

Company / Organisation	Persimmon Homes North West
Person ID	1287380
Title	Stakeholder Submission
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287380_LandRectoryLane.pdf PFE1287380_LandPepperLane.pdf
Company / Organisation	Persimmon Homes North West
Person ID	1287380
Title	Our Strategic Objectives
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287380_LandPepperLane.pdf PFE1287380_LandRectoryLane.pdf
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	<ol style="list-style-type: none"> 1. Meet our housing need 2. Create neighbourhoods of choice
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	<p>Objective 1: Persimmon Homes support the objective to meet housing need. However, the specified measures and policies within PfE will not achieve this. To increase net additional dwellings is an unambitious aim which would be achieved regardless of PfE and has no relevance to the scale of need nor the Government's objective of "significantly boosting" the supply of homes (NPPF parag. 60).</p> <p>It is not considered that the components of the housing land supply and associated PfE policies concerning density of housing sites (particularly those in proximity to public transport hubs) will support delivery of a diverse mix of housing as defined in Objective 1. Similarly, the over reliance on apartment developments to achieve housing requirements is unlikely to support a sufficient increase in the number of affordable homes; evidence suggesting that such developments fail to deliver sufficient affordable homes due to viability constraints.</p>

	Objective 2: It is not realistic to focus new homes within 800m of public transport "hubs" as there are an insufficient number of hubs available with suitable development sites within this distance to allow the objective to be met; further there is little justification for setting 800m as an appropriate distance to focus development. Having regard to paragraph 105 of NPPF, significant development should be focussed on developments which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes.
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.	Objective 1: It should be ensured that need for market and affordable housing is met, and that there should be sufficient housing to support the economic growth of Greater Manchester. Objective 2: Having regard to paragraph 105 of NPPF, significant development should be focussed on developments which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes.
Company / Organisation	Persimmon Homes North West
Person ID	1287380
Title	JP-Strat 6 Northern Areas
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287380_LandRectoryLane.pdf PFE1287380_LandPepperLane.pdf
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	Persimmon Homes support the intentions of Policy JP-Strat 6. It is welcome that the policy recognises that it is not only important to regenerate brownfield land but to increase the mix, type, quality and range of the residential offer. It is also welcome that it is recognised that the selective release of Green Belt and previously Safeguarded Land may be needed to achieve this. The pattern of growth has historically been uneven with growth concentrated in Manchester, Salford and Trafford and with the key assets and locations set out at 4.3 being in central parts of Manchester, this is set to continue without decisive action. Indeed, it is acknowledged at 4.6 that low forecast growth rates risk reinforcing rather than tackling the significantly worse performance of these areas. However, the Policy does not indicate the scale of growth which is expected across the Northern Areas and it will only be effective with sufficient developable land in the right places, as we comment upon under Policy JP-H1 and elsewhere.

Places for Everyone Representation 2021

	<p>Paragraph 4.48 of PfE refers to the potential to increase the number of higher income workers who choose to live in the north. An influx of entrepreneurs and skilled workers would support business creation, support economic activity and reduce pressures within the southern areas. However, the Plan identifies an insufficient range of sites to achieve this, and none of the sites listed in 4.48 are in Bolton or Wigan, despite suitable land being available, including sites outside of the Green Belt.</p>
<p>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.</p>	<p>The policy could indicate the scale of growth proposed, and refer to opportunities which the Plan should identify to diversify the housing offer in Bolton and Wigan in order to attract an increased number of higher income households and rebalance the City Region by providing greater opportunities in the north.</p>
<p>Company / Organisation</p>	<p>Persimmon Homes North West</p>
<p>Person ID</p>	<p>1287380</p>
<p>Title</p>	<p>JP-Strat 7 North East Growth Corridor</p>
<p>Agent Company / Organisation</p>	<p>Mosaic Town Planning</p>
<p>Type</p>	<p>Web</p>
<p>Include files</p>	<p>PFE1287380_LandPepperLane.pdf PFE1287380_LandRectoryLane.pdf</p>
<p>Soundness - Positively prepared?</p>	<p>NA</p>
<p>Soundness - Justified?</p>	<p>NA</p>
<p>Soundness - Consistent with national policy?</p>	<p>NA</p>
<p>Soundness - Effective?</p>	<p>Unsound</p>
<p>Compliance - Legally compliant?</p>	<p>NA</p>
<p>Compliance - In accordance with the Duty to Cooperate?</p>	<p>NA</p>
<p>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.</p>	<p>Persimmon support the designation of the North-East Growth Corridor in principle, as one of the means by which to achieve the aims of Northern Areas Policy JP-Strat 6. It is noted at paragraph 4.15 of PfE that the northern areas benefits from an important infrastructure asset in the form of the M62 motorway. The designated area is already well established as an employment location, and is unique in its ability to accommodate large scale urban extensions within Greater Manchester. The Plan has identified the scope for public transport improvements and the potential, not only to support the regeneration of existing communities, but to significantly enhance the residential offer in terms of the type, quality and mix of housing to ensure that it is inclusive.</p> <p>The Employment Topic Paper states "The most significant proposed intervention in the northern areas is focused on the M62 corridor from junction 18 (the confluence with the M60 and M66) to junction 21 (Milnrow), extending across parts of Bury, Rochdale and Oldham. The scale of this initiative is considered necessary in order to transform perceptions of, and opportunities</p>

	<p>within, the north of Greater Manchester." However, the reality is that the approach will create individual and disjointed development sites and not maximise the potential of the corridor to achieve strategic change.</p> <p>An example of an additional strategic development opportunity is land North of Langley Lane, Middleton which is situated to the south-west of Junction 19 of the M62 and would be a logical additional allocation within the Corridor.</p> <p>Land North of Langley Lane is the subject of an accompanying site-specific Vision Document. Some of the key points contained within this are:</p> <ul style="list-style-type: none"> -The site is within the control of a single housebuilder with no abnormal constraints to delivery. -The Development Framework Plan envisages a development area of some 15 Ha accommodating up to 500 dwellings, together with public open space of 8.8 Ha and potential sports provision. However, an alternative option under active consideration and in response to market demand, would be to incorporate a logistics park at the closest part of the site to Junction 19. -The proposed development area would round off the settlement of Middleton, with the suggested development area projecting no further north than the consented site to the east. -Parcel BU BA02 considered in the Green Belt Assessment, within which land is already proposed to be allocated for development, considers a wider area. The site as promoted will have a lesser impact and land within the same ownership allows for a new permanent Green Belt boundary to be established with structural planting, providing compensatory improvements for the loss of Green Belt. -Allocation would avoid dependence on a small number of strategic housing sites, and support delivery of employment land through providing more choice of high-quality homes for the labour force along with the potential opportunity for logistics or advanced manufacturing development adjacent to the motorway <p>Whilst Persimmon Homes support the aims of Policy Strat 7, they therefore object to the policy on the grounds that it will not be effective in delivering the full potential of the North East Growth Corridor due to the omission of land North of Langley Lane.</p>
<p>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.</p>	<p>The Policy should identify Land at Langley Lane, Middleton as a mixed-use development opportunity to ensure that the potential of the North-East Growth Corridor is fully realised.</p>
<p>Company / Organisation</p>	<p>Persimmon Homes North West</p>
<p>Person ID</p>	<p>1287380</p>
<p>Title</p>	<p>JP-Strat 8 Wigan Bolton Growth Corridor</p>
<p>Agent Company / Organisation</p>	<p>Mosaic Town Planning</p>
<p>Type</p>	<p>Web</p>
<p>Include files</p>	<p>PFE1287380_LandRectoryLane.pdf PFE1287380_LandPepperLane.pdf</p>

Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	<p>Persimmon Homes agree that the Wigan-Bolton Growth Corridor can make a significant contribution to the delivery of the aspirations of PfE for the Northern Areas in principle. This will capitalise on improved transport connections and the availability of major brownfield sites. However, such sites located within the urban area have previously been identified for a substantial period already with limited delivery. This highlights the importance of including a proportion of Green Belt release as identified by the policy, where sequentially preferable safeguarded land is not available within the relevant local authority area.</p> <p>In the case of Bolton, there has been a persistent shortage of housing delivery due to over-dependence on unviable brownfield and housing estate regeneration sites, which have not been aligned to housing need due to an over-dependence on apartments. However, PfE does not make any additional greenfield allocations in Bolton, which immediately constrains the delivery of the strategy including aspirations for the Wigan-Bolton Growth Corridor.</p> <p>This is despite the existence of suitable development opportunities, consistent with the existing recognition that Green Belt boundaries require revision. Persimmon Homes seek such an alteration and the allocation of an additional site for housing at Chew Moor Lane in Westhoughton. Westhoughton is one of the locations in which substantial new employment development is proposed without accompanying additional housing allocations.</p> <p>The site is sustainably located 1.5 km north-east of Westhoughton town centre and consists of some 9.4 Ha in total which is used for the keeping of horses. The presence of Lostock Sports Club to the north with the M61 beyond, combined with housing to the south and west, confirms its urban fringe character.</p> <p>The accompanying site-specific Vision Document sets out the case for its allocation for housing:</p> <ul style="list-style-type: none"> -This is a logical self-contained site for release from the Green Belt, with defensible long-term site boundaries. -Two suitable access points are proposed on Chew Moor Lane -The site is not dependent on third party land or off-site infrastructure. -The proposed Development Framework envisages a development area of 7.6 Ha, accommodating some 265 dwellings and public open space of 1.8 Ha. -The site-specific issues to be addressed are typical of those for a greenfield site of this scale and character. -As an immediately deliverable site, it would rectify the failure to allocate any housing land whatsoever in Bolton which will adversely affect the vision of addressing spatial disparities across Greater Manchester. <p>Recent government confirmation of the electrification of the Bolton to Wigan railway line to be completed in 2024/25, featuring the extension of platforms</p>

Places for Everyone Representation 2021

	at Westhoughton station, confirms that this is a sustainable location for development.
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.	Recognition that Green Belt release within the Bolton local authority area, such as at Chew Moor Lane, is necessary to achieve the housing delivery aspirations of the Wigan-Bolton Growth Corridor and an adequate supply of deliverable housing land in Bolton overall.
Company / Organisation	Persimmon Homes North West
Person ID	1287380
Title	JP-J 1 Supporting Long Term Economic Growth
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287380_LandPepperLane.pdf PFE1287380_LandRectoryLane.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Company / Organisation	Persimmon Homes North West
Person ID	1287380
Title	JP-J 2 Employment Sites and Premises
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287380_LandRectoryLane.pdf PFE1287380_LandPepperLane.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	NA

Compliance - In accordance with the Duty to Cooperate?	NA
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.	Persimmon Homes note that the policy seeks to achieve a strong portfolio of opportunities, and that these must have regard to prime growth sectors. Accordingly, and having particular regard to requirements for industry and warehousing development in well-connected locations, Persimmon Homes support the selective removal of land from the Green Belt for this purpose.
Company / Organisation	Persimmon Homes North West
Person ID	1287380
Title	JP-J 4 Industry and Warehousing Development
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287380_LandPepperLane.pdf PFE1287380_LandRectoryLane.pdf
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Sound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	<p>Policy JP-J4 addresses Industry and Warehousing Development and refers to the need to significantly increase the supply of high quality sites across the northern parts of Greater Manchester to help increase the competitiveness of the area. This is consistent with the increased importance of logistics as recognised by paragraph 6.28, based on its enabling of other sectors such as manufacturing and retail, and changes in consumer behaviour. The scale of the potential sites available for this purpose and advanced manufacturing, in conjunction with the presence of the M62, make the North-East Growth Corridor an important focus for this purpose.</p> <p>Previously, the ability to retain and attract occupiers has been constrained by a lack of suitable sites, and there is also a need for flexibility to provide a choice of sites and compensate for losses to other land uses. This confirms the case for Green Belt within the North-East Corridor to satisfy the requirement.</p>
Company / Organisation	Persimmon Homes North West
Person ID	1287380
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Agent Company / Organisation	Mosaic Town Planning

Places for Everyone Representation 2021

Type	Web
Include files	PFE1287380_LandRectoryLane.pdf PFE1287380_LandPepperLane.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Scale</p> <p>The Housing Topic Paper purports to discuss how the scale of housing proposed by Policy JP-H1 has been arrived at, beginning with the sentence at paragraph 6.6 "As expected by NPPF, the housing need set out in Joint Plan has been derived using the standard methodology provided in the NPPG for calculating Local Housing Need (LHN)."</p> <p>However, Planning Practice Guidance makes it apparent that it is necessary to distinguish between the outcome of the application of the standard method and the development of an appropriate plan strategy. This is inherent throughout the document, beginning with the statement that "Assessing housing need is the first step in the process of deciding how many homes need to be planned for." (ID: 2a-001-20190220). It goes on to say "The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement figure." (ID: 2a-002-20190220). Similarly, NPPF at paragraph 61 only requires that strategic policies to determine the minimum number of homes required are "informed by" a local housing need assessment conducted using the standard method, rather than automatically adopting the resultant figure.</p> <p>Planning Practice Guidance sets out when it might be appropriate to plan for a higher housing need figure than the standard method indicates, highlighting how the government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. It reiterates how the standard method provides a minimum starting point, which does not predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.</p> <p>Some of the examples of where a higher figure might be justified are given at ID: 2a-010-20201216:</p> <ul style="list-style-type: none"> -growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals); -strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or -an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground; -where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method.

To these it can be added that a higher total could be justified where it could help deliver the required number of affordable homes. (ID: 2a-024-20190220).

Persimmon Homes are not advocating an alternative approach to establishing housing need to the standard method, but request that the standard method is properly utilised as the first step in identifying the minimum housing requirement. The Housing Topic Paper simply ignores the issue of how the minimum level of need should be translated into a requirement.

In the case of Greater Manchester, a higher total would be justified by the following considerations:

-The Housing Topic Paper at 6.40 outlines a range of schemes and mechanisms intended to boost delivery. These include funding from the Housing Investment Loan Fund (which has committed over £458m to build over 6,100 units at 55 sites across Greater Manchester), the Brownfield Housing Fund, Getting Building Fund, Housing Infrastructure Fund and the Marginal Viability Fund. In addition, there is a pending Strategic Place Partnership with Homes England.

-PfE expressly proposes strategic infrastructure improvements which are specifically tied to increases in housing delivery. These are set out in the Greater Manchester Transport Strategy 2040 Refresh and accompanying Delivery Plans. They include investment in the motorway network and integrated public transport to support the scale of development proposed within the North-East Growth Corridor, together with new road and rail infrastructure in the Bolton-Wigan Growth Corridor.

-As noted in the PfE - Statement of Common Ground August 2021 (parag. 4.1) "The withdrawal of Stockport MBC from the joint development plan process does not negate that they are part of the Greater Manchester housing market area or travel to work area."

To expand upon the last point, it is apparent from the Statement of Common Ground that the relationship between the housing requirement of Stockport and PfE remains unresolved. The letter from PfE to Stockport Council of 11th June 2021 noted that work on Stockport's needs was incomplete and requested that details be shared when available "so that districts may consider whether it is possible to meet all or some of the need in PfE". The letter sought "to agree a process for future engagement between Stockport Council and the other nine districts regarding the scale and distribution of housing across Greater Manchester", but there is apparently no progress with this.

NPPF parag 26 states that "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy" and there is no evidence that this has occurred. It remains highly unlikely that Stockport will meet its own development needs for both market and affordable housing and it is inevitable that people who might otherwise have chosen to live in Stockport will look elsewhere in Greater Manchester and add to housing pressure in the PfE constituent authorities.

With regard to whether a higher requirement should be proposed to help deliver the required number of affordable homes, affordability is clearly a serious concern in Greater Manchester. PfE refers at 7.2 to a "housing crisis" and says "lying behind this is a much more extensive problem of many people being unable to access suitable housing at an affordable price and with certainty of tenure. Over 70,000 people are on our local authority housing waiting lists with almost 27,000 "reasonable preference". A lack of appropriate housing options prevents some people from forming their own households, particularly younger adults, whilst those who can may have to cope with substandard or expensive accommodation."

It is acknowledged that "the supply can only be truly met through a more diverse range of new provision including a major boost in the supply of

affordable housing", which is consistent with the evidence contained within Table 5.5 of the SHMA which shows that an annual average of only 1,446 dwellings have been completed over the last 8 years in Greater Manchester outside of Stockport. This compares with an annual need of 5,214 as revealed by Table 7.15, again excluding Stockport, which will far exceed the target of affordable 50,000 dwellings should this persist over the plan period.

However, no such major boost will result from a Plan which only proposes the minimum number of houses expected by the standard method, incorporating an annual affordability uplift of 1,164. Paragraph 22 of Executive Summary of the Strategic Viability Assessment finds that only about one fifth of the target of 50,000 units of affordable housing is capable of being delivered through Section 106 agreements. Therefore, there is compelling evidence that a higher housing requirement, in conjunction with the identification of viable greenfield sites, is justified.

Flexibility

The plan proposes a flexibility allowance of 16%. When almost 150,000 of the existing supply is either wholly or partially brownfield, much of which is long-standing and could have come forward already if it were genuinely developable, there continue to be significant doubts about the deliverability of a substantial proportion of the supply.

Much of Greater Manchester, including large swathes of the north, is covered by lower value areas (outside of VA1-3 as defined in the Strategic Viability Report Stage 1 September 2020) where there is a need for public sector intervention to achieve viable scheme delivery and to meet the requirements of the draft plan. In this context it is notable that, even looking at just the 5 year supply, the Strategic Viability Assessment Stage 1 Addendum June 2021 finds that 31% is unviable. This assessment is in any case based on a questionable assumption that all of the supply from large sites within the 5 year supply is viable.

An additional concern is that, according to the Strategic Viability Assessment Stage 2 Allocated Sites Report, viability is negative or marginal on a number of proposed allocations. Indeed, thirteen of the allocated sites are within Category 4, within which public sector funding is likely to be required or landowners and developers will not receive an acceptable return. This may result from viability not being adequately assessed as part of the site selection process, and substantiates the case to provide additional flexibility by means of the allocation of additional deliverable sites.

It is therefore requested that a buffer or at least 20% is provided for.

Distribution

The proposed distribution is intended to support higher levels of housing in the northern districts to achieve a more balanced pattern of growth. This is consistent with Policy JP-Strat 6 and supported by Persimmon Homes. It is also stated that "The proposed distribution of housing development also reflects the availability of suitable sites in each of the districts" and we dispute that this is the case.

As a general point, it is apparent that the consequence of a significant proportion of the supply being directed towards Salford and Manchester is that the balance of house types is disproportionately skewed towards city centre apartments rather than family housing, creating a balance of provision which is not aligned with needs arising within the PfE area. We also wish to comment on the numbers apportioned to Wigan, Bolton and Rochdale in which Persimmon have land interests.

The adopted Wigan Core Strategy (Policy CP6) currently makes provision for an average of at least 1,000 net additional dwellings per year between 2011 and 2026. However, Table 7.2 of the Housing Topic Paper shows that that average annual provision for 2021-2037 would be 972 dwellings. This

compares with 1,350 completions in 2018/19 and 1,367 completions in 2019/20. It is perverse that PfE is actually proposing a reduction in housing development in Wigan when a key element of the spatial strategy of PfE is to rebalance the pattern of growth across Greater Manchester so that the potential of the northern areas is fully realised.

In discussing the attractiveness of the northern areas to a wider range of people, paragraph 4.48 says "In particular, there is the potential to increase the number of higher income households who choose to live in the north. The influx of more entrepreneurs and skilled workers could help to increase business creation and support local economic activity, as well as reducing pressure in the southern areas which currently have high levels of demand."

Wigan contains safeguarded land in Standish, which is eminently suitable for more aspirational housing as identified by the Inspector following the examination of the Wigan Core Strategy. Wigan as a whole has historically been affected by under-delivery of housing. It is appropriate to maintain the recent success of Standish in addressing this, by ensuring the continued availability of suitable sites including those which will attract higher income households as promoted by Policy JP-Strat 6. However, successful delivery to date means that there is only a limited residual supply with planning permission.

The two safeguarded sites which Persimmon Homes already own and are suitable for this purpose are detailed below.

Land to rear of 43-99a Pepper Lane, Standish: This 2.5 Ha area of safeguarded land is surrounded by existing housing or residential development under construction within the urban area of Standish. As detailed within the Development Framework which accompanies this representation:

- The site and its access are already owned by Persimmon Homes.
- It is accessible by public transport and within walking distance of schools and Standish town centre.
- Development would have an imperceptible impact on the broader landscape as infill development between the existing settlement and consented development currently under construction.
- There are no site-specific issues of archaeology, noise or flood risk which would affect the principle of development.
- The site would provide some 64 dwellings at a net density of 36 per hectare.

Rectory Lane, Standish: The case for the development of this site is set out in the accompanying Development Framework previously provided, although it should be noted that 413 of the 500 dwellings previously approved in phases 1 and 2 have now been completed.

- The site is jointly owned by Persimmon Homes and Morris Homes and under construction.
- As such the wider site has already been accepted as an appropriate location for residential development and access and services are already in place.
- The submitted Masterplan shows that some 438 dwellings could be accommodated based on a net density of 30 per hectare.
- Allocation of Phase 3 will allow continuity of development at the site to ensure the contribution to Wigan's housing land supply to be maintained following sustained under delivery.

Safeguarded land in Standish should be preferred in sequential terms to the release of Green Belt yet, contrary to the policy claim within JP-H1 that regard has been had to the availability of suitable sites, nowhere in the PfE evidence base have these opportunities for additional housing been fully examined in advance of Green Belt review as required by paragraph 141 of NPPF.

The PfE Site Selection Paper discusses Safeguarded Land as follows:

"□the approach to POL / safeguarded land must vary in relation to its consideration in the GMSF. If the policy allows development of this land within the current plan period, and it has been considered appropriate in principle for development to be brought forward via a planning application, it has been included within the baseline housing land supply. However, where adding the land to the 2021 baseline supply would be contrary to a district's current Local Plan policy it was considered necessary to bring these sites forward for development through the Draft PfE 2021. This is because the PfE is being produced in advance of the adoption of district Local Plans in order that it can provide the overarching principles for those plans. However, because the Site Selection process outlined in this paper relates only to sites within the currently adopted Green Belt, these POL / safeguarded sites were not subject to the Site Selection process."

The Site Selection Background Paper therefore exclusively considers sites within the Green Belt and this represents a serious flaw in the evidence base for PfE which therefore cannot be regarded as justified. Instead, the sites only receive cursory attention in the 2020 Wigan SHLLA, the thrust of which is that the sites could be suitable for development subject to further consideration of infrastructure capacity which Wigan Council has not actually undertaken. This is apparent from the following extracts:

Wigan 2020 SHLAA site 0426 Residual land at former Standish golf course, Rectory Lane, Standish "Site owned by Morris and Persimmon Homes who intend to deliver as a further phase (or phases) to the existing approved adjacent development. The site is within the broad location for new development as set in Policy SP4 of the Local Plan Core Strategy. Suitability of the site for housing development is subject to the impact on local infrastructure capacity, including the local road network. Site is assumed unsuitable until suitability can be demonstrated. Areas of protected woodland have been removed from the developable area. Green infrastructure corridors running north-south and east west across the site would be sought to enhance sustainable connectivity."

Wigan 2020 SHLAA site 0270 Land to rear of 43-99a Pepper Lane, Standish "Site is safeguarded for future development. Its suitability for development is subject to the conclusions of traffic modelling that is currently underway. The site has capacity for approximately 85 homes."

It can only be concluded that the approach to Wigan has not been justified by consideration of reasonable alternatives or proportionate evidence and the PfE is not sound in this respect.

Bolton

Average annual provision for Bolton is proposed to be 930 dwellings, compared with the delivery of 544 dwellings in 2018/19 and 463 net dwellings in 2019/20.

The proposed supply for Bolton consists of between 70% and 84% brownfield land, depending on the proportion of the 2,021 "allowances"(windfalls and demolitions/clearances) which are brownfield. There are no new allocations whatsoever proposed by PfE. This is a high risk strategy given Bolton's historic failure to deliver housing.

Furthermore, Table 6.4 of the Housing Topic Paper shows that 40% of dwellings in Bolton would be apartments, compared with 22% in adjacent Bury and 11% in adjacent Wigan. There is no evidence that this is aligned to demand, and indeed it conflicts with the points made in paragraph 6.90 of the Topic Paper that:

-Smaller dwellings are less adaptable and unable to respond to the changing needs of households

-The lack of space can inhibit home working, which will be increasingly important in helping to minimise the need for travel and enabling digital-based business opportunities

-The provision of appropriate private outdoor amenity space will support good health

This seems to be an approach contrived to avoid Green Belt release, with the consequence that there will not be a developable supply aligned to either existing demand or the aim of PfE to increase the attractiveness of the northern areas to a wider range of people. As we have identified under Policy JP-Strat 8, there is scope at Chew Moor Lane, Westhoughton to provide additional housing in a sustainable location within the Wigan-Bolton Growth Corridor and this should be reflected in an increased housing requirement for Bolton.

Rochdale

The proposed average annual of 616 dwellings for Rochdale in PfE represents a welcome increase on the Core Strategy requirement and is 122% of local housing need (LHN). However, this is not as large as margin as it might appear when adjacent Bury will only meet 76% of its need and LHN ignores the effects of economic growth. Policy JP-Strat 7 North-East Growth Corridor specifically refers to a "nationally significant area of economic activity and growth which will be supported by a significant increase in the residential offer in this location". Given our comments on the potential of land to the south-west of Junction 19 of the M62 in response to JP-Strat 7 (North of Langley Lane, Middleton), the opportunity should be taken to rebalance the Greater Manchester economy through more ambitious plans including enhanced housing provision for Rochdale.

Phasing

The proposed phasing of housing delivery reveals a lack of confidence in the ability to deliver the brownfield sites on which PfE relies, concerns which are understandable in the light of how previous forecasts of delivery have fared, and the issues of viability across substantial areas of Greater Manchester as confirmed by the Strategic Viability Report. Paragraph 6.9 of the Policy refers to the need to understand the impact of Covid and refers to insufficient evidence of its impact, but table 7.2 proposes that acceptable delivery rates should be as low as 8,732 between 2021 and 2025 compared with 10,797 dwellings achieved in 2018/19 and 12,443 in 2019/20. To take one example, it is unclear on what basis housing completions in Bolton would realistically increase by 73.5% between 2021-2025 and 2030-2037. Bolton has consistently failed to achieve a 5 year supply based on a supply consisting primarily of regeneration sites, and with no Green Belt housing allocations proposed, neither the approach nor the trajectory are justified. As a consequence of the resultant lack of accountability in housing delivery, there will be a prolonged failure to satisfy housing need so that fewer people have access to suitable accommodation.

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.

-Translate the Local Housing Need figure into an appropriate housing requirement taking account of the specific factors relevant to Greater Manchester which we have identified.

-Work effectively with Stockport MBC which is within the same housing market to address housing provision.

-Increase the flexibility allowance to 20%

-Allocate an improved range of deliverable sites to ensure sufficient completions early within the plan period and avoid uncertain back-loaded delivery which will exacerbate the housing crisis in the short term

-Review housing distribution for Wigan, Bolton and Rochdale in particular and the range of sites which will be required to ensure delivery.

Places for Everyone Representation 2021

	-Undertake a site selection process consistent with national guidance by fully examining the potential of safeguarded land to influence housing distribution.
Company / Organisation	Persimmon Homes North West
Person ID	1287380
Title	JP-H 2 Affordability of New Housing
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287380_LandPepperLane.pdf PFE1287380_LandRectoryLane.pdf
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	<p>The first of the identified means of improving the ability of people to access housing at a price that they can afford within the policy is to significantly increase the supply of new housing in general terms, thereby reducing the potential for a shortfall to lead to large house prices and rent increase. However, PfE only proposes an average of 10,305 dwellings per annum, having treated local housing need as a proxy for the overall requirement rather than correctly treating it as a starting point.</p> <p>The affordability adjustment applied in the calculation of Local Housing Need is set at a level "to ensure that minimum annual housing need starts to address the affordability of homes." (PPG ID: 2a-006-20190220). There is no suggestion that it is intended to ensure that real affordable need is satisfied. Regarding the actual level of need, the Strategic Housing Market Assessment is an annual total of 5,214 households for the PfE plan area. Whilst this cannot be simply translated into a policy requirement for the plan period as a whole plan, it confirms why the delivery of affordable housing across the Plan area should be treated as a very high priority in accordance with paragraph 7.24.</p> <p>A policy approach which seeks to deliver the minimum amount of housing proposed by the standard method is not consistent with the declared priority. In Wigan, it remarkably actually proposes a reduction in new housing supply. In addition, the nature of the supply suppresses the availability of viable housing sites which will be able to make a full Section 106 affordable housing contribution. This is in contrast to high density apartment schemes which invariably fail to deliver policy compliant levels of affordable housing due to viability issues. As noted under our response to Policy JP-H1, paragraph 22 of Executive Summary of the Strategic Viability Assessment finds that only about one fifth of the target of 50,000 units of affordable housing is capable of being delivered through Section 106 agreements. The supply is overwhelmingly dominated by previously developed land, yet it is predominantly greenfield sites which are able to deliver affordable housing at 30%, the minimum level which is required to make significant inroads into</p>

	the shortfall. The substantial reduction in greenfield site allocations cannot do other than harm affordable provision.
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.	Translate Local Housing Need into a housing requirement which is consistent with the identification of affordable need as a 'very high priority'.
Company / Organisation	Persimmon Homes North West
Person ID	1287380
Title	JP-H 3 Type Size and Design of New Housing
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287380_LandRectoryLane.pdf PFE1287380_LandPepperLane.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	<p>Type</p> <p>Figure 4.29 of the Strategic Housing Market Assessment Update 2021 shows that Greater Manchester's dwelling composition differs from the national and regional picture, with higher proportions of terraced and semi-detached housing and lower proportions of bungalows, flats and detached housing. Within Greater Manchester, Bolton and Rochdale are amongst the districts with the highest levels of terraced housing.</p> <p>Paragraph 7.27 of PfE notes how many of the higher value suburban neighbourhoods are located in the south of the conurbation, and paragraph 7.28 states that "It is a key aim of this Plan to boost the supply of well designed, adaptable new homes with appropriate access to private open space." It is said that focusing a significant proportion of housing growth in the northern areas will assist this and that this will deliver higher value housing relative to prevailing values in the local area.</p> <p>Persimmon Homes support this key aim which is in accordance with Policy JP-Strat 8, but unfortunately Policy JP-H3 is in fundamental conflict with this. The reason for the tension is explicit in paragraph 7.30, which refers to the intention to maximise the amount of development on brownfield locations and minimise the loss of greenfield land. Whilst this is not objectionable in itself, the issue is how this is balanced with other land-use planning</p>

objectives, in addition to the question of whether the strategy will be effective as we have discussed under Policy JP-H1.

The approach chosen by PfE achieves no such balance, saying in paragraph 7.30 that "In order to deliver the necessary densities, an increasing proportion of new dwellings will be in the form of apartments and town houses, continuing recent trends."

At present, only Manchester and Salford are identified in the SHMA Update as authorities in which flats are the most prevalent property type. This is a reflection of the past tower block social housing construction, the relatively new city centre apartment market and the number of large houses split into flats to cater for students and young professionals as well as housing with multiple occupation (HMO) in light of the bedroom tax.

There is no evidence that it will be viable to develop 59% of the housing supply across the PfE area as a whole as apartments as envisaged in Table 7.3. The conditions in the urban core do not apply to the outer boroughs, some of which have unrealistic proportions of apartments proposed. As acknowledged in paragraph 7.31, smaller household sizes do not necessarily translate into demand for apartments where larger dwellings are sought to facilitate home working or accommodate visiting relatives.

To use Bolton as an example, Table 7.3 of PfE shows that 40% of the housing supply is envisaged to be apartments. However, according to the Bolton Authority Monitoring Report 2019/20, the greatest proportion of completions was of semi-detached houses at 32%, closely followed by detached houses at 30%. The most significant changes from the previous year have been a reduction in the proportion of flat completions from 34% down to 26%, and an increase in the proportion of detached property completions from 23% up to 30%. The percentages mask the fact that only 144 apartments were completed, compared with the 315 which would be needed to reach 40% of the proposed PfE requirement.

Paragraph 7.33 states "The provision of appropriate outdoor amenity space will be vital in delivering high quality homes that support good health". The importance attached to this by consumers has increased due to Covid-19, as demonstrated by the strong demand experienced by Persimmon Homes, and this trend is reflected in the proportions of different property types in the Bolton figures. The PfE approach is manifestly incoherent as, notwithstanding issues of consumer demand and viability, it is not possible to provide "vital" amenity space to the degree required with such imbalanced provision.

Space and Accessibility Standards

The policy sets out concerns about "less adaptable dwellings that are unable to respond to the changing needs of households" yet this is precisely what will result from a high proportion of apartments for which there is only a limited demand outside of the urban core.

Notwithstanding this point, national guidance is clear that where the nationally described space standards or universal use of the "accessible and adaptable" standard is proposed, this must be substantiated by evidence. Had the universal use of the standards been considered appropriate by the Government, they would not have been made optional. People will make choices as to whether a home is suitable for them based on their circumstances and priorities including affordability, proximity to work or family, costs of upkeep and how they wish to use accommodation. For example, the size standard which might be sought for a bedroom is not necessary for a home office.

It should be borne in mind that the use of the standards incurs costs and that these may run counter to other objectives of the Spatial Framework. Paragraph 7.33 states that "cost considerations for both developers and households are placing further downward pressure on dwelling size". These will not be resolved by only allowing the construction of larger properties.

Places for Everyone Representation 2021

	<p>Give the viability issues identified across much of Greater Manchester in the Strategic Viability Assessment, the likely result will be to reduce housing completions.</p> <p>Neither the policy itself nor the Housing Topic Paper refer to the necessary evidence and so the policy approach cannot be considered as "sound".</p>
<p>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.</p>	<p>It is appropriate to plan for a higher proportion of houses rather than apartments outside of the urban core to achieve both the overall housing numbers proposed and to provide the private amenity space required to provide residential amenity. An evidence-based approach is necessary to any application of specific space and accessibility standards.</p>
<p>Company / Organisation</p>	<p>Persimmon Homes North West</p>
<p>Person ID</p>	<p>1287380</p>
<p>Title</p>	<p>JP-H 4 Density of New Housing</p>
<p>Agent Company / Organisation</p>	<p>Mosaic Town Planning</p>
<p>Type</p>	<p>Web</p>
<p>Include files</p>	<p>PFE1287380_LandPepperLane.pdf PFE1287380_LandRectoryLane.pdf</p>
<p>Soundness - Positively prepared?</p>	<p>Unsound</p>
<p>Soundness - Justified?</p>	<p>Unsound</p>
<p>Soundness - Consistent with national policy?</p>	<p>Unsound</p>
<p>Soundness - Effective?</p>	<p>Unsound</p>
<p>Compliance - Legally compliant?</p>	<p>NA</p>
<p>Compliance - In accordance with the Duty to Cooperate?</p>	<p>NA</p>
<p>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.</p>	<p>Paragraph 124 of NPPF sets out a list of considerations which should be taken into account to achieve appropriate densities. First amongst these is "the identified need for different types of housing, and the availability of suitable land for accommodating it". However, PFE has approached this from the opposite starting point. Paragraph 7.30 confirms that the delivery of the "necessary densities" is the imperative, and the conflicts inherent in the explanation to Policy JP-H3 (discussed in our representation) result from this, leading to an excessive focus on apartments which will lack "vital" amenity space. Similarly, local market conditions and viability seem to have taken a back seat outside of the urban core, where the market for high density development is uncertain.</p> <p>Persimmon Homes support the concept that new housing development should be at a density appropriate to the location and reflecting the degree of accessibility by walking, cycling and public transport. However, Policy JP-H4 sets out a highly prescriptive approach to minimum densities and neither the policy nor the Housing Topic Paper give any indication of how the proposed densities have been arrived at. For example, the physical context of suburban Metrolink stops and rail stations should not automatically</p>

Places for Everyone Representation 2021

	<p>be assumed to be suitable for 70 dwellings per hectare within a 400m radius. Such lack of justification reinforces the impression that density is regarded as an end in itself</p> <p>The policy seeks to apply rigid categorisations of centres and straight line distances from boundaries but there is no current uniformity in how the ten local plans currently designate centres and local plans are to continue to define them. The GMAL score data incorporated into the policy is not accessible to anybody without the technical skills to interpret the data.</p> <p>The policy purports to provide some flexibility on the basis of local housing market issues and site-specific issues, but then immediately negates this by adding "where it would not compromise the overall delivery of new homes in the district". This creates an expectation that unviable developments which would harm the townscape including heritage assets and green infrastructure should somehow be relied upon to achieve housing numbers, which is clearly untenable.</p>
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.	<p>-Review approach on basis of the identified need for different types of housing and the availability of suitable land for accommodating it.</p> <p>-Review the unduly prescriptive approach.</p> <p>-Remove the use of GMAL data or provide this in an acceptable format.</p> <p>-Delete the phrase 'where it would not compromise the overall delivery of new homes in the district'</p>
Company / Organisation	Persimmon Homes North West
Person ID	1287380
Title	JP-G 10 Green Belt
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287380_LandRectoryLane.pdf PFE1287380_LandPepperLane.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to	<p>Persimmon Homes agree that exceptional circumstances have been fully evidenced and justified to release Green Belt across the plan area of PfE as a whole. A comprehensive analysis is provided by the Council in Appendix 1 of the Green Belt Topic Paper with which we are generally in agreement. However, the proposed boundaries are based on an insufficient scale of development and a flawed site selection process.</p>

co-operate. Please be as precise as possible.

The application of the exceptional circumstances test was considered in [Compton PC v Guildford BC 2019] EWHC 3242 (Admin). Paragraphs 68 to 72 are relevant and confirm that:

-Housing need can be sufficient to meet the test;

-The exceptional circumstances test is not as stringent as the "very special circumstances" test to justify inappropriate development in the Green Belt within paragraph 87 of NPPF.

-the phrase is not limited to some unusual form of housing, nor to a particular intensity of need.

In the case of PfE, we have set out under our representation to Policy JP-H1 how PfE incorrectly regards the minimum Local Housing Need identified under the Government's standard methodology and the number of homes which should be planned for as one and the same thing. Providing the minimum number of homes shows a lack of ambition which will fail to significantly boost the supply of housing, fail to align with infrastructure delivery, fail to recognise the practical effects of unmet demand from Stockport, and fail to meaningfully address the affordability crisis. This is not simply an issue of housing numbers, but of overdependence on delivery of dwellings (and apartments in particular) from brownfield sites of questionable developability, and of achieving the aims of the spatial strategy.

The aspirations of PfE for the Northern Areas under Policy JP-Strat 6 will not be realised without additional release of Green Belt land through an appropriate site selection process. Whilst in sequential terms the potential of safeguarded land should be examined fully, the failure to undertake this relates primarily to the Standish area of Wigan and an element of Green Belt release may still be required within that local authority area. However, looking at North-East Growth Corridor and focusing on the Wigan-Bolton Growth Corridor outside of Wigan local authority, there are obvious opportunities for the release of Green Belt land which would:

-Help to reduce the overall shortage of housing land within PfE

-Rebalance the attractiveness of the northern areas, with increase scope to attract higher income households

-Sustain the mutually beneficial relationship between housing development and economic growth

Our representations have identified specific opportunities at Chew Moor Lane, Westhoughton under Policy JP-Strat 8 and North of Langley Lane, Middleton under Policy JP-Strat 7. Persimmon Homes therefore object to the proposed Green Belt boundary which fails to remove these sites.

It would be appropriate to review the flawed site selection process as part of the process of meeting development requirements. With reference to the Green Belt Assessment, the Green Belt Topic Paper acknowledges that this is only one element of the site selection process, with the consequence that sites which make a significant contribution to Green Belt purposes may nonetheless be considered appropriate for housing allocation.

Notwithstanding this, the Green Belt Assessment carried out by LUC is flawed in some respects.

NPPF identifies Green Belt purposes at paragraph 138. We wish to comment on the approach of LUC to two of these:

b) to prevent neighbouring towns merging into one another: the actual approach by LUC is not to consider actual "towns" but to regard any enclave of development as a settlement which must be kept separate, even where this lacks a distinct identity and constitutes a suburban enclave in an area which is presently rural at present. This is evident in the assessment of Site B43 which includes land at Chew Moor Lane, Westhoughton in which Persimmon Homes have an interest. The evaluation places importance on separation from Chew Moor and Hunger Hill which by no stretch of the

imagination can be regarded as "towns". This is not consistent with national guidance.

c) to preserve the setting and special character of historic towns: a common sense view would not just imply that a town should be regarded as historic for this purpose because it is long-established, which could be said of the majority of towns. The purpose is clearly intended to distinguish a particular sub-group of towns which have a distinct setting and special character. Thus, the starting point should be to identify a limited number of towns within this study area on this basis. Instead, the approach repeatedly refers to settlements which are obviously not "towns" and are not noteworthy for their setting or character. The approach is devalued further by reference to digital analysis of bare earth height data indicating that an alleged historic settlement is "theoretically visible" from a parcel. This approach has no credibility.

The process should also ensure that sub-parcels which have been promoted are properly assessed. For example, the site promoted by Persimmon Homes at Chew Moor Lane represents a modest proportion of Site BT43 which already has strong urbanising influences and would retain a substantial open margin between the development area and the M61 Motorway.

Turning to site selection more generally, the approach in the Site Selection Topic Paper lacks transparency. It refers to a Stage One which considers opportunities on safeguarded land, but this forms no part of the process described within the Topic Paper which purely considered Green Belt sites. There is not systematic analysis of how safeguarded land has been "fully examined" elsewhere within the evidence based as required by paragraph 141 of the Framework.

With reference to the selection criteria applied to sites which are within the Green Belt, the extent to which these rely upon subjective judgements which are not properly substantiated means that PfE is not justified in a way which can withstand scrutiny. However, the method in which rigid measures have been applied is also inappropriate. For example, the application of 800m to the centroid of town centres as inconsistently defined in 9 individual development plans is irrational, adopts an unusually cautious approach to what is typically regarded as a reasonable walking distance, and ignores the role of district centres. Criteria 6 only considers specific major transport schemes. Paragraph 105 of NPPF recognises that development can also be focused in locations which can be made sustainable, and it is also typical for additional transport measures, such as diversion or funding of bus routes, only to be identified as part of specific development proposals.

As Areas of Search have been identified on the basis of criteria which are either highly subjective or flawed, they do not provide a reliable guide for site identification. Furthermore, it is unclear how all of the proposed allocations satisfy the criteria. As part of a revision of PfE to amend Green Belt boundaries so as to address actual development requirement, a more systematic approach is required.

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.

-Amend proposed Green Belt boundaries on the basis of an appropriate numerical housing requirement and to ensure that the specified requirement can be met.

-Undertake transparent and comprehensible site selection process in order to do so, beginning with the proper evaluation of land which is currently safeguarded in Standish.

-Review the consistency of the Green Belt Assessment with national guidance best practice.

-Within this properly evaluate the potential of Green Belt sites based on actual parcels promoted at Chew Moor Lane, Westhoughton and land North of Langley Lane, Middleton.

Company / Organisation

Persimmon Homes North West

Places for Everyone Representation 2021

Person ID	1287380
Title	JP-G 11 Safeguarded Land
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287380_LandPepperLane.pdf PFE1287380_LandRectoryLane.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	<p>NPPF is explicit that:</p> <ul style="list-style-type: none"> -Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. (paragraph 140) -When defining Green Belt boundaries, plans should where necessary identify safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. (paragraph 143). <p>The Green Belt Topic Paper justifies the addition of new safeguarded land adjacent to proposed HS2 at Manchester Airport statement. However, it fails to address how development needs will be met across the PfE area as a whole beyond the plan period without additional safeguarded land, other than making an unsubstantiated statement at parag. 6.12 that a number of sites have capacity for development beyond the plan period.</p> <p>Boosting northern competitiveness is a key part of the PfE strategy, and rebalancing the northern areas is an exercise which will require more than one plan period. Reviewing the Green Belt boundary once again when the current PfE is replaced would be contrary to national guidance. The purpose of safeguarding land is to identify potential development land which can be brought forward through a plan review, if required. If the PfE suggestion that there will be sufficient land on current allocation is correct, it will not be required.</p> <p>However, PfE cannot predict rates of take-up and providing an appropriate reservoir of land will ensure that future progress in the defined Northern Areas is not unnecessarily constrained. Given that there are suitable development opportunities within the current Green Belt at Chew Moor Lane in Westhoughton and North of Langley Lane in Middleton, as identified elsewhere within our representations, safeguarding should be considered if they are not brought forward for development at the present time.</p>
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant	Provide a thorough evaluation of development needs beyond the plan period; in the absence of compelling evidence that these will be satisfied, identify safeguarded land in case it is required to be allocated in a future Plan review.

and sound, in respect of any legal compliance or soundness matters you have identified above.	
Company / Organisation	Persimmon Homes North West
Person ID	1287380
Title	JPA 35: North of Mosley Common
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287380_LandRectoryLane.pdf PFE1287380_LandPepperLane.pdf
Soundness - Positively prepared?	NA
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	<p>The development is proposed to provide around 1,100 dwellings in the Green Belt.</p> <p>The Green Belt Assessment identifies that the allocation currently makes a significant contribution to checking sprawl (Purpose 1), preventing encroachment on the countryside (Purpose 3), and a relatively significant contribution to maintaining the separation of Tyldesley and Astley and Walkden. In terms of cumulative harm on Strategic Green Belt Area 8 (SGBA 8), release would constitute significant urban sprawl (Purpose 1), reduce the gap between settlements (Purpose 2) and encroach on the countryside (Purpose 3).</p> <p>With reference to the justification in the Green Belt Topic Paper, proposed additions to Green Belt elsewhere would constitute a long-term policy intervention rather than changing the effect of the proposed development.</p> <p>In accordance with paragraph 141 of NPPF, "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development."</p> <p>Wigan already contains Safeguarded Land within Standish which is deliverable and has not been reasonably assessed within either the 2020 Wigan Strategic Housing Land Availability Assessment (which provides the baseline supply for Wigan) or within PfE. The Site Selection Background Paper only considers sites within the Green Belt and exceptional</p>

Places for Everyone Representation 2021

	<p>circumstances cannot be said to exist when the potential of safeguarded land within Wigan has not been examined fully.</p> <p>Allocation 35 therefore fails the test of soundness as not being justified or consistent with national policy.</p>
<p>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.</p>	<p>A proper site selection for Wigan should be undertaken to fully assess the potential of safeguarded land in accordance with paragraph 141 of NPPF.</p>
<p>Company / Organisation</p>	<p>Persimmon Homes North West</p>
<p>Person ID</p>	<p>1287380</p>
<p>Title</p>	<p>JPA 37: West of Gibfield</p>
<p>Agent Company / Organisation</p>	<p>Mosaic Town Planning</p>
<p>Type</p>	<p>Web</p>
<p>Include files</p>	<p>PFE1287380_LandPepperLane.pdf PFE1287380_LandRectoryLane.pdf</p>
<p>Soundness - Positively prepared?</p>	<p>NA</p>
<p>Soundness - Justified?</p>	<p>Unsound</p>
<p>Soundness - Consistent with national policy?</p>	<p>Unsound</p>
<p>Soundness - Effective?</p>	<p>NA</p>
<p>Compliance - Legally compliant?</p>	<p>NA</p>
<p>Compliance - In accordance with the Duty to Cooperate?</p>	<p>NA</p>
<p>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.</p>	<p>The development is proposed to provide around 500 dwellings in the Green Belt.</p> <p>As summarised in the Green Belt Topic Paper, the site at present makes a relatively significant contribution to checking sprawl (Purpose 1) and preventing encroachment on the countryside (Purpose 3), with land in the north making a lesser contribution, although land in the north makes a significant contribution to maintaining the narrow separation between inset land at Atherton and Westhoughton.</p> <p>The proposed allocation would narrow the gap between Westhoughton and Atherton and the area of Green Belt left would make a weaker contribution to preventing urban sprawl (Purposes 1 & 2). Its release would increase containment of the remaining strip of Green Belt to the east, although this area is already well contained (Purpose 3).</p>

Places for Everyone Representation 2021

	<p>In accordance with paragraph 141 of NPPF, "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development."</p> <p>Wigan already contains Safeguarded Land within Standish which is deliverable and has not been reasonably assessed within either the 2020 Wigan Strategic Housing Land Availability Assessment (which provides the baseline supply for Wigan) or within PfE. The Site Selection Background Paper only considers sites within the Green Belt and exceptional circumstances cannot be said to exist when the potential of safeguarded land within Wigan has not been examined fully.</p> <p>Allocation 37 therefore fails the test of soundness as not being justified or consistent with national policy.</p>
<p>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.</p>	<p>A proper site selection for Wigan should be undertaken to fully assess the potential of safeguarded land in accordance with paragraph 141 of NPPF</p>
<p>Company / Organisation</p>	<p>Persimmon Homes North West</p>
<p>Person ID</p>	<p>1287380</p>
<p>Title</p>	<p>Bolton - Green Belt Additions</p>
<p>Agent Company / Organisation</p>	<p>Mosaic Town Planning</p>
<p>Type</p>	<p>Web</p>
<p>Include files</p>	<p>PFE1287380_LandRectoryLane.pdf PFE1287380_LandPepperLane.pdf</p>
<p>GBA Bolton - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below</p>	<p>Bolton GBA01 Ditchers Farm, Westhoughton</p>
<p>Soundness - Positively prepared?</p>	<p>NA</p>
<p>Soundness - Justified?</p>	<p>Unsound</p>
<p>Soundness - Consistent with national policy?</p>	<p>Unsound</p>
<p>Soundness - Effective?</p>	<p>NA</p>
<p>Compliance - Legally compliant?</p>	<p>NA</p>
<p>Compliance - In accordance with the Duty to Cooperate?</p>	<p>NA</p>

<p>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.</p>	<p>Paragraph 139 of NPPF states new Green Belts should only be established in exceptional circumstances. There is no national planning policy suggesting that land should be added to the Green Belt as "compensation" for sites being removed. Rather, paragraph 142 says that development plans should "set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land."</p> <p>In the case of Ditchers Farm, Westhoughton, the only potential purpose to which it is claimed that it would make a strong contribution would be in preventing urban sprawl. However, this would be true of any open land adjoining a built-up area and would prevent the natural growth of the settlement in the future. The Green Belt designation would be applied to an area which is currently safeguarded. It is surrounded by built development on three sides and the M61 to the north, and is an obvious location for the long-term extension of Westhoughton which fulfils no role in the separation of settlements.</p> <p>As safeguarded land is treated as Green Belt for development management purposes, there is no compelling case that exceptional circumstances exist.</p>
<p>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.</p>	<p>- Delete proposed addition to Green Belt at Ditchers Farm, Westhoughton</p>
<p>Company / Organisation</p>	<p>Persimmon Homes North West</p>
<p>Person ID</p>	<p>1287380</p>
<p>Title</p>	<p>Other Comments</p>
<p>Agent Company / Organisation</p>	<p>Mosaic Town Planning</p>
<p>Type</p>	<p>Web</p>
<p>Include files</p>	<p>PFE1287380_LandRectoryLane.pdf</p>
<p>Soundness - Positively prepared?</p>	<p>NA</p>
<p>Soundness - Justified?</p>	<p>NA</p>
<p>Soundness - Consistent with national policy?</p>	<p>NA</p>
<p>Soundness - Effective?</p>	<p>NA</p>
<p>Compliance - Legally compliant?</p>	<p>NA</p>
<p>Compliance - In accordance with the Duty to Cooperate?</p>	<p>NA</p>
<p>Company / Organisation</p>	<p>Persimmon Homes North West</p>
<p>Person ID</p>	<p>1287380</p>
<p>Title</p>	<p>Other Comments</p>

Places for Everyone Representation 2021

Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287380_LandPepperLane.pdf
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Company / Organisation	Persimmon Homes North West
Person ID	1287380
Title	Other Comments
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287380_LandChewMoorLane_Redacted.pdf
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Company / Organisation	Persimmon Homes North West
Person ID	1287380
Title	Other Comments
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287380_LandLangleyLane_Redacted.pdf
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA

Places for Everyone Representation 2021

Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA