

Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)BuryGroups
Person ID	1287364
Title	Stakeholder Submission
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287364_SiteAssessmentWalshaw.pdf PFE1287364_SiteAssessmentElton.pdf PFE1287364_RepLeithPlanning_Redacted.pdf
Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)BuryGroups
Person ID	1287364
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287364_RepLeithPlanning_Redacted.pdf PFE1287364_SiteAssessmentElton.pdf PFE1287364_SiteAssessmentWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
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.	We have particular concern in relation to the identified housing need and the fact that the Plan appears to be seeking to over provide for housing land. The Plan itself and the associated supporting documentation appear to be inconsistent in the identification of a housing need figure, fails to pay sufficient regard to reasonable alternatives and is seeking to be over flexible in relation to land supply. The Plan is therefore deemed to be unsound, as whilst one can argue the Plan has been positively prepared (in terms of its aspiration), it cannot be seen to be being realistic.
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.	The Plan should be modified to reduce the overall level of housing land required to meet the needs of Greater Manchester over the plan period.

Places for Everyone Representation 2021

Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)BuryGroups
Person ID	1287364
Title	JP-H 2 Affordability of New Housing
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287364_SiteAssessmentWalshaw.pdf PFE1287364_SiteAssessmentElton.pdf PFE1287364_RepLeithPlanning_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
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.	The Plan sets out a target for the delivery of affordable housing but leaves the allocation and delivery of such homes to each authority Local Plan process. Such an approach may result in an inconsistent and incoherent application of policy on the delivery of affordable homes across the Greater Manchester region, with some areas potentially seeking lower levels of provision. There is a danger that as drafted local authorities could fail to set out policies which secure the needs of those requiring affordable provision, and as such the Plan could be deemed to be unsound.
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.	We would therefore ask that the affordable housing policy within PfE be duly amended to set a standard affordable housing requirement for new development across the Greater Manchester area, to ensure that housing needs are delivered to a consistent level across the Plan area.
Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)BuryGroups
Person ID	1287364
Title	JP-G 10 Green Belt
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287364_RepLeithPlanning_Redacted.pdf PFE1287364_SiteAssessmentElton.pdf PFE1287364_SiteAssessmentWalshaw.pdf

Places for Everyone Representation 2021

Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
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.	The Plan sets out an area of Green Belt release to meet the perceived housing need across the nine authorities. However, insufficient consideration has been given to the allocation of alternative urban sites, including increased densities and better use of the High Street and other brownfield land in advance of releasing land from within the Green Belt. The Plan is therefore unsound as there has been insufficient assessment of reasonable alternatives.
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.	In order to address this issue the Plan should be modified to remove all proposed allocations that are currently designated on land falling within the Green Belt, with additional land identified for development within the main urban areas.
Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)BuryGroups
Person ID	1287364
Title	JPA 7: Elton Reservoir Area
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287364_SiteAssessmentElton.pdf PFE1287364_RepLeithPlanning_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
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.

Ground Conditions - Previous uses include farm yards, former railways, areas of infilling, collieries, allotments, marshlands and reservoirs. Also, partially within a Radon Class 2 Area. The geological mapping indicates the allocation is underlain by glacial till and glaciofluvial deposits underlain by the Penning Middle Coal Measures and Pennine Lower Coal Measures Secondary Aquifers, with at least 6 faults across the allocation. Japanese knot weed is present across the site.

All the above would need to be taken into consideration along with a phase 2 contamination assessment for any site being brought forward for development.

Flood Risk & Drainage - Areas fall within in flood zones 1, 2 & 3 (see above extract from EA mapping). There are implications for building close to the existing reservoirs and dams, with mitigation and structural works required to minimise potential risk to life. Detailed drainage strategy would be required including identifying the effects of introducing impermeable surfaces - as the effects of development on existing flood zones is not known it is not possible to define areas appropriate for development.

There is unlikely to be capacity for surface water in the existing water courses and mitigation will be required.

Transport - Existing issues of road congestion and constraints - the allocation anticipates that development can alleviate the existing pressures through new infrastructure and contributions to enhancements of/access to the metrolink with a park & ride facility.

Utilities - There is a large pressurised water main and sewers which cut through the allocation, along with various easements. The majority of the allocation is not currently served directly by utilities and the infrastructure would need to be connected to adjoining facilities if/where capacity allows.

Environmental - The land within the allocation makes a moderate to significant contribution to preventing the sprawl of Greater Manchester and a significant contribution to maintaining the separation of Bury and Radcliffe. Although an area of

Green Belt would be retained as part of the allocation, the assessment concludes that the contribution of this retained Green Belt would be diminished as a result of some weakening of the Green Belt boundary, increasing urbanising containment and a reduction in connectivity with the wider Green Belt.

As Green Belt, any development within the proposed allocation area will have an impact on the existing site environment. The mitigation proposed by way of the creation of Elton Parkland on the remaining Green Belt land is not of substantial weight to justify the harm caused by the extent of proposed Green Belt release and the associated scale of proposed development. Within the allocation there are 6 SBIs, with SSSIs and a SAC in proximity to the allocation - all of which would be impacted on by the scale of development proposed, five within areas identified for prospective development, and for which substantial mitigation would almost certainly be required. Such impact is not only direct, through physical development, but indirect, as a result of recreational activity.

Historic Environment - There is a single Grade II listed building within the Site and

another three in close enough proximity to require any development to consider impacts on setting and context. The Roman Road runs through the allocation and 17 sites

of archaeological interest have been identified. Social Any development within the proposed allocation site would need to facilitate additional social infrastructure (education, healthcare etc). Requirements to overcome constraints Flood mitigation and structural works to minimise risk to life from the reservoirs/dams being breached and flooding. Detailed drainage strategy. Phase 2 contamination assessment and mitigation.

Ecological mitigation and Appropriate Assessments (relating to Habitat regs) will be required. Impacts on heritage assets, including listed buildings, non-designated

heritage assets, and archaeologically import areas will need to be given due consideration.

Deliverability Not known although the initial viability assessment indicated that development would be viable albeit forward funding may be necessary due to the requirement for infrastructure to be in place at an early stage in the process. Blanket values of £250,000 per ha were applied across the whole of Greater Manchester. The viability assessment included for a full 25% affordable housing contribution along with strategic transport and infrastructure costs which would be high. The Site is predominantly in the private freehold ownership of Peel L&P who have an in-house house building arm and as such there is a realistic chance of deliverability.

The aspiration is to deliver an urban extension comprising approximately 3,500 new

homes within a parkland setting, alongside recreational facilities, provision of new

facilities for primary and secondary education, small local centres, community amenities and strategic transport infrastructure which includes a new link road, a

new Metrolink stop with associated park and ride facilities.

Development of the Site would remove the green buffer between the settlements

of Radcliff to the south and Bury to the north and east.

The justification for this area of green belt release would appear to be weighted

heavily on how it could contribute to improving existing infrastructure capacity issues - driving the need for a new trunk road through the allocation and creation

of a metrolink stop and associated park and ride - it's questionable whether the

residential element is required as much to facilitate raising the funds necessary for

this infrastructure as to meet housing need.

Although the proposals would appear viable, by including an area of Green Belt

substantially larger than the area anticipated for development, there remains the

real potential for future pressure to develop the wider site, foregoing any of the

purported mitigation.

The presence of protected species and use of the allocated area by migratory

	<p>birds has been identified and yet this has not been given due consideration in</p> <p>terms of defining "developable" areas within the wider green belt release - no land</p> <p>should be specifically set aside as being appropriate for potential development</p> <p>when there is existing knowledge of protected species and habitats, especially where the defined impact of such works has not been assessed.</p> <p>There are no exceptional or mitigating circumstances that would justify circumventing appropriate assessments of impact in advance of making any site allocations or releasing land from the Green Belt.</p>
Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)BuryGroups
Person ID	1287364
Title	JPA 9: Walshaw
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287364_RepLeithPlanning_Redacted.pdf PFE1287364_SiteAssessmentWalshaw.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
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>Ground Conditions - Previous uses of the allocation include agricultural fields,</p> <p>farmland, sewage works, bleach and print works, outbuildings and reservoirs and located in an area of historic quarrying/mining activity and also within an identified coal mining area.</p> <p>There is potential for ground gas and groundwater which will require monitoring, and due to the presence of coal seams and 2 historical mine shafts on parts of the</p> <p>allocation additional assessment/monitoring needs to be undertaken.</p> <p>Flood Risk & Drainage - Predominantly flood zone 1 with areas of surface water.</p> <p>Transport - Limited transport routes through the allocation. Development proposals would need to facilitate a northsouth link along with peripheral connections.</p> <p>Utilities - The majority of the allocation is not currently served directly by utilities and the infrastructure would need to be connected to adjoining facilities if/where capacity allows.</p> <p>Environmental - The land within the allocation makes a moderate to significant contribution to preventing urban sprawl and safeguarding the countryside from encroachment. The allocation recommends works to the wider green</p>

	<p>infrastructure as mitigation/compensation for the loss of Green Belt. The allocation lies within the "Manchester Pennine Fringe"Landscape Character Area and there are no identified</p> <p>benefits to the area brought about by the allocation. An SBI and Recreation Ground a within the southernmost section of the allocation located with a Wildlife Links and</p> <p>Corridors Unitary Development Plan (UDP) designation.</p> <p>Social - Any development within the proposed allocation site would need to facilitate additional social infrastructure (education, healthcare etc).</p> <p>Requirements to overcome constraints - Potentially FRA to address any localised areas of surface water flooding. Off site green infrastructure enhancements.</p> <p>Deliverability - Not known although the initial viability assessment indicated that development would not be viable but with an uplift in anticipated sales values of 5% the proposals would potentially be viable. Blanket values of £250,000 per ha were applied across the whole of Greater Manchester. The viability assessment considered the anticipated scale of development could provide 25% affordable housing and that strategic transport and infrastructure costs would be high.</p> <p>The allocation seeks to deliver 1,250 homes in the existing urban area alongside</p> <p>recreation facilities, a new primary school, a local centre and strategic transport</p> <p>infrastructure which includes a new link road. The allocation relies on wider off site enhancement to green infrastructure as mitigation for the loss and harm notwithstanding proposing a substantially larger area of Green Belt release than proposed for development. The release of a larger area of Green Belt than required for development would most likely result in additional pressure to develop the remainder of the allocation in future years</p>
Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)BuryGroups
Person ID	1287364
Title	Supporting Evidence
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287364_SiteAssessmentWalshaw.pdf PFE1287364_SiteAssessmentElton.pdf PFE1287364_RepLeithPlanning_Redacted.pdf
Redacted comment on supporting documents - Please give details of why you consider any of the evidence not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	As set out within the Regulations, development plans need to be based on a robust and justified evidence base. The Evidence Base as currently drafted is in fact inconsistent, incoherent and does not support the case for a sound plan. The evidence base needs to be revisited to (1) ensure consistency in approach, assessment and aspirations and (2) to ensure that the Plan being presented at Examination is based on up to date and accurate detail.
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Title	Other Comments

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