

Consultation Analysis

Draft Supplementary Planning
Document 18: Development
Frameworks for Strategic Site
Allocations at Elton Reservoir and
Walshaw

April 2025

Consultation Analysis

Ref No.	SPD reference	Comment	Response	Change required
1	N/A	Objects to the Places for Everyone plan, the allocations and the principle of development on green belt, countryside and wildlife	Places for Everyone was adopted by Bury Council with effect from 21 st March 2024 which means that the plan is now part of Bury's statutory development plan. The allocated sites are therefore no longer designated as Green Belt and the principle of development has been established.	No change
2	N/A	Should utilise empty properties instead	The need for the Elton and Walshaw sites was considered in detail during the examination of the Places for Everyone Joint Plan. Both sites are now adopted site allocations.	No change
3	N/A	Should develop brownfield first	National planning policy does not support an explicit 'brownfield first' approach, as Local Authorities are required to be able to provide a 5 year supply of housing sites which are available and deliverable. Places for Everyone does, however, include a 'brownfield preference' approach.	No change
4	N/A	Concerns regarding infrastructure, congestion and parking	Places for Everyone includes policies that set out the infrastructure requirements	No change

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			necessary to support the developments of both sites site and this is reflected in the draft SPD. In addition, the site promoters will be required to undertake detailed Transport Assessments to demonstrate that the developments would not have an unacceptable adverse impact on congestion.	
5	N/A	Not enough GPs, dentists, primary schools	Places for Everyone includes policies that set out the infrastructure requirements necessary to support the developments of both sites site and this is reflected in the draft SPD.	No change
6	N/A	Bury is no longer clean and tidy	Comment does not relate to SPD18.	No change
7	N/A	Houses will not be affordable	The PfE policies for both sites state that development will be required to make provision for affordable housing in accordance with local planning policy requirements, equivalent to at least 25% of the dwellings proposed on the site and across a range of housing types and sizes.	No change
8	N/A	More housing will exacerbate regular flooding	PfE Policy JP-S4 relates to flood risk and the water environment and states that flood risk will be managed through a	No change

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			variety of methods and the draft SPD sets out in more details what will need to be considered from a flood risk perspective for the Elton and Walshaw sites.	
9	N/A	Concern that modal shift to cycling will not take place in winter months and for long journeys	Comment not directly related to the SPD but one of the key aims of the Bury Transport Strategy is for all our residents, or anyone who visits or works in the Borough, to have a real choice of how they travel. The Strategy aims to provide for a much better public transport system that's safe, affordable and reliable and to make it possible for people to make some of their short local journeys by walking or cycling if they can.	No change
10	N/A	Green spaces should be prioritised	The policies for both sites include a requirement for the developments to incorporate multifunctional green and blue infrastructure within the sites.	No change
11	N/A	Concerns that the requirements for planned infrastructure are too vague. An additional health centre would be required yet we were informed it may just be an extension, the same with schools.	As specified in the SPD, the Local Planning Authority will continue to work closely with the Greater Manchester Integrated Care Board's (ICB) Primary Care and Estates teams for the Bury Locality to determine the specific nature of health provision required. Similarly, the	No change

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			Local Planning Authority will continue to work closely with the Council's Education services to determine the expected level of pupil yield from the development and the specific nature of primary and secondary school provision and whether such provision should be made on-site or through an off-site contribution.	
12	N/A	Compensatory measures do not compensate anything.	The policies for both sites require the developments to make provision for compensatory improvements to the environmental quality and accessibility of remaining Green Belt within the site in accordance with PfE Policy JP-G2.	No change
13	N/A	Relief road will not resolve the problems we already face.	The Development Frameworks and subsequent planning applications on both sites will need to be accompanied by detailed transport modelling and design work to ensure that any transport interventions minimise impacts.	No change
14	N/A	Concerns that plans will lead to more air pollution and worsen climate change	The developments will need to accord with a range of PfE policies designed to ensure that the potential impact on air quality and climate change can be fully assessed and to only permit development where impacts	No change

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			are acceptable and/or where suitable mitigation measures can be provided.	
15	N/A	Concerns regarding the impacts of construction noise	This would be a matter that would be considered at the application stage.	No change
16	N/A	There should be a clause that gardens, local perimeters, paint and gutters should be maintained to remain in a good condition	These are not matters that can be controlled through the planning process.	No change
17	N/A	The area will lose the small town character and appeal.	The principle of residential development on these sites has now been established following the adoption of Places for Everyone.	No change
18	N/A	No concerns	Support noted	No change
19	Paragraph 7.8	Numerous Rights of Way affected by the proposals. Guidance should be taken from ROW Circular (1/09) especially Paragraph 7.8 which states that, "any alternative alignment should avoid the use of estate roads for the purpose wherever possible and preference should be given to the use of made up estate paths through landscaped or open space areas away from vehicular traffic". Should a temporary or	Existing Public Rights of Way (PROW) and the provision of new PROWs will be considered at the masterplanning stage for both sites. The need to consider PROWs is set out in Table 1(4) which lists PROWs and one of the site conditions/constraints.	No change

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		permanent obstruction be unavoidable, then no development should take place until a Diversion Order has been confirmed, and the diversion route, with a satisfactory surface and adequate width and marking, is available for public use. Use of the PROWs, and the safety of users must not be affected by the development, nor during the work taking place except by way of the above procedures.		
20	N/A	Support the intention that the Development Frameworks for Elton Reservoir and Walshaw will be adopted as Supplementary Planning Documents	Support noted	No change
21	N/A	Agree the Development Frameworks should comprise a comprehensive masterplan, supported by a wide ranging and comprehensive evidence base including that for the historic environment.	Support noted	No change
22	N/A	Pleased to see that the historic environment will form part of the masterplan framework scope	Support noted	No change

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23	N/A	Agree that the Development Framework and the integral masterplan will need to take account of heritage assets and their settings within and around the Elton Reservoir site, including the Old Hall Farmhouse Grade II Listed Building and other heritage assets contained on the Historic Environment Record and the Bury's draft Local List.	Support noted	No change
24	N/A	The SPD for Walshaw and Elton sites should include a requirement for 1 new primary school building, one new medical centre, 1 new secondary school campus building linked to one of the existing secondary schools in the borough and sufficient new flood drainage systems to compensate for the loss of the flood plain.	<p>As specified in the SPD, the Local Planning Authority will continue to work closely with the Greater Manchester Integrated Care Board's (ICB) Primary Care and Estates teams for the Bury Locality to determine the specific nature of health provision required.</p> <p>Similarly, the Local Planning Authority will continue to work closely with the Council's Education services to determine the expected level of pupil yield from the development and the specific nature of primary and secondary school provision and whether such provision should be made on-site or through an off-site contribution.</p>	No change

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			In addition, PfE Policy JP-S4 relates to flood risk and the water environment and states that flood risk will be managed through a variety of methods. Issues around flood risk will be considered at both the masterplanning and planning application stages.	
25	N/A	Local youth groups who cannot afford to travel are concerned that they will no longer be able to hike and photograph the local nature and cannot afford to travel.	<p>Places for Everyone was adopted by Bury Council with effect from 21st March 2024 which means that the plan is now part of Bury's statutory development plan. The allocated sites are therefore no longer designated as Green Belt and the principle of development has been established.</p> <p>Notwithstanding, the Policy for Elton Reservoir requires the development to provide a significant green corridor which remains within the Green Belt and provides a strategic amount of new, high quality and publicly accessible open space/parkland coupled with a network of multi-functional green and blue infrastructure within the allocation including the enhancement and the integration of the existing assets at Elton and Withins Reservoirs and the Manchester, Bolton and Bury Canal to</p>	No change

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			<p>create an extensive recreation, tourism and leisure asset.</p> <p>Similarly, the policy accompanying the Walshaw allocation requires the development to make provision for new, high quality, publicly accessible, multifunctional green and blue infrastructure within the allocation including the integration and enhancement of the existing green infrastructure corridors and assets at Walshaw and Elton Brooks.</p>	
26	N/A	There are rare local finds in the area that have not been considered when the council chose the site.	The Council will take full account of ecological interest in moving the allocations forward and will continue to engage closely with our colleagues at the Greater Manchester Ecology Unit (GMEU) and take account of their expert advice throughout the masterplanning process.	No change
27	N/A	The high school will have no scope to grow with the population due to the site being made smaller with the road.	Criterion 5 of the PfE Policy for Elton Reservoir (JPA7) requires provision for a new secondary school or, in the event that secondary school provision is delivered in an alternative way, make a financial contribution towards secondary school provision to meet needs generated by the development, in accordance with policy	No change

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			JP-P5. Plans to develop a new 5-form entry Radcliffe Star Academy secondary school have progressed independently of the Elton Reservoir allocation with occupation of the school anticipated to be in Autumn 2025. Consequently, there will be a need for a developer contribution towards secondary school provision.	
28	N/A	Housing market has stalled and the plans are not what the area needs	Places for Everyone was adopted by Bury Council with effect from 21st March 2024 which means that the plan is now part of Bury's statutory development plan. The allocated sites are therefore no longer designated as Green Belt and the principle of development has been established. However, at this stage, there are no details of the types and tenure of housing that will be developed.	No change
	N/A	This won't benefit the local people. We will lose our green space and they will mitigate it elsewhere and we won't have the houses we need or the facilities we need.	the Policy for Elton Reservoir requires the development to provide a significant green corridor which remains within the Green Belt and provides a strategic amount of new, high quality and publicly accessible open space/parkland coupled with a network of multi-functional green and blue infrastructure within the allocation	No change

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			<p>including the enhancement and the integration of the existing assets at Elton and Withins Reservoirs and the Manchester, Bolton and Bury Canal to create an extensive recreation, tourism and leisure asset.</p> <p>Similarly, the policy accompanying the Walshaw allocation requires the development to make provision for new, high quality, publicly accessible, multifunctional green and blue infrastructure within the allocation including the integration and enhancement of the existing green infrastructure corridors and assets at Walshaw and Elton Brooks.</p> <p>At this stage, there are no details of the types and tenure of housing that will be developed but the policies that accompany both the Elton Reservoir and Walshaw allocations require the delivery of a range of infrastructure to support the wider developments.</p>	

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29	Section 4.3	Welcome the statement in Section 4.3 that any development in the Elton area will need to “provide a significant green corridor which remains within the Green Belt and provides a strategic amount of new, high quality and publicly accessible open space/parkland coupled with a network of multifunctional green and blue infrastructure within the allocation including the enhancement and the integration of the existing assets at Elton and Withins Reservoirs and the Manchester, Bolton and Bury Canal to create an extensive recreation, tourism and leisure asset”	Support noted.	No change.
30	Section 4.3	Ask that the MBB canal is also recognised as a significant heritage asset in its own right.	Paragraph 4.3 sets out the specific wording of PfE policy JPA7. This has now been adopted so there is no scope to amend this. Notwithstanding, the reference to Old Hall Farmhouse in criterion 14 is not exhaustive and taking appropriate account of heritage assets could include the MBB Canal.	No change.

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31	Section 4.3 (12)	Welcome the statement that any development in the Elton area will “need to make provision for biodiversity, including taking appropriate account of SBIs at Elton Reservoir and the Manchester, Bolton and Bury Canal.”	Support noted.	No change.
32	N/A	Ask that the raising of the level of the Water Street Bridge, so as to allow navigation along the canal, be added to the list of key enabling infrastructure required to be provided by the developer. Consideration should be given to how a Bury Terminus for the canal could be provided.	The raising of the Water Street Bridge or the provision of a Bury terminus is not considered necessary to support the development of the Elton Reservoir site.	No change
33	N/A	Request that towpath/footpaths be provided on both sides of the canal to improve access for people with a disability. This would in turn attract more visitors to the canal and towpath.	Paragraphs 4.50-4.52 of the draft SPD describe the requirements for the provision of a significant green corridor which remains within the Green Belt and provides a strategic amount of new, high quality and publicly accessible open space/parkland coupled with a network of multi-functional green and blue infrastructure within the allocation including the enhancement and the integration of the existing assets at Elton	No change.

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			<p>and Withins Reservoirs and the Manchester, Bolton and Bury Canal to create an extensive recreation, tourism and leisure asset. This includes the need for the park to be accessible to all, including for walking, wheeling, cycling and horse riding and involve upgraded surfaces to existing footpaths and bridleways connecting adjoining residential developments to the wider open countryside. Details of footpaths/towpaths will be provided in the Elton Development Framework.</p>	

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34	N/A	The canal is an internationally significant heritage asset in its own right and was the prime route for delivering coal, cotton and other materials & goods to and from the mills and industries of Salford, Bury and Radcliffe and beyond at the start of the industrial revolution. That in itself will attract visitors to a navigable canal, will prompt guided walks to be provided along an accessible towpath, stimulate boat trips, provide volunteer opportunities, learning materials, interpretative resources and public events. It could also facilitate further opportunities to provide music and cultural events.	Comments noted	No change
35	N/A	Recognises the importance of a vision led approach to ensure that the right sustainable measures for travel are considered ahead of the need for large-scale highway improvements.	Comments noted.	No change

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36	N/A	Supportive of the need to explore mass transit options for the area, with the requirement for the delivery of an Elton Metrolink stop and Park & Ride facility which will assist in reducing the need for residents and visitors to rely on private vehicles for trips that can be made more sustainably.	Support noted	No change
37	N/A	Park & Ride facility will be a vehicular attractor in its own right and the impact to the surrounding highway network should be considered at the earliest opportunity.	The precise nature and specification of the Park and Ride facility at the Elton Reservoir site will be informed by detailed transport modelling and design work. The impact on the surrounding highway network will be considered as part of this detailed work.	No change required.
38	N/A	The phasing of the required infrastructure should be considered at the earliest point so that this becomes the first choice for residents.	The policies accompanying each site (JPA7 and JPA9) both specify that any proposals for this allocation must be in accordance with a comprehensive masterplan that has been approved by the LPA. It shall include a clear phasing strategy as part of an integrated approach to the delivery of infrastructure to support the scale of the whole development. This will be required as a key part of the	No change

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			Development Framework and in advance of any planning applications.	
39	N/A	Need to ensure that the necessary funding (contributions or equalisation agreements) are available ahead of later applications to ensure that mitigations are delivered from the outset, rather than retrospectively.	The expectations in terms of equalisation agreements and the intended approach towards infrastructure funding are set out in Section 3 of the SPD.	No change
40	N/A	Refers to Paragraph 33 of National Highways' Planning for the Future. Advises that the 'vision strategy' for a site should feed into any Travel Plans, be specific to the site, and include wherever possible clarity on the funding and deliverability of proposed measures. For example, National Highways would be more supportive of applications and Travel Plans that contained fully costed and approved transport measures, than one which simply highlighted a future need without clarity of funding. This should include an element of monitoring the site to ensure that the proposed measures had the desired effect of reducing single occupancy vehicle	Comment noted.	No change.

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		travel, and that impacts to the SRN had been minimised.		
41	N/A	Development at Spen Moor has not dealt with the public concerns or conditions to preserve the protected wildlife or prevent flooding and traffic issues so have concerns that development of Elton will be the same and developers will not adhere to requirements	PfE is now adopted and forms part of Bury's statutory development plan. The law requires that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise. Policy JPA7 sets out the requirements for the development of the allocation at Elton Reservoir and any development will need to be in line with this Policy.	No change
42	N/A	New development must first have the entire necessary infrastructure in place to sustain the development. It would not be acceptable to build large estates and then only think about the impact on the roadways, transport, health and school needs afterwards	The SPD sets out the infrastructure requirements for the Elton Reservoir and Walshaw sites.	No change
43	N/A	Should improve the existing roads first	Comment does not relate to SPD18.	No change
44	N/A	Should get landlords to bring empty properties back into use or sell.	Comment does not relate to SPD18.	No change
45	N/A	Complaints about Atom Valley.	Comment does not relate to SPD18.	No change

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46	Paragraph 5.3, 5.39 to 5.42	The location and functionality of the church building could play an important part in the development of a new community here in Walshaw and pleased that this is recognised in the draft SPD.	Support noted.	No change
47	N/A	The interface between 'old' and 'new' is critical to the success or otherwise of a thriving new community.	Criterion 8 of the Policy for Walshaw (JPA9) specifies that development in this allocation will be required to ensure the design and layout allows for effective integration with surrounding communities.	No change
48	N/A	The burial grounds also include several war graves. The integrity of the grounds needs to be maintained out of respect for the deceased and their families, and because there are stories contained there relating to the history of Walshaw.	There are no proposals to affect the burial grounds associated with Christ Church and criterion 12 of Policy JPA9 (Walshaw) states that development is required to take appropriate account of relevant heritage assets, and their setting, including the Christ Church Grade II* Listed Building.	No change
49	N/A	The design for the interface at the bottom end of the church yard needs careful planning. If the gardens of new houses back onto the yard railings, how will responsibility be allocated to maintain the railings? If there is to be a walkway between the railings and houses, how will this be maintained	These are detailed matters that would be considered at the planning application stage.	No change

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		and illuminated? Will there be any landscaping between the walkway and the church yard railings?		
50	N/A	Would like consideration to be given for access to the church grounds to be designed into the scheme so that people from several hundred houses can easily attend events in the church building. With regard to the proposed road connecting the top of Scobell Street with Dow Lane, could a side road be included in the plan so that a well-lit turning circle would allow people attending events in church to be dropped off and collected in a convenient way?	<p>This is a detailed matter that would be considered at the planning application stage.</p> <p>Nevertheless, Places for Everyone Policy JP-P2 states that we will proactively manage and work with partners to positively conserve, sustain and enhance our historic environment and heritage assets and their settings, including ensuring that the heritage significance of a site or area is considered in the planning and design process and opportunities for interpretation and local engagement are optimised.</p>	No change

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51	Boundary map at 4.2 & 5.2	Any sites (identified from the site allocation boundary map at 4.2 (Elton Reservoir) that include Elton Sailing Club; Warth Fold; and football fields to the northeast of the site; and 5.2 (Walshaw) that includes Stables Country Club) should be consistent with Sport England Playing Fields Policy and any present, past or future contribution of the site for sport to be considered in any site assessment.	The Council will have regard to Sport England's Playing Fields policy when considering the masterplanning of both sites and any subsequent planning applications.	No change
52	N/A	Where greater housing need is demonstrated, Bury may also wish to commission evidence in a Built Facilities Strategy alongside its Playing Pitch and Outdoor Sport Strategy, to ensure that decisions about planning for meeting the current and future outdoor playing pitch and indoor sports facility needs of the community through the Local Plan, are also based on up-to-date evidence.	The Council is developing its evidence base of open space, sport and recreational matters to support the emerging Local Plan.	No change
53	N/A	Paragraphs 4.53-4.59 and 5.43-5.47 related specifically to the provision of	The Council will have regard to Sport England's Playing Fields policy when	No change.

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		recreation spaces which include playing fields and includes reference to the NPPF paragraph 103 wording. Sport England would encourage inclusion of reference also to our Playing Fields Policy.	considering the masterplanning of both sites and any subsequent planning applications. Specific topic-based policy references are not made as it is not considered appropriate to include that level of detail in the document.	
54	Paragraph 4.57 and 5.45	Welcome further discussion in relation to any proposed detailed proposal which either impacted existing sporting provision or has the potential to provide new facilities. With particular regard to paragraph 4.57 and 5.45, advised that they do not support a 'standards based' approach to sporting provision and that this must be based on a needs assessment i.e. PPS/PPOSS and Built Facilities Strategy.	SPD18 is intended to provide advice on what matters should be considered in developing the masterplans for each site. There will be further consultation on the masterplans as and when these come forward and at that stage the potential impact on existing and/or the provision of new open space, sport and recreational facilities will be clearer.	No change
55	N/A	Support inclusion of the SPD's aim to seek to support proposals for new and improved sport and recreation facilities and this should set out a positive approach to the provision and enhancement of sports facilities that are fit for purpose and in suitable locations, addressing needs identified	Support noted	No change

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		through a robust and up-to-date assessment.		
56	N/A	The Masterplan needs to clearly state that sports facilities (built as well as pitches, open space and recreational land) will be protected from loss except where it is demonstrated that a site can meet the requirements of Sport England's Playing Field Policy and NPPF 103.	SPD18 is intended to provide advice on what matters should be considered in developing the masterplans for each site. There will be further consultation on the masterplans as and when these come forward and at that stage the potential impact on existing and/or the provision of new open space, sport and recreational facilities will be clearer. Notwithstanding, SPD18 does set out the position in terms of existing open space, sports and recreational buildings and land, including playing fields.	No change

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57	N/A	Supports the SPD's aim to seek developer contributions required to provide infrastructure, facilities and services as a result of new development through section 106 contributions and/or planning obligations. Reference to the Councils own evidence base in the form of the up to date Playing Pitch and Outdoor Sport Strategy and potentially a Built Facilities Strategy would be relevant here. Sport England can assist in using our Playing Pitch and Built Facility Calculators to establish the scope of sports facilities that an area will require alongside what contributions would be needed, using last quarter costings.	Support noted. SPD18 specifies that the provision of infrastructure could be required on-site or through off-site developer contributions. The scale and nature of the necessary infrastructure will be developed through the subsequent masterplanning and planning application process.	No change
58	N/A	SPD should make clear that off-site contributions should not be considered as mitigation for any loss of playing field, which must meet the tests of our Playing Field Policy and 103 of the NPPF.	SPD18 sets out the position with regard to any potential impacts on existing open space, sport and recreation provision.	No change

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59	Paragraphs 4.58 and 5.46	Does not support use of sporting areas for use as SuDS as it will constrain the use of these facilities and hinder their contribution to the provision of sporting opportunities and promotion of healthy lifestyles. This is also similar for any proposals for biodiversity net gain or landscaping schemes, which should not impact playing field or other sporting provision.	It is accepted that paragraphs 4.58 and 5.46 could be clarified to make clear that consideration will also be given as to whether <u>informal</u> open spaces can also provide dual use for Sustainable urban Drainage Systems (SuDS). This should not apply to formal sports or children's play areas.	Amend the last sentences of paras 4.59 (formally 4.58) and 5.46 to read: 'Consideration will also be given as to whether informal open spaces can also provide dual use for Sustainable urban Drainage Systems (SuDS)'
60	N/A	The document includes the intention for the provision of new primary schools. Sport England would expect such proposals to include an appropriate level of playing field provision commensurate with the numbers of pupils they would serve and be of a minimum sufficient size to include natural turf playing field for; football (U10's FA standards); athletics; rounders; and non turf playing field for netball and basketball. As part of such proposals, Sport England would expect schools to provide for community use.	Whilst the detail of education provision would be considered at the planning application stage, it is accepted that the SPD should include references to ancillary facilities, such as playing fields.	Amend the first sentences of paras 4.28 and 5.22 to read: 'Should it be concluded that on-site primary school provision is needed, the specific location of such provision and the scale and nature of ancillary facilities (e.g. playing fields) will be determined by the Council taking account of factors such as accessibility and location in relation to key infrastructure and the number of pupils that the education provision would serve'.

61	Key requirements	<p>Would welcome inclusion of policies on active design and building active design concept into a range of policies where relevant.</p> <p>This relates to all types of development to ensure that people can live, work and play and that those locations are linked sustainably to facilitate active travel enabling people to be active in their everyday lives. It would be helpful if not only through built development, but also enabling the creation of hubs and opportunities for active travel so that policies to enhance cycling and walking routes are included with site-based policies. We ask that you consider if this can be included in SPD wording where relevant, potentially within the 'Design' and 'Sustainable transport and highways infrastructure' sections of each Key Requirements section, although we would welcome a separate reference to Active Design within the document.</p>	<p>As set out in the SPD, the developments at Elton Reservoir and Walshaw will need to comply with a wide range of development plan policies, including those within the recently adopted Places for Everyone Joint Plan (PfE). PfE includes a number of policies connected to active design and active travel.</p>	No change
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62		Green space is vital for recreation, health and wellbeing and access to nature	<p>Places for Everyone was adopted by Bury Council with effect from 21st March 2024 which means that the plan is now part of Bury's statutory development plan. The allocated sites are therefore no longer designated as Green Belt and the principle of development has been established.</p> <p>Notwithstanding, the Policy for Elton Reservoir requires the development to provide a significant green corridor which remains within the Green Belt and provides a strategic amount of new, high quality and publicly accessible open space/parkland coupled with a network of multi-functional green and blue infrastructure within the allocation including the enhancement and the integration of the existing assets at Elton and Withins Reservoirs and the Manchester, Bolton and Bury Canal to create an extensive recreation, tourism and leisure asset.</p> <p>Similarly, the policy accompanying the Walshaw allocation requires the development to make provision for new, high quality, publicly accessible, multifunctional green and blue</p>	No change

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			infrastructure within the allocation including the integration and enhancement of the existing green infrastructure corridors and assets at Walshaw and Elton Brooks.	
63		The construction risks disrupting local natural springs, which are critical for maintaining the area's water table. Disturbing these springs could lead to flooding in surrounding areas, exacerbating drainage issues, and posing serious risks to properties in the vicinity, including our cattery.	Any potential risks arising from construction would be considered at the planning application stage.	No change
64		Cattery, located nearby, would be negatively impacted by increased noise and human activity associated with the proposed development. The stress of additional disturbances could jeopardize the well-being of the animals in our care, as well as impact our business operations. Our business' unique selling point is that it's located within the tranquil countryside and the proposed development would threaten this.	Any potential impacts from noise arising from the development would be considered at the planning application stage.	No change

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65		This green space supports various wildlife species, including birds and other fauna. Development would disrupt their natural habitats, leading to a loss of biodiversity that is crucial for ecological balance in the locality.	The Council will take full account of ecological interest in moving the allocations forward and will continue to engage closely with our colleagues at the Greater Manchester Ecology Unit (GMEU) and take account of their expert advice throughout the masterplanning process. This includes their recent recommendation to extend one of the Grade A SBIs on the site to reflect the presence of Waxcap fungi on part of the site.	No change
66		Concerned that the development is splitting itself into smaller sections and splicing the impacts and are not being considering entirely.	The requirement for any development on the site to be in accordance with a masterplan and phasing strategy is to ensure that the sites are planned comprehensively.	No change
67		The site needs working farms, and conservation grazing to continue as an ecologically valuable site. Abandonment to rough grass, conversion to amenity grassland and conversion to tree planting will destroy or diminish any areas of interest for grassland fungi that are not lost to building.	The Council will take full account of ecological interest in moving the allocations forward and will continue to engage closely with our colleagues at the Greater Manchester Ecology Unit (GMEU) and take account of their expert advice throughout the masterplanning process. This includes their recent recommendation to extend one of the Grade A SBIs on the	No change

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			site to reflect the presence of Waxcap fungi on part of the site.	
68		The UK Government has supported a pledge which was initiated by the Chilean Government to formally include fungi as a distinct and important component of global biodiversity. At the recent UN Biodiversity Summit (CBD COP 16) in Cali, Colombia this pledge also received the support of the EU. Therefore, instead of referring to 'biodiversity' as 'animals and plants' (with fungi subsumed as a minor, often neglected, component of 'plant' biodiversity), this pledge supports the idea that fungi should be treated separately (the three F's; FFF=fauna, flora funga). In due course, it is expected that this pledge will be formally incorporated into legislation.	The Council will take full account of ecological interest in moving the allocations forward and will continue to engage closely with our colleagues at the Greater Manchester Ecology Unit (GMEU) and take account of their expert advice throughout the masterplanning process. This includes their recent recommendation to extend one of the Grade A SBIs on the site to reflect the presence of Waxcap fungi on part of the site.	No change
69		Believe the grassland warrants the highest designation of local wildlife site the Greater Manchester Ecology Unit can designate, is keen to see the process of further evaluation for SSSI designation be carried out.	The Council will take full account of ecological interest in moving the allocations forward and will continue to engage closely with our colleagues at the Greater Manchester Ecology Unit (GMEU) and take account of their expert advice	No change

Ref No.	SPD reference	Comment	Response	Change required
			throughout the masterplanning process. This includes their recent recommendation to extend one of the Grade A SBIs on the site to reflect the presence of Waxcap fungi on part of the site.	
70		The site requires the urgent attention as a matter of Bury Council's Biodiversity Duty to ensure Elton Reservoir is not lost and retains appropriate habitat management moving forward.	The Council will take full account of ecological interest in moving the allocations forward and will continue to engage closely with our colleagues at the Greater Manchester Ecology Unit (GMEU) and take account of their expert advice throughout the masterplanning process. This includes their recent recommendation to extend one of the Grade A SBIs on the site to reflect the presence of Waxcap fungi on part of the site.	No change
71	N/A	To ensure the delivery of necessary health infrastructure, it is essential that new development makes a proportionate contribution to funding the health infrastructure needs arising from new homes. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. The ability	Noted. The SPD sets out what the Development Frameworks for each site will need to consider in terms of the delivery of health infrastructure.	No change

Ref No.	SPD reference	Comment	Response	Change required
		to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies.		
72	N/A	Fully supportive of the use of an SPD to provide further details of what the Council expects to see within future masterplans for the strategic site allocations at Elton Reservoir and Walshaw, including detail on infrastructure requirements to support the scale of the whole development.	Support noted	No change
73	N/A	Pleased to see standalone sections on health provision within the site-specific advice for both sites. The inclusion of specific detail on the requirement for new/additional primary care provision linked to each site sets a clear expectation that development proposals will need to make provision for essential health infrastructure.	Support noted	No change

Ref No.	SPD reference	Comment	Response	Change required
74	N/A	Identifying both the requirement for on-going engagement with the GM ICB's Primary Care, Locality and Estates Teams as well as the process that will be followed in determining the required level of additional primary care provision will support the effective implementation of Places for Everyone Policy JP-P6 Health in relation to both sites.	The SPD specifies that the Local Planning Authority will continue to work closely with the Greater Manchester Integrated Care Board's (ICB) Primary Care and Estates teams for the Bury Locality.	No change
75	N/A	Consider that the draft SPD also incorporates the right level of flexibility to allow healthcare providers to determine the most appropriate means of meeting the primary healthcare needs arising from new development, in alignment with NHS requirements.	Support noted	No change

Ref No.	SPD reference	Comment	Response	Change required
76	N/A	Both the Elton reservoir and Walshaw sites have mine entries and shallow coal workings recorded to be present within them. Where mine entries and their zones of influence are present these may impact on the quantum of development that can be accommodated on site. The Coal Authority is of the opinion that building over the top of, or in close proximity to, mine entries should be avoided wherever possible. It is recommended that these features, the risks they pose, and their potential impacts to site development, are acknowledged in the document in order to ensure that full consideration is given to the risks these features pose. As mine entries have potential to impact on development layout highlighting their presence at an early stage would ensure that any future proposal is informed by them. Drawing attention within the document to relevant land stability policies would also be appreciated to provide the framework within which any proposals will be formally considered.	<p>The Council will have regard to mine entries and shallow coal workings when considering the masterplanning of both sites and any subsequent planning applications. Specific topic-based policy references/site constraints are not made as it is not considered appropriate to include that level of detail in the document.</p> <p>However, Table 1 – Scope and Content of the Development Frameworks – Chapter 4 Understanding the Site will now include reference to coal mining entries and shallow coal workings.</p>	Coal mining entries/shallow coal workings to be identified as examples of site conditions/constraints which should be identified in Chapter 4 – Understanding the Site.

Ref No.	SPD reference	Comment	Response	Change required
77	N/A	Any planning application which comes forward for development within the defined Development High Risk Area, such as these two sites, will need to be supported by a Coal Mining Risk Assessment. Where mine entries are present we would expect this to be informed by site investigations to locate these features, where necessary, and establish the remedial works necessary to ensure their stability. The layout of development should then be informed by these findings.	This is an issue that would be considered in detail at the planning application stage.	No change

Ref No.	SPD reference	Comment	Response	Change required
78	N/A	<p>Questions the merit of the Councils preference for the development framework to be approved and adopted as a standalone SPD and whether it is necessary. The current draft SPD18 provides detailed guidance and advice on the masterplan that is required by PfE JPA9. It is considered that SPD18, alongside the masterplan (as required by JPA9), is wholly sufficient to inform the delivery of a comprehensive and sustainable development at JPA9. An additional standalone SPD for JPA9 would result in the unnecessary duplication of work. PfE Policy JPA9 requires proposals for the allocation to be in accordance with a comprehensive masterplan that has been approved by the Local Planning Authority (LPA). The endorsed masterplan will thereafter be used by the LPA as a material consideration for the determining of future planning applications. By definition, a comprehensive masterplan will set the parameters which will guide future development, based on opportunities and constraints at the Site.</p>	<p>To give the Development Framework for Elton Reservoir and Walshaw material weight in the decision-making process, it is the Council's strong preference for them to be approved and adopted as Supplementary Planning Documents (SPD) in their own right.</p> <p>SPDs for strategic sites are generally a useful tool to move from fixing the principle of development in the development plan and fixing key spatial development aspects.</p> <p>Even if the Development Frameworks were not taken forward as SPDs, the significance of these Frameworks would require public consultation. Such consultation and subsequent Cabinet approval would also be necessary for the Frameworks to have material weight in decision-making.</p> <p>As such, the preparation of the Development Frameworks as SPDs is not considered to be an unnecessary duplication of work and will not increase timescales by any significant degree.</p> <p>Whilst the PfE Inspectors recommended that any reference to SPDs be removed</p>	No change

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		<p>Accordingly, it is not necessary for the approved comprehensive masterplan to be an SPD. This position is made clear by the Inspectors at Paragraph 215 of the Report on the Examination of Places for Everyone Development Plan Document. Specifically, this confirms that 'Several allocations also refer to the potential production of supplementary planning documents. However, there is no definitive commitment or timetable by any of the Councils to produce such documents and so any reference to them is not justified or effective and are removed'.</p>	<p>from those allocation policies that did include them, this was not on the basis that they did not consider it suitable for them to be prepared as SPDs but, rather, on the basis that there was no definitive commitment or timetable by any of the Councils to produce such documents.</p>	

Ref No.	SPD reference	Comment	Response	Change required
79	N/A	Comments related to delivery of housing development and 5-year supply. there is a very real risk that if Bury Council pursues a standalone SPD for the Walshaw strategic site that it will exacerbate an already critical under delivery of housing in the borough. There is also no guarantee that the Council's cabinet will approve the SPD document. In light of the Council's ongoing challenges with housing delivery, extensive work into an SPD document that may not get approved should be avoided.	Even if the Development Frameworks were not taken forward as SPDs, the significance of these Frameworks would require public consultation. Such consultation and subsequent Cabinet approval would also be necessary for the Frameworks to have material weight in decision-making.	No change
80	N/A	Objects to a standalone SPD for the Walshaw strategic site and instead requests the draft SPD18 document be used as a material consideration alongside an approved comprehensive masterplan as required by PfE Policy JPA9.	Even if the Development Frameworks were not taken forward as SPDs, the significance of these Frameworks would require public consultation. Such consultation and subsequent Cabinet approval would also be necessary for the Frameworks to have material weight in decision-making.	No change
81	Paragraph 3.18	The Consortium do not agree that the Council should take ownership of the Development Framework. As a jointly produced document (from inception to adoption), which is funded by the	The Council will need to take ownership of the Development Framework in order to take it through the necessary processes to achieving Council approval and adoption.	No change

Ref No.	SPD reference	Comment	Response	Change required
		Consortium, it would be inappropriate for the masterplan to be controlled by the Council. The requirement of PfE JPA9 is that a comprehensive masterplan be approved by the LPA and as such taking ownership, whilst perhaps a question of semantics, would be an overreach and should be amended in SPD18 accordingly.		
82	Paragraph 3.25	The Government is clear at NPPG 'Before submitting an application', that 'a planning performance agreement is agreed voluntarily between the applicant and the local planning authority prior to the application being submitted' (Paragraph: 016 Reference ID: 20-016-20150326). There is therefore no requirement for developers or landowners to enter a Planning Performance Agreement (PPA). At paragraph 3.25, the Council describe how a PPA will still be required even if a Development Framework has not been prepared in partnership with the Council. There is no policy requirement for a PPA within JPA9 and therefore the Consortium object to paragraph 3.25 and request	Noted.	Amend paragraph 3.26 (formally 3.25) to read: "If a Development Framework has not been prepared in partnership with the Council, a PPA will be requested. In the absence of a PPA there is a risk that the Council may be unable to properly resource the review of the Framework and its supporting evidence leading to potential delays in securing approval of the Framework – a process that would not be required if the Council was able to review material on an on-going basis throughout the Framework's preparation stage".

Ref No.	SPD reference	Comment	Response	Change required
		that it is amended or removed to reflect this position. If the Consortium pursue a PPA, it should be because they have decided to, and the progression / adoption of the masterplan should not be tied to this.		
83	N/A	Notwithstanding the infrastructure requirements, it is not possible due to the differing landownership arrangements for a true equalisation agreement to be achieved. It is, therefore, recommended that an approach to developer contributions be defined through the masterplan to ensure that all development in the JPA9 allocation contributes to the infrastructure that is necessary to ensure that it is both deliverable and sustainable. A collaborative approach is currently being progressed by/between the Consortium members. The purpose of this agreement is to devise a method through which extents of infrastructure funding can be agreed. Trigger points for these contributions will be informed by the forthcoming masterplan and delivery/phasing strategy. Such	Noted.	Paragraph 3.29 (formally 3.28) has been amended to read: “Significant complications can arise around this issue unless there is an agreement in place to ‘equalise’ the land and delivery costs between all parties. The Development Frameworks should set out the appropriate outcomes in terms of co-ordination of infrastructure with phases of development and establishing a mechanism for fair and proportionate contributions towards shared and strategic infrastructure requirements”.

Ref No.	SPD reference	Comment	Response	Change required
		contributions can then be secured through Section 106 agreements. It is only possible for developer(s) to provide infrastructure up to their respective boundaries, and so the phasing strategy and Section 106 agreement should reflect this as to avoid delays to the delivery of any individual land parcel.		
84	N/A	Eager to explore the available and optional solutions for funding the necessary delivery of supporting infrastructure (required by JPA9), including via a potential 'roof tax' tariff.	Noted.	No change

Ref No.	SPD reference	Comment	Response	Change required
85	Paragraphs 3.37 to 3.43	<p>The draft SPD18 describes how EIA will be required on the basis of the Walshaw site as a whole, as opposed to within the context of individual planning applications. It is not clear how this would work in practice, and the Council should have regard to the case law which highlights that developments can be considered as a separate project from a wider allocation for the purposes of EIA Regulations e.g. Wingfield. R v Canterbury City Council [2019]. The impacts of the wider allocation can be considered through this approach. Accordingly, the Consortium considers that the Council should look again at paragraphs 3.37 to 3.43 and devise an arrangement that could work in reality based on the multiple landownership context. (see para 3.3.13-3.3.15 for more)</p>	<p>Noted.</p> <p>For EIA purposes, a planning application should not be considered in isolation if, in reality, it is an integral part of a more substantial development. Case law is clear that in such cases, the need for an EIA must be considered in the context of the whole development. In other words, a single project cannot be “salami-sliced” into a series of smaller projects. What constitutes the “project” for the EIA Regs is a matter of planning judgment for the local planning authority.</p> <p>As Policies JPA7 and JPA9 require any proposals for the Walshaw and Elton allocations to include an integrated approach to the delivery of infrastructure to support the scale of the whole development, it is unlikely that any proposals could proceed independently as a stand-alone project due to the need for an integrated approach to the delivery of a range of infrastructure.</p>	No change.

86	Paragraphs 3.44 to 3.47 and accompanying Table 1	<p>Agree that the comprehensive Masterplan as required by JPA9 should comprise a high-level framework that guides development, incorporating a degree of flexibility to account for changing circumstances. However, the comprehensive Masterplan document should not be overly prescriptive beyond what is required through PfE Policy JPA9 so do not agree that an overview of the collaboration arrangements should be outlined within the comprehensive Masterplan, as set out at Chapter 2 of Table 1. There is no policy or legislative requirement for this information to be put into the public domain and, from the developers' perspective, commercially sensitive information may be compromised in doing this. Prescribing detailed requirements beyond what is stipulated within PfE policy is not necessary.</p>	Noted.	Requirement for collaboration arrangements to be included in the Development Frameworks has been removed.
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87	Table 1 Chapter 7	Consider it unnecessary to include this level of detail within a masterplan (such as bullet points relating to the inclusion of parking and servicing.), especially where the adopted Bury Unitary Development Plan and Parking Standards SPD already provide specific standards and guidance for this. Similarly, standards for biodiversity net gain, carbon, heat and energy, quality, and affordable housing are already set within local and national planning policy. It is therefore unnecessary to repeat these policy requirements within the development framework.	The purpose of the SPD is to ensure that the policy requirements for each site are consolidated and set out clearly and comprehensively.	No change
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Ref No.	SPD reference	Comment	Response	Change required
88	Chapter 9 of Table 1	Consider Chapter 9 of Table 1 (infographic relating to the potential scheme benefits) to be an unnecessary addition to a forthcoming Masterplan. While the benefits of the scheme will undoubtedly be outlined through the planning application submission(s), there is no requirement or need for this level of information to be provided at the masterplan stage, especially where principle of residential development within the Walshaw Site has already been established and accepted through its allocation in Places for Everyone.	It is considered important that the benefits of the scheme are clearly presented as part of the Development Frameworks in order for local communities and other stakeholders to fully and clearly understand what is being proposed.	No change
89	Plan 4	Do not consider the inclusion of Plan 4 to be necessary (given progress with the draft masterplan and associated technical highways inputs) but is content with the indicative location of the route identified on Plan 4. (more at 3.4.2-3.4.4)	The delivery of a strategic through road is considered critical to the delivery of the wider Walshaw site and the inclusion of the plan is intended to provide an indication of where that road should be routed.	No change

Ref No.	SPD reference	Comment	Response	Change required
90	Paragraph 5.21	Agree with SPD18 Paragraph 5.21 that the need for a new one-form entry primary school within the allocation should continue to be assessed with input from the Council's Education services. However, in order for the masterplan to move forward, this information is required. The Consortium therefore requests the Council progresses this data gathering exercise in the immediate term and shares the results at the earliest opportunity.	<p>The exploration of options for the delivery of primary education provision in conjunction with the wider development are on-going.</p> <p>The findings of this work will be relayed to the Consortium at the earliest opportunity.</p>	No change
91	Paragraph 5.24 and 5.25	Paragraph 5.24 and 5.25 of the draft SPD18 is in conflict with this provision of JPA9 twofold. First, the wording of 'new local centres' seems to suggest the provision of more than one centre. It also states that said centre should be of a 'scale that serves the needs of the surrounding neighbourhoods'. SPD18 should not be overly restrictive or prescriptive beyond what is specified within strategic policy JPA9. For consistency with PfE wording, the Consortium request that Paragraph 5.24 is amended from 'centres' to 'centre', and Paragraph 5.25 is	<p>It is accepted that Policy JPA9 only requires the provision of one new local centre. The inclusion of 'new local centres' in para. 5.24 is a typographical error.</p> <p>Whilst it is considered that serving the needs of surrounding neighbourhoods represents the same as serving purely local needs, the terminology will be amended to ensure full consistency with Policy JPA9.</p>	<p>Delete the 's' from the end of 'centres' in para. 5.24.</p> <p>Replace 'the needs of the surrounding neighbourhoods' with 'purely local needs' in para. 5.25.</p>

Ref No.	SPD reference	Comment	Response	Change required
		amended to state 'local needs' rather than 'the needs of the surrounding neighbourhoods'.		

Ref No.	SPD reference	Comment	Response	Change required
92	Paragraph 5.34	<p>Plan 6 of the SPD18 denotes a wildlife corridor at the south of the JPA9 allocation. This wildlife corridor is 'saved' under Policy EN6/4 of the adopted Bury Unitary Development Plan (UDP). However, the wildlife corridor saved by Policy EN6/4 is in conflict with PfE. the Site's allocation for mixed-use development in PfE takes precedence over the wildlife corridor designation in the UDP. While the Walshaw Site is now allocated for residential-led mixed use development through PfE JPA9, the Consortium acknowledges the historic green corridor designation and proposes to utilise landscaping solutions to achieve an overall betterment across the Site incorporating drainage solutions, biodiversity net gain, enhanced tree planting etc where possible.</p> <p>To recognise JPA9 in the context of Section 38(5) of the Planning and Compulsory Purchase Act 2004, paragraph 5.34 of the draft SPD18 requires amending. The Consortium suggest the following 'development will be expected to avoid fragmenting</p>	<p>Policy EN6/4 is retained within the allocation and it is proposed to carry forward the existing Wildlife Links and Corridors designation into a new Strategic Green Infrastructure designation in the emerging Local Plan.</p> <p>Paragraph 5.34 reflects the wording of adopted PfE policy JP-G8.</p>	No change.

Ref No.	SPD reference	Comment	Response	Change required
		or severing this corridor where possible'.		

Ref No.	SPD reference	Comment	Response	Change required
93	N/A	<p>The Consortium acknowledges that the delivery of the Walshaw allocation will create an increased demand for sports and recreation provision. However, JPA9 does not require sports provision to be provided on site. Accordingly, clarity is required with respect to the Council's vision for the Site in relation to sports provision. On site sports provision will materially impact the Masterplan and as such the Consortium requests that this information is communicated to developer(s) and landowner(s) at an early stage to ensure this is accounted for within the design (if required) and to avoid abortive work.</p>	<p>The Places for Everyone Joint Plan should be read as a whole and there are other policies beyond JPA9 that are applicable to the Walshaw site, as set out in paras. 5.2 – 5.8 of the draft SPD.</p> <p>This includes PfE Policy JP-P7 (Sport and Recreation) and saved UDP Policy RT2/2 which include requirements for the provision of sport and recreation.</p> <p>In particular, criterion 3 of PfE Policy JP-P& requires new development to provide new and/or improved existing facilities commensurate with the demand they would generate. The provision of sports facilities will be determined by individual local authorities through an evidence-based approach.</p> <p>Similarly, saved UDP Policy RT2/2 requires developers of new housing to make provision for the recreational needs of the prospective residents.</p> <p>The LPA will work with colleagues to determine the specific requirements for the provision of open space, sport and recreation and will relay these to the Consortium at the earliest opportunity.</p>	No change

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94	Paragraph 5.46	Furthermore, paragraph 5.46 of the draft SPD18 suggests that a dual use of open spaces for Sustainable urban Drainage Systems (SuDS). This is not something the Consortium supports or considers practical from a health and safety perspective.	Amendments have been made to para. 5.46 to remove reference to play and sports areas and to state that consideration will also be given as to whether <u>informal</u> open spaces can also provide dual use for Sustainable urban Drainage Systems.	Amend para. 5.46 to remove reference to play and sports areas and to state that consideration will also be given as to whether informal open spaces can also provide dual use for Sustainable urban Drainage Systems.
95	Paragraph 5.49	Paragraph 5.49 seems to suggest that forthcoming development at JPA9 should look to alleviate surface water flooding that is occurring within the vicinity of the Site, including on Scobell Street. Developers cannot be expected to alleviate problems outside of their land interests. Therefore, request that paragraph 5.49 is amended so as to avoid reference to mitigating existing drainage issues on land outside of the allocation area.	The NPPF requires development to ensure that flood risk is not increased elsewhere and applications which could affect drainage on or around the site should incorporate SUDS to control flow rates and reduce volumes of runoff. Paragraph 5.49 identifies existing flood risk/drainage issues in the vicinity of the site and which would need to be considered to meet the requirements of the NPPF.	No change.
96		Sections 12 & 10, Page 22: Questions the reality of the commitments in the policy for biodiversity and compensatory improvements as they have submitted priority habitats to call for sites.	On its adoption in March 2024, Places for Everyone is now part of Bury's statutory development plan and Policy JPA7 (including criteria 10 and 12) sets out the requirements that the development at Elton Reservoir will need to make provision for.	No change

Ref No.	SPD reference	Comment	Response	Change required
			Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.	
97		Due to the nature of the flora and fauna found at the priority habitat sites it would be impossible to recreate such unique and environmentally important sites at other locations within Bury MBC. So far the Council has failed to offer sufficient support the biodiversity of the sites	The Council will take full account of ecological interest in moving the allocations forward and will continue to engage closely with our colleagues at the Greater Manchester Ecology Unit (GMEU) and take account of their expert advice throughout the masterplanning process.	No change
98		Doubts remain as to whether the permanent Star Academy Radcliffe school will be completed in time for the September 2026 intake. The first intake in September 2024 was oversubscribed even before the new houses.	Criterion 5 of Policy JPA7 requires provision for a new secondary school or, in the event that secondary school provision is delivered in an alternative way, make a financial contribution towards secondary school provision to meet needs generated by the development, in accordance with policy JP-P5. Plans to develop a new 5-form entry Radcliffe Star Academy secondary school have progressed independently of the Elton Reservoir allocation and, as such, there will be a need for a developer contribution towards secondary school provision.	No change

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99		New spine road will not alleviate problems and will add to traffic	The inclusion of a new spine road through the Elton Reservoir site is to provide an alternative route to Bury and Bolton Road and Bury Bridge. The precise nature and specification of the new highways, junction arrangement and the specific route of these roads should be informed by detailed transport modelling and design work	No change
100		Document does not make clear where replacement facilities for Warth Fold will be. Questions where a suitable replacement would be, given that green belt is to be developed.	Criterion 8 of the PfE policy for Elton Reservoir (JPA7) states that the development of this allocation should make provision for the replacement of existing recreation space at Warth Fold that is equivalent or better in terms of quantity and quality and in a suitable location. Potential replacement provision will be considered through the subsequent masterplanning of the site but the SPD acknowledges that replacement provision could potentially be incorporated into the provision of the Country Park.	No change
101		Questions provision of a significant green corridor (item 9, Page 22) as The existing site offers significantly more access to open space than will	The Elton Reservoir site is now an adopted site allocation within PfE meaning that the principle of residential development on the site is established.	No change

Ref No.	SPD reference	Comment	Response	Change required
		be available if the proposed plan goes ahead.	Criterion 9 of the PfE policy for Elton Reservoir (JPA7) states that the development of this allocation should provide a significant green corridor which remains within the Green Belt and provides a strategic amount of new, high quality and publicly accessible open space/parkland coupled with a network of multi-functional green and blue infrastructure within the allocation including the enhancement and the integration of the existing assets at Elton and Withins Reservoirs and the Manchester, Bolton and Bury Canal to create an extensive recreation, tourism and leisure asset.	
102		In reference to Policy JP-P6, It should be noted that some of the existing housing close to the proposed site is in areas of index of multiple deprivation of one. Some of the poor health outcomes in the area are related to failure to address residents physical and mental wellbeing. Many residents do not have access to their own personal green space and therefore rely on access to the proposed development site under	<p>The Elton Reservoir site is now an adopted site allocation within PfE meaning that the principle of residential development on the site is established.</p> <p>Criterion 9 of the PfE policy for Elton Reservoir (JPA7) states that the development of this allocation should provide a significant green corridor which remains within the Green Belt and provides a strategic amount of new, high quality and publicly accessible open space/parkland coupled with a network of</p>	No change

Ref No.	SPD reference	Comment	Response	Change required
		discussion for space to aid health improvement.	multi-functional green and blue infrastructure within the allocation including the enhancement and the integration of the existing assets at Elton and Withins Reservoirs and the Manchester, Bolton and Bury Canal to create an extensive recreation, tourism and leisure asset.	
103		Life expectancy in the central Radcliffe area LSOA is the lowest for both males and females in the whole of Bury MBC and there is already a very high demand on health and support services. Although additional health facilities are proposed it would need to be clear that this provision should be supplied before any housing is built on the site otherwise the already strained health provision would collapse, leaving a failing service supporting some of the most vulnerable within the borough.	The nature and timing of the delivery of healthcare provision as part of the Elton Reservoir development will be considered as part of the infrastructure phasing strategy that will be a key part of the subsequent Development Framework for the Elton Reservoir site.	No change
104		Questioned the use of section 106 money. Bury MBC does not have a good record on the control and spending of section 106 monies. In the past the Council has failed to	The processes for requiring and spending developer contributions through S106 and the projects that have been delivered through these monies is set out in the	No change

Ref No.	SPD reference	Comment	Response	Change required
		prove the use of the money for effective mitigation and with such a large site being discussed that must be a serious concern to anybody looking at this plan.	Council's annual Infrastructure Funding Statement.	
105		<p>Although section 4.68 on page 36 states that it recognises the following clause in the National Planning Policy Framework:</p> <p>"that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design."</p> <p>To follow these recommendations, the Council would need to have an approved local plan, something Bury MBC has failed to have since 1997. Such a local plan should be drawn up in consultation with residents, considering issues and concerns raised by local democratically elected politicians and local residents. As stated above, there has been little demonstration that feedback and evidence presented in previous submissions made to various</p>	<p>Strategic-level design will be considered through the masterplanning process and more detailed design matters will be considered at the planning application stage.</p> <p>Places for Everyone includes policies relating to the design of new development. This plan was subject to extensive public consultation throughout its preparation.</p> <p>In addition, the Council is currently developing a new Local Plan for Bury and this will also include design-related policies.</p>	No change

Ref No.	SPD reference	Comment	Response	Change required
		consultations have been listened to or acted upon.		
106	N/A	Complaints regarding lack of acknowledgement (other than automated) of call for sites or previous engagement with Local Plan process in 2024.	This comment is unrelated to the SPD. The Local Plan Call for Sites was not a consultation. It is a process to gather evidence about potential sites for development or sites which stakeholders feel should be protected from development.	No change
107	N/A	Defamatory comments in relation to GMEU. Claims that Councillors have made decision to adopt PFE based on a lack of detailed, inaccurate and misleading information on the site in question.	Comments do not relate to the SPD and defamatory comments are inappropriate.	No change
108	N/A	Elton Reservoir should be classified as an SSSI site.	Comments do not relate to the SPD.	No change
109	N/A	Biodiversity Gain will also fail to protect the area and moving habitats of site is not acceptable.	The Council will take full account of ecological interest in moving the allocations forward and will continue to engage closely with our colleagues at the Greater Manchester Ecology Unit (GMEU) and take account of their expert advice throughout the masterplanning process.	No change

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110	N/A	Defamatory Comments in relation to GMEU	Comments do not relate to the SPD and defamatory comments are inappropriate.	No change
111	N/A	The proposed plans would have a detrimental impact both nationally and internationally on protected bird species.	The Council will take full account of ecological interest in moving the allocations forward and will continue to engage closely with our colleagues at the Greater Manchester Ecology Unit (GMEU) and take account of their expert advice throughout the masterplanning process.	No change
112	N/A	There are priority habitats on the Elton allocation	The Council will take full account of ecological interest in moving the allocations forward and will continue to engage closely with our colleagues at the Greater Manchester Ecology Unit (GMEU) and take account of their expert advice throughout the masterplanning process.	No change
113	N/A	43 scarce species and Nationally Rare Fly (Green Long-legged Fly <i>Dolichopus lineatocornis</i>) the site qualifies as one of Buglife's Important Invertebrate Areas.	The Council will take full account of ecological interest in moving the allocations forward and will continue to engage closely with our colleagues at the Greater Manchester Ecology Unit (GMEU) and take account of their expert advice throughout the masterplanning process.	No change

Ref No.	SPD reference	Comment	Response	Change required
114	N/A	Biodiversity Net Gain is an additional requirement from government and the law stresses that it is an additional requirement on top of the raft of national legislation and policy and local policy. To move straight to compensation and BNG is illegal and unlawful and those who promote it are promoting disinformation and criminality.	The Council will take full account of ecological interest in moving the allocations forward and will continue to engage closely with our colleagues at the Greater Manchester Ecology Unit (GMEU) and take account of their expert advice throughout the masterplanning process.	No change
115	N/A	UU have confirmed that there is insufficient hydraulic capacity in the sewer system, with a 'weak point' of a T-junction in the sewer system on Scobell Street. From the outline planning documents, they are concerned that is the intention for the development at Walshaw to connect the foul water discharge from the development to the public sewer system at the exact point that is the 'weak point' in the sewer system on Scobell Street. This is the exact point at which the sewer system currently lacks hydraulic capacity and is overwhelmed frequently during heavy rainfall, backing up and flooding the road, our land and on one devastating	<p>The Council will take full account of existing flooding issues/sewer capacity in moving the allocations forward and will continue to engage closely with our colleagues at United Utilities and take account of their expert advice throughout the masterplanning process.</p> <p>The NPPF requires development to ensure that flood risk is not increased elsewhere and applications which could affect drainage on or around the site should incorporate SUDS to control flow rates and reduce volumes of runoff. Paragraph 5.49 identifies existing flood risk/drainage issues in the vicinity of the Walshaw site and which would need to be considered through the masterplan</p>	No change.

Ref No.	SPD reference	Comment	Response	Change required
		occasion our home (as outlined above). Connecting to the sewer at this point, unless there is a significant plan such as the installation of large storm storage tanks or the upsizing of the sewer system will be catastrophic and it cannot be allowed to go ahead.	process to meet the requirements of the NPPF.	
116	N/A	The stream flooded as it all ways does and large area of the fields were flooded. The corner of church st was flooded as normal and in passable as normal, and water was flowing into the fields making the flooding worse.	It is acknowledged that there have been several incidents of surface water flooding around the Walshaw site, particularly on Scobell Street, which occurs when intense rainfall overwhelms existing drainage systems. Hydraulic modelling will need to be undertaken to support the Development Framework and to inform the design and layout of the development, including methods of surface water management.	No change
117	N/A	Pollution levels are high in the area, because of the high traffic levels. Fine pollution particles of concern, particulates matter or PM2.5 have been linked to cancer, heart disease, asthma.	PfE Policy JP-S5 relates to clean air and it sets out a comprehensive range of measures that will be taken to support improvements in air quality, focusing particularly on locations where people live, where children learn and play, where there are impacts on the green	No change

Ref No.	SPD reference	Comment	Response	Change required
			infrastructure network and where air quality targets are not being met.	
118	N/A	Wholly supportive of development coming forward in accordance with the allocation in Places for Everyone	Support noted	No change
	N/A	Landowners within the Elton Reservoir allocation have been disappointed that there has been very limited engagement or collaboration since the largest promoter first engaged. As such, we would welcome such engagement, which may beneficially be facilitated by the Council who will play a critical role in bringing all stakeholders together. We welcome the opportunity to work with all relevant parties for positive discussions to facilitate development coming forward. As at 3.7 of the Framework Document we are equally keen for such engagement to take place at an earlier stage, to enable progress in a timely manner. It is imperative that the stakeholders are engaged early, and the Council have a critical role to play in bringing this together.	The Elton Reservoir Development Framework will establish parameters for the entire PfE allocation and therefore all landowners and stakeholders will be encouraged to engage in the preparation of the masterplan.	No change

Ref No.	SPD reference	Comment	Response	Change required
119	N/A	Welcome the concept of an 'ownership-blind' basis to support the development as a whole, and we welcome the commitment to equalisation, "agreed up front" which ought to enable the most efficient delivery of future development. As referenced at 3.27 of the document we would be happy to cooperate in respect of services, infrastructure, drainage, green spaces etc. which we acknowledge are as fundamental and integral to the development as housing and other 'ground up' built uses.	Support noted.	No change
120	N/A	Support the country park / parkland concept and green infrastructure improvements to be delivered as part of the proposals, together ensuring delivery of an appropriate quality scheme, whilst protecting the integrity of the area and allowing continued enjoyment for local / future residents.	Support noted.	No change
121	N/A	Are in agreement around the complications that can arise around land assembly cited at 3.28 of the document and we are happy to	Support noted.	No change

Ref No.	SPD reference	Comment	Response	Change required
		engage throughout to facilitate the common goal of the most timely delivery of development.		
122	N/A	Supportive of the Council leading the process when negotiations begin to ensure the fairest outcomes for all landowners without favour to those promoting.	Support noted.	No change
123	N/A	If current primary schools were expanded at Christ Church Walshaw and Tottington South, both the volume of extra traffic and parking situation would be untenable.	The Local Planning Authority will continue to work closely with the Council's Education services to determine the expected level of pupil yield from the development and the specific nature of primary school provision and whether such provision should be made on-site or through an off-site contribution.	No change
124	N/A	Provision should be determined before building proceeds to ensure adequate primary places to avoid the situation in Radcliffe with the high school still in temporary classrooms with building delayed. Developers cannot be allowed to make promises to build or contribute costs of building a primary school only later to claim	The nature and timing of the delivery of education provision to support the wider development of the sites will be considered as part of the infrastructure phasing strategy that will be a key part of the subsequent Development Frameworks for each site.	No change

Ref No.	SPD reference	Comment	Response	Change required
		this is not affordable. Proper written agreements must be given.		
125	N/A	Native hedgerows must be protected for the large numbers of breeding birds in the area and not bulldozed or replaced by fencing. There should be safeguards established for boundaries of properties that preserve these hedges. The wildlife corridor should not be restricted to this area and corridors inserted throughout the development to protect bats and other wildlife.	The Council will take full account of ecological interest in moving the allocations forward and will continue to engage closely with our colleagues at the Greater Manchester Ecology Unit (GMEU) and take account of their expert advice throughout the masterplanning process.	No change
126	N/A	Emphasis should be on significant on-site gains, preservation of trees and hedgerows to mitigate against flood risk and the significant surface water run off with streams throughout the area. Additional planting of native trees should be undertaken to enhance the area which will lose its rural character through such large scale building which again may offset the flood risk. There should be no time limit of 30 years, flood risk will not diminish.	PfE Policy JP-S4 relates to flood risk and the water environment and states that flood risk will be managed through a variety of methods. Issues around flood risk will be considered at both the masterplanning and planning application stages.	No change

Ref No.	SPD reference	Comment	Response	Change required
127	Paragraph 5.43	Care should be taken to ensure any spaces are not easily subject to vandalism.	The detailed design of any recreation provision will be considered at the planning application stage.	No change
128	Paragraph 5.44	Consideration of unintended traffic congestion should be looked at in creating or enhancing existing sports facilities.	Transport modelling will be undertaken in conjunction with the preparation of the Development Frameworks for the sites.	No change
129	Paragraph 5.45	The area is currently used by many people for walking, public footpaths should be maintained in accordance with their character alongside hedgerows and green spaces throughout the development.	Existing Public Rights of Way (PROW) and the provision of new PROWs will be considered at the masterplanning stage for both sites. The need to consider PROWs is set out in Table 1(4) which lists PROWs and one of the site conditions/constraints.	No change.
130	Paragraph 5.46	Open spaces are crucial with the dual necessity for drainage.	Comment noted.	No change
131	Paragraph 5.51 -5.54	Emphasis should be on enhancing the natural beauty of the area of the development in consultation with residents and conservation experts.	PfE Policy JP-G2 states that development which involves the removal of land from the Green Belt (including allocations proposed in the plan) will be required to offset the impact of removing land from the Green Belt through identifying and delivering compensatory improvements to the environmental quality and accessibility	No change

Ref No.	SPD reference	Comment	Response	Change required
			of remaining Green Belt in the vicinity of the site.	
132	Paragraph 5.55-5.58	<p>The boundaries of properties should be natural in character with the area. Building materials should also be chosen to be in character with current properties.</p> <p>Heights of buildings and boundaries should not block light for current properties nor overlook or impinge on privacy. Additional planting of trees should compensate for green views lost and protect privacy, enhancing the area.</p> <p>Local residents should be consulted throughout on decisions which will affect views from their properties.</p>	These are detailed matters that would be considered at the planning application stage.	No change
133	Paragraph 5.57	Noise levels and construction traffic must be carefully regulated so as not to adversely affect residents. Working hours must also be regulated and limited so as not to adversely affect sleep patterns of residents and prohibited or strictly limited at weekends.	These are detailed matters that would be considered at the planning application stage.	No change

Ref No.	SPD reference	Comment	Response	Change required
134	N/A	In principle, the SPD is considered to be a positive approach to help shape the future development of plans for the site and the content of the document appears to be generally well considered.	Comments noted.	No change
135	N/A	Keen to ensure that appropriate consideration is given to Canal and Rivers Trust assets including the reservoir, part of the Manchester Bolton & Bury Canal, and a wide variety of associated infrastructure including feeders, weirs, storm sluices, bridges and culverts.	Criterion 9 of the policy for the Elton Reservoir allocation requires the development of the site to make provision for a significant green corridor which remains within the Green Belt and provides a strategic amount of new, high quality and publicly accessible open space/parkland coupled with a network of multi-functional green and blue infrastructure within the allocation including the enhancement and the integration of the existing assets at Elton and Withins Reservoirs and the Manchester, Bolton and Bury Canal to create an extensive recreation, tourism and leisure asset.	No change
136	N/A	Part 3: The early identification of key issues through a development framework is an appropriate approach to delivery of strategic sites.	Comments noted.	No change

Ref No.	SPD reference	Comment	Response	Change required
137	N/A	Note the Council's preference for development frameworks to be approved and adopted as SPDs and consider such an approach to be appropriate. Also suggest where significant future changes or updates are proposed, these follow the same process.	Comments noted.	No change
138	N/A	Welcome collaborative working	Comments noted.	No change
139	N/A	Would not expect to be liable for any costs associated with the provision of infrastructure however does anticipate improvements to assets to manage the increase in usage of the recreation routes and the canals integration with the country park	Criterion 9 of the policy for the Elton Reservoir allocation requires the development of the site to make provision for a significant green corridor which remains within the Green Belt and provides a strategic amount of new, high quality and publicly accessible open space/parkland coupled with a network of multi-functional green and blue infrastructure within the allocation including the enhancement and the integration of the existing assets at Elton and Withins Reservoirs and the Manchester, Bolton and Bury Canal to create an extensive recreation, tourism and leisure asset.	No change

Ref No.	SPD reference	Comment	Response	Change required
140	N/A	The scope and proposed content of the development framework appears reasonable.	Comment noted	No change
141	N/A	Suggest that details of new highways junctions and transport modelling should also take account of the impacts of the character and users of the canal. (Reference to ecological interests could be widened to 'other interests')	It is accepted that it would be beneficial for the SPD to refer to other potential interests when referring to highways design work.	Amend para 4.14 to read: 'The precise nature and specification of the new highways, junction arrangement and the specific route of these roads should be informed by detailed transport modelling and design work and should take appropriate account of ecological and other interests within the site'.
142	N/A	Ways to improve access to towpath and walking and cycling links should be considered	Criterion 9 of the policy for the Elton Reservoir allocation requires the development of the site to make provision for a significant green corridor which remains within the Green Belt and provides a strategic amount of new, high quality and publicly accessible open space/parkland coupled with a network of multi-functional green and blue infrastructure within the allocation including the enhancement and the integration of the existing assets at Elton and Withins Reservoirs and the Manchester, Bolton and Bury Canal to	No change

Ref No.	SPD reference	Comment	Response	Change required
			create an extensive recreation, tourism and leisure asset.	
143	N/A	Enhanced water safety measures along with improvements to canal infrastructure will be required.	This is a detailed matter that would be considered at the planning application stage.	No change
144	N/A	Whilst the reference to structural upgrades to Elton reservoir is noted, it is considered that wider reference to NPPF 'agent of change' principles (see PPG on Flood Risk) whereby those introducing a change in the use of land are required to manage the impact of that change (flood risk) rather than existing uses.	<p>Criterion 13 of the PfE policy for the Elton Reservoir allocation (JPA7) states that development within this allocation will be required to ensure the allocation is safe from and mitigates for potential flood risk from all sources including the River Irwell, Elton and Withins Reservoir and surface water and does not increase the flood risk elsewhere. The delivery of the allocation should be guided by an appropriate flood risk and drainage strategy which ensures co-ordination between phases of development.</p> <p>The onus is therefore on the developer to ensure that the allocation is safe from flood risk.</p>	No change
145	N/A	Welcomes that many of the key issues, such as positive climate resilience action, brownfield first policy, enhancement of biodiversity, and improvement of environmental	Support noted.	No change

Ref No.	SPD reference	Comment	Response	Change required
		health to address health inequalities and deprivation are referenced.		
146	Paragraph 3.3.	Support the general advice regarding the Council's expectations with respect to the benefits of effective community and stakeholder engagement set out in paragraph 3.3. support the requirement set out in Table 1 for the frameworks to contain an Engagement Section giving an overview of the engagement undertaken during the preparation of the Development Framework and how the masterplan has responded to this and the requirements set out in the Community and Stakeholder Section paragraphs 3.33-3.36.	Support noted.	No change

Ref No.	SPD reference	Comment	Response	Change required
147	N/A	Support the requirement for the Frameworks to include a section on Affordable Housing and to require the provision of affordable housing. However raise concerns with respect to the idea that not all information will be public available including viability assessments. Developers occasionally argue that affordable housing requirements cannot be met due to viability reasons. In such circumstances it would be in the public interest for such viability calculations to be made public so that decision making is transparent in the same way as other parts of the planning process.	Support for the provision of affordable housing noted. Viability will be considered in detail at the planning application stage but the assessments often contain commercially sensitive information.	No change
148	N/A	A more objective sustainable assessment approach with community engagement is recommended to enable ambitions of the public and private sector to be realised in tandem and not at the expense of social and environmental goals. While there are requirements in the SPD for the Frameworks to incorporate or include active travel	It is intended that a detailed Transport Strategy Document will be prepared to support the Development Frameworks for each of the allocations. The Transport Strategy will set out out the transport ambitions that the developments are seeking to achieve and identify the multimodal transport infrastructure needed to achieve that vision including active travel infrastructure.	No change

Ref No.	SPD reference	Comment	Response	Change required
		routes and public transport this does not go anywhere near far enough. To eliminate car dependency and reduce car usage development proposals need to be designed to do more than just include or incorporate active travel routes. A clear strategy for reducing car use and eliminating car dependency needs to be incorporated into the design of the development and this needs to be a key requirement of the Frameworks.		
149	N/A	Site specific requirements for example for a Metrolink Stop and travel hubs are welcome.	Support noted	No change
150	N/A	Active travel can be encouraged in many ways that have been long established in urban design practice including land use patterns, mixing of uses within buildings, density, improvements to security, lighting, overlooking, way finding, tight radii on corners, build outs for crossing streets and so on and these should all be explored. (LTN 1/20, Manual for Streets, Urban Design Compendium to name just some and the	<p>It is intended that a Transport Strategy Document will be prepared to support the Development Frameworks for each of the allocations.</p> <p>This document will set out in detail how the developments intend to create and deliver a comprehensive network of active travel routes and will refer to examples of good practice for both active travel and public transport.</p>	No change.

Ref No.	SPD reference	Comment	Response	Change required
		Frameworks should be required to reference these as appropriate) The SPD might benefit from signposting to exemplars with respect to promotion of active travel and public transport in UK or abroad.		
151	N/A	To ensure for carbon zero development, CPRE encourages sustainable design principles, and requirement of solar PV on residential and commercial roof space to maximise building energy efficiency. It can help us respond to the climate emergency and cost of living crisis.	Sustainable design and energy principles and renewable energy provision will be set out within the Development Framework documents for both allocations as set out within Table 1 of the SPD.	No change
152	N/A	Concerned there is no reference to solar power or photo voltaics in the document. This would appear to be an important opportunity for ensuring a more sustainable energy future being missed and should be rectified by an amended SPD having clear requirements for all housing and commercial buildings to have solar panels on roofs. This would put the SPD in accordance with paragraphs 4.67 and 5.55.	Sustainable design and energy principles including renewable energy provision will be set out within the Development Framework documents for both allocations as set out within Table 1 of the SPD.	No change

Ref No.	SPD reference	Comment	Response	Change required
153	N/A	Agree with the requirements for Sustainable Urban Drainage Systems and various requirements set out in the sections on Flood Risk.	Support noted	No change
154	N/A	CPRE support the sections on requirements regarding Ecology and Biodiversity Net Gain. CPRE believe that all new development and infrastructure should support the aims of the Local Nature Recovery Strategy and we are supportive of the requirements set out in the SPD in this regard.	Support noted	No change
155	N/A	Support the sections setting out requirements with respect to heritage for both Frameworks	Support noted.	No change
156	N/A	Pleased to see that, in addition to the requirements with regard to health facilities, there is a requirement set out in Table 1 for the Development Framework to include a Masterplan Framework that responds to an objective on Health and Wellbeing. However, more could be said about the physical and mental health and wellbeing benefits of access to green	Health and Wellbeing will be covered within the future Development Framework documents and will provide details on the benefits to physical and mental health through access to green space, active travel and improved air quality.	No change

Ref No.	SPD reference	Comment	Response	Change required
		space and active travel such as greater exercise and improved air quality. There should be specific requirements to ensure such benefits in both developments.		
157	N/A	The site is especially rich in wetland and open habitat invertebrates. The site's extensive area as one of the largest wetland sites in Greater Manchester adds greater wildlife conservation value through increased capacity to withstand stochastic negative impacts. The site requires appropriate, sympathetic conservation management practices promoting wetland and open mosaic habitat diversity in order for it to retain its significance as regionally important site for invertebrate life.	The Council will take full account of ecological interest in moving the allocations forward and will continue to engage closely with our colleagues at the Greater Manchester Ecology Unit (GMEU) and take account of their expert advice throughout the masterplanning process.	No change
158	N/A	As Places for Everyone is currently subject to Judicial Review proceedings, we dispute that any plans using PfE as a basis should be consulted upon until those proceedings have been determined.	Places for Everyone was adopted in March 2024 and is now part of Bury's statutory development plan. This situation would only change if a legal challenge were successful and a judge ordered the plan to be quashed.	No change

Ref No.	SPD reference	Comment	Response	Change required
159	Paragraph 1.5	Once again, a circular argument is being used to justify the development of the strategic sites. If the sites were not being built on there would be no need for additional infrastructure. The existing infrastructure would not need improvement if it was not about to be overloaded with additional housing in two areas which are in relatively close proximity to each other. No benefits, let alone significant ones, have been created in relation to the development of the strategic sites and there are no guarantees that the additional infrastructure will be forthcoming.	Following the adoption of Places for Everyone in March 2024, the site allocations within it have now established the principle of development. It is important that this development is supported by the necessary infrastructure.	No change
160	Paragraph 2.5, 3.33-3.36	Comments made by the public in previous consultations have been ignored as the Council has ploughed on with the developer-led PfE. Very little notice has been taken by the Council of the genuine concerns raised by affected communities who will have to live with the impact of the development of the sites. It is highly unlikely that comments made by communities in this Consultation will be taken notice of.	Comments made in response to consultation on the SPD have been given detailed consideration and the document has been amended in response to comments that raise matters that would need to be considered through the masterplanning process.	No change

Ref No.	SPD reference	Comment	Response	Change required
161	Paragraph 3.30	Bury Council's record with regard to accountability for monies received and spent under S106 agreements is notoriously bad. It is therefore a real and serious concern that planned infrastructure will not be forthcoming.	The processes for requiring and spending developer contributions through S106 and the projects that have been delivered through these monies is set out in the Council's annual Infrastructure Funding Statement.	No change
162	Paragraph 5.12-13	The provision of a new road will not alleviate traffic problems generated by the planned development.	<p>The inclusion of a new strategic through road is considered critical to the delivery of the wider Walshaw site.</p> <p>The precise nature and specification of the new highway, junction arrangements and the specific route of these roads will be informed by detailed transport modelling and design work.</p> <p>In addition, the site promoters will be required to undertake a detailed Transport Assessment to demonstrate that the development would not have an unacceptable adverse impact on congestion.</p>	No change.

Ref No.	SPD reference	Comment	Response	Change required
163	N/A	The existence of another busy junction to cross where the planned new route crosses Walshaw Road will deter those students who walk or cycle to and from school from doing so. An increase in traffic utilising Walshaw Road can only serve to make the road even more dangerous	<p>The site promoters will be required to undertake a detailed Transport Assessment.</p> <p>The Transport Assessment will be informed by detailed transport modelling and design work. The impact on the surrounding highway network will be considered as part of this detailed work.</p>	No change
164	N/A	Questioned whether Church Street is sound enough and has the capacity to cope with additional traffic.	<p>The site promoters will be required to undertake a detailed Transport Assessment.</p> <p>The Transport Assessment will be informed by detailed transport modelling and design work. The impact on the surrounding highway network will be considered as part of this detailed work.</p>	No change
165	N/A	The existing junction at Walshaw Cross is already dangerous with poor visibility. There is no guarantee that traffic generated by the new development will utilise the planned new road. Any increase in traffic at the Walshaw Cross junction will cause further problems.	<p>The site promoters will be required to undertake a detailed Transport Assessment.</p> <p>The Transport Assessment will be informed by detailed transport modelling and design work. The impact on the surrounding highway network will be considered as part of this detailed work.</p>	No change

Ref No.	SPD reference	Comment	Response	Change required
166	Paragraph 5.20-5.21	<p>Draft SPD 18 appears to already be reneging on Criterion 6 of the PfE policy for Walshaw which states that “the development in this allocation will be required to make provision for a new one-form entry primary school.” A non-specific commitment by the LPA to look at primary school provision is not the same as providing a new school.</p> <p>Certainly, alarm bells rang loudly when the Council put land set aside for the new primary school into the accelerated disposal scheme and the wording of draft SPD 18 seems to confirm that the Council does not intend to meet the requirement for school provision in PfE.</p>	As set out in the SPD (para 4.27), the Local Planning Authority will continue to work closely with the Council’s Education services to determine the expected level of pupil yield from the development and the specific nature of primary and secondary school provision and whether such provision should be made on-site or through an off-site contribution.	No change
167	Paragraph 5.29	<p>There is no explanation provided as to how the decision has been reached to simply “improve” existing health facilities in the locality, rather than provide new health facilities. Whilst a calculation has been used regarding the additional floorspace provision required, no evidence has been provided about how many more</p>	The term ‘improve existing health facilities’ refers to whether or not the new demand for GP provision generated by the whole development would be large enough to require a new practice provision (potential on-site new build), or could be accommodated by the off-site expansion of existing practice(s) that would enable additional staffing and appointments to meet the needs generated by the new	No change

Ref No.	SPD reference	Comment	Response	Change required
		<p>patients will be generated by a development of 1,250 homes. It is currently difficult enough to obtain a doctor's appointment, and it is hard to see how thousands more patients in the area could be accommodated without a new health centre being provided.</p> <p>SPD 18 also states at 5.29 that "existing primary care estate is well-located in relation to the Walshaw site" This is simply untrue. Currently, local health facilities that serve the area necessitate a car journey to reach them. Any additional health facilities should be in place before any of the proposed development takes place to avoid additional overload on a service already at capacity.</p>	<p>housing. These initial planning assessments are based on ICB standard requirements with regard to the primary care floorspace requirement per number of patients from new housing, as derived from national guidance relating to provision of facilities for primary care. In both cases this approach would ensure the required additional provision of primary healthcare infrastructure for future residents of the new housing proposed is provided in alignment with NHS requirements.</p> <p>With regard to the location of existing primary care estate in the Walshaw area, the next stage review of health provision would also need to include a full traffic impact assessment that would take full account of available transport links and distances for patients to travel</p>	
168	N/A	The planned wildlife corridors for Walshaw within the Draft SPD 18 are fragmented and insufficient, especially to the North of the allocation.	Criterion 9 of the policy for the Walshaw allocation (JPA8) requires the development of the site to make provision for new, high quality, publicly accessible, multifunctional green and blue infrastructure within the allocation including the integration and enhancement of the existing green infrastructure	No change

Ref No.	SPD reference	Comment	Response	Change required
			corridors and assets at Walshaw and Elton Brooks. This criterion will need to be considered as part of the development of the masterplan and any subsequent planning applications.	
169	Paragraph 5.43	5.43: Here, there is a commitment to provide recreation areas for “prospective residents” of new housing sites. This conflicts with 5.45. Paragraph 5.45 is only a vague commitment to look at recreation provision, and actually states that provision could be made in other areas instead. This clearly conflicts with the requirement in the UDP to provide recreation areas for residents of new developments.	UDP Policy RT2/2 requires developers of new housing on sites of 10 or more dwellings to provide for the recreational needs of the prospective residents. Such provision can be made either within the site or off-site where this would still cater for the needs of the prospective residents.	No change

Ref No.	SPD reference	Comment	Response	Change required
170	N/A	The removal of the Walshaw Allocation from the greenbelt will adversely affect existing local residents as there is no alternative site proposed locally to compensate residents for their loss of amenity. The next most local greenbelt site at Elton is also part of the allocations within PfE, thus removing the vast majority of accessible greenbelt in the locality. The fundamental purpose of the greenbelt is to put a stop to urban sprawl. The removal of the Walshaw site from the greenbelt disregards the actual purpose of this greenbelt site.	The removal of the Green Belt designation at Walshaw and Elton was considered in detail by Independent Planning Inspectors as part of the examination of the Places for Everyone Joint Plan and it was concluded that there were exceptional circumstances to justify the removal of the Green Belt in both cases.	No change
171	N/A	Urge you to consider excluding completely the area which has Priority Habitat status, Lowland Meadow and Flood Plain Grazing Marsh, from the housing allocation.	The Council will take full account of ecological interest in moving the allocations forward and will continue to engage closely with our colleagues at the Greater Manchester Ecology Unit (GMEU) and take account of their expert advice throughout the masterplanning process.	No change

Ref No.	SPD reference	Comment	Response	Change required
172	N/A	It is not sufficient to conserve such areas as fragments of amenity grassland, amongst housing. The impact of dog excrement alone changes the nutrient status of the soil, it is compacted by use and it is impossible to maintain the management which these very special habitats require.	The Council will take full account of ecological interest in moving the allocations forward and will continue to engage closely with our colleagues at the Greater Manchester Ecology Unit (GMEU) and take account of their expert advice throughout the masterplanning process.	No change
173	N/A	It would save you money and increase your green credentials to simply exclude the important area from the proposals and avoid the need for an EIA here. I recommend you involve Natural England in the discussions about how best to conserve these important habitats	The Council will take full account of ecological interest in moving the allocations forward and will continue to engage closely with our colleagues at the Greater Manchester Ecology Unit (GMEU) and take account of their expert advice throughout the masterplanning process.	No change

Ref No.	SPD reference	Comment	Response	Change required
174	Paragraph 2.4 and 3.2	It is fundamental that any masterplan(s) and infrastructure strategy for both allocations are informed by site wide flood risk and ecological assessments to ensure the design principles and phasing assumptions are deliverable, as well as capturing the associated costs for required infrastructure. Therefore, we support the position within paragraph 3.2 that it is an expectation of the Council that this is brought forward.	Support noted.	No change

175	Paragraph 3.5	<p>Given the position that the development framework is to bridge this gap, it is unclear on the relationship between the framework and development of the masterplan(s) which are required to be approved under Places for Everyone (PfE) Development Plan Document Policies JPA 7 (Elton) and JPA 9 which also require clear phasing strategies. (3.9-3.10-3.44) there appears to be no specific details on these matters within the development frameworks supplementary planning document other than prescriptive thematic issues for consideration (Table 1). Therefore, we are unable to comment on any details in relation to phasing and infrastructure needs that are associated with the delivery of the allocations or provide feedback on matters within the Environment Agency's remit in relation to relevant associated baseline assessments. Without a fully comprehensive site-specific baseline assessment of environmental matters, it will not be possible to hold sufficient confidence on the appropriateness of the proposed placemaking intentions and therefore, the overall suitability of the masterplan as this is prepared. This is</p>	<p>A Development Framework is effectively a collective term used for the masterplan and infrastructure phasing strategies that are required by the PfE policies for both sites.</p> <p>Further consultation will be undertaken on the Development Frameworks as and when these are prepared.</p>	No change
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		<p>supported by the PPG principles that are highlighted above. We would recommend that the development frameworks are updated with these specific details or the associated masterplan(s) infrastructure phasing strategies produced for further review and consultation to ensure there is confidence on the deliverability of what is being proposed.</p>		
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Ref No.	SPD reference	Comment	Response	Change required
176	Table 1	To support the strategic priority for green infrastructure (and related PfE Policy JP-G2 Green Infrastructure Network) the emerging development framework will need to have regard to nature recovery priorities as contained with the Greater Manchester Local Nature Recovery Strategy We would welcome wider reference to flood risk in section 7 beyond the consideration of drainage matters to ensure both fluvial and surface water matters are captured.	Noted.	Reference to flood risk has been added into Table 1, section 7.
177	Table 1:	'Policy JP-D1: Infrastructure Implementation' within PfE provides guidance to consider the alignment of infrastructure provision in consideration of alignment with other infrastructure providers programmes with associated collaboration and early engagement. This could be further reflected in section 8 of the table.	Agreed that this is an important consideration for the Infrastructure Delivery Strategy.	Include a new bullet point within section 8 of Table 1 to read: 'Evidence of collaboration and early engagement to consider alignment of infrastructure provision with other infrastructure provider's programmes'.
178	Paragraph 4.42	We welcome the reference to the Local Nature Recovery Strategy.	Support noted.	No change

179	Paragraphs 4.43 – 4.45 & Paragraphs 5.36 – 5.38	<p>Whilst we welcome the support to consider ecological matters, this section could be further strengthened to reference wider priorities for the water environment.</p> <p>There are significant Irwell tributaries that dissect and flow through the proposed allocation area and we would support that these key green infrastructure assets are positively integrated, and where feasible enhanced as part of new development proposals to improve ecological networks linking to existing green infrastructure assets local wildlife as advocated in PfE policies JP-G2 (Green infrastructure) and JP-G3 (River Valleys and waterways). Any new large-scale regeneration of existing largely greenspace areas within the mid Irwell catchment area will need to be sustainably designed to protect and preferably enhance the existing water environment. For example, by combining regeneration of area with an enhanced blue-green infrastructure that provides</p>	Noted.	<p>Inset additional text at paragraph 4.43 and 5.36:</p> <p>“The Development Framework should also seek the positive integration and where feasible enhancement of the existing water environment to improve ecological networks. For example, by combining regeneration of area with an enhanced blue-green infrastructure that provides opportunities of overflow reduction and improved water quality in Irwell, but designed in a way that will also support an increase in flood resilience and looks to improve the ecological quality and connectivity of habitats in the locality”.</p>
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		<p>opportunities of overflow reduction and improved water quality in Irwell, but designed in a way that will also support an increase in flood resilience and looks to improve the ecological quality and connectivity of habitats in the locality.</p>		
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Ref No.	SPD reference	Comment	Response	Change required
180	N/A	We support the specific reference to the biodiversity net gain (BNG) statutory requirement and the need to deliver the required minimum 10% net gain. This will need to be considered across all three environmental elements of the biodiversity metric assessment (The Biodiversity Metric Supporting Documents - JP039), and preferentially ensure this is delivered on-site in compliance with the mitigation hierarchy.	Support noted.	No change
181	Paragraphs 4.60 – 4.62	We welcome reference to the need to undertake a site wide flood risk and drainage strategy. The consideration of water management across the allocation as a whole will ensure that the future masterplan is considered in conjunction with the need to make space for water which is the preferred approach and best practice design as opposed to a plot by plot assessment.	Support noted.	No change
182	N/A	In support of PfE, a Level 2 Strategic Flood Risk Assessment was undertaken which also provided high level analysis of the Elton Allocation within the Appendix B of the	Noted.	The first sentence of paragraph 4.62 has been amended to read: “Delivery of the allocation should be guided by an appropriate flood risk and drainage strategy in accordance

Ref No.	SPD reference	Comment	Response	Change required
		associated report with accompanying recommendations for taking this forward. Further reference/consideration of this should be made within the development framework.		with PfE Policy JP-S4 (and the recommendations for the site identified in the PfE Level 2 Strategic Flood Risk Assessment) which ensures coordination between phases of development”.
183	Paragraph 5.35	We welcome the reference to the Local Nature Recovery Strategy.	Support noted.	No change
184	N/A	Supportive of the preparation of a Development Framework for the two strategic sites	Support noted	No change
185	N/A	Supportive of the adoption of the Development Framework as a supplementary planning document which will be given weight in the determination of planning applications at the site.	Support noted	No change
186	N/A	Would welcome clarity on whether the Development Framework is additional to the preparation of a masterplan. Our interpretation is that the Development Framework will provide the basis for preparing a masterplan.	A Development Framework is effectively a collective term used for the masterplan and infrastructure phasing strategies that are required by the PfE policies for both sites. Further consultation will be undertaken on the Development Frameworks as and when these are prepared.	No change

Ref No.	SPD reference	Comment	Response	Change required
187	N/A	Request that the Development Framework, any subsequent masterplans and planning applications are underpinned by the need to respond to the climate emergency. At the current time, the Development Framework makes limited reference to the need to respond to the climate emergency in the design of the site.	Climate change and sustainable design principles will be set out within the Development Framework documents for both allocations as set out within Table 1 of the SPD.	A criterion on climate change has been added to Table 1 of the SPD.
188	N/A	Supportive of Paragraphs 3.26 to 3.39 which identify the need for a land value equalisation agreement to secure the delivery of development at the site	Support noted	No change

Ref No.	SPD reference	Comment	Response	Change required
189	N/A	Without a land value equalisation agreement, we would be very concerned that the delivery of infrastructure on such sites can be fragmented and led by land ownership boundaries as opposed to a logical site-wide infrastructure strategy. This leads to sub-optimal approaches to the delivery of new infrastructure, e.g., foul and surface water management, as well as sub optimal approaches to design quality and place making. The delivery of any masterplan and the opportunity to create sustainable development will be fundamentally determined by whether there is a mechanism to coordinate delivery of land in fragmented ownership. We are wholly supportive of an equalisation mechanism which ensures a more coordinated and holistic approach to the delivery of development that works alongside the requirements of the Development Framework and wider planning policy.	<p>As set out in the SPD, it is vital that the masterplan that will sit within the wider Development Framework is prepared on an 'ownership-blind' basis i.e. that location of the infrastructure that is necessary to support the development as a whole (e.g. schools, highways, open space, sustainable urban drainage systems, ecological mitigation and local centres) takes no account of land ownership.</p> <p>The Council will request an equalisation agreement which subsequently informs the Development Framework in terms of the infrastructure phasing strategy.</p>	No change

Ref No.	SPD reference	Comment	Response	Change required
190	N/A	<p>It is critical that you engage with UUW so that our assets are fully considered in the detail of your design and the proposed construction works. Have appended guidance document which they ask is considered at the masterplanning stage. Within the Development Framework , we request that our assets are clearly referenced as a major constraint that must be fully understood as soon as possible and prior to progressing the detail of any design and / or the acquisition of any land. The detail of any design and the approach to construction will need to be agreed with UUW. This must include agreement of any changes in levels. You should not assume that changes in levels will be acceptable. Changes in levels on top of our assets can affect the structural integrity of our infrastructure and the hydraulic performance of our assets. Changes in manhole cover levels on our sewers can result in the increase or displacement of flood risk from the public sewer, which would not be acceptable. The details of any access or roads (temporary or permanent)</p>	<p>Noted.</p> <p>The Council will take full account of existing flooding issues/sewer assets/capacity in moving the allocations forward and will continue to engage closely with colleagues at United Utilities and take account of their expert advice throughout the masterplanning process.</p>	<p>Drainage has been identified as an example of site conditions/constraints which should be identified in Chapter 4 – Understanding the Site.</p>

Ref No.	SPD reference	Comment	Response	Change required
		that are proposed on top of our assets and any services that are located within the easement / offset area for our assets must also be agreed in writing.		

Ref No.	SPD reference	Comment	Response	Change required
191	N/A	Note the importance of any approach to planting trees and landscaping giving due consideration to the impact on utility services noting the implications that can arise as a result of planting too close to our assets. This can result in root ingress, which in turn increases the risk of drainage system failure and increases flood risk.	Noted.	No change.
192	N/A	Biodiversity proposals on top of our assets will not normally be acceptable as we will need to maintain access for maintenance, repair and replacement.	Noted.	No change.
193	N/A	Wish to emphasise the need for an allocation wide infrastructure strategy (foul and surface water management and clean water supply) in accordance with adopted policy.	Noted. Table 1 – Scope and Content of the Development Framework identifies the requirement for an Infrastructure Delivery Strategy.	No change.
194	N/A	Sustainable management of surface water is a critical element of addressing the impact of climate change. In accordance with national planning policy, we recommend that the surface water hierarchy for the	Noted. The Council will continue to engage closely with colleagues at United Utilities and take account of their expert advice throughout the masterplanning process to	No change.

Ref No.	SPD reference	Comment	Response	Change required
		management of surface water is followed.	ensure the surface water hierarchy for the management of surface water is followed.	
195	N/A	Request that all land ownerships confirm their approach to surface water management as part of the preparation of the Development Framework. We expect to receive only foul flows to the public sewer. In this context, all land parcels will need to either infiltrate or discharge to a watercourse. In order to discharge to a watercourse, a development parcel will require a right to discharge, which can be a critical determinant of the approach to surface water management and the deliverability of a holistic and integrated approach to drainage. If a landowner is unable to demonstrate that they have an option for the management of surface water, we would wish to discuss with the council further and prior to finalisation of the development framework. The approach to drainage will need to be considered alongside the equalisation mechanism.	<p>Noted.</p> <p>The Council will continue to engage closely with colleagues at United Utilities and take account of their expert advice throughout the masterplanning process to ensure the approach to surface water management is acceptable and based on robust evidence.</p>	No change.

Ref No.	SPD reference	Comment	Response	Change required
196	N/A	Request that the emerging Development Framework outlines clear expectations for new development to fully embrace sustainable surface water management, noting that at the current time there is little detail on the nature of SuDS which are expected to be delivered at the site in the draft Supplementary Planning Document. Such an approach has added benefits associated with the quality of the public realm, the enhancement of biodiversity and urban cooling. The Development Framework should clearly outline that any landscaping and public realm design is intrinsically linked to surface water management opportunities. The evaluation of surface water and flood risk management opportunities should be undertaken at the outset of the design process.	Noted. The Council will continue to engage closely with colleagues at United Utilities and take account of their expert advice throughout the masterplanning process to ensure the approach and use of SUDS is acceptable and based on robust evidence.	No change.
197	N/A	Request that the approach to sustainable drainage reflects the 'four pillars' of sustainable drainage systems (SuDS), i.e., water quantity,	Noted. The Council will continue to engage closely with colleagues at United Utilities and take account of their expert advice	No change.

Ref No.	SPD reference	Comment	Response	Change required
		water quality, amenity, and biodiversity.	throughout the masterplanning process to ensure the approach and use of SUDS is acceptable and based on robust evidence.	
198	N/A	The Development Framework should clearly outline the need for sustainable drainage systems to be incorporated throughout the development rather than a reliance on end of pipe solutions. You should outline this expectation in the development framework and identify a range of SuDS features.	Noted. The Council will continue to engage closely with colleagues at United Utilities and take account of their expert advice throughout the masterplanning process to ensure the approach and use of SUDS is acceptable and based on robust evidence.	No change.

Ref No.	SPD reference	Comment	Response	Change required
199	N/A	Any approach to foul water management should also be part of a holistic and coordinated strategy which should avoid the proliferation of a large number of pumping stations. The laying of drainage for foul and surface water infrastructure in one phase should have full regard to any interconnecting phases for the entire site. We request that the Development Framework clearly outlines the need for an allocation-wide strategy for foul water management is prepared to inform future masterplans, and the approach to co-ordinating the delivery of each phase with necessary water and wastewater infrastructure on both sites. This holistic and coordinated approach should ensure that a proliferation of pumping stations is minimised wherever possible.	Noted. Table 1 – Scope and Content of the Development Framework identifies the requirement for an Infrastructure Delivery Strategy.	No change.

Ref No.	SPD reference	Comment	Response	Change required
200	N/A	<p>Request that the Development Framework identifies a need to assess and respond to the existing hydrological characteristics of the sites to ensure a flood resilient design is achieved and water / flooding is not deflected or constricted. As noted above, we have highlighted that there is a range of water supply and wastewater network assets that pass through and close to the sites. They include sewers which carry both foul and surface water. Our assets will need careful assessment and consideration in the detailed design of any proposals.</p> <p>There are existing public sewers that pass near to the sites which modelling data and flooding incident data identifies as being at risk of sewer flooding. There are existing hydraulic flooding incidents from the public sewer in the wider vicinity of the sites. We request that the Development Framework refers to the need for applicants to engage with UUW to consider the detailed design of the site and drainage details. The risk of</p>	<p>Noted.</p> <p>Table 1 (Understanding of the Site) requires the Development Frameworks to identify the site conditions/constraints, this includes flood and drainage constraints.</p>	No change.

Ref No.	SPD reference	Comment	Response	Change required
		sewer flooding will need careful consideration in the detailed design, masterplanning and drainage details for the site.		

Ref No.	SPD reference	Comment	Response	Change required
201	N/A	An understanding of any potential overland flows from on site and from adjacent parcels is critical especially given the change in levels on the site. Such steeply sloping sites can also suffer from subsoil drainage issues. These steeply inclined sites can have existing ground water problems due to underground springs. The Development Framework should identify the need to carefully consider such matters when designing a proposed development and the associated drainage system. There is a risk that groundwater / overland flow could overload the drainage system that is designed due to illegal connections being made as an afterthought by individual residents if their plots are not drained effectively.	Noted. Table 1 (Understanding of the Site) requires the Development Frameworks to identify the site conditions/constraints, this includes flood and drainage constraints.	No change.
202	N/A	Request early engagement with UUW prior to any masterplanning or detailed design to ensure that the implications on our assets of any change in levels, or proposed diversion, are fully understood.	Noted.	No change.

Ref No.	SPD reference	Comment	Response	Change required
203	N/A	Request that the Development Framework identifies a need to be underpinned by an allocation-wide approach to the delivery of a clean water supply for the site including details on the likely points of connection to our network. Once we have this information, we will be able to assess the impact on our assets and identify any investment response we may need to make due to development occurring.	Noted. Table 1 – Scope and Content of the Development Framework identifies the requirement for an Infrastructure Delivery Strategy.	No change.

Ref No.	SPD reference	Comment	Response	Change required
204	N/A	<p>Within the boundary or adjacent to the boundaries of each allocation, there wastewater pumping stations that operate 24-hours a day and can result in odour, noise and vibration. In accordance with good practice, we request that the Development Framework refers to the need to retain an offset distance from these assets in the detailed design of any proposals. Subject to the site-specific circumstances, any detailed proposals may need to be informed by appropriate impact assessments reflecting the 'agent of change' principle at paragraph 193 of the National Planning Policy Framework. It will also be important to consider visual amenity when preparing proposals near to our pumping stations. Appropriate screening may be necessary and this should be reflected in the detailed design of any proposals.</p>	<p>Noted.</p> <p>The Council will continue to engage closely with colleagues at United Utilities and take account of their expert advice throughout the masterplanning process.</p>	No change.

Ref No.	SPD reference	Comment	Response	Change required
205	N/A	Request that the Development Framework clearly outlines the opportunity presented by any spine road/s that run through the sites. We request that the Development Framework states that the spine roads are a potential conduit for the laying of new services and should be designed alongside a strategy for site-wide infrastructure. The spine roads could be an important component of ensuring a coordinated approach to the delivery of new water and wastewater infrastructure.	Noted.	No change.

Ref No.	SPD reference	Comment	Response	Change required
206	Part 2: Policy Context	In order to set the transport policy context and GM wide vision for transport, it would be helpful if this section made reference to the Greater Manchester Local Transport Plan – GM Transport Strategy 2040, and the Right Mix vision. The GM Transport Strategy 2040 describes the vision and ambitions for transport in Greater Manchester. The ambition is to improve the transport system so that - by 2040 - 50% of all journeys in Greater Manchester are made by public transport or active travel, supporting a reduction in car use to no more than 50% of daily trips. This will mean one million more sustainable journeys every day in Greater Manchester by 2040, enabling us to deliver a healthier, greener and more productive city-region. Achieving this Right Mix vision is expected to lead to zero net growth in motor vehicle traffic in Greater Manchester between 2017 and 2040. Setting this out within the Policy Context section of the SPD should help to clarify that vision-led transport strategies for the Elton Reservoir and Walshaw allocations	<p>The policy context chapter is intended to support the concept of masterplanning rather than the broad range of issues relevant to each site.</p> <p>The transport policy context for each site will be set out within the Development Framework Documents and the Transport Strategy document for each allocation.</p>	No change.

Ref No.	SPD reference	Comment	Response	Change required
		are expected to be aligned with GM transport ambitions and support the GM wide Right Mix vision at site level.		

Ref No.	SPD reference	Comment	Response	Change required
207	Paragraph 3.2	Paragraph 3.2 makes reference to a range of other plans and technical reports that may be needed alongside a masterplan. In order to identify the scale of transport infrastructure needed in support of a masterplan and any off-site mitigation, a vision-led Transport Assessment should be undertaken. This will form part of the accompanying detailed supporting evidence that makes up the Development Framework. In order to provide greater clarity on what is expected, this section of the SPD could list out the range of other plans and technical reports (including a Vision-led Transport Assessment) that the Council would expect to form the supporting evidence.	The range of other plans and technical reports that the Council would expect from the supporting evidence will be set out in detail within the Development Framework Documents.	No change.
208	Paragraph 3.11	Paragraph 3.11 This section provides a list of the type of infrastructure that may be required to support the development as a whole including “new strategic highways, off-site highway interventions, active travel routes, education provision, green infrastructure etc.” It is understood that this is not intended for this to be	Agreed.	Include reference to public transport infrastructure and services within para 3.12.

Ref No.	SPD reference	Comment	Response	Change required
		an all-inclusive list, however the lack of any reference to public transport infrastructure and services may be misinterpreted to mean that they are not required. It may be helpful to include public transport infrastructure and services in this list in order to clarify that they will be needed to support the development of both allocations.		
209	Paragraph 3.11	Paragraph 3.11 also concludes that "In the absence of an approved Development Framework, it is unlikely that the Council would be able to support separate planning applications on parts of the sites." It may be helpful to include a clear statement that piecemeal applications which fail to deliver or contribute towards the wider strategic infrastructure will be resisted.	Agreed.	Amend the last sentence of para 3.12 to read: '...In the absence of an approved Development Framework, it is unlikely that the Council would be able to support piecemeal planning applications on the sites and applications which fail to deliver or contribute towards the wider strategic infrastructure will be resisted'.

Ref No.	SPD reference	Comment	Response	Change required
210	Paragraph 3.17	Paragraph 3.17 states “The Development Frameworks should ideally be co-produced, with the site promoter(s)/developer(s)/landowner(s) working in partnership with the Council. A collaborative approach towards the production of the Development Frameworks will ensure that it ultimately represents a position that all parties are satisfied with.” As stated above, TfGM as a key stakeholder (involved in the delivery of sustainable transport and active travel infrastructure) would welcome the opportunity to also be involved in the co-production of the Development Frameworks particularly the Infrastructure Delivery and Phasing Strategies, and scoping and development of the associated Transport Assessments.	It is accepted that during the preparation and review of the Development Frameworks, the Council will draw on expert advice from other relevant bodies and reference to this should be included within para 3.17.	Amend the first sentence of para 3.18 to read: ‘The Development Frameworks should ideally be co-produced, with the site promoter(s)/developer(s)/landowner(s) working in partnership with the Council and other relevant bodies’.

Ref No.	SPD reference	Comment	Response	Change required
211	Paragraph 3.31	<p>Paragraph 3.31 refers to the potential for adopting a “per dwelling” tariff-type S106 agreement.</p> <p>A Framework S106 agreement approach towards contributions from development within a defined area (the allocation) benefitting from certain specified, strategic, infrastructure (identified through the Infrastructure Delivery and Phasing Strategy (or a separate Infrastructure Delivery Plan)); may be an alternative approach. A Framework S106 Agreement approach can provide developers/landowners and Bury Council with some certainty around the contributions required whilst allowing for greater flexibility (over time as the allocation is developed) than a “per dwelling” tariff-type S106 Agreement.</p>	Noted.	<p>Paragraph 3.32 (formally 3.31 has been revised to read:</p> <p>“This may, for example, explore the potential for adopting a ‘per dwelling’ tariff-type or framework s106 agreement where each landowner makes contributions to infrastructure costs, apportioned taking into account the mix of in kind and financial contributions to be made on each landholding”.</p>

Ref No.	SPD reference	Comment	Response	Change required
212	Paragraph 3.32	A Framework S106 agreement approach can also ensure that, where applicable S106 contributions can be collected on a retrospective basis. Where strategic infrastructure has been forward-funded and delivered, developers can still be required to make S106 retrospective contributions. This would ensure that all the relevant developers/landowners of development benefitting from the strategic infrastructure, contribute towards that infrastructure on a fair, consistent and proportionate basis.	Noted.	Paragraph 3.32 (formally 3.31 has been revised to read: “This may, for example, explore the potential for adopting a ‘per dwelling’ tariff-type or framework s106 agreement where each landowner makes contributions to infrastructure costs, apportioned taking into account the mix of in kind and financial contributions to be made on each landholding”.
213	Paragraph 3.33 – 3.36	Welcome the inclusion of this section on community and stakeholder engagement particularly with reference to comments above regarding TfGM’s role as a key stakeholder involved in the delivery of sustainable transport and active travel infrastructure to support the allocations. Whilst reference is made to the statutory instruments which will require consultation and engagement, it may be helpful if the SPD made a clear statement that Bury Council	It is agreed that this paragraph could make a clear statement on what the Council will expect from the consultation and engagement on the Development Frameworks for both sites.	Amend para 3.36 to read: ‘Whilst there are statutory instruments which will require consultation and engagement, the Council would expect the preparation of Development Frameworks for Elton Reservoir and Walshaw to go above and beyond these statutory processes in order to generate positive outcomes and greater trust in the process’.

Ref No.	SPD reference	Comment	Response	Change required
		would expect the preparation of Development Frameworks for Elton Reservoir and Walshaw to go above and beyond these statutory processes and would not adopt Development Frameworks that failed to demonstrate effective early community and stakeholder engagement.		
214	Paragraph 3.46	As well as the strategic highways and active travel routes, the fixed elements in the Development Framework could also include public transport infrastructure (such as the Metrolink stop at Elton Reservoir or the location of bus stops and walking routes to them within the Masterplan for both allocations).	Agreed.	Amend the first sentence of para 3.47 to read: 'Consequently, the Development Framework should include fixed elements, such as the extent of built development and areas to be left open; the breakdown of land uses; and key transport routes, including strategic highways, public transport infrastructure and active travel routes.'

215		<p>Table 1 – Scope and content of the Development Framework</p> <p>Chapter 2. Collaboration arrangements – could this include collaboration with key stakeholders such as TfGM</p> <p>Chapter 3. Strategic Context – could this include reference to the GM Local Transport Plan – GM Transport Strategy 2040.</p> <p>Chapter 7. Masterplan Framework</p> <p>The “Land uses” bullet point could refer to the location of any key service provision required within the allocations such as education, health care, retail, employment and leisure provision all of which, if well located, can help to reduce the need to travel by car?</p> <p>The “Streets/movement” bullet point could refer to a street hierarchy and to the GM Streets for All Strategy and the GM Streets for All Design Guide. The masterplan should show indicative sections for different street types.</p> <p>The “Drainage” bullet point could include a reference to Sustainable Urban Drainage.</p> <p>Should this list also include a bullet point reference to density of residential development aligned to</p>	<p>Noted.</p> <p>Chapter 3- includes reference to sub-regional planning policy and other relevant plans and strategies which includes the GM 2040 Transport Strategy.</p> <p>Chapter 7- ‘Land uses’- the location of key services and Streets Hierarchy have been included within table1.</p> <p>‘Drainage’- reference to Sustainable Urban Drainage (SUDS) has been included within Table 1.</p> <p>Chapter 8- reference to be made to phasing of development.</p>	<p>Table 1 Chapter 6 amended to include reference to the location of key services and street hierarchy, Sustainable Urban Drainage and density.</p> <p>Table 1 Chapter 7 amended to make reference to phasing of development.</p>
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		<p>PfE policy H4?</p> <p>Should this list also include a bullet point reference to public spaces or community spaces such as communal gardens or small parks?– some definition of what is meant by public spaces in a residential context (as opposed to a town centre) may help with clarification.</p> <p>Chapter 8. Infrastructure delivery strategy</p> <p>Should the “Timescales for implementation of on-site and off-site infrastructure” state that this needs to be aligned with the phasing of development of the allocation, possibly by identifying trigger points?</p>		
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Ref No.	SPD reference	Comment	Response	Change required
216	Paragraphs 4.13 and 5.12	Paragraphs 4.13 and 5.12 make reference to local design standards and could include reference to Greater Manchester's Streets for All Design Guidance.	Reference to Greater Manchester's Streets for All Design Guidance is now included in paragraph's 4.70 and 5.58.	No change.
217	Paragraphs 4.14, 4.18, 5.13 and 5.17	Welcome the wording in paragraphs 4.14, 4.18, 5.13 and 5.17 that states that "the precise nature and specification of (transport) interventions should be informed by detailed transport modelling and design work".	Support noted.	No change
218	Paragraph 4.14	Would recommend reference to a vision-led planning approach is incorporated into the wording around the transport modelling and design work referenced in these paragraphs. It would be helpful if paragraph 4.14 was amended to state "The precise nature and specification of the new highways, junction arrangement and the specific route of these roads should be informed by a vision-led planning approach to the required detailed transport modelling and design work and should take appropriate account of ecological	Noted.	Paragraphs 4.14, 4.18, 5.13 and 5.17 have been amended to reference a 'vision-led' approach.

Ref No.	SPD reference	Comment	Response	Change required
		interests within the site.” Subsequent paragraphs 4.18, 5.13 and 5.17 could also be amended in a similar manner.		
219	Paragraphs 4.70 and 5.58	Paragraphs 4.70 and 5.58 could also include a reference to Greater Manchester’s Streets for All Design Guidance.	Noted.	Paragraph’s 4.70 and 5.57 have been amended to include reference to the Streets for All Design Guidance.
220	Paragraphs 4.57 and 5.46	Paragraphs 4.57 and 5.46 could reference providing inclusive recreation and sports facilities for girls and young people (to avoid delivering MUGA’s only teenage boys use) – see Homes England Inclusive spaces and places for girls and young people An introduction for Local Government 2023	Noted. It is not appropriate to provide this level of detail in SPD18 however it will be important to identify the types of recreation which will be provided in the development frameworks for each of the allocations.	No change.
221	Paragraphs 4.61 & 5.50	Paragraphs 4.61 and 5.50 could also include reference to rain gardens, swales, SuDS-enabled trees, detention basins in the list of measures, these can be integrated into the streetscape and green/open spaces. Also, green SuDS are preferred over grey SuDS.	Noted.	Additional examples added into paragraphs 4.62 and 5.50.

Ref No.	SPD reference	Comment	Response	Change required
222	Paragraphs 4.69 & 5.57	Paragraphs 4.69 and 5.57 could place greater emphasis on the requirement for the Development Frameworks to ensure a high quality, people-centred approach to design that avoids creating car dependent lifestyles for future residents. For clarification it may be helpful to set out certain design elements or criteria that would not be acceptable to Bury Council.	<p>Noted.</p> <p>It is not appropriate to provide this level of detail in SPD18.</p> <p>Design will be an important consideration in determining the acceptability of the development framework and Table 1 requires the development frameworks to consider the site's:</p> <ul style="list-style-type: none"> ▪ Response to surrounding context and character. ▪ Land uses and location of key services. ▪ Character areas. ▪ Legibility. ▪ Quality. ▪ Built form: uses, scale and frontages. 	No change.

Ref No.	SPD reference	Comment	Response	Change required
223	N/A	<p>Whilst it is understood that the Development Frameworks need to remain flexible and therefore do not need to be overly prescriptive on matters such as housing mix and tenure, there is a policy requirement for both allocations to deliver a range and appropriate mix of housing types. Different housing typologies will ensure appropriate residential densities, contribute to creation of different character areas across the site, and provide a range of housing options that suits different needs – young professionals, small/large families, older people etc. Not only does this create liveable, inter-generational communities, but it helps to promote the use of the sustainable transport network by ensuring a range of users throughout different times of the day, thereby helping to support and grow the Bee Network. It would be helpful for the Development Frameworks to make it clear that this required range of different housing typologies will need to be considered at the planning application stage.</p>	Noted. This will be set out within the Development Frameworks.	No change.

Ref No.	SPD reference	Comment	Response	Change required
224	N/A	<p>Welcomes the Council's decision to prepare a Supplementary Planning Document (SPD) which relates to both the Elton Reservoir and Walshaw allocations within PfE. The proximity of the sites and 2 links between them in terms of infrastructure requirements mean that it is important to establish key principles at this stage. Peel welcomes that the draft SPD sets out principles and guidance for the formulation and agreement of Development Frameworks for each site including an up-to-date masterplans, phasing strategies, and coordinated approach to the design and delivery of key infrastructure. Peel confirms its willingness to work collaboratively with the Council and others to ensure timely delivery of the proposed development at Elton Reservoir.</p>	Support noted.	No change

Ref No.	SPD reference	Comment	Response	Change required
225	N/A	Considers that the SPD, and subsequent Development Frameworks for the sites, are critical planning tools which will help to ensure sustainable place-making; co-ordinate new development with the infrastructure needed to support it; establish a clear, fair and proportionate approach to funding of that infrastructure; and avoid a piecemeal approach to development that might frustrate or dilute these objectives.	Comments noted.	No change

Ref No.	SPD reference	Comment	Response	Change required
226	N/A	Peel welcomes the proposal within the draft SPD to equalise the costs of such infrastructure to ensure that all key areas of new development, including on sites outside the Elton allocation, contribute fairly and proportionately. Some of the infrastructure proposed within the Elton site and adjacent to it (e.g. off-site enhancements to the local highway network) will be of strategic benefit, and is therefore a 'shared' requirement needed by all proposed development within the western part of Bury given the constraints within the area. It is important that the SPD establishes a framework for fair and proportionate contributions to such infrastructure by all developments that would rely upon it or benefit from its provision including the Walshaw site.	Support noted.	No change

Ref No.	SPD reference	Comment	Response	Change required
227	N/A	<p>Peel welcomes the requirement for an Infrastructure Development Strategy (IDS) for the site. However, the scope and content of an IDS could helpfully be expanded upon at this stage (with further detail beyond what is referenced in Table 1 of the draft SPD). It is suggested that an additional section is included within chapter 3 of the draft SPD to set out that the IDS should identify at an early stage the on- and off-site infrastructure needed to support the development and indicative phasing of its delivery. This should be accompanied by a cost assessment of key works (with any confidential or commercially sensitive information omitted as necessary) and a proposed approach to contributions (whether in kind or through financial contribution) that identifies how the contribution of a phase of development would be assessed. Where possible this should outline how any financial contributions will be collected and how any drawdown to deliver identified works will be managed.</p>	<p>The delivery of supporting infrastructure is critical to the development of both sites and it is considered that this should be appropriately included as a key part of the development framework.</p> <p>It is considered that the scope of the Infrastructure Strategy is adequately covered in Table 1.</p>	No change.

Ref No.	SPD reference	Comment	Response	Change required
228	N/A	The IDS would form part of the evidence base of the Development Framework SPD but would not formally comprise part of it. This would allow more frequent update and evolution as the development proceeds, and enable it to reflect changes and fluctuations in requirements and associated costs over a prolonged delivery period without the need to revise the SPD itself.	The delivery of supporting infrastructure is critical to the development of both sites and it is considered that this should be appropriately included as a key part of the development framework.	No change.

Ref No.	SPD reference	Comment	Response	Change required
229	Paragraph 1.5	<p>Para 1.5 The rationale for and purpose of the SPD could be more clearly articulated in this section. (See also comments on Section 3).</p> <p>In particular, it is considered that the text could set out the critical role that the SPD will play in ensuring that the development fulfils the vision for the site which comprised the exceptional circumstances that justified its allocation. We request that text along the following lines is added perhaps to the end of paragraph 1.5: "This role in ensuring that development and infrastructure come forward in a planned and comprehensive manner is important to local stakeholders and formed a critical part of the justification for the removal of the Elton and Walshaw sites from the Green Belt and their allocation for the proposed development. This SPD will help to ensure that this vision is fulfilled throughout the lifetime of the development process."</p>	Noted	Suggested wording added to paragraph 1.5.

230	Paragraph 1.10	<p>Para 1.10 The relationship of this SPD to the future Development Framework SPDs for each site could helpfully be expanded to ensure clarity for all stakeholders.</p> <p>Our understanding is that the intention of this draft SPD is to provide guidance on the contents of more detailed future Development Frameworks (DFs), and that those DFs will include or be accompanied by more detailed spatial masterplans and phasing and infrastructure strategies (as referred to at paragraph 3.2) and be adopted by the Council (para 3.12). Clarity of this in the introduction would be helpful. Paragraph 1.10 could helpfully be amended as follows: "This draft Supplementary Planning Document 18 (SPD18) sets out more detailed guidance on what the Council will expect to be addressed in subsequent and more detailed Development Frameworks for each site in terms of the specific requirements of the PfE policies for the Elton Reservoir and Walshaw strategic site allocations. The Council's intention is that these further Development Frameworks will be adopted as SPDs. In accordance with Policies JPA7 and JPA9 of PfE</p>	<p>Accepted that this could be made clear at the outset and paragraph 1.10 to be amended accordingly.</p> <p>This SPD is primarily aimed at those responsible for preparing development frameworks and it is therefore not considered necessary to include a glossary of terms.</p>	<p>Add the following to the end of para 1.10:</p> <p>'...in terms of the specific requirements of the PfE policies for the Elton Reservoir and Walshaw strategic site allocations. The Council's strong preference is that these further Development Frameworks will be adopted as SPDs. In accordance with Policies JPA7 and JPA9 of PfE future planning applications within the sites must accord with the contents of both this SPD and future Development Frameworks'.</p>
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		<p>future planning applications within the sites must accord with the contents of both this SPD and future Development Framework SPDs.” It is suggested that addition of a short glossary including explanations of terms used throughout the draft SPD may also assist lay readers. This could include for example the meanings and purpose of terms including masterplan, Development Framework, IDS and phasing strategy.</p>		
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Ref No.	SPD reference	Comment	Response	Change required
231	Paragraph 3.1	Para 3.1 It is suggested that rather than describing advice in Section 3 as “generic” it is made clear that the contents of the section apply to both allocations.	Accepted that para 3.1 could be clarified and should be changed.	Amend paragraph 3.1 to read as follows: ‘The general advice within this section applies to both site allocations made under PfE Policies JPA7 (Elton Reservoir) and JPA9 (Walshaw). Chapters 4 and 5 set out the advice that is specific to the Elton Reservoir and Walshaw sites respectively’.
232	Paragraph 3.3	Para 3.3 It is suggested that engagement with local communities is important and should be referenced in the context of the collaborative approach referred to in paragraph 3.3	The 5 th bullet point under para 3.3 refers to the benefits of effective community and stakeholder engagement and this is further expanded on in paras 3.33 to 3.36.	No change
233	Paragraph 3.5	Para 3.5 The allocation for Elton Reservoir includes provision for a range of developments alongside the proposed housing – it is considered that reference in line 2 of paragraph 3.5 could be amended to: “....the principle of residential and associated development on both sites...”.	Accepted that both sites will require the development of supporting infrastructure alongside the residential.	Amend para 3.5 to include reference to associated development.

Ref No.	SPD reference	Comment	Response	Change required
234	Paragraph 3.5	<p>Para 3.5 cont'd Building on the comments above in relation to paragraphs 1.5 and 1.10, it is considered that important aspects of the purpose of the SPDs should be included. It is requested that the following is added to paragraph 3.5: "Development Frameworks for the sites will ensure that development fulfils the vision and objectives that justified their removal from the Green Belt and complies with the provisions of the development plan. This will include comprehensive masterplans showing how the whole sites and their infrastructure will be delivered. This will include phasing strategies which show how phases of the development and the infrastructure needed to support them will be co-ordinated both in relation to each site and across the two sites. It makes clear that piecemeal development of part of either site, which does not accord with and help deliver the comprehensive development of the site, will not comply with the SPD.</p>	<p>Agreed that there needs to be greater clarity on the purpose of the Development Frameworks.</p>	<p>Include additional paragraph after para 3.5 to read:</p> <p>'Development Frameworks for the sites will ensure that development fulfils the vision and objectives that justified their removal from the Green Belt and complies with the provisions of the development plan. This will include comprehensive masterplans showing how the whole sites and their infrastructure will be delivered including phasing strategies to show how phases of the development and the infrastructure needed to support them will be co-ordinated both in relation to each site and across the two sites. By adopting this approach, the Development Frameworks will ensure that piecemeal development of part of either site, which does not accord with and help deliver the comprehensive development of the site, is avoided'.</p>

Ref No.	SPD reference	Comment	Response	Change required
235	Paragraph 3.10	Para 3.10 While the aspiration of ensuring that key issues are “addressed to the satisfaction of all parties” is supported, the SPD and subsequent planning applications may need to balance competing or conflicting issues and resolve matters to which not all parties agree. It is considered that reference should be made to “addressing key issues in ways which ensure that the vision and objectives that justified the allocation of the site are fulfilled”.	Accepted that this paragraph would benefit from change.	Amend first sentence of paragraph to read: ‘Fundamentally, the purpose of the Development Framework is to ensure that key issues for the site are identified at an early stage in the planning process and addressed in ways that are consistent with relevant planning policies’.
236	Paragraph 3.13	Para 3.13 In support of the increased clarity of the purpose of the Development Frameworks it is considered that the first sentence of paragraph 3.13 should be strengthened to help deter piecemeal development. It is suggested it be amended as follows: “SPDs for strategic sites are generally a useful an essential tool to move from fixing the principle....”.	It is considered that the SPD includes sufficient references to deterring piecemeal development without amending this paragraph.	No change
237	Paragraph 3.14	Para 3.14 The final bullet point should make clear the Council’s intention that	As stated elsewhere in the document, it is the Council’s strong preference for the	No change

Ref No.	SPD reference	Comment	Response	Change required
		the Development Frameworks be adopted as SPDs.	Development Frameworks to be adopted as SPDs.	
238	Paragraph 3.16	Para 3.16 Peel welcomes the confirmation that the Development Frameworks may need to be updated as the developments proceed. It would be helpful for paragraph 3.26 to confirm that updates would follow the same collaborative engagement and approval process as the original Development Framework SPDs and that supporting documents such as the IDS would be capable of more frequent update as they sit outside the SPD process	It is not considered necessary to amend as suggested.	No change
239	Paragraph 3.17	Para 3.17 It is considered that reference to appropriate engagement and consultation with local communities and stakeholders should be added to paragraph 3.17. Work undertaken on the sites to date, in particular transport modelling, has shown that some of the strategic infrastructure to be delivered within and adjacent to the Elton site is also required to enable other	It is accepted there may be a need for collaboration between the site promoters of both sites on certain matters.	Add sentence to the end of the first paragraph on collaborative working to read: 'This includes collaboration between the site promoters of both sites around issues that are common to both sites e.g. highways infrastructure.'

Ref No.	SPD reference	Comment	Response	Change required
		developments, specifically the Walshaw site. As such, the SPD must make clear that collaborative working includes sharing relevant evidence and contributing the necessary strategic infrastructure modelling across the two allocations.		
240	Paragraph 3.18	Para 3.18 Peel welcomes the Council's commitment to 'ownership' of the Development Frameworks from draft stage. It is requested that if material changes to the Development Frameworks are proposed following draft stage that landowners/delivery partners would be consulted and have opportunity to comment on proposed changes, such that the adopted Framework remains a shared output that reflects close collaboration between the parties.	Landowners/delivery partners would be consulted on any changes made to the Development Frameworks post draft stage.	No change

Ref No.	SPD reference	Comment	Response	Change required
241	Paragraph 3.26	<p>Para 3.26 The Council's aspiration for masterplans to be prepared 'blind' to ownerships is acknowledged, but this is unachievable in practice. Some components of the masterplans will necessarily reflect land ownerships. This is necessary to ensure that willing landowners bring forward their land in a timely way to optimise delivery as part of a coordinated whole. Within this context it is recognised that the delivery of infrastructure should be on an "ownership blind" basis. It is requested that the first sentence of paragraph 3.26 is amended to read: "It is vital that proposed delivery of necessary infrastructure that will sit within the wider Development Frameworks is prepared on an "ownership blind" basis" i.e. that location of the infrastructure that is necessary to support the developments as a whole (eg. schools, highways, open space, sustainable urban drainage systems, ecological mitigation and local centres) takes no account are in</p>	<p>It is considered that this paragraph is sufficiently clear in that it is referring to supporting infrastructure being developed in the most appropriate location, irrespective of land ownership.</p>	No change

Ref No.	SPD reference	Comment	Response	Change required
		appropriate locations irrespective of land ownership.”		

Ref No.	SPD reference	Comment	Response	Change required
242	Paragraph 3.28	Para 3.28 The SPD must also recognise that the means to achieve equalisation is a matter for landowners which may be commercially sensitive. Rather than seeking to prescribe the means by which equalisation is achieved, the SPD should focus on ensuring the appropriate outcomes in terms of co-ordination of infrastructure with phases of development and establishing a mechanism for fair and proportionate contributions towards shared and strategic infrastructure requirements. It is requested that paragraph 3.28 be amended accordingly.	It is accepted that the means for achieving equalisation is a matter for landowners and that such agreements may contain commercially sensitive information. Paragraph should be amended accordingly.	Amend paragraph to read: Significant complications can arise around this issue unless there is an agreement in place to 'equalise' the land and delivery costs between all parties. The Development Frameworks should set out the appropriate outcomes in terms of co-ordination of infrastructure with phases of development and establishing a mechanism for fair and proportionate contributions towards shared and strategic infrastructure requirements'.
243	Paragraph 3.32	Welcomes the Council's commitment to proactively explore ways to enable the delivery of infrastructure.	Support noted.	No change
244	Paragraph 3.38	Para 3.38 It is considered that EIA must apply to the development as a whole i.e. to the full proposals of the Development Frameworks. It is suggested that "for the project as a	Agreed that the EIA should cover the development as a whole and paragraph should be amended accordingly.	Add 'for the development as a whole' to the end of the first sentence of the paragraph.

Ref No.	SPD reference	Comment	Response	Change required
		whole” is added to the end of the first sentence of paragraph 3.38.		
245	Paragraph 3.40	Para 3.40 It is not considered necessary for EIA to apply jointly to both sites. To avoid any potential misunderstanding it is suggested that “an EIA will be required for both sites” should be amended to: “an EIA will be required for each site”. The other site will be considered cumulatively as part of the EIA.	Accepted that this would benefit from clarification as suggested.	Amend to replace ‘both sites’ with ‘each site’.
246	Table 1	Table 1 – Scope and content of the Development Frameworks 3. Strategic Context Reflecting the comments above it is requested that the bullet point is amended to read: “Setting out the visions for the sites which led to their allocation and key strategic messages....”.	Accepted	Amend the overview of content for the Strategic Context chapter as follows: ‘Setting out the visions for the sites which led to their allocation and the key strategic messages...’
247	Table 1	4. Understanding of the site In the second bullet it is suggested “relevant planning history” replaces “site history”. The fourth bullet could helpfully refer to minerals policy designations.	Accepted. Amend as suggested.	Replace ‘Site history’ with ‘Relevant planning history’.

Ref No.	SPD reference	Comment	Response	Change required
248	Table 1	7. Masterplan framework It is suggested that blue infrastructure be referenced in the eleventh bullet and that minerals be referenced in the list.	Accepted. Amend as suggested.	Include reference to blue infrastructure and minerals within the overview of the content for the Masterplan Framework.
249	Table 1	8. Infrastructure delivery strategy See the overarching comment above regarding the importance of the IDS and its coverage within this SPD. It is suggested education provision and green/blue infrastructure are referenced. It is considered that viability should also be referenced to ensure that Development Frameworks are supported by evidence of viability.	Accepted. Amend as suggested.	Include reference to education, green infrastructure and viability assessment and minerals within the overview of the content for the Infrastructure Delivery Strategy.
250	Table 1	10. Main partners Landowners should be included in this list.	Accepted. Amend as suggested.	Include reference to landowners within the overview of content for the Main Partners chapter.

Ref No.	SPD reference	Comment	Response	Change required
251	Paragraph 4.8	Para 4.8 This statement is very general and risks presenting a level of uncertainty as to future requirements on the site. It is requested that clarity as to the circumstances where additional policy requirements might be introduced and the mechanism for this. The following text is suggested: "Whilst the above PfE, UDP and Joint Minerals Plan policies are considered to be comprehensive the Council reserves the right to introduce additional policy requirements for the site where necessary to address changes in circumstances and maintain conformity with any future changes of national policy or the Bury development plan. If such changes necessitate updates to the Development Framework of the site these would be supported by proportionate evidence and prepared and consulted on in the normal way prior to their adoption."	Accepted that paragraph 4.8 would benefit from an amendment to improve clarity.	Add the following to the end of para 4.8: '...to address changes in circumstances and maintain conformity with any future changes of national or local planning policy. If such changes necessitate updates to the Development Framework for the site, these would be supported by proportionate evidence and prepared and consulted on in the normal way prior to their adoption.' The same change also required to para 5.8 in relation to the Walshaw site.
252	Paragraph 4.10	Para 4.10 For consistency with comments made above in relation to Sections 1 and 3 of the draft SPD,	Accepted. Amend as suggested.	Amend para 4.10 to replace 'masterplan' with 'Development Framework.

Ref No.	SPD reference	Comment	Response	Change required
		"masterplan" should be replaced with "Development Framework".		Same change required to para 5.10 in relation to the Walshaw site.
253	Paragraph 4.11	Para 4.11 Peel welcomes the requirement for equalisation of costs and values across the site. It is essential that this achieves fair and proportionate sharing of responsibility for delivery of infrastructure and returns from delivery of the development. It is the phases of the development that will need to contribute fairly and proportionately to overall infrastructure. With this in mind it is requested that the first sentence of paragraph 4.11 is amended to read: "...so that all landowners/developers phases of the development contribute fairly and proportionately towards the delivery of the infrastructure....".	Accepted. Amend as suggested.	Add the following to the end of the first sentence of para 4.11: '...so that all landowners/developers phases of the development contribute fairly and proportionately towards the delivery of the infrastructure...'

Ref No.	SPD reference	Comment	Response	Change required
254	Paragraph 4.14	<p>Para 4.14 : It is known from the modelling work already undertaken to date that the spine road provision through the Elton site has an important strategic function for existing traffic and other development traffic, whilst also serving as a development access road. Its introduction will create alternative routes for some trips that will result in trip reassignments and transfers which will relieve congestion at some of the busiest locations and junctions within Bury and will help to reduce impacts, thereby not only assisting the delivery of Elton but also Walshaw (JPA9). These effects are unsurprising given the relatively close proximity of the two allocations.</p> <p>Given the strategic benefits which the spine road and other off-site highway improvements associated with the Elton site are capable of providing, the SPD must make clear that contributions to the funding of this new strategic infrastructure could come from a number of sources, including the development of</p>	<p>In line with the NPPF's approach to achieving sustainable development it is accepted that there is a need to pursue an integrated approach towards achieving economic, social and environmental objectives. This will require a balanced approach.</p>	<p>Paragraph 4.14 has been amended as follows: "...and other interests/constraints within and adjacent to the site. This will need to be balanced with the benefits of the development to achieve a sustainable outcome".</p>

Ref No.	SPD reference	Comment	Response	Change required
		Walshaw and, potentially, via public finance and grants.		

Ref No.	SPD reference	Comment	Response	Change required
255	Paragraph 4.14	Para 4.14 The detailed design of the transport infrastructure within the site will need to take account of a range of factors. Ecological interests are recognised to be important in this context but will need to be balanced with other physical and technical constraints to arrive at the optimal outcome. To reflect this it is requested that the final part of paragraph 4.14 is amended as follows: “....and should take appropriate account of ecological interest and other constraints within and adjacent to the site. These will need to be balanced with the benefits of the development to achieve a sustainable overall outcome.”	In line with the NPPF’s approach to achieving sustainable development it is accepted that there is a need to pursue an integrated approach towards achieving economic, social and environmental objectives. This will require a balanced approach.	Paragraph 4.14 has been amended as follows: “....and other interests/constraints within and adjacent to the site. This will need to be balanced with the benefits of the development to achieve a sustainable outcome”.
256	Plan 2 & Paragraph 4.12	Plan 2 – indicative route of strategic highways through the Elton Reservoir site. Plan 2 does not appear to be referenced in the SPD text. It is considered reference could helpfully be added to paragraph 4.12. This should make clear that the routes are	Accepted. Include reference to Plan 2 in para 4.12.	Add the following to the end of para 4.12: ‘The indicative route of the strategic highways through the Elton Reservoir site are shown on Plan 2.’

Ref No.	SPD reference	Comment	Response	Change required
		indicative at this stage and may be subject to change.		
257	Paragraph 4.15	Para 4.15 References to “Appendix D” at paragraph 4.15 and elsewhere could helpfully make clear that this is Appendix D to the adopted PfE.	Para 4.15 is quoting from criterion 2iii of PfE Policy JPA7. Paragraph 4.16 does clarify that it is Appendix D of PfE. This is similarly the case for references within the Walshaw chapter of the SPD.	No change

258	Paragraph 4.19	<p>Para 4.19: Whilst it is noted that the precise nature and specification of the additional transport interventions should be informed by detailed transport modelling and design work, there is no reference to how they could be funded. As with the spine road through the Elton site, the Metrolink Stop and Park & Ride facility will provide strategic benefits for other journeys not related to Elton. In this regard, there is reference (in paragraph 4.22) to City Region Sustainable Transport Settlement being used to start to develop the proposed new stop and Travel Hub/Park and Ride and that the Council will work with TfGM and the developer to determine an appropriate funding and delivery strategy for the new stop. The SPD needs to make clear that contributions to the funding of these new strategic facilities route could come from various sources, including other development sites and public finance/grants. Paragraph 4.19 states that the Metrolink stop is intended to encourage a large proportion of trips generated by the site to be made by sustainable modes and will support Bury in contributing to the region's Right Mix target for half of</p>	Noted.	<p>Paragraph 3.33 has been amended and reference to other public finance opportunities has been included.</p>
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		all journeys to be made by sustainable modes by 2040. The SPD should include reference to the transport modelling therefore needing to reflect the aspiration of this key transport investment.		
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Ref No.	SPD reference	Comment	Response	Change required
259	Paragraph 4.28	Para 4.28 It is considered that the location of any primary school(s) on site should be determined as part of the Development Framework process. This would ensure that the deliverability of any proposals is considered in the context of the whole development and would provide early certainty for landowners and development partners.	It is intended that the location of primary school provision should be identified through the Development Framework process.	No change
260	Paragraph 4.29	Para 4.29 In calculating education contributions the size and type of homes is relevant to the likely pupil yield. For example, retirement accommodation is not likely to generate school age children and larger homes are likely to generate more need than smaller ones. The final sentence of paragraph 4.29 should be amended to read: “The level of financial contribution will be calculated on the basis of the number, type and size of dwellings....”.	Noted.	Paragraph 4.29 has been amended to include type and size of dwelling.

Ref No.	SPD reference	Comment	Response	Change required
261		<p>Local centres</p> <p>It is considered that the location of the local centres on site should be determined as part of the Development Framework process. This would ensure that the deliverability of any proposals is considered in the context of the whole development and would provide early certainty for landowners and development partners. The precise scale and mix of uses will be determined planning application stage to ensure that what is delivered responds to needs and requirements at the time. It is requested that the SPD is amended to reflect this approach.</p>	<p>It is intended that the location of local centres should be identified through the Development Framework process.</p>	No change

Ref No.	SPD reference	Comment	Response	Change required
262	Paragraph 4.44	<p>Para 4.44 Given the scale of proposed development and expected longevity of the delivery programme, it is considered unrealistic that the Development Framework contains details of how BNG will be achieved. Whilst the Development Framework would be able to establish a strategy for the site, details of works for individual phases of development would need to be established at planning application stage. It is requested that paragraph 4.44 be amended as follows:</p> <p>“The Development Framework should establish the details principles of how the required Net Gain is to be achieved. Details of how these principles will be delivered will be set out for each phase of development and determined at planning application stage. If this will require....”.</p>	Noted.	Paragraph 4.44 has been updated with suggested text.

Ref No.	SPD reference	Comment	Response	Change required
263	Paragraph 4.51	<p>Country Park Paragraph 4.51 implies a somewhat open-ended process of liaison with the Council's Operations department regarding facilities within the Country Park. This would not provide the certainty and clarity needed to progress the development. It must also be recognised that the desire to "create an extensive recreation, tourism and leisure asset" will need to be balanced with other objectives for the site – for example nature conservation interest. The approach to this will need to be established through the Development Framework process.</p> <p>To provide the required certainty for all parties and ensure that the Country Park is deliverable the minimum facilities required in the Country Park and any other parameters for its design and delivery should be established through the Development Framework. To reflect this it is requested that the following is added</p>	Noted.	A new paragraph 4.53 has been included to refer to the minimum requirements will being set out within the Development Framework.

Ref No.	SPD reference	Comment	Response	Change required
		after the first sentence of paragraph 4.51: "The minimum requirements will be set out within the Development Framework".		

Ref No.	SPD reference	Comment	Response	Change required
264	Paragraph 4.57	4.57 A flexible approach to the determination of specific recreation needs, as referenced in paragraph 4.57, is welcomed. Peel acknowledges the wide variety of needs that a community of the size proposed is likely to need and the importance of provision that is informed by relevant standards but also tailored to local needs at the time.	Noted.	No change.

Ref No.	SPD reference	Comment	Response	Change required
265	Paragraph 4.58	4.58 It is important to acknowledge that different types of provision may be deliverable on different parts of the site. For example, informal facilities such as running/walking trails or woodland play may be more compatible with ecological and landscape interests on parts of the site than more formal and managed facilities. They could deliver equivalent health and wellbeing benefits and it is important that the Development Framework for Elton addresses this. It is requested that the first sentence of paragraph 4.58 be amended to read: “....such provision will be determined by the Council taking account of factors such as accessibility, natural surveillance, (in the case of children’s play), ecological and landscape sensitivity, and residential amenity.”	Noted.	Paragraph 4.58 amended to reflect suggested wording.

Ref No.	SPD reference	Comment	Response	Change required
266	Paragraph 4.60	4.60 Given recent inconsistencies in the approach to sequential testing in relation to surface water flooding, the SPD should make reference to the flood risk assessments undertaken as part of the PfE process and confirm that in light of these there will be no requirement for a sequential test at the Development Framework or planning application stage.	Noted. Reference to the PfE Level 2 Strategic Flood Risk Assessment has been added to paragraph 4.61. The NPPF sets out when sequential tests are required.	No change.
267	Paragraph 4.69	Para 4.69 The relationship of the Elton DF to the DF for the Walshaw allocation is unclear. There is no certainty as to the timing of any DF for Walshaw being in the public domain. If it is intended that the Elton DF and Walshaw DF should be co-ordinated the means for achieving this should be made clear.	It is considered that the Elton and Walshaw development frameworks are capable of being produced independently.	No change.
268	Section 5	5 Site-specific advice: Walshaw Peel is concerned that as drafted the SPD overlooks the findings of transport modelling commissioned to support PfE which shows that the Walshaw site would rely on/benefit from strategic infrastructure which is	Noted. Appendix D of PfE identifies the link road connecting Bury & Bolton Road (A58) to Bury Road, Radcliffe and a strategic connection from the link road to Spring Lane, Radcliffe as being necessary to support the development of the Elton	No change.

Ref No.	SPD reference	Comment	Response	Change required
		to be delivered within and adjacent to the Elton allocation.	Reservoir site. However the link road is not identified as a necessary intervention for the Walshaw site.	
269	Paragraph 5.11	5.11 It is requested that the final sentence of paragraph 5.11 of the SPD is amended as follows: "It will also ensure that the cost of delivering the infrastructure, including any contributions to the delivery of off-site infrastructure, is proportionately split across the development....."	Noted.	Paragraph 5.11 has been amended to include delivery of off-site infrastructure.
270	Paragraph 5.15	5.15 Part 4 of Policy JPA-9 of Places for Everyone requires that the Walshaw development will be required to make provision for new and improved sustainable transport and highways infrastructure having regard to the indicative transport interventions set out in Appendix D in accordance with Policy JP-C8. For the Walshaw site, this includes: • "Appropriate linkages to Elton Link Road"	Noted. 'Appropriate linkages to Elton Link Road' is included in Paragraph 5.15 under 'supporting' infrastructure.	No change.

Ref No.	SPD reference	Comment	Response	Change required
271	Paragraph 5.17	5.17 Reference is made to the requirement for detailed transport modelling and design work. Given that modelling already undertaken shows that infrastructure within and adjacent to the Elton site will benefit the delivery of the Walshaw site, it is requested that the following is added to paragraph 5.17: “and the Walshaw development will be required to make a fair and proportionate contribution towards the funding of Elton Link Road and/or the proposed new Metrolink stop and travel hub/park and ride facilities”.	<p>Appendix D of PfE identifies the link road connecting Bury & Bolton Road (A58) to Bury Road, Radcliffe and a strategic connection from the link road to Spring Lane, Radcliffe and the Elton Metrolink Stop and Park and Ride Facility as being necessary to support the development of the Elton Reservoir site.</p> <p>However, the link road and the Metrolink Stop and Park and Ride Facility are not identified as a necessary intervention for the Walshaw site.</p>	No change.
272	N/A	The job of examining land for biodiversity in making plans is the job of the local authority and it is patently clearly it has not been done and thus the allocation is unlawful and reports submitted during planning process are not sufficient	<p>Criterion 12 of the policy accompanying the Elton Reservoir allocation states that the development is required to make provision for biodiversity, including taking appropriate account of SBIs at Elton Reservoir; Manchester, Bolton and Bury Canal (East); Elton Goit; Withins Reservoir; Black Lane Marl Pits; and Radcliffe Wetlands in accordance with Policy JP-G8.</p> <p>The Council will take full account of ecological interest in moving the</p>	No change

Ref No.	SPD reference	Comment	Response	Change required
			allocations forward and will continue to engage closely with our colleagues at the Greater Manchester Ecology Unit (GMEU) and take account of their expert advice throughout the masterplanning process. This includes their recent recommendation to extend one of the Grade A SBIs on the Elton Reservoir site to reflect the presence of Waxcap fungi on part of the site.	
273	N/A	Accuse GMEU of hiding Waxcap species	The Council will take full account of ecological interest in moving the allocations forward and will continue to engage closely with our colleagues at the Greater Manchester Ecology Unit (GMEU) and take account of their expert advice throughout the masterplanning process. This includes their recent recommendation to extend one of the Grade A SBIs on the Elton Reservoir site to reflect the presence of Waxcap fungi on part of the site.	No change
274	N/A	Elton Reservoir allocation is a site of County and National importance for grassland fungi, and an additional Waxcap species will take it to the Internationally Important site threshold. It warrants a Grade A Site of Biological Importance Designation	The Council will take full account of ecological interest in moving the allocations forward and will continue to engage closely with our colleagues at the Greater Manchester Ecology Unit (GMEU) and take account of their expert advice throughout the masterplanning process.	No change

Ref No.	SPD reference	Comment	Response	Change required
		and is on the list for SSSI consideration.	This includes their recent recommendation to extend one of the Grade A SBIs on the Elton Reservoir site to reflect the presence of Waxcap fungi on part of the site.	
275	N/A	Complaints regarding GMSF consultation	Comment does not relate to SPD18.	No change
276	N/A	Biodiversity Net Gain is an additional requirement from the government and the law stresses that it is an additional requirement on top of the raft of national legislation and policy and local policy. To move straight to compensation and BNG is illegal and unlawful and those who promote it are promoting disinformation and criminality. Local Authorities' Biodiversity Duty has been massively increased due to the threats our natural environment is facing, not least from this disinformation from local government officials.	The development of both sites will be required to achieve at least a 10% Net Gain in Biodiversity as measured using a Statutory Metric, in accord with the terms of the Environment Act 2021 and Places for Everyone Policy JP-G8 and the approach should follow the Biodiversity Net Gain Hierarchy.	No change

Bury
Council