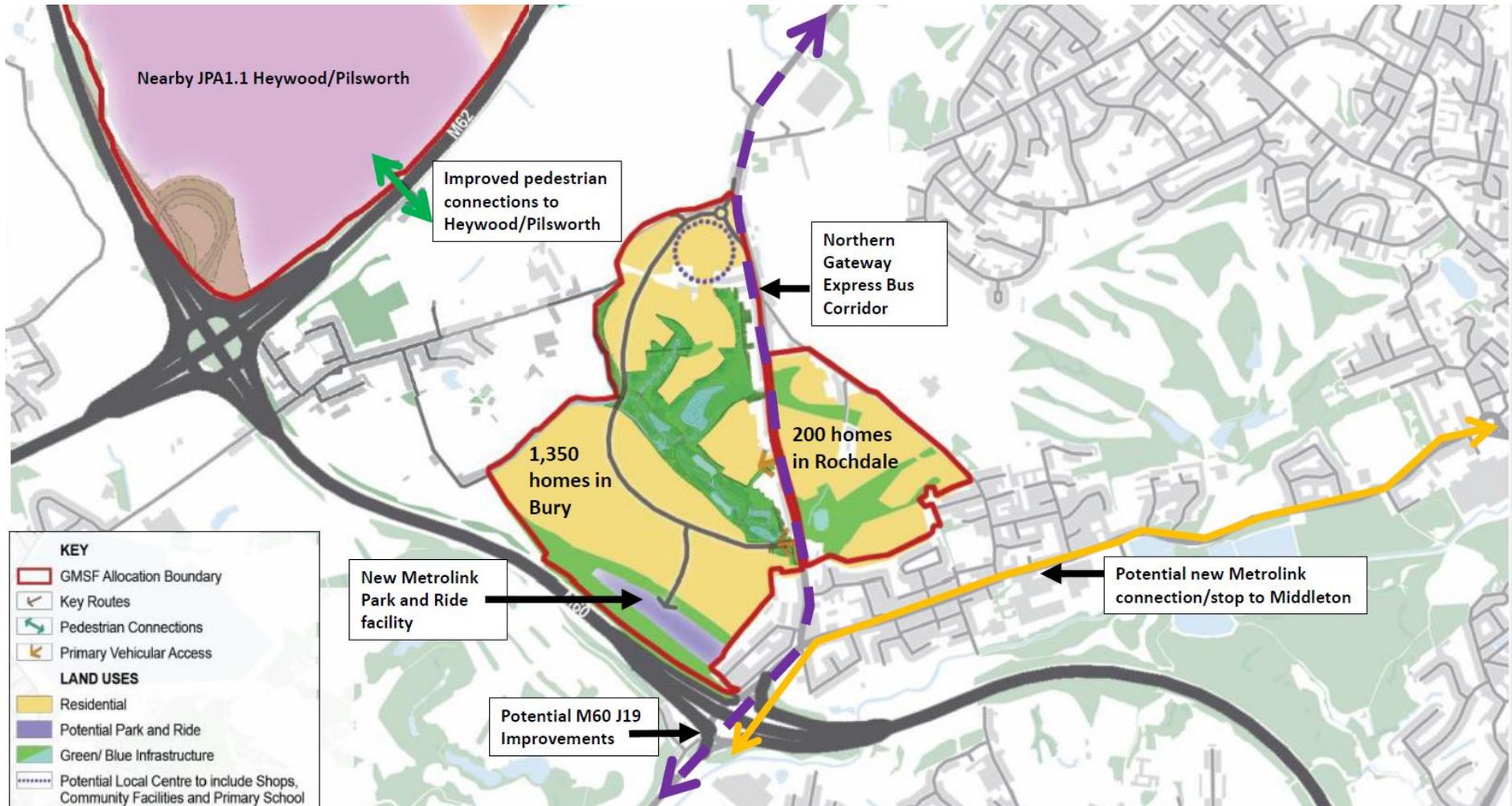
<b>Elton Reservoir (Policy JPA7)</b>	
PfE proposes that the Elton Reservoir site will deliver around 3,500 homes (1,900 within the plan period).	
<b>Environmental Effects</b>	<p>The Integrated Assessment of the plan includes a number of objectives and assessment criteria within the IA framework that are environmentally focussed. The conclusions of the IA in respect of the Elton Reservoir site are set out in more detail in Appendix 4.</p> <p>A Habitats Regulations Assessment (HRA) has been undertaken to consider the potential impacts of PfE on European Protected Sites. However, the HRA does not provide any site-specific conclusions.</p> <p>Ultimately, however, the environmental effect of retaining this site within the Green Belt will be wholly positive.</p> <p>Further information on the Integrated Appraisal and HRA of the plan can be found <a href="#">here</a>.</p>
<b>Green Belt Assessment</b>	<p>In general, the assessment concludes that the overall harm to the Green Belt varies across the site but that most areas are considered to have a 'high' or 'moderate-high' impact on the purposes. The impact on adjacent Green Belt is considered to be mostly 'minor'.</p> <p>The assessment of Green Belt harm of the site allocations can be found <a href="#">here</a>.</p>
<b>Site Selection</b>	<p>The PfE site selection process considers that the Elton Reservoir site meets the following site selection criteria:</p> <p><u>Criteria 6 - Land where transport investment (by the developer) and the creation of significant new demand (through appropriate development densities), would support the delivery of long term viable sustainable travel options and delivers significant wider community benefits):</u></p> <ul style="list-style-type: none"> <li>▪ This site is considered to be strategically important to Bury, with the scale of development enabling the delivery of substantial supporting infrastructure that will not only benefit the immediate area but will bring wider benefits to the Borough.</li> <li>▪ Fundamental to the delivery of residential development on the Elton Reservoir site will be the provision of major highways infrastructure. This will include the need to incorporate a new strategic spine road connecting Bolton and Bury Road (A58) in the north with Bury Road, Radcliffe in the south-east as well as the provision of a new spur road connecting the allocation to Spring Lane via the former Coney Green High School site.</li> <li>▪ The development will also be required to make provision for improved public transport connectivity including a new transport hub and Metrolink stop at Warth as well as new</li> </ul>

	<p>pedestrian and cycle links through the development and into surrounding areas which will provide more sustainable travel options to residents in the area.</p> <p><u>Criteria 7 (Land that would deliver significant local benefits by addressing a major local problem/issue):</u></p> <ul style="list-style-type: none"> <li>▪ The allocation will provide a deliverable site for housing in the north of Greater Manchester where there is an opportunity to capitalise on an existing high end housing market area and/or provide an opportunity to diversify the housing market, contributing to the competitiveness of the north; and</li> <li>▪ The new strategic north-south spine road connecting Bury and Bolton Road (A58) to Bury Road, Radcliffe will provide an essential alternative to Bury Bridge for traffic travelling south towards Manchester from the west Bury area.</li> <li>▪ Furthermore, any new development on the Elton Reservoir site will need to be fully integrated into the existing urban fabric and with surrounding neighbourhoods and communities. In doing so, it will need to facilitate new pedestrian and cycle links through the development and into surrounding areas. This will include strong linkages to inner Radcliffe and Radcliffe town centre, Radcliffe Metrolink and local schools which, in addition to the spur road, will further help in supporting on-going physical and social regeneration efforts in this area.</li> </ul>
<p><b>Consultation Responses</b></p>	<p>The Regulation 19 consultation on PfE generated 331 responses relating to the Simister/Bowlee site.</p> <p>The majority of the representation submitted were objecting to the release of the site from the Green Belt and its proposed allocation for housing.</p> <p>On this basis, the removal of the site and retention within the Green Belt would clearly address the objections submitted.</p> <p>The key issues raised are summarised in Appendix 3 of this report.</p>

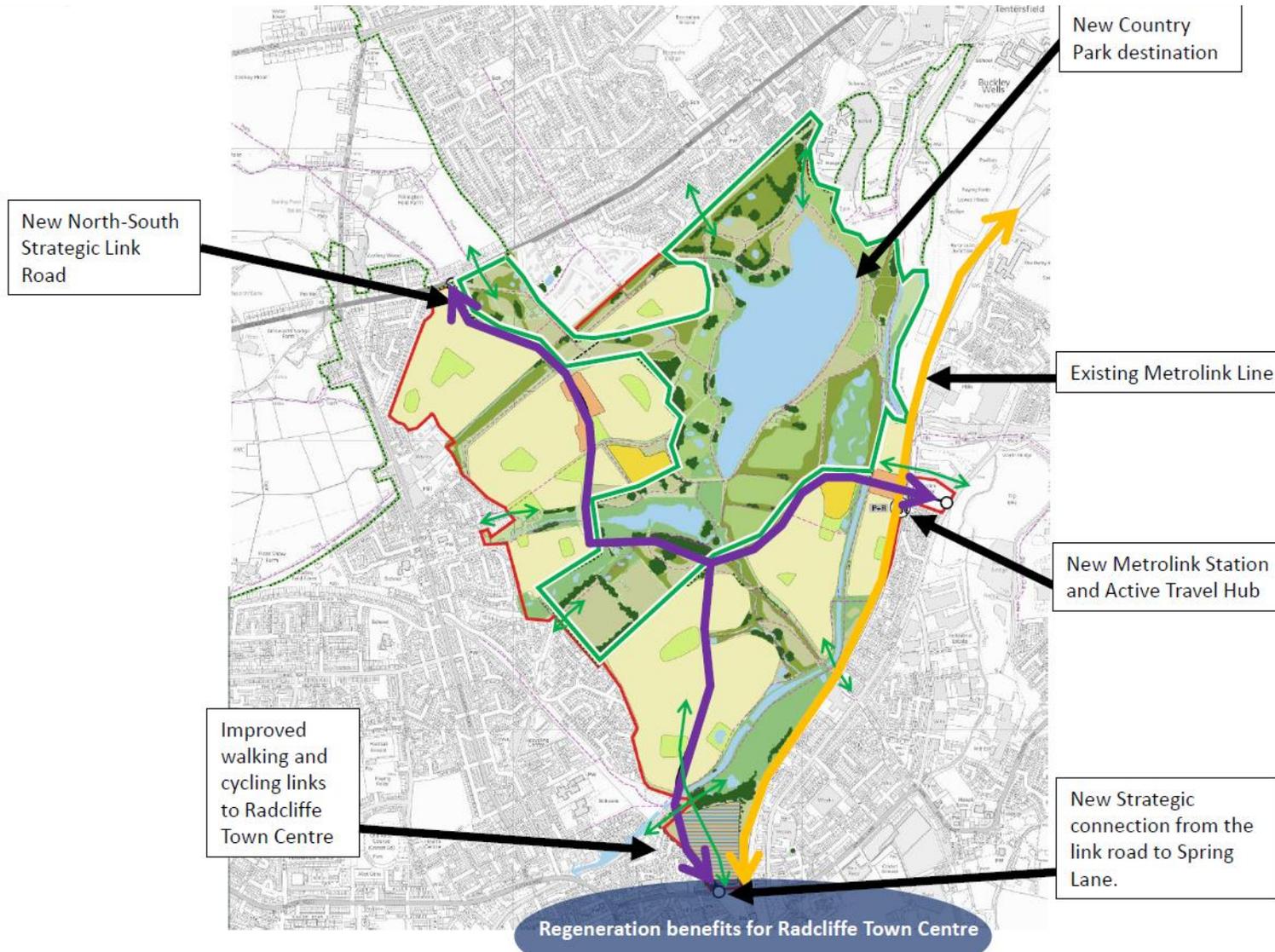
<b>Walshaw (Policy JPA9)</b>	
PfE proposes that the Walshaw will deliver around 1,250 homes.	
<b>Environmental Effects</b>	<p>The Integrated Assessment of the plan includes a number of objectives and assessment criteria within the IA framework that are environmentally focussed. The conclusions of the IA in respect of the Walshaw site are set out in more detail in Appendix 4.</p> <p>A Habitats Regulations Assessment (HRA) has been undertaken to consider the potential impacts of PfE on European Protected Sites. However, the HRA does not provide any site-specific conclusions.</p> <p>Ultimately, however, the environmental effect of retaining this site within the Green Belt will be wholly positive.</p> <p>Further information on the Integrated Appraisal and HRA of the plan can be found <a href="#">here</a>.</p>
<b>Green Belt Assessment</b>	<p>In general, the assessment concludes that the release of the Walshaw site from the Green Belt would have a 'moderate' overall impact on Green Belt purposes but that the impact on adjacent Green Belt would be 'negligible'.</p> <p>The assessment of Green Belt harm of the site allocations can be found <a href="#">here</a>.</p>
<b>Site Selection</b>	<p>The PfE site selection process considers that the Walshaw site meets the following site selection criteria:</p> <p><u>Criteria 7 (Land that would deliver significant local benefits by addressing a major local problem/issue):</u></p> <ul style="list-style-type: none"> <li>▪ The allocation will provide a deliverable site for housing in the north of Greater Manchester where there is an opportunity to capitalise on an existing high end market housing area and/or provide an opportunity to diversify the housing market, contributing to the competitiveness of the north; and</li> <li>▪ The development of this site will be required to make provision for improvements to the local highway network including a new link road through the allocation that will provide an alternative and more direct route to the more difficult Church Street/Bank Street route.</li> </ul>
<b>Consultation Responses</b>	<p>The Regulation 19 consultation on PfE generated 329 responses relating to the Simister/Bowlee site.</p> <p>The majority of the representation submitted were objecting to the release of the site from the Green Belt and its proposed allocation for housing.</p> <p>On this basis, the removal of the site and retention within the Green Belt would clearly address the objections submitted.</p> <p>The key issues raised are summarised in Appendix 3 of this report.</p>

## Appendix 2 – Plans showing key benefits associated with PfE sites.

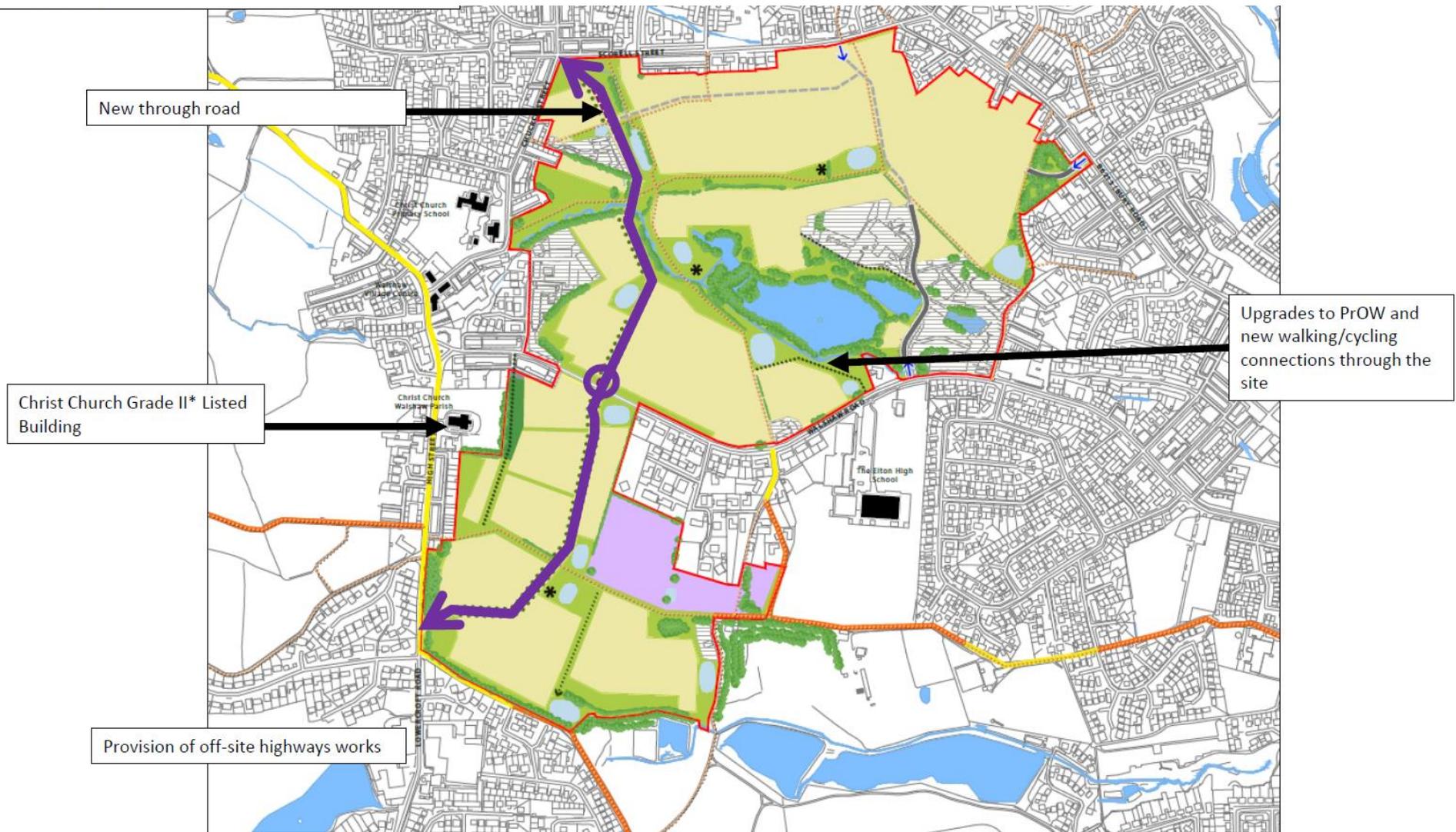
### JPA1.2 – Simister/Bowlee



# JPA7 – Elton Reservoir



# JPA9 – Walshaw



New through road

Christ Church Grade II\* Listed Building

Provision of off-site highways works

Upgrades to PrOW and new walking/cycling connections through the site

## Appendix 3 – Summary of key issues raised in response to Regulation 19 consultation on PfE

The following sets out a summary of the key issues raised in response to the invitation to make representation on the Publication PfE:

### JPA1.2 - Simister/Bowlee

Row	Key Issue
1	Object to the scale of development.
2	In conjunction with JPA 1.1 Heywood/Pilsworth the proposals are considered over development.
3	Supported to help deliver the new homes and jobs that the northern parts of Greater Manchester needs.
4	The development will cause considerable harm to character of Simister village.
5	The requirement for a comprehensive masterplan for the whole site allocation is not justified.
6	Object to the loss of Green Belt/green space
7	Support decision to classify the fields at the entrance to Simister as green belt
8	Object to the loss of green infrastructure, key walking routes and rights of way used by both walkers and horse riders.
9	Concerns regarding the impact of the development on the Landscape Character Areas included within the allocation.
10	There is a lack of priority around affordable housing provision.
11	Site doesn't meet the site selection criteria and the site selection process has been developer-led.
12	There is no need to release Green Belt when there is an adequate supply of brownfield sites.
13	The proposal conflicts with the climate emergency.
14	Housing need calculations are based on out-of-date information i.e. 2014 household projections and do not take into account the impacts of Covid and Brexit.
15	The site will not be delivered as anticipated.

16	Concerns regarding the viability of the site.
17	The proposal will have an adverse impact on local roads and the wider network leading to increased congestion and air pollution.
18	The site is poorly served by public transport.
19	Need more information on how infrastructure will be funded.
20	There is a lack of healthcare and educational infrastructure to support the development.
21	Proposals will lead to the loss of biodiversity and ecological habitats and wildlife and environmental surveys have not been done correctly.
22	Loss of open land will have a negative impact on physical and mental health.
23	The proposal will lead to increased flooding.
24	Concern that there is an absence of clear expectations for high quality sustainable water management and that the development will increase flood risk.
25	Need to consider heritage assets within the site.
26	Concerns over the impact on noise and air quality.

## JPA7 - Elton Reservoir (JPA7)

Row	Key Issue
1	Object to the loss of Green Belt/green space
2	Exceptional circumstances exist in which Green Belt loss can be acceptable and efforts to minimise this are welcomed.
3	Housing will not be affordable
4	Site doesn't meet the site selection criteria and the site selection process has been developer-led.
5	Object to the release of Green Belt for 3,500 homes when only 1,900 can be delivered within the plan period.
6	This is a site of strategic significance that will make a considerable contribution to housing supply, is accessible to surrounding towns and well connected to existing infrastructure.
7	There is no need to release Green Belt when there is an adequate supply of brownfield sites.
8	The proposal conflicts with the climate emergency.
9	Housing need calculations are based on out-of-date information i.e. 2014 household projections and do not take into account the impacts of Covid and Brexit. In addition, the Government's standard housing methodology is not mandatory.
10	The proposed Elton Parkland does not compensate for the loss of Green Belt.
11	The site will not be delivered as anticipated.
12	The site is located on the opposite side of the Borough to the proposed employment development at the Northern Gateway.
13	The proposal will have an adverse impact on local roads and the wider network leading to increased congestion and air pollution.
14	The site is poorly served by public transport.
15	Supports and welcomes detailed proposals on infrastructure and landscape design.
16	Transport evidence is incomplete and does not identify in sufficient detail the nature, scale and timing of infrastructure requirements at the SRN.
17	Utilities infrastructure will not be able to cope with increased demands.

18	Support for policy reference that ensures mitigation of flood risk from all sources.
19	Need more information on how infrastructure will be funded.
20	There is a lack of healthcare and educational infrastructure to support the development.
21	Proposals will lead to the loss of biodiversity and ecological habitats and wildlife and environmental surveys have not been done correctly.
22	Loss of open land will have a negative impact on physical and mental health.
23	The proposal will lead to increased flooding.
24	Need to consider heritage assets within the site.

## JPA9 - Walshaw

Row	Key Issue
1	The setting of Walshaw village would be harmed. Separation required between existing and proposed properties.
2	Loss of farmland that should be kept open as it offers local benefits e.g. residential amenity and improved health/wellbeing.
3	Support: the site is available, suitable, achievable and deliverable and exceptional circumstances exist for the release of the site from green belt.
4	The area is unsuitable for housing. Poor land stability due to past mining activity, culverted watercourses and natural springs are on-site. Evidence required addressing land stability/hydrology.
5	The necessity for a comprehensive masterplan would lead to delays in the delivery of development.
6	The need to allocate sites within green belt is more pressing than currently set out in PFE.
7	The site is contained entirely by the existing urban area and accordingly makes a very limited contribution towards the purposes of the Green Belt
8	The Walshaw site performs poorly against site selection criteria and only met one of the criteria for site selection whereas all the objectives could be satisfied by any number of sites in the borough
9	The site is in fact in multiple ownerships, there does not appear to be any evidence that land agreements between landowners are in place to enable the whole site to be delivered. The site is therefore not available.
10	The affordable housing situation will not be addressed.
11	Concern regarding targets. Housing targets are not mandatory. The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19 on housing need and work patterns. There isn't enough local employment to sustain such a big increase in housing.
12	The development of the site will not be delivered within the timescales anticipated.
13	Places for Everyone proposes employment sites on the other side of the borough from Walshaw so should build more in the south of the borough to support the northern gateway
14	Object to the loss of large amount of Green Belt which would be contrary to the purposes of Green Belt.

15	Green Belt land should be protected, not built on. No housing is needed and should utilise brownfield land first and if Green Belt is still needed, scale down the level of development. Green belt areas to be added will not provide any benefit for those within the Walshaw area
16	There has been no evidence of the existence of exceptional circumstances to justify the alteration of the green belt boundaries to allow building on the Walshaw allocation as is required by the NPPF. Housing need is not an exceptional circumstance to justify the release of greenbelt.
17	Existing roads are at capacity and are in poor condition. There would be an impact on road safety, emergency services and businesses. Proposed highway solutions will not alleviate the situation. Insufficient and vague infrastructure, particularly transport infrastructure, for Walshaw has been proposed, with no sources of funding specified. The existing infrastructure could not cope with an increase in people and cars.
18	There is no evidence or viability testing to prove that this level of policy ask for infrastructure is deliverable on site in the timeframe and will not render the site unviable. Therefore, the site is not deliverable.
19	Concern regarding drainage, surface water flooding due to removal of trees and an already inadequate sewerage system in Scobell Street area.
20	Concern of increased stress on schools, which are already inadequate, and at capacity and more clarity needed on new social infrastructure.
21	Detailed proposals on infrastructure and new school welcomed
22	Negative impact on key ecological sites, Special Landscape Area, climate and considerable loss of wildlife
23	Support the policy proposals to include multifunctional green and blue infrastructure within the allocation and to integrate and enhance existing green infrastructure corridors along Walshaw and Elton Brooks. Support for inclusion of requirement for net gains for biodiversity and long-term management of green infrastructure.
24	Should preserve open spaces around Christ Church to retain setting.
25	Consider that the policy wording should be amended to take into account viability and local requirements at the time of any application for both affordable housing provision and public transport improvements.

## Appendix 4 – Results of the Integrated Appraisal of site allocations against environmental objectives

IA Objective	Assessment Criteria	Simister/Bowlee	Elton Reservoir	Walshaw
Objective 10 is to Improve air quality	Improve air quality within Greater Manchester, particularly in the 10 Air Quality Management Areas (AQMAs)?	++/--	++/-	++
Objective 11 is to Conserve and enhance biodiversity, green infrastructure and geodiversity assets	Provide opportunities to enhance new and existing wildlife and geological sites?	+	++	++
	Avoid damage to or destruction of designated wildlife sites, habitats and species and protected and unique geological features?	+	++	+
	Support and enhance existing multifunctional green infrastructure and / or contribute towards the creation of new multifunctional green infrastructure?	++	++	++
	Ensure access to green infrastructure providing opportunities for recreation, amenity and tranquillity?	++	++	+
Objective 12 is to Ensure communities, developments and infrastructure are resilient to the effects of expected climate change	Ensure that communities, existing and new developments and infrastructure systems are resilient to	+	0	++

	the predicted effects of climate change across GM?			
Objective 13 is to Reduce the risk of flooding to people and property	Restrict the development of property in areas of flood risk?	+	o	++
	Ensure adequate measures are in place to manage existing flood risk?	+	o	++
	Ensure that development does not increase flood risk due to increased run-off rates?	+	-/?	++
	Ensure development is appropriately future proof to accommodate future levels of flood risk including from climate change?	+	-	++
Objective 14 is to Protect and improve the quality and availability of water resources	Encourage compliance with the Water Framework Directive?	o	o	o
	Promote management practices that will protect water features from pollution?	o	o	o
	Avoid consuming greater volumes of water resources than are available to maintain a healthy environment?	o	o	o
Objective 15 is to Increase energy efficiency, encourage low carbon generation and	Encourage reduction in energy use and increased energy efficiency?	+	+	+

reduce greenhouse gas emissions	Encourage the development of low carbon and renewable energy facilities, including as part of conventional developments?	-/?	-	-/?
	Promote a proactive reduction in direct and indirect greenhouse gas emissions emitted across GM?	+	+	+
Objective 16 is to Conserve and/or enhance landscape, townscape, heritage assets and their setting and the character of GM	Improve landscape quality and the character of open spaces and the public realm?	o	o	o
	Conserve and enhance the historic environment, heritage assets and their setting?	++	++	++
	Respect, maintain and strengthen local character and distinctiveness?	o	o	o
Objective 17 is to Ensure that land resources are allocated and used in an efficient and sustainable manner to meet the housing and employment needs of GM, whilst reducing land contamination	Support the development of previously developed land and other sustainable locations?	-	-	-
	Protect the best and most versatile agricultural land / soil resources from inappropriate development?	-	+	+
	Encourage the redevelopment of	-	-	-

	derelict land, properties, buildings and infrastructure, returning them to appropriate uses?			
	Support reductions in land contamination through the remediation and reuse of previously developed land?	-	-	-
Objective 18 is to Promote sustainable consumption of resources and support the implementation of the waste hierarchy	Support the sustainable use of physical resources?	o	o	o
	Promote movement up the waste hierarchy?	o	o	o
	Promote reduced waste generation rates?	o	o	o