

Northern Gateway Development Framework

Consultation Statement

March 2025

1. Introduction

- 1.1 Bury and Rochdale Councils are jointly preparing a Northern Gateway Development Framework (NGDF) Joint Supplementary Planning Document (SPD).
- 1.2 The SPD has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.3 Regulation 12(a) requires the Councils to produce a consultation statement before adoption of the SPD. This statement must set out who was consulted, a summary of the issues raised, and how these issues were incorporated into the SPD.
- 1.4 Regulation 12(b) requires the Council to publish the documents (including a 'consultation statement') for a minimum of 4-week consultation, specify the date when responses should be received, and identify the address to which responses should be sent.
- 1.5 Regulation 13 stipulates that any person may make representations about the draft SPD and that the representations must be made by the end of the consultation date referred to in Regulation 12.
- 1.6 Regulation 12 states that when seeking representations on an SPD, documents must be made available in accordance with Regulation 35. This requires the Council to make documents available by taking the following steps:
 - Make the document available at the principal office and other places within the area that the Council considers appropriate; and
 - Publish the document on the Council's website.
- 1.7 This Consultation Statement sets out the extent of the consultation and engagement undertaken on the SPD, highlights the issues raised and how the document was amended to reflect the issues raised.

2. Engagement during the preparation of the draft Northern Gateway Development Framework SPD

- 2.1 The role of the Northern Gateway Development Framework SPD is to effectively bridge the gap between the allocation of the site in Places for Everyone (PfE) and

the subsequent detail of the development that will emerge through planning applications on the site.

- 2.2 The preparation of the draft SPD and its supporting evidence has enabled key issues to be identified and addressed to the satisfaction of all parties at an early stage in the planning process. Fundamentally, the draft SPD establishes the parameters against which future planning applications will be considered and identifies the necessary infrastructure required to support the development of the site.
- 2.3 The draft SPD was prepared jointly by Bury and Rochdale Councils (hereafter collectively referred to as 'the Councils') with technical input from the Northern Gateway Development Vehicle (NGDV) as the main site promoter and input from other landowners/stakeholders, including National Highways and Transport for Greater Manchester (TfGM). This engagement helped to identify and understand expectations and key issues around the delivery of the site during the early stages of preparing the draft SPD.
- 2.4 The following table sets out the key issues raised during the internal engagement and how these were addressed in the draft SPD.

Issue	How was this incorporated into the draft SPD
How will the proposed residential scheme at Castle Road be linked to wider employment development?	Reflected in draft SPD which identifies a new active travel route running east-west through the Castle Road residential scheme which will provide the key connection point for new and existing communities to access the employment opportunities in the wider site and also the high-quality parkland.
What are the proposals for Pike Fold Golf Club?	PfE Policy JPA1.1 requires existing recreation facilities (including Pike Fold Golf Course) to be retained and enhanced. In this context the Development Framework Plan presented in the SPD assumes that Pike Fold Golf Course and the adjacent playing fields will be retained. Notwithstanding this, there may be an opportunity in the future for development to come forward on the Golf Course and playing fields, subject to alternative re-provision.
How will development be phased within the allocation?	Reflected in draft SPD which identifies that development is expected to come forward in a series of phases alongside necessary infrastructure provision and a flexible approach which is responsive to opportunities. This approach does not restrict the potential for later phases to be

	accelerated where opportunities arise, or where infrastructure allows certain phases to be advanced, early than currently envisaged.
Concerns that some areas would be excluded from the masterplanning process	Reflected in draft SPD which requires a comprehensive approach to development

3. Screening Assessments

Strategic Environmental Assessment (SEA) Screening

- 3.1 A Screening Statement has been prepared to determine whether a Strategic Environmental Assessment (SEA) would be required for the draft SPD. The Councils consulted Natural England, Historic England and the Environment Agency over a four-week period (30th July 2024 – 28th August 2024) in order to seek their views on the conclusions of the SEA Screening Assessment.
- 3.2 Responses were received from all three bodies, all of whom agreed with the Councils that the above assessment would not be required to accompany the SPD.

Habitats Regulations Assessment (HRA) Screening

- 3.3 The Greater Manchester Ecology Unit (GMEU) were consulted on 30th July 2024. GMEU agreed with the Councils conclusion that the draft SPD would not require a full HRA.

4. Consultation

- 4.1 The draft SPD was approved for consultation by Rochdale Council's Cabinet on 29th October 2024 and Bury Council's Cabinet of the 6th November 2024. Consultation on this draft subsequently took place over an eight-week period running from **Friday 15th November 2024 to Friday 10th January 2025**.
- 4.2 In Bury, during this consultation, all relevant documentation was available to view on the Council's website, copies of the document were made available for inspection electronically at Bury Town Hall between the hours of 8.45am and 5.00pm (Monday-Friday) and at local libraries and the Tottington Centre during their normal working hours (see www.bury.gov.uk/libraries and www.tottingtoncentre.co.uk for details. Paper copies of the draft SPD and comments forms were also available in these locations.
- 4.3 In Rochdale, during this consultation, all relevant documentation was available to view on the Council's website, copies of the document were made available for inspection electronically at all local libraries during their normal working hours

(see [Local libraries and customer service centres | Rochdale Borough Council](#)) for details. In addition, paper copies of the draft SPD and comments forms were put in the four main borough libraries – Heywood, Littleborough, Middleton and Rochdale.

- 4.4 Contacts on Bury Council's and Rochdale Council's development plans consultation databases were notified directly of the consultation. The Councils held two drop-in events, where Planning Officers were able to answer any questions on the draft SPD on Wednesday 4th December at Unsworth Academy in Unsworth and on Tuesday 10th December at The Old Police Station in Heywood.
- 4.5 Comments were invited by email to northerngateway1@bury.gov.uk or by post to the following address:

Strategic Planning
Rochdale Borough Council
Floor 3, Number One Riverside
Smith Street
Rochdale, OL16 1XU

- 4.6 On-line comments via a consultation portal accessed via Bury Council's website www.bury.gov.uk/spd or Rochdale Council's website [The Northern Gateway - Heywood and Pilsworth | Rochdale Borough Council](#) were encouraged.

5. Summary of main issues raised during the consultation

- 5.1 Bury and Rochdale Councils received 26 responses to the SPD via the on-line consultation portal and 16 responses via email. A detailed summary of all the issues raised during the consultation and how the authorities have responded to those issues in the preparation of the final SPD is shown in the table in Appendix 1. Below is a brief summary of the main issues identified.

Policy Context

- Ensure the policy context is up to date.

Vision and Strategic Objectives

- The vision and objectives could be strengthened by stronger reference to the drive towards environmental gains and future development which is resilient to future climate change.

Understanding of the Site and Surroundings

- Responses from some statutory consultees regarding features not identified on the plans.

Key Development Principles

- Active travel routes, highways and multifunctional green and blue infrastructure should be accessible for all;
- Unclear how Biodiversity Net Gain will be delivered in a phased manner as development comes forward without further strategic assessment across the whole allocation area;
- The opportunity to work with natural processes and adopt a nature-based solutions as part of the wider approach to managing surface water/drainage should be identified;
- There should be a greater clarity in terms of addressing issues relating to biodiversity, natural environment and public realm.

Design Principles and Character Areas

- Consideration of additional mixed-use areas within the site;
- Clarity on the status, location and phasing of access points into the site and consideration of the existing Motorway Service Area;
- Ensuring bus accessibility from the site to local areas;
- There is the potential for the Castle Road area to accommodate more than 200 dwellings;
- There should be greater emphasis of the use of sustainable drainage systems (SUDs) across individual character areas.

Phasing, Infrastructure and Delivery

- Comments in relation to the need for on-going collaboration between stakeholders and landowners as the Infrastructure, Phasing and Delivery Strategy evolves over time.

Development Framework Plan

- Labelling of access points lacks clarity.

General

- Several general comments were raised, these included the loss of greenbelt and greenspace, traffic congestion, under-used existing employment land and air quality;
- Legibility of maps and plans;
- Typos and other minor changes to the text were also suggested by respondents, these have been reflected in the final version of the SPD.

6. Response to Consultation

- 6.1 Detailed responses to all the comments made are provided in Appendix 1. Below are details of the changes made to the draft SPD.

Policy Context

- All policy references have been updated (for example reference is now made to the National Planning Policy Framework (NPPF), December 2024).

Vision and Objectives

- Vision and 12 key principles strengthened in relation to integration with the natural environment and future climate change.

Understanding of the Site and Surroundings

- Constraints Plan updated.

Key Development Principles

- Amended wording in relation to shared paths (pedestrians, cyclist and horse riders) and active travel opportunities;
- Additional wording to confirm that additional access points may be required at Birch Services and through South Heywood (both accesses shown on the Development Framework plan;
- Amended wording to reflect the fact that the biodiversity net gain requirements will not all be met on site and there will be a need to secure BNG credits off-site;
- Amended wording in relation to working with natural processes;
- Additional text added to confirm that the development framework is based on several assumptions and goals which may change or evolve during delivery of the project.

Design Principles and Character Areas

- Identification of a second mixed use hub at the Pilsworth Road/Moss Hall Lane entrance to the site (Three Arrows junction);
- Additional wording to confirm a new motorway service area would be off-line;
- Stronger references to enhancement of existing natural assets.

Review

- Commitment to engagement with key infrastructure bodies as sites and projects come forward.

Development Framework Plan

- Amendment to labelling of access points

General

- The resolution and legibility of all plans and diagrams will be improved.
- All minor wording changes and typos updated

Appendix 1: Northern Gateway Development Framework – Consultee Responses

Ref	Summary of main issues raised	Summary of response to issues raised
1	The document is confusing, neither precise nor easily understandable.	Noted. Document will be checked to ensure plain language is used where possible
2	<p>Routes through the site (including Egypt Lane at the southern extent and Castlebrook at the Eastern extent) have been used for many years by the horse communities. The site also links through to the horse communities at Birtle.</p> <p>Important that as part of the “improved sustainable transport, active travel and highways infrastructure and multifunctional green and blue infrastructure” plans include vulnerable road uses, including equine population.</p> <p>Good examples (Cumbria/Cambridgeshire) where proactive engagement of ramblers, cyclists and equine organisations have resulted in designs which benefit all.</p> <p>Plan only has access points for pedestrian and cyclists, but equestrian access should also be included. Often very little changes need to be made to allow equestrians to also benefit from safe off road routes.</p>	<p>Noted.</p> <p>Additional references to access for horse riders/shared access paths have been added, where appropriate.</p>
3	<p>It is essential that the SPD reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Paras 103, 104 and 200.</p> <p>The site should be consistent with Sport England Playing Fields policy and any present, past or future contribution of the site for sport be considered and identified in any site assessment.</p> <p>The indicative Development Framework Plan as shown in Fig.3 shows the retention of the playing field (this is understood to be the former Castlebrook High School playing fields) and golf course. However, on Fig.18 Landscape Plan, the playing field is identified as ‘community space’. This will require further clarification on more detailed drawings.</p>	<p>Noted.</p> <p>Reference to the NPPF is made in Chapter 2. Specific topic-based references are not made as it is not considered appropriate to include that level of detail in the document.</p> <p>Existing sports facilities are identified in Chapter 5 and PfE policy JPA1.1 seeks to retain and enhance existing facilities.</p>

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	<p>It would be useful to include the playing field and golf course within the 5.78 'constraints' section of the SPD. It should be noted that any development adjacent to the playing field will need to be considered under paragraph 200 of the NPPF and the possibility for the 'agent of change' to be required to provide suitable mitigation.</p>	<p>Figure 18 - key for former Castlebrook High School playing fields to be amended from "community open space" to "retained playing field".</p> <p>Site Constraints – sub-title amended from "Landscape Designations" to "Landscape and Recreation designations".</p> <p>Additional paragraph after paragraph 5.28 - <i>"The site includes existing sports provision, namely Unsworth Academy sports pitches and Pike Fold Golf Club. Any development adjacent to the playing fields will need to be considered under paragraph 200 of the NPPF and may be required to provide suitable mitigation"</i>.</p> <p>Paragraph 5.78 - additional constraint added - <i>"site includes existing sports provision - Unsworth Academy sports pitches and Pike Fold Golf Club"</i>.</p> <p>Para 6.31 - <i>"Streets and public spaces should be designed to be accessible to all, facilitating people to become more active in their everyday lives. Building orientation and design should also be considered to maximise levels of activity and natural surveillance over streets and spaces"</i>.</p> <p>Para 7.28 updated to read <i>" Existing recreation facilities will be retained and enhanced and contributions towards recreation and education provision made"</i>.</p>

Ref	Summary of main issues raised	Summary of response to issues raised
4	<p>Department for Transport Circular 01/2022 should also be reference given the need for enhancement to the SRN to support the development opportunity.</p> <p>The vision and key pillars recognise the need to promote the building of a nationally significant development that is diverse and resilient through the promotion of sustainability and connectivity. Key principles 9 & 10 relating to integrated transport solutions and the promotion of active travel are fundamental to achieving this and are supported.</p> <p>Supports the three pillars to deliver on Economic, Social and Environmental benefits as part of the Development Framework.</p> <p>Keen for the Development Framework to identify, as far as is possible, the specific interventions that might be required to deliver the vision for the site in terms of sustainable and active travel opportunities to reduce reliance on the SRN for non-strategic journeys. Where this cannot be reasonable achieved, the Development Framework should seek to identify where strategic highway mitigations will be required and plan for their implementation, in liaison with National Highways. Where possible, funding streams should also be identified to further the understanding of the deliverability of any proposed measures.</p> <p>Support the general design principles set out in this chapter, however the wider Northern Gateway site (via the mixed-use character area) is predicated on taking access from the location of the existing Birch Motorway Service Area, which would need to be provided elsewhere.</p> <p>Supportive of the approach to sustainability outlined in this chapter.</p> <p>Supportive of the approach to phasing and infrastructure delivery, in particular at paragraph 9.4 which states “Piecemeal planning applications which fail to deliver or contribute towards the wider strategic infrastructure will be resisted’. A coordinated approach will be key to the realisation of the vision associated with the Development Framework.</p>	<p>Support comments noted.</p> <p>Reference to the NPPF is made in Chapter 2. Topic based references are not made as it is not considered appropriate to include that level of detail in the document.</p> <p>The SPD identifies required interventions to deliver the vision where these are known. The Infrastructure, Phasing and Delivery Strategy will be updated as and when further information is known.</p> <p>Chapter 7 – Design Principles and Character Areas (Mixed Use Character Area) identification of a second mixed use hub at the Pilsworth Road/Moss Hall Lane entrance to the site (Three Arrows junction).</p> <p>Chapter 10 – Review – additional commitment to engagement with key infrastructure bodies as sites and projects come forward.</p> <p>As part of on-going activity and a joined-up approach to bringing forward development on the site there is a commitment to engage with stakeholders on a regular basis. It is not appropriate at this stage to identify specific review periods and consultee groups; all relevant groups will be consulted. The Infrastructure, Phasing and Delivery Strategy is a live document and will updated regularly as new information becomes available.</p>

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	<p>To support the delivery of highway infrastructure it will be important to understand the full mitigation requirements for the whole Northern Gateway site along with what is required for early development and/or phases of development. The Development Framework identifies that further work will be undertaken to explore how later phases, and infrastructure, can be brought forward and that significant levels of investment in the SRN will be required. Having an understanding at this stage of the full build-out requirements will assist in the making of investment decisions and the exploration of the availability of funding.</p> <p>The Review chapter outlines how future amendments to the Development Framework would be achieved through an agreement between the two participating authorities.</p> <p>There is very limited commentary to define what circumstances would initiate a review of the SPD and there is no mention of any monitoring tools or high-level processes.</p> <p>It is noted that there is scope within the wider documents to set out a requirement for the 'monitor and manage' approach to supplement and inform the vision, most notably in terms of the phasing associated with Transport Infrastructure. This detail may be specific to the Infrastructure Phasing and Delivery Strategy (IPDS) but there is an opportunity to underpin this as part of the function served by the Development Framework.</p> <p>The Government published an amended NPPF in December this year and there is a further round of reform to the NPPF expected in Spring 2025. The Development Framework should seek to reflect the latest Policy.</p> <p>Paragraph 5.20 of the document incorrectly refers to 'Highways England'. This should be 'National Highways'.</p> <p>Further reference should made to wider transport governance, including the potential for long-term sustainable travel working groups.</p>	<p>It is not appropriate to include monitoring indicators within an SPD.</p> <p>The SPD includes a commitment to engagement with key infrastructure bodies as sites and projects come forward.</p> <p>Areas of ecological mitigation across the whole site are not identified on the development framework.</p> <p>Typos corrected.</p>

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	Whilst the SPD's indicative plans reflect certain elements of the Simister Island scheme, they do not reflect the full extent of the permanent land take for essential environmental mitigation areas.	
5	<p>Welcome reference to green and blue infrastructure networks and note that the pillar for sustainability seeks to provide an overall enhancement which we support. To strengthen the vision further it would be useful to see stronger reference to the drive towards environmental gains and a future development which is resilient to future climate change. For example, <i>'supported by sustainable transport connectivity and enhanced green and blue infrastructure networks which help adapt to future climate change'</i>.</p> <p>Given the ambition to have a pillar for sustainability we would also welcome a clear commitment within the '12 Principles' to deliver a future development which seeks to integrate with the natural environment and ensuring it is a critical component for achieving a sustainable development and future resilience. Currently the only reference to this is within key principle 10 (Active Travel) and we would support an additional/separate principle for this specifically which would further link to the environmental benefits noted on Page 46.</p> <p>Noting Paragraph 4.28, we would also highlight that the SPD will deliver benefits against the following policies in PfE given the environmental characteristics of the allocation area and the overall potential to deliver environmental gains through the proposed development:</p> <ul style="list-style-type: none"> • Policy JP-G3: River Valleys and Waterways • Policy JP-G2 Green Infrastructure Network • Policy JP-G8: A Net Enhancement of Biodiversity and Geodiversity <p>Criterion 8 of JPA1.1 requires the provision and enhancement of Whittle Brook, so we welcome the wording in Para 6.36 which outlines this specific requirement. To align with this, suggest Para 6.35 is worded to reflect the enhancement requirement. For example, <i>'Green and blue infrastructure networks across the site should be formed through the retention and enhancement of identified environmental features of the existing landscape. Valuable existing natural assets, such as the brooks and their u-shaped valleys, mature trees, hedgerows and woodland blocks should be retained where possible and integrated within a series of structural landscaped corridors to deliver overall gain for the environment'</i>.</p>	<p>Support comments noted.</p> <p>Changes to vision made using suggested wording.</p> <p>Amend Principle 7 from infrastructure and operations to integrating with natural environment.</p> <p>Paragraph 4.28 has been updated.</p> <p>Para 5.51, 5.54, 5.55, 5.57, 5.74 and 5.75 have been updated to reflect suggested wording.</p> <p>Paragraphs 6.35 and 6.36 have been amended to reflect suggested wording.</p> <p>Para 7.3 (Landscape) has been updated.</p> <p>Urban Valley Design Principles – updated to reflect suggested wording.</p> <p>Para 8.25 updated to reflect suggested wording.</p>

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	<p>Related to the above, and noting para 6.36 which seeks to enable 'delivery of ecological mitigation measures to achieve Biodiversity Net Gain (BNG) and deliver these in a phased manner as development comes forward', it is currently unclear on what these are or how they will be delivered without further strategic assessment across the whole allocation area. This should be further information by baseline ecological and BNG assessments as part of the evolving Infrastructure Phasing and Delivery Strategy (IPDS).</p> <p>The principles to adopt a landscape led approach to the SPD is welcome, however this section could be further strengthened by highlighting the opportunity to work with natural processes and adopting nature-based solutions as part of the wider approach to managing surface water/drainage.</p> <p>Within paragraph 6.20 there is reference to the potential location of 'data centres' as part of the future proposals within Northern Gateway. Earlier this year, central government confirmed that data centres are to be considered as national critical infrastructure given their strategic importance to support the transition to future technologies and for the UK data industry to remain secure and stable. Data centres have the potential to require significant amounts of water for cooling processes and it will be important to consider how such uses will be deliverable in this location in relation to water resources and have the required infrastructure in place to support the proposals.</p> <p>Related to this, the supporting infrastructure and phasing strategy will need to be informed by a comprehensive drainage and water management strategy to identify future infrastructure demand.</p> <p>Chapter 7 - To align with PfE policy requirements we would like a stronger reference to enhancement for the landscape led principles (page 97). For example: 'Green and blue infrastructure networks across the site should be formed through the retention and enhancement of identified environmental features of the existing landscape. Valuable existing natural assets should be retained where possible and integrated within a series of structural landscaped corridors to deliver measurable net gains for biodiversity'.</p> <p>As a general comment, there should be greater emphasis of the use of sustainable drainage systems (SUDs) across each individual character area, noting the current function of the land which</p>	

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	<p>has a high value in managing surface water and overland flow at the top of the Whittle Brook catchment area. The location and optimisation of nature-based solutions and holistic SUDs measures should be informed by a site wide drainage strategy which then identifies strategic interventions for each character area and to ensure design principles, phasing and infrastructure costs are captured.</p> <p>Referencing the 'Urban Valley' character area we would welcome stronger reference to enhancement within design principle 4 to align with the PfE Policy requirement Criterion 8 of JPA1.1. As currently worded it is reliant on the development 'retaining' such features.</p> <p>We would welcome the amendment of paragraph 8.25 (bullet 2) as follows: 'Reduction of flood through Sustainable Drainage Systems (SuDS) and positive interventions within the natural riparian environment working with natural processes, without significantly increasing embodied carbon emissions.'</p> <p>To have greater clarity of the intention for 'enhancement' when considering the watercourses and compliance with PfE policy (JPA1.1 criterion 8, JP-G3), we would welcome a stronger commitment to enhancement of the watercourses to support wider WFD objectives. Currently the SPD scope for enhancement is reliant on the retainment of riparian corridors and SuDs features and should be wider in scope in terms of other riverine outcomes (e.g. improved floodplain connectivity, creation of additional in channel habitat etc). For example: '<i>Ecological improvements should include the retention and enhancement of the Whittle Brook and tributaries corridors and associated riparian habitats to support Water Framework Directive objectives</i>'.</p> <p>Amend paragraph 5.54 as follows '<i>Analysis of the site concludes that flood risk to the development from existing fluvial (rivers and watercourses) sources is low. Development on, or within 8 metres from the bank top, of a designated main river will require a flood risk activity permit or exemption granted from by the Environment Agency. For mitigation, Watercourses should be retained and enhanced including the provision of an ecological corridor. An 8m easement free from development should be applied to either side of these watercourses. either side of these watercourses informed</i></p>	

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	<p><i>through comprehensive ecological assessments having regard to the Water Framework Directive and current flood risk processes up to the modelled 1 in 1000 plus climate change extent(s). The easements provide green/blue corridors along these channels providing an opportunity for SuDS features, biodiversity enhancements and recreational areas as well as flood risk mitigation'.</i></p> <p>Encourage paragraph 5.57 is amended as follows: <i>'No public surface water sewers have been identified within the site. Surface water run-off will be, where shown to be appropriate, discharged into the ground through multiple infiltration structures or to the watercourses within the site at the limiting discharge rates'.</i></p> <p>We would welcome a strengthening of Paragraph 5.55 to specify that the preferred drainage strategy should seek to utilise natural flood management interventions and work with natural processes where feasible.</p> <p>Paragraph 5.56 should be amended to drive towards an overall reduction of flood risk where possible.</p> <p>Noting criterion 8 of JPA1.1 the specific wording references the need to enhance Whittle Brook, Castle Brook and Brightly Brook. Reading across to the SPD there is inconsistency in reference to the named watercourses for enhancement (e.g. Para 5.51 Whittle Brook and its tributaries). The SPD should be reviewed to ensure that all watercourses are named throughout the document in alignment with JPA1.1.</p> <p>Paragraph 5.74 should be amended as follows: <i>potential for contamination of shallow groundwater- Consideration of contamination if impacted shallow groundwater present in contaminated parts of the site".</i></p> <p>Paragraph 5.75 should be amended as follows <i>'Intrusive ground investigation, assessment and detailed remediation to mitigate these risks should be undertaken before future development comes forward. Whereby land contamination is known or suspected, investigation and assessment work should be carried out by a suitably competent person(s) and follow the government's published Land</i></p>	

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	<p><i>Contamination Risk Management (LCRM) guidance. Prior to the undertaking of any intrusive works, it should be ensured that any necessary permissions are obtained or exemptions secured. Whereby uncertainty exists over permission requirements, preliminary engagement with the relevant competent authorities will be necessary”.</i></p>	
6	<p>Disagreement with the vision and with many of the objectives of the Northern Gateway Framework SPD. Biodiversity and the need to leave nature in a better condition post development must be a major objective for the development plan and the delivery of biodiversity uplift should be a major driver in steering the policies and landscape design.</p> <p>Whilst we welcome the aim to protect the river and valley systems within the framework, the approach taken to merge biodiversity and ecology issues with the provision of public open space, together with the obvious drive to deliver an urban park-like approach to green and blue infrastructure means that ecological considerations can be lost and diluted. The ability of the design framework to leave nature in a better state post development is therefore not at all certain.</p> <p>Chapter 1: Introduction; The overview of the site should provide details of the current biodiversity interest contained within the site, especially relating to both existing priority habitats and priority section 41 species.</p> <p>Chapter 2 Strategic Policy Context; This section needs to highlight the need to comply with the Environment Act 2021 and deliver the expected net gains in biodiversity to leave nature in a better condition post-development.</p> <p>Chapter 3: Vision and Strategic Objectives; The pillars of development refer to the provision of enhanced biodiversity and blue and green infrastructure networks, which we agree with and welcome, however, the 12 key principles outlined within the strategy do not make any reference to biodiversity at all. WE would suggest the following be added to the key principles;</p> <ul style="list-style-type: none"> <input type="checkbox"/> The requirement to deliver good quality enhanced biodiversity habitats that comply with the mandatory 10% net increase in BNG provision. <input type="checkbox"/> The requirement to protect and enhance the habitats of S41 species of conservation concern and ensure that local species populations are not adversely impacted but enhanced. 	<p>Noted.</p> <p>PfE Policy references have been updated where appropriate.</p> <p>Details of the current ecological assets are provided in Chapter 5.</p> <p>Detailed topic-based policy requirements are not set out in Chapter 2.</p> <p>The key principles are high level and strategic and include additional reference to the natural environment. The requirements for BNG and ecological assessment are highlighted throughout the document.</p> <p>Where appropriate, additional PfE references have been added into paragraph 4.18.</p> <p>Additional paragraph to confirm that multi-functional green space will not always be considered suitable for mitigation aimed at achieving BNG and that it is likely that significant off-site mitigation will also be required to achieve BNG.</p>

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	<p>Chapter 4: Local and Strategic Outcomes; whilst I welcome the intent within this chapter that development must ensure that it does not have a detrimental impact on the environment by maximising opportunities to provide net gains for biodiversity, this should be highlighted much earlier in the framework. Promotion of biodiversity should have an equal importance to the strategy as the delivery of the development itself.</p> <p>Green policies within PfE should be discussed in this section and should include;</p> <p>Policy JP-G1: Landscape Character Policy JP-G2: Green Infrastructure Network Policy JP-G3: River Valleys and Waterways Policy JP-G4: Lowland Wetlands and Mosslands Policy JP-G6: Urban Green Space Policy JP-G7: Trees and Woodland Policy JP-G8: A Net Enhancement of Biodiversity and Geodiversity Policy JP-G9: The Green Belt</p> <p>Chapter 5 – Habitats might be of low ecological value but have the potential to support section 41 species of principle importance. Appropriate surveys need to be undertaken to determine the ecological importance and value of the grasslands to S41 ground nesting birds.</p> <p>Chapter 6. Key Development Principles - Design Approach - Step 5 - Landscape - there is a danger within the approach of conflating biodiversity delivery and recreation provision.</p> <p>Paragraph 6.10: There is too much of an emphasis on provision of narrow corridors. Whilst corridors can help to maintain ecological connectivity, the provision of just narrow corridors will inevitably lead to the loss of priority species such as Lapwing that require larger more undisturbed open spaces. The corridors should be designed to open out into more wider, more open and undisturbed habitats that can support the priority species identified. If it is not possible to incorporate features that support these species then off-site mitigation must be identified and managed to ensure the populations of these important species are maintained.</p>	<p>Detailed layouts of character areas and plots are not provided in the SPD. Details such as the location of ecological mitigation and public realm will form part of future planning applications.</p> <p>Details of phasing (including phasing of BNG) will be provided in the Infrastructure, Phasing and Delivery Strategy, when the information is available.</p>

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	<p>Paragraph 6.16 and Fig 15: Whilst welcoming the intent to deliver a network of green and blue routes and spaces, as outlined above, some of these spaces need to be delivered as quiet wildlife areas. This needs to be carefully planned to not compromise the ecological benefits provided by the open spaces.</p> <p>Chapter 7: Design Principles and Character Areas Paragraph 7.1 – One of the character areas should be the designed quiet wildlife only areas outlined above. This is a vital design principle if the priority S41 species identified within the site are to be protected and conserved.</p> <p>Character Areas – we recommend that with all the character areas, public open space should be designed to be multi-functional and help to deliver eco-system services where possible.</p> <p>Chapter 9: Phasing, Infrastructure and Delivery There needs to be an acknowledgement of how each phase of the development is to contribute to the overall Biodiversity Gain Plan. This overarching plan must set out how the overall BNG objectives will be achieved. It is acknowledged that this must, by necessity, be a projection of the BNG values at the completion of the entire development. For each development phase, a phased BNG plan must be submitted and approved as contributing sufficiently to the overall plan</p>	
7	<p>The NGDV supports the progression of a Development Framework for the Northern Gateway (JPA1.1) site. The Development Framework will play an important role in helping to shape and inform the development as it is brought forward; ensuring that the site is delivered in a comprehensive manner and alongside necessary infrastructure, and that the full scale of the opportunity is realised. It will provide certainty to developers, landowners and the local communities about the expectations of the Councils and will be an important material consideration in the determination of planning applications within the allocation site.</p> <p>The NGDV supports the Vision and Strategic Objectives set out within the Consultation Draft SPD. In particular, the NGDV wishes to highlight the importance that the planning and regulatory framework reflects the Northern Gateway Strategic Development Vision, including the importance of “flexibility and responsiveness to market demands and opportunities”. The inherent need for a</p>	<p>Support comments noted.</p> <p>No change to SPD required.</p>

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	<p>'Flexible Approach' to development of the site is also recognised by its identification as one of the 12 Key Principles on page 38 of the draft SPD.</p> <p>Given the longevity of the development and the rapid pace at which advancements are being made in the range of industry sectors that the site is likely to support, it is vital that potential opportunities which would contribute to the agreed Vision and Strategic Objectives are not unduly stifled due to inflexibility in the planning system. As such, it is anticipated that the Councils take a pragmatic approach to considering alternative opportunities if or when they arise, and where the proposals are shown to be consistent with the overall Vision and Strategic Objectives established in the draft SPD.</p> <p>Section 9 of the draft SPD provides an overview of the current expectations around initial phasing and infrastructure and is expected to be supplemented by the IPDS in due course. As clearly noted within the draft SPD, development will come forward over a number of phases over a 20-year period and a flexible approach is needed to be responsive to opportunities that may arise. In this context, Section 9 of the draft SPD helpfully confirms that the Development Framework Plan presented in the draft SPD is indicative only and is intended to support the Development Framework as an illustrative interpretation of one way the site could be delivered. The NGDV supports this recognition, as well as the confirmation that the phasing is not necessarily intended to be chronological and that the SPD does not seek to restrict the potential for later phases to be accelerated where opportunities arise, or where infrastructure allows certain phases to be advanced earlier than currently envisaged (e.g. should external funding become available).</p>	
8	<p>We support the Northern Gateway Pillars of Development.</p> <p>We support the measures set out within paragraph 4.25 which sets out the expectations for all development to incorporate measures which demonstrate adaptability and resilience to climate change.</p> <p>The high pressurised sludge asset is not included in Figure 14 'Constraints Plan' and is not listed as a constraint at paragraph 5.78.</p>	<p>Support comments noted.</p> <p>High pressurized sludge asset added to Figure 14.</p> <p>Reference to a site wide drainage strategy added in to paragraph 7.3</p> <p>Water efficiency measures referenced in paragraph 8.22.</p>

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	<p>Proposals should give early consideration to a drainage strategy for the whole of the SPD area which reflects the hierarchy for managing surface water. Consideration should also be given to how any public realm proposals within the SPD boundary can be linked to opportunities for surface water management.</p> <p>Any emerging SPD clearly identifies the need to carefully consider proposals that are sited in proximity to our pumping stations, wastewater tanks and overflows. The SPD should further consider how water efficiency measures can be incorporated into the future detailed design of the site.</p>	
9	<p>Regarding the design principles for Castle Road key character areas, we note the potential for high-quality residential development to the west of the site, estimating around 200 new homes (subject to infrastructure requirements).</p> <p>We propose that with an appropriate southern access and improvements to Castle Road, this area could accommodate additional residential development beyond the currently proposed 200 dwellings.</p> <p>The location, combined with the evolving needs of the community, makes this area ideal for additional housing and would align with wider housing and planning objectives, supporting sustainable growth of the area.</p>	Noted.
10	Identify Pilsworth Fisheries as a leisure destination.	<p>Noted.</p> <p>The potential leisure offer at Pilsworth fisheries is referenced.</p>
11	<p>Consider the residential offer off Castle Road can deliver a higher number of dwellings from the area shown as residential in the draft SPD. The actual quantum of development will be established through detailed highway work and other technical assessment.</p> <p>Suggest wording is changed from “around 200 homes” to “a minimum of 200 homes”.</p> <p>Additional housing at Castle Road would also enable a greater capacity from the site for housing which would assist in helping the Council meet its higher local housing need of 979 dwellings per</p>	<p>Noted.</p> <p>Wording relating to the quantum of residential development cannot be changed as this wording is included in Places for Everyone policy JPA1.1.</p> <p>Figure 3 has been amended to show the farmhouse the end of Griffe Lane.</p>

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	<p>annum which is significantly greater than the annual average of 452 dwellings per annum in Table 7.2 of PfE.</p> <p>With regard to Figure 3, the farmhouse at the end of Griffie Lane is not shown</p>	
12	Geo - technical references Figure 15, this should be amended to Figure 14	Noted. Change to SPD made.
13	<p>Given the uncertainty around the delivery of Birch Services junction, an alternative indicative location for the mixed use gateway should be considered, perhaps closer to the local road network gateway to the site from the proposed Western Access scheme?</p> <p>Locating the Mixed Use area closer to Moss Hall Road/Pilsworth Road junction ensures greater certainty as a genuine 'gateway' use, promoting development at the site from its early phases and being closer to existing development at Heywood Distribution Park and South Heywood, may provide greater usage of the facility in the early phases of development.</p> <p>Consideration of the interaction between the envisaged Mixed-Use Gateway and any relocated Motorway Service Area also needs consideration to ensure that national policy requirements are met namely that there must be no route through a roadside facility or its access link between the local road network and the SRN and access to other developments through a roadside facility or from its connection to the SRN is not permitted.</p> <p>With specific reference to the Mixed-Use Gateway acting as a transport hub, whilst this may be beneficial for bus services to Middleton, it may be less beneficial for services between Bury and Rochdale, particularly in the early phases of development. It would also be more distant from the early phases of the site (set out in Fig 26) for those cycling to the site, should the gateway also act as a cycle hub, as mentioned in the Mixed-Use Gateway Key Design Principles.</p> <p>With reference to the potential for park and ride (and shuttle bus connections) at the site, further clarity should be provided around this.</p> <p>Achieving high quality public transport to the site from neighbouring residential areas is challenging due to the size and undeveloped nature of the site and so developer funding should primarily be focussed on bus accessibility to local areas to achieve the transport vision for the site. These</p>	<p>Noted.</p> <p>Identification of a second mixed use hub at the Pilsworth Road/Moss Hall lane entrance to the site (Three Arrows junction).</p> <p>Amended wording confirms that a new motorway service area would be off-line.</p>

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	services would connect with secondary nodes as set out in the remainder of the Mixed-Use Gateway Point 8 text. In relation to potential park and ride, we would welcome this remaining as an option for the site, particularly if a new junction at Birch Services can be delivered within the lifetime of the development. Northern Gateway could represent a good location for bus-based park and ride, given its location adjacent to the strategic road network and this could bolster use of a service between Northern Gateway and the Regional Centre.	
14	How will the SPD affect disabled people?	Development on the site will include the provision of new housing and employment development which will reflect the needs of people with disabilities. No change to SPD required.
15	Simister already suffers from nearly 100% above the recommended pollution rate that is stipulated by the government, living in Simister will lower our life expectancy. It will bring congestion to Simister, will lower the quality of life for its existing residents. The noise will again impact negatively on Simister, the motorway noise is already bad enough even when road works are halted. The building will bring additional pressures and again Impact on the points above.	Noted. No change to SPD required.
16	Destinations are key to the overall ambitions of the proposals.	Noted. No change to SPD required.
17	Damage to the area.	Noted. No change to SPD required.
18	Strongly disagree. Object to the loss of open space and countryside and another erosion of the green belt which will ultimately render Greater Manchester one continuous conurbation. The claim that building sheds on fields "creates jobs" is a false one. Usually jobs are displaced from another location. This is a purely speculative designed to increase revenues to local government coffers - an understandable objective after years of austerity but a misguided "solution".	Noted. The site was taken out of the greenbelt through Places for Everyone. Information on job numbers is included within the Atom Valley website. It is not necessary or appropriate to identify a detailed breakdown of this in the SPD.

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	<p>Explain how the 20 000 jobs figure is arrived at with a breakdown of type, pay and other information. Also where is the demand for the products or services provided? How many of the jobs will be companies relocating from other sites?</p> <p>The development is misconceived and does not justify loss of green belt land.</p>	<p>No change to SPD required.</p>
19	<p>This scheme is not a good idea and will not bring all the benefits claimed</p> <p>Don't agree this development should go ahead at all. Sustainability would be far better served by not ripping up green space and disturbing wildlife</p> <p>Query as to whether active travel will be realised, most trips are likely to be used by private car and go via the motorway network. This is already heavily congested and this project will only make it worse and you offer no solution for this.</p>	<p>Noted.</p> <p>Promotion of a modal shift towards more sustainable forms of transport and healthier travel habits is a priority. Key to this, is a network of transport hubs and nodes across the site which connect a range of active travel links and routes.</p> <p>No change to SPD required.</p>
20	<p>This plan is taking away too much of the greenbelt/ green spaces in the area. We have already lost a lot due to large housing building projects. There are already lots of empty warehouse spaces in the Borough on Stakehill, Kingsway way and in Heywood. It will also mean a lot more traffic/ lorries on the road when there is already a high percentage of people/ children living with asthma due to pollution and poor air quality.</p> <p>Local people will not benefit and it will largely be people from outside of the area benefitting from the jobs and new housing. Many of the jobs will be low/ semi skilled.</p> <p>The area is better left how it is with distinct village and semi rural communities. Lots of local people use the area for recreational and wellbeing. This will be destroyed.</p> <p>How can the plan have green credentials when it is destroying wildlife habitats and creating extra traffic on the already clogged road system.</p> <p>Disagree with the whole plan. We should be getting better public transport infrastructure without destroying our green spaces.</p>	<p>Noted.</p> <p>The site was taken out of the greenbelt through Places for Everyone.</p> <p>No change to SPD required.</p>

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	The plan will have a detrimental effect on the local environment and on existing communities.	
21	<p>Concern that delivery and infrastructure delivery is not properly aligned. It is essential that all aspects are delivered for this to be considered a success</p> <p>It is generally well considered and there will always be some people who object and some who will be unhappy but it is time to get on with it. Companies may not be willing to invest in our local area with the delays and go elsewhere</p>	<p>Noted.</p> <p>No change to SPD required.</p>
22	<p>Stop building on green field sites.</p> <p>Public money should not be wasted on projects such as these and net zero targets.</p> <p>If greenbelt sites are to be built on, plant trees on them for carbon capture.</p>	<p>Noted.</p> <p>Site was removed from the greenbelt and allocated for development through PfE.</p> <p>No change to SPD required.</p>
23	Site should come forward without further delay.	<p>Support noted.</p> <p>No change to SPD required.</p>
24	<p>The plan is effectively to build a new town there on a vast area which is a flood plain, the rest of the satellite towns will be forgotten plus there's not a chance schools, doctors surgeries etc will supplement this development.</p> <p>Generally don't have problems with development at a certain scale but all but the text about enhanced "links to Middleton" etc is just a pie in the sky statement as nothing will be done, or it would have been done by now.</p> <p>There is buildings and brownfield land in Middleton for example that could be developed.</p> <p>You mention a 20 year build time, we all know that in those 2 decades Governments will change, ideas will change and this grand plan will be watered down and diluted into loads of developments of poor quality housing with no joined up thinking just plonked down on the land, Adding to strain on already tight local services.</p>	<p>Noted.</p> <p>No change to SPD required.</p>

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	As long as it continues across the lifetime of the developments.	
25	<p>This is green belt or at least open land that will be lost, whilst brownfield sites needing decontamination such as the old Turners site remain unaddressed. If you were addressing contaminated sites to offset the loss of undeveloped agricultural land I would be more supportive, but you are just taking the easy option. The M60 is currently a car park at rush hour - how is this going to take the additional load that this will generate. You need to plan for improved infrastructure first before starting such a development so that existing NE Manchester residents have to put up with yet further traffic issues</p> <p>The development is not attracting any further infrastructure improvements in NE Manchester to car, rail and tram networks</p> <p>How can the development of green belt open space be sustainable when there is no planning gain to other brownfield sites and Greater Manchester infrastructure? It is simply the cheapest way to deliver the development whilst leaving the brownfield sites for future generations to deal with</p>	<p>Noted.</p> <p>The site was taken out of the greenbelt through Places for Everyone.</p> <p>The infrastructure required to deliver the site (as currently know) is identified in the Infrastructure, Phasing and Delivery Strategy.</p> <p>No change to SPD required.</p>
26	Excellent development scheme. Please ensure Stakehill has a similar redevelopment plan to maximise GM as a northern beacon of high-tech development.	<p>Support noted.</p> <p>No change to the SPD required.</p>
27	<p>We understand that the comprehensive masterplan mentioned in the document is expected to be released in stages as part of the ongoing planning and consultation process. There should be a clearer timeline for release. The only date mentioned is 2039. Without more detailed timelines, it is challenging to consider this a true phasing strategy.</p> <p>Landowner concerns that main site promoter is not considering the interests of all landowners within the allocation in terms of information sharing and progressing a fair and equitable approach to development. Concern that phasing of development benefits certain landowners more than others.</p> <p>It is imperative that the council establishes robust oversight mechanisms to ensure transparency and fairness in the development process. The council must address how it will prevent entities with</p>	<p>Noted.</p> <p>The requirements in the SPD are intended to relate to all landowners. The SPD is intended to promote a collaborative approach to the delivery of a comprehensive development.</p> <p>Paragraph 9.31 sets out what statutory powers Bury and Rochdale Councils have in terms of CPO. Although there is reference to CPOs, the focus of the SPD is working collaboratively with all</p>

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	<p>significant monopolistic power from leveraging their position to the detriment of the project as a whole and to landowners not aligned with the partnership.</p> <p>Also concerned about the council's reference to using statutory powers, particularly the Compulsory Purchase Order (CPO) outlined in section 9.31. It is essential that the council strictly adheres to the established process before considering the use of its CPO powers.</p> <p>The principles outlined in section 9.4 must also apply to the main site promoter, given its significant role as a landowner in planning and development. The main site promoter must not undermine the wider scheme or the interests of other landowners by prioritising its commercial interests. The council must ensure that the main site promoter adheres to a fair and balanced approach, avoiding any conflicts of interest that could jeopardise the overall project or disadvantage other stakeholders.</p>	<p>landowners to deliver a high-quality comprehensive scheme.</p> <p>The phasing set out in the SPD is based primarily around points of access and not specific land ownerships.</p> <p>No change to the SPD required.</p>
28	<p>The masterplan's phases release lacks clear timelines, making it difficult to assess as a true phasing strategy. Landowners are concerned that the main site promoter may prioritise its own interests, potentially disadvantaging others through monopolistic control and unfair practices, including low purchase offers and rumoured ransoming. Robust council oversight is essential to ensure transparency, fairness, and prevent monopolistic behaviour.</p> <p>Concerned by the council's reference to Compulsory Purchase Orders (CPOs). Guidance stresses that CPOs should be a last resort after negotiations, yet we have not received any offers, including from the main site promoter. The council must follow proper procedures before considering CPOs.</p> <p>Finally, the main site promoter must be held to the same principles as other landowners, ensuring it does not exploit its position to undermine the broader development or disadvantage stakeholders. Fairness, transparency, and accountability must guide the process.</p>	<p>Noted.</p> <p>The requirements in the SPD are intended to relate to all landowners. The SPD is intended to promote a collaborative approach to the delivery of a comprehensive development.</p> <p>Paragraph 9.31 sets out what statutory powers Bury and Rochdale Councils have in terms of CPO. Although there is reference to CPOs, the focus of the SPD is working collaboratively with all landowners to deliver a high-quality comprehensive scheme.</p> <p>No change to the SPD required.</p>
29	<p>The *Mining Remediation Authority records indicate that within the Northern Gateway area there are coal mining features present at surface and shallow depth including: mine entries, coal workings and reported surface hazards. These features may pose a risk to surface stability and public safety.</p>	<p>Support noted.</p> <p>It is not considered appropriate to identify these areas in the SPD. Issues related to minerals</p>

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	Where mine entries are present we would expect their exact location to be established on site and any development layout designed to avoid being located over, or close to, these features. We are pleased to see that paragraph 5.74 acknowledges that mine workings will need to be investigated and remediated. The findings of these works should inform the layout of the development.	workings will be considered through groundwork investigations as part of the planning application process.
30	<p>Vision and objectives ignore the value of the land as Green Belt and farming land and as a separation of villages and towns.</p> <p>The maps have been presented intentionally difficult to see any close-up detail, makes it difficult to truly understand boundaries and is contradictory.</p> <p>Wildlife is mentioned and lists several protected animals, and yet there is no consideration for these animals with regard to an impact assessment mentioned throughout.</p> <p>Concern regarding language used, it is not easy to understand for local residents, specifically within the Castle Road section e.g. - marker buildings should provide a gateway feature at the junction with Castle Road.</p> <p>In addition – “Links to the existing Unsworth communities and into the wider employment site will be provided through the creation of a new active travel corridor through this Character Area”. This route will be restricted to local bus services and will not provide connection for other vehicles between the employment and residential parts of the site.</p> <p>Concern about traffic impacts on Castle Road and around Unsworth Pole, already existing problems in this area.</p> <p>9.16 & 9.17 suggest that the road infrastructure improvements between Pole Lane and Castle Road and the residential element would be part of the initial stage. If the residential element is part of the initial phase, then assume the houses will be sold and occupied prior to the 20,000 jobs being made available from the next phase of the project, so my question is, where will those people live once the properties are occupied?</p>	<p>Noted.</p> <p>The site has been removed from the greenbelt and allocated for development through PfE.</p> <p>The maps are only able to view at a certain scale given the size of the document.</p> <p>The SPD refers to the need for ecological assessments and assessments for Biodiversity Net Gain.</p> <p>Acknowledge that the SPD is a technical document and some terminology is more relevant to developers in order to ensure a well-designed scheme.</p> <p>Promotion of a modal shift towards more sustainable forms of transport and healthier travel habits is a priority. The active travel route which links the employment development through the Castle Road residential development onward towards existing Unsworth communities is designed to encourage the use of public transport, walking and cycling ahead of the private car.</p>

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	<p>It is not fair that all of this land is released from development when smaller schemes in the past have had to deal with all the requirements associated with being on greenbelt land.</p> <p>Values of surrounding properties will in no doubt be affected, is there a compensation scheme to assist with this?</p>	<p>All planning applications will require a transport assessment which will identify any required mitigation. This links to the need for greater access via public transport and active travel discussed above.</p> <p>The site is a strategic employment site however there are a number of other strategic residential sites designed to accommodate economic growth.</p> <p>The issue of value of surrounding properties is not something which can be addressed through this SPD.</p>
31	<p>PfE does not constrain or limit what can and cannot be developed within the Plan period. Extents and development areas stated are merely indicative. Development at the very earliest opportunity should be encouraged across the whole plan area in order to deliver its objectives and benefits. To this extent early engagement is imperative to deliver infrastructure as soon as possible to facilitate development on an equal basis for all landowners and developers across the wider Plan area, without geographical constraint. Very early engagement with infrastructure service providers should take place to provide a geographically comprehensive and flexible network.</p> <p>Support the Indicative Development Framework Plan as it appears sensible and deliverable, though we have concerns about the deliverability, commercially, legally and technically of an access point close to the Birch MSA. The agreement of a redevelopment plan for J3 M66, the Western Access should be accelerated, as a matter of urgency.</p> <p>Constraints plan identifies peat deposits which have been proved NOT to exist and is thus confusing, particularly given point 5.76.</p>	<p>Support comments noted.</p> <p>Changes to the movement and access section in Chapter 6 identifies several access points which takes into account the ability to deliver a new access close to Birch MSA.</p> <p>Reference to giga-scale has been clarified.</p> <p>The SPD provides guidance on boundary corridors to ensure that these areas are appropriately designed as part of high quality scheme.</p> <p>A number of comments relate to the IDPS, whilst this consultation was not on the IDPS any comments made will be considered in the update of the IDPS.</p>

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	<p>It is difficult to envisage the deliverability of the Mixed Use Gateway shown at Fig 16 and the primary accesses shown adjacent Birch MSA, shown at Fig 3 and Fig 15 given the questions marks over the deliverability of this access point. It potentially places the timing of delivery of SPD in some jeopardy.</p> <p>Core Development Character Area - 'Giga-Scale Plus employer'. This term is coined at 7.2, page 108, and is often repeated throughout the draft SPD, but there is no clear explanation as to exactly what it means, where it would be located or how much space it would consume. Whilst it may be aspirational, and there's nothing wrong with aspiration, how long might the rest of the development be delayed waiting for it to land? Clarity is required around this term and the potential development implications.</p> <p>Boundary Corridors - It is important to properly acknowledge the difference between the boundary treatments required against motorway boundaries for residential use as opposed to commercial employment B2/B8 uses. Clearly, for noise, air quality and visual amenity the corridor required next to a residential properties and their associated gardens, will be significant. Point 5.69 at p70 describes boundary mitigation zones of circa 50 metres. This is clearly not required for an employment zone with very large monolithic buildings, vehicle access and parking yards and car parks. We therefore question the proposal for significant boundary treatment along the southern boundary with the M62 and particularly the introduction of new paths and cycle routes along the motorway edge which attract people into a noisy zone with the potential for poorer air quality. It would be sensible to create the amenity links inbound of the motorway edge, possibly along the golf course boundary. The potential loss of developable land in this, non-sensitive location will also be significant.</p> <p>There is no one best way of phasing a large development site but it is clear that the provision of infrastructure will play a part. So too will site complexity, time and cost of delivery of individual parcels, the abnormal cost and timing of elements of work such as those associated with landforms and topography, the creation of development platforms for large format units, complexities arising from ground conditions and the timing and cost of foundation and engineering solutions. The individual cost base of some plots will be considerably greater than others, potentially resulting in skewed development costs, viability and ability to market at sensible market values. Any delay arising from ability to market a plot at viable levels has the potential to delay all subsequent phases,</p>	

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	<p>unless an equal and flexible approach is taken. Therefore the, preferred by some, concept of starting at one end and working through to the other, as might be argued if one was solely looking through the prism of infrastructure provision does not and should not always apply. Those sites most readily developable, and free from time consuming and costly abnormal development constraints ought to be broad forward at an early stage.</p> <p>If public sector funding is applied, as it already has been in assisting infrastructure development around M62 J19 and the newly constructed Queen Elizabeth II Way, then there should be an equality of opportunity for all landowners and developers to open up their lands for development. It is envisaged that further public sector finance will be delivered in support of further and wider infrastructure provision, if only by initial aid which will subsequently be recovered through planning gain or other developer contributions. Should early provision have a disproportionately large cashflow impact and cost then it should be taken into account in the equalisation provision within a Development Agreement. The Infrastructure Phasing & Delivery Strategy (IPDS) makes clear, perfectly reasonably, at 3.4, p.9, that a Landowner "will be required to contribute towards its infrastructure requirements." This should include any exceptional cost of early delivery and if a landowner is prepared to accept the cost then delivery should not be precluded. It must surely be to the benefit of the Councils, by way of earlier revenues, and this ought to be taken into account in assessing the cost of early delivery. Would it not be sensible to run a collective Cost/Benefit Analysis involving all affected stakeholders at these key decision points?</p> <p>It is useful to note the provisions included in the Bury Council consultation document for Elton and Walshaw SPD which was recently put to Public Consultation. It contains useful sections on Equalisation Agreements and Infrastructure Funding. I refer particularly to point 3.27 and suggest wording of this kind should be introduced to the SPD</p> <p>It is clear that some work has been carried out in regard to the provision of power supplies required for the wider site with an identified point of connection (5.66, page 68) in that a 33KV substation will be necessary with a further network of 11KV substations. Is there a timeline for this provision? Why can't this be planned and funded at an early stage?</p>	

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	<p>How long is it anticipated for highways infrastructural upgrades to take? What is the development capacity in the meantime?</p> <p>The Infrastructure, Phasing and Delivery Strategy is a key document referenced in the SPD which cross-refers to Chapter 9 particularly and ought to be consulted publicly, particularly as it lays out an initial view on phasing at 4.3 and table 4.1.</p> <p>Of particular note is that, at 1.10, it makes clear that it relates only to delivery of the 'remaining site' and not that which has already been granted planning permission at South Heywood. How can the Councils protect other stakeholders and themselves that any delay in developing and selling or letting parcels at South Heywood will not adversely affect the timing and cost of development of the 'remaining site', since the owner of South Heywood has a significant commercial interest in the Northern Gateway Development Vehicle, referenced at IPDS 3.4.</p> <p>National Highways Simister Island M60/M62/M66 upgrade Northern Loop - the proposals are seeking to take an inordinately large amount of land for environmental mitigation which has the potential to reduce the developable area identified in JPA1.1. An area of approximately 12 acres in the SW corner of the is at risk of being sterilised needlessly.</p>	
32	<p>Understand the need for providing employment opportunities but believe these should be done in a sustainable way that protects and enhances the countryside and green space.</p> <p>As such welcome the sustainability pillar "Sustainability - Northern Gateway will contribute to Greater Manchester's commitment to be net zero carbon by 2038. The future of our planet needs climate change resilience at its heart, with enhanced biodiversity, green and blue infrastructure networks, sustainable resource use and therefore support all the benefits. Wish to emphasise that these can be achieved in such a way that protects and enhances the environment including the countryside and green spaces while promoting a net zero approach.</p> <p>The design principles are good. The Street and Movement principles could go a bit further by mentioning how public transport will be integrated and also saying something about ensuring that vehicle speeds are kept low not just through signage but through design. Active Travel should be safe, easy and pleasant. The Landscape Design Principle is also welcome including the mention of</p>	<p>Support and comments noted.</p> <p>Additional references to the enhancement to the natural environment have been made.</p> <p>Rooftop solar is referenced in paragraph 8.11.</p>

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	<p>structural landscaped corridors but there could be some specific mention of wildlife corridors as these can significantly enhance biodiversity and could form part of the structural landscaped corridors. For some species i.e. birds and flying insects, stepping stones are sufficient to enhance their range of movement. It is possible to integrate the landscaped/wildlife corridors with walking and cycling routes.</p> <p>Like to see Rooftop Solar required wherever possible so as to reduce the pressure for ground level solar power and its impact on the countryside.</p> <p>Environmental accreditation of buildings can be useful but it is important to follow up after buildings have been built to see whether their performance actually meets the projected performance of the designs.</p> <p>Support section 9.13 'A package of active travel and public transport improvements will be required to connect with nearby communities and town centres. Early planning applications within the site should deliver these interventions in a way that is proportionate and that establishes the principle of the site being accessed in line with the sustainable transport hierarchy' as it is important that developers don't cherry pick the bits they want to do and promise to do other bits later only to not deliver.</p>	
33	<p>The Development Framework will require extensive infrastructure investment, including a wide range of public transportation enhancements, is required to ensure its implementation. This aims to prove that the site is unsustainable in its current state and is not properly connected to an existing urban area or community. As a result, the site is deemed unsuitable for allocation.</p> <p>The development will have a major influence on both the strategic and local road networks, both in isolation and in combination with other neighbouring allocations. The impact on the Strategic Road Network (SRN) is expected to be focused at M60 Junction 19 and M62 Junction 19, while the impact on the Local Road Network (LRN) is projected to be concentrated at the intersections on the A6045 Heywood Old Road. To facilitate and deliver this site, it is evident that major investment and improvements to the highway network will be required.</p>	<p>Noted.</p> <p>The site has been removed from the greenbelt and allocated for development through PfE.</p> <p>The SPD refers to improvements to the local route network to mitigate increases in traffic as far as possible.</p> <p>The SPD promotes improvement to active travel and public transport to reduce car trips.</p>

Ref	Summary of main issues raised	Summary of response to issues raised
	<p>These works are of such a scale as to potentially render the scheme unviable. Furthermore, the construction will have a major negative impact on current inhabitants, not just due to traffic and roadworks during construction, but also due to traffic, increased idle vehicles, and longer travel times once the development is completed.</p> <p>Investment in public transport is unlikely to be adequate to alleviate these legitimate concerns, especially when considering the cumulative consequences of all the anticipated growth in the surrounding area.</p> <p>To deliver this allocation there are requirements for investment in the transport network, public transport provision, school places, health, historic assets etc. All of which could well have a detrimental impact on the viability and delivery of the site.</p> <p>The purpose of the NPPF greenbelt protection is to prevent urban sprawl. Developing on this green belt site will create an urban sprawl contrary to NPPF para 137 and para 138 a,b,c, and e.</p> <p>This proposed allocation will result in the loss of approximately 74 hectares of Green Belt. This area of Green Belt currently performs strongly in relation to checking the unrestricted sprawl of large built-up areas and in preventing neighbouring towns from merging. The loss of this land from the Green Belt will therefore clearly result in harm which has not been justified. The case for exceptional circumstances to release this site for development has simply not been made given the lack of suitable assessment of reasonable alternatives.</p> <p>To prove that exceptional circumstances to justify alteration to greenbelt boundaries exist, the NPPF requires evidence that all other reasonable options to meet identified need have been considered (NPPF para 141). This must include maximising use of brownfield and underutilised sites and maximising density.</p> <p>The development principles do not take into account the lack of infrastructure in the surrounding area particularly the local road network, which cannot currently cope. Many roads are single file country lanes, and Heywood Old Road is regularly gridlock with no sign of improvements this will only get worse with the size of development and the public transport plan for the area.</p>	<p>The viability of the site, taking into account policy requirements was tested as part of the PfE process.</p> <p>The issue of air quality is considered in the SPD and will need to be considered as part of any planning applications.</p> <p>No change to SPD required.</p>

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	<p>The development area currently have illegal air quality readings due to the motorways (M60, M62 and M66) surrounding the site. The local Council are not responsible for the Strategic Road Networks (motorways) and this is National Highways. However, the local authority as a duty of care for all residents and should consider all intelligence particularly when it could jeopardise the health and wellbeing of local residents.</p> <p>National Highways readings through a freedom of information request and the readings on the Strategic Road Networks on the local area in 2015/2016 were: 75% at illegal limit, 15% at legal limit, 10% not full year readings</p> <p>With the introduction of a 1.2 million square metres of industrial and 1550 homes this will undoubtedly increase already illegal levels of carbon emissions even further.</p> <p>The intention is to incorporate appropriate noise and air quality mitigation measures and high-quality landscaping along the M60 motorway corridors and local road network if required within the allocation. National Highways have already tried this through the barrier erecting study and it failed. The before and after results were provided and it was confirmed there was no reduction in pollution.</p>	