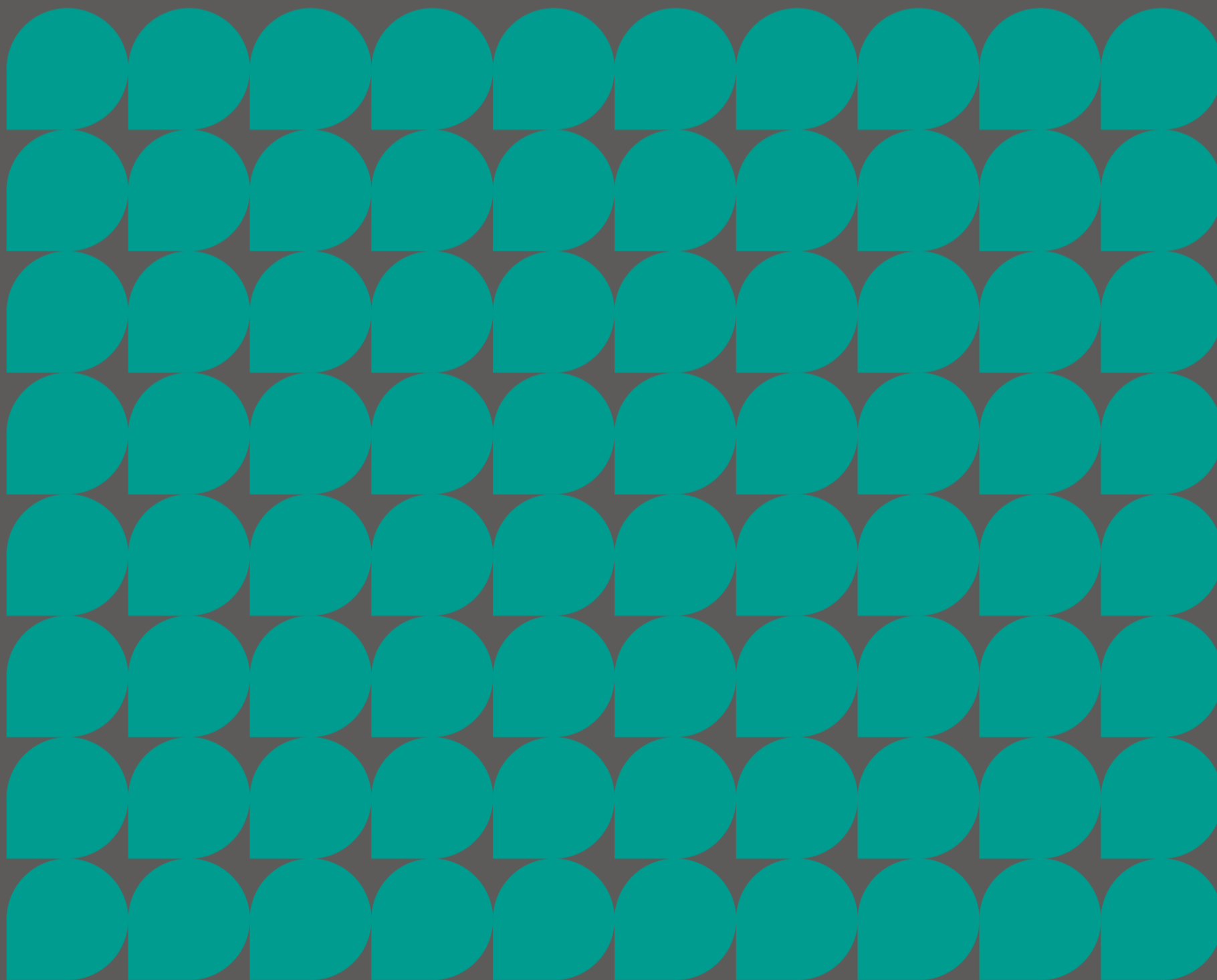


Places for Everyone

Allocations: Bolton Issues Summary

February 2022



Chapter 11 – Site Allocations (Bolton)

A summary of the issues raised in relation to the policies within PfE 2021 Chapter 11 Site Allocations (Bolton) and the relevant respondents to PfE 2021 is set out below:

PfE 2021 Policy JP Allocation 4 - Bewshill Farm

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Support		
JPA4.1	Support for the Bewshill Farm allocation as it is a natural extension of the Logistics North employment site.	Support noted	Harworth Group David Clough Rebecca Green
JPA4.2	The associated policy wording has been changed from that in preceding drafts, including introducing the requirement for development to contribute to the Logistics North Local Link (transport service). This is considered acceptable.	Support noted	Harworth Group
	Evidence		
JPA4.3	The proposals are not based on factual and recent data regarding the amount of warehousing floorspace required. A number of speculative road based developments have been approved in recent months. The need for allocations should be revisited.	No change is considered necessary because a proportionate evidence base has been provided regarding the quantity of warehousing floorspace required. The evidence can be found here: [05.01.04] Employment Topic Paper (paragraph's 4.6-4.19) [15.01.01] Economic Forecasts for Greater Manchester [05.01.02] Employment Land Needs in Greater Manchester	David Hawes CRPE
JPA4.4	The 'JPA4 Bewshill Farm Allocation Topic Paper' 10.02.05 presents an appropriate reflection of the matters relevant to the allocation and development of this site.	Noted	Harworth Group

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle of Development		
JPA4.5	The Logistics North area is over industrialised	No change is considered necessary. Site selection is justified in paragraph's 5.1-5.4 of the JPA4 Bewshill Farm Allocation Topic paper [10.02.05]. Full information on the site selection process can be found in the Site Selection Background Paper [03.04.01].	Slyvia Fewtrell
JPA4.6	Westhoughton and the surrounding area (M61 Corridor) is bearing the complete load of industrial development on green space in Bolton.	No change is considered necessary because the Wigan to Bolton growth corridor is an excellent location for logistics and industrial uses. Strong demand for employment uses in the M61 corridor is evidenced by the success of other developments including Logistics North. Developing the land at Bewshill Farm would allow a continuing supply of land for warehousing and distribution in the M61 corridor and would assist in boosting the competitiveness of northern districts, in line with the spatial strategy.	Phil Wood
	Green Belt		
JPA4.7	Concern over the loss of green belt land for employment site.	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25].</p> <p>There are allocation specific exceptional circumstances for releasing the Green Belt at Bewshill Farm. These are outlined in paragraph 14.7 of the Bewshill Farm Topic Paper [10.02.05] and fully outlined in the Green Belt Topic paper [07.01.25].</p>	David Hawes
JPA4.8	The cumulative impacts on Green Belt purpose should be fully considered.	<p>No change is necessary because cumulative assessment on Green Belt purpose is assessed in:</p> <p>[07.01.07] Stage 2 GM Green Belt Study – Cumulative Assessment of Proposed 2020 GMSF Allocations and Additions</p>	CPRE

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>[07.01.22] Stage 2 GM Green Belt Study – Addendum: Cumulative Assessment of proposed 2021 PfE Allocations and Additions.</p>	
	Transport		
JPA4.9	<p>No access arrangements are specific to and from the Strategic Route Network with local road access stated as being gained from the adjacent Logistics North site.</p>	<p>No change is considered necessary. The allocation is proposed to be accessed from the existing Logistics North Development as outlined in:</p> <ul style="list-style-type: none"> - [10.02.05] JPA4 Bewshill Farm Allocation Topic paper – paragraph 10.2 - Criterion 2 of policy JPA4 - [09.01.08] Transport Locality Assessments – Bolton – GMSF 2020 – Appendix A Paragraph 4.2 <p>Further detail will be provided at masterplanning and planning application stage.</p>	National Highways
JPA4.10	<p>Transport (Strategic Route Network) – National Highways state that at this stage, it is WSP’s opinion that the transport evidence underpinning this allocation is incomplete and does not identify in sufficient detail, the nature, scale and timing of the infrastructure requirements at the SRN; or what future assessments and studies that will be required to determine any such infrastructure requirements.</p>	<p>Transport Locality Assessment – <i>[Bolton]</i> [09.01.08] – GMSF2020 and Transport Locality Assessment Addendum – <i>[Bolton]</i> [09.01.20] provide detailed information on the nature, scale and timing of infrastructure requirements at the SRN.</p> <p>With respect to future assessments, the report states that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF.</p> <p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out</p>	National Highways

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>in [09.1.01] GM Transport Strategy 2040 and 09.01.02 GM Transport Strategy Our Five Year Delivery Plan 2021-2026. We are also working alongside National Highways to prepare a further piece of work examining a “policy-off/worst-case” impact on the SRN to help address National Highways remaining concerns.</p> <p>No change is considered necessary.</p>	
JPA4.11	Development will increase heavy traffic into the area including HGV's and commuting traffic, which will worsen the existing congestion.	<p>Paragraph's 10.12 and 10.13 of [10.02.05] JPA4 Bewshill Farm Allocation Topic Paper outline that the Locality Assessment concludes that traffic impacts are less than severe and that the allocation is considered deliverable with the proposed mitigation measures in place.</p> <p>No change is considered necessary because these mitigations are addressed through policies JPA4 and JPC7. These are considered to be robust policies, supported by a proportionate evidence base.</p>	Sylvia Fewtrell Phil Wood
JPA4.12	An impact assessment on locality is needed, including likely traffic flows out of area to adjoining areas	<p>It is considered that a proportionate evidence base has been provided, including likely flows out of the area to adjoining areas. It can be found here:</p> <ol style="list-style-type: none"> 1. [09.01.08] Transport Locality Assessments – Bolton – GMSF 2020 (Appendix A) 2. [09.01.20] Transport Locality Assessment Addendum – Bolton (Section 4) <p>No change is considered necessary.</p>	Peter Carr
	Infrastructure		
JPA4.13	Existing physical infrastructure and utilities cannot cope with new developments. Infrastructure will need to improve before any further units are built.	No change is considered necessary because a number of policies in the plan provide a sufficient policy framework to address this matter, such as JP-P1 (energy, water, drainage and green spaces) and JP-D2 (developer contributions). The plan needs to be read as a whole.	Peter Carr M Durbar Vicky Harper

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		As outlined in [12.02.05] JPA4 Bewshill Farm Topic Paper this allocation is located immediately adjacent to Logistics North which has a wide range of existing services and utilities (paragraph 13.1).	
	Environment		
JPA4.14	Ecology and Biodiversity Uplift -the allocation policy should specifically address ecological and biodiversity issues.	<p>A number of policies in the plan provide a sufficient policy framework to address this matter, such as policy JP-G9. The plan needs to be read as a whole, therefore no change is considered necessary.</p> <p>It is considered that policy JP-G9 is a robust policy supported by a proportionate evidence base. Further information on the allocation and policy JP-G9 can be found here:</p> <ul style="list-style-type: none"> - [10.02.05] JPA4 Bewshill Farm Allocation Topic Paper (paragraph's 18.0-18.3). - [07.01.26] Natural Environment Topic Paper 	Wildlife Trusts
JPA4.15	Biodiversity Evidence and 10% Biodiversity Uplift - No information on the current biodiversity interest is provided, without which ecological constraints and/or opportunities cannot be identified. Habitat and species surveys must be undertaken to inform any ecological avoidance, mitigation and/or compensation provided. Biodiversity enhancement plans need to be provided and the proposal needs to evidence how it would be able to provide the 10% biodiversity uplift.	See response on row JPA4.14.	Wildlife Trusts
JPA4.16	Landscaping should be provided that buffers the green infrastructure to the east and west of the site and protects and buffers the Cutacre Brook SBI and amphibian populations to the south of the proposed allocation.	<p>No change is required because Policy JP-G9 deals with nature conservation and sufficiently addresses this issue. The Plan needs to be read as a whole.</p> <p>It is considered that Policy JP-G9 is a robust policy supported by a proportionate evidence base. Further information on the allocation and Policy JP-G9 can be found here:</p>	Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<ul style="list-style-type: none"> - [10.02.05] JPA4 Bewshill Farm Allocation Topic Paper (paragraph's 18.0-18.3). - [07.01.26] Natural Environment Topic Paper 	
JPA4.17	Biodiversity Evidence and Biodiversity Net Gain Hierarchy - Interrogation of Natural England's Magic Map indicates that that woodlands along the brook are identified within the priority habitat inventory and that good quality semi-improved grassland (non-priority) habitat lies immediately adjacent to the East. Magic Map also identified that this area is within the Countryside Stewardship targeting area for Lapwing. Specific farmland bird surveys, therefore, need to be undertaken to assess the sites importance in supporting such species. This information should then be used to inform the Biodiversity Net Gain mitigation hierarchy of avoid, mitigate and finally, where no alternative is available, compensate any consequent loss of existing biodiversity.	See response in row JPA.16	Wildlife Trusts
JPA4.18	Ecological concern over decline in wildlife and habitats, including farmland birds.	<p>A number of policies in the Plan provide a sufficient policy framework to address this matter, such as policy JP-G9. The Plan needs to be read as a whole, therefore no change is considered necessary.</p> <p>Policy JP-G9 is considered to be a robust policy supported by a proportionate evidence base. Further information on the policy and evidence base can be found in [07.01.26] Natural Environment Topic Paper.</p>	Vicky Harper CPRE
JPA4.19	Water Saving - the following additional criterion should be added: 'The proposed development will be expected to incorporate water saving measures and equipment in accordance with the requirements of BREEAM or any other best practice targets as appropriate'.	Water efficiency measures in new developments will be a matter for district local plans to determine. This approach is considered consistent with the NPPF, particularly paragraph 28 which confirms that it is for local planning authorities 'to set out more detailed policies for specific areas, neighbourhoods or types of development'. Therefore, no change to the plan is considered as necessary.	United Utilities Group PLC
JPA4.20	Unsustainable	No change is considered necessary. The allocation has been subject to Integrated Assessment as set out in sections 8 and 9 of [10.02.05] JPA4	Vicky Harper

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Bewshill Farm Allocation Topic Paper. This concluded that the Bewshill Farm allocation makes a very positive or positive contribution to several objectives of the plan.	
JPA4.21	Concern over loss of green space and its importance for the Greater Manchester Green Infrastructure Network.	<p>Criterion 4 of Policy JPA4 requires high quality frontage, especially along the frontage with the A6. Policy JPA4 is considered to be a robust policy supported by a proportionate evidence base.</p> <p>In addition a number of policies in the Plan provide a sufficient policy framework to address this matter should development come forward, such as policy JP-G2. The Plan needs to be read as a whole, therefore no change is considered necessary. Policy JP-G2 is considered to be a robust policy supported by a proportionate evidence base. Further information on the policy can be found here in [07.01.26] Natural Environment Topic Paper (page 23).</p>	Vicky Harper CPRE
	Air Quality		
JPA4.22	Concern about air, light and noise pollution.	<p>As outlined in paragraph 21.2 of [10.02.05] JPA4 Bewshill Farm Allocation Topic Paper the site is not within an Air Quality Management Area.</p> <p>In terms of mitigation criterion 3 of Policy JPA4 requires that the development contributes to the Logistics North local link demand responsive transport service and criterion 4 requires high quality landscaping especially along its prominent frontage with the A6.</p> <p>In addition, a number of policies in the Plan provide a sufficient policy framework to address this matter, such as policy JP-S6 and JP-C7.</p> <p>Also, issues can be addressed at planning application stage. Any proposals will need to consider appropriate mitigation.</p>	Vicky Harper Sylvia Fewtrell Phil Wood
	Flood Risk		
JPA4.23	Concern over increased flood risk because development will reduce natural drainage	As outlined in section 11 of Topic Paper [10.02.05] JPA4 Bewshill Farm Allocation Topic Paper , the SFRA identified Bewshill Farm as a 'less vulnerable' site to flood risk and concludes that a site specific flood risk assessment is required at planning application stage.	Vicky Harper

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Flood risk at this site is considered to be addressed by policy JP-S5. The plan needs to be read as a whole, therefore no change is considered necessary.	
JPA4.24	<p>SuDS) – The following additional criteria should be added:</p> <p>‘Ensure that sustainable drainage systems are fully incorporated into the development to manage and control surface water run-off, discharging in accordance with the hierarchy of drainage options. Applicants should consider site topography, any naturally occurring flow paths and any low lying areas where water will naturally accumulate. Resultant layouts should take account of such existing circumstances to ensure the most sustainable and flood resilient solution is achieved. Landscaping proposals will be expected to be integrated with the strategy for surface water management. Natural and multi-functional SuDS should be utilised (in preference to traditional piped and tanked storage systems), prioritising the use of ponds, swales and other infrastructure which mimic natural drainage and connect to the wider green and blue infrastructure network. They will be designed in accordance with nationally recognised SuDS design standards. There should be a clear allocation-wide strategy for foul and surface water management which demonstrates a holistic approach with co-ordination between phases of development and no surface water discharging to public sewer. A proliferation of pumping stations should be avoided’.</p>	No change is considered necessary. A Strategic Flood Risk Assessment has been undertaken [04.02.01] across the plan, identifying the allocation as less vulnerable to flood risk and the need for a site specific Flood Risk Assessment [04.02.12] at the planning application stage in accordance with national policy and guidance. Policy JP-S5 provides further detailed policy in relation to flood risk and includes the management of surface water run-off through sustainable drainage systems. Therefore, the Plan as a whole, is considered to provide an appropriate policy framework to deal with this matter	United Utilities Group PLC
	Consultation		
JPA4.25	I am sure you make these documents deliberately long to stop people responding.	Comment not relevant to the content of Policy JPA4. No change is considered necessary.	Paul Roebuck
JPA4.26	Existing members of the community have not been properly engaged. A questionnaire should be submitted to every household or member of the community.	Comment not relevant to the content of Policy JPA4. Matter addressed elsewhere. No change is considered necessary.	M Durbar
	Minerals		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA4.27	It is disappointing that Minerals Safeguarding Areas and Minerals Infrastructure Safeguarding are not shown on the plan.	The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDP and will remain unchanged and applicable once PfE is adopted. Therefore it is not necessary to identify them on the PfE policies map and no change is considered necessary.	Mineral Products Association
	Residential		
JPA4.28	There are no affordable housing or eco homes	This is an employment allocation. No change is considered necessary.	Vicky Harper
	Greed of Developers		
JPA4.29	Object to the greed of developers	Comment not relevant to the content of Policy JPA4. No change is considered necessary.	Vicky Harper
	Hulton Park		
JPA4.30	Object to residential house building on and adjacent to Hulton Park.	Planning application 00997/17 at Hulton Park was approved by the Secretary of State following call in. A revised planning application has been submitted but it currently undetermined: 12218/21 . The proposals for Hulton Park are addressed in PfE Policy JP-Strat 8.	Graham White

PfE 2021 Policy JP Allocation 5 - Chequerbent North

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Support		
JPA5.1	<p>The allocation isn't immediately adjacent to housing and is aligned with existing industrial activity so will have minimal impact.</p> <p>This site is deliverable and will make an important contribution towards boosting competitiveness in northern Greater Manchester and will support the strategic 'Wigan-Bolton Growth Corridor. It is within the M61 Corridor, a location which experiences strong demand for employment uses.</p>	Support noted.	<p>Chris Green</p> <p>David Clough</p> <p>Rebecca Green</p> <p>Peel L&P Investments North Ltd</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>The site is ideally located to respond positively to the increasing demands of the growing logistics market, taking advantage of proximity to other developments in the M61 corridor, including the nearby Logistics North.</p> <p>The site has excellent direct access to the strategic highway network (M61, M6, M62).</p> <p>Part of the allocation is comprised of previously developed land and occupied by industrial uses; its use for employment is established and acceptable in principle having regard to paragraph 149 (g) of the NPPF.</p>		
	Planning History		
JPA5.2	The site has a long planning history and a number of applications have been refused, for genuine planning reasons.	This site is proposed to be allocated in line with the NPPF as explained in the [10.02.06] JPA5 Chequerbent North Allocation Topic Paper. Allocation of this site will help boost the competitiveness of the Northern Areas of Greater Manchester. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]	CPRE
	Principle of Development		
JPA5.3	Westhoughton and its surrounding area is bearing the complete load of industrial development on green land. There is already excessive industrial development at Cutacre/Logistics North and Wingates	<p>The [05.01.04] Employment Topic Paper identifies an industrial and warehousing floorspace requirement of 3,300,000 sqm across Greater Manchester for the plan period, and a shortfall of 1,494,491 sqm (paragraph 7.13) in terms of supply.</p> <p>To identify sites to meet this shortfall a site selection process was undertaken in line with the plan objectives and spatial strategy.</p> <p>The Chequerbent North allocation was identified through this site selection process as explained paragraph's 5.1-5.3 of the JPA5 Chequerbent North Allocation Topic paper 10.02.06.</p>	Phil Wood Slyvia Fewtrell

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		This allocation will support the aim of boosting the competitiveness of the northern boroughs in Greater Manchester, therefore no change is considered necessary.	
	Green Belt		
JPA5.4	<p>The site is well contained, separate and distinct from the wider Green Belt. It does not perform a strategic Green Belt function and its release for development would not result in significant harm to the contribution of remaining Green Belt land to the north and west.</p> <p>Exceptional circumstances exist to justify releasing the site from the Green Belt to meet the specific locational demands of the growing logistics sector and support economic growth in Greater Manchester.</p> <p>The site has clearly defined boundaries that will provide a long-term defensible boundary to the Green Belt in this location.</p>	Support for release of Green Belt noted.	Peel L&P Investments North Ltd
JPA5.5	<p>Concern over the loss of green belt in Bolton for an employment site. The site should be maintained as Green Belt land due to the important purpose it serves.</p>	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]</p> <p>There are allocation specific exceptional circumstances for releasing the Green Belt at Chequerbent North. These are outlined in paragraph 14.8 of the Chequerbent North Allocation Topic Paper [10.02.06] and fully outlined in the Green Belt Topic paper [07.01.25].</p> <p>No change is considered necessary.</p>	Chris Green CPRE
JPA5.6	Proposed development would mean no natural separating from nearby communities, which would lead to urban sprawl.	[07.01.09] Stage 2 GM Green Belt Study – Assessment of Proposed 2019 Allocations Appendix B splits Chequerbent North into two parcels – GM5-1	Phil Wood

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>and GM5-2. With regard to Green Belt purpose 1 (check the unrestricted sprawl of large built-up areas) GM5-1 has a rating of relatively significant and GM5-2 has a rating of moderate. With regard to Green Belt purpose 2 (prevent merging towns merging into one another) GM5-1 has a rating of relatively strong and GM5-2 has a rating of moderate.</p> <p>However, despite the PfE Plan setting out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]</p> <p>There are allocation specific exceptional circumstances for releasing the Green Belt at Chequerbent North. These are outlined in paragraph 14.8 of the Chequerbent North Allocation Topic Paper [10.02.06] and fully outlined in the Green Belt Topic paper [07.01.25].</p> <p>The Chequerbent North allocation was identified through the site selection process as explained paragraph's 5.1-5.3 of the JPA5 Chequerbent North Allocation Topic paper 10.02.06.</p> <p>This allocation will support the aim of boosting the competitiveness of the northern boroughs in Greater Manchester, therefore no change is considered necessary.</p>	
	Transport		
JPA5.7	It is envisaged that there will be no material impact on the highway network within Chorley. Chorley Council therefore has no objection to the allocation of this site as proposed.	Noted.	Chorley Council
JPA5.8	The traffic in and around Westhoughton and M61 junction 5 is gridlocked and traffic backs up onto the motorway. The proposals will	As outlined in paragraph's 10.5-10.7 of [10.02.05] JPA5 Chequerbent North Allocation Topic Paper the Locality Assessment gave an indication that	Sylvia Fewtrell Phil Wood

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>only increase traffic including HGV's. This will create more traffic and air pollution.</p>	<p>Chequerbent North is suitable for allocation, however, further work is required to progress with a scheme at Chequerbent Roundabout. Workable solutions are considered feasible.</p> <p>Paragraph 10.4 of [10.02.05] JPA5 Chequerbent North Allocation Topic Paper summarises the mitigation considered necessary in the [09.01.08] Transport Locality Assessments – Bolton – GMSF and [09.01.20] Transport Locality Assessments Addendum – Bolton. No change is considered necessary because these mitigations are addressed through policies JPA4 and JPC7. These are considered to be robust policies, supported by a proportionate evidence base.</p> <p>With regard to air quality see response on row JPA5.30.</p>	
JPA5.9	<p>It is WSP's opinion that the transport evidence underpinning this allocation is incomplete and does not identify in sufficient detail, the nature, scale and timing of the infrastructure requirements at the SRN; or what future assessments and studies that will be required to determine any such infrastructure requirements.</p>	<p>Transport Locality Assessment – <i>[Bolton]</i> [09.01.08] – GMSF2020 and Transport Locality Assessment Addendum – <i>[Bolton]</i> [09.01.20] provide detailed information on the nature, scale and timing of infrastructure requirements at the SRN.</p> <p>With respect to future assessments, the report states that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF.</p> <p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our "Right Mix" vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in [09.1.01] GM Transport Strategy 2040 and 09.01.02 GM Transport Strategy Our Five Year Delivery Plan 2021-2026. We are also working</p>	National Highways

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>alongside National Highways to prepare a further piece of work examining a “policy-off/worst-case” impact on the SRN to help address National Highways remaining concerns.</p> <p>No change is considered necessary.</p>	
JPA5.10	Improvement to Chequerbent roundabout should be proposed - the roundabout is overwhelmed during peak travel times.	<p>No change is necessary because improvement to Chequerbent Roundabout is addressed through criterion 4 of Policy JPA5. The supporting text for Policy JPA5 states that the requirements of this site to contribute to improving Chequerbent Roundabout will be considered at the time of any planning application.</p> <p>As outlined in paragraph’s 10.5-10.7 of [10.02.05] JPA5 Chequerbent North Allocation Topic Paper the Locality Assessment states that further work is required to progress with a scheme at Chequerbent Roundabout. Workable solutions are considered feasible.</p> <p>Policy JPA5 is considered to be robust, and supported by a proportionate evidence base, which can be found here:</p> <ol style="list-style-type: none"> 1. [09.01.08] Transport Locality Assessments – Bolton – GMSF 2020 (Appendix B) 2. [09.01.20] Transport Locality Assessment Addendum – Bolton (Section 5) 	Carole Dawson
JPA5.11	An impact assessment on locality is needed including likely traffic flows out of area to adjoining areas	<p>It is considered that a proportionate evidence base has been provided, including likely flows out of the area to adjoining areas. It can be found here:</p> <ol style="list-style-type: none"> 1. [09.01.08] Transport Locality Assessments – Bolton – GMSF 2020 (Appendix B) 2. [09.01.20] Transport Locality Assessment Addendum – Bolton (Section 5) 	Peter Carr

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		No change is considered necessary.	
JPA5.12	<p>Criterion 4 of policy JPA5 states 'Provide financial contribution to mitigate impacts on the Local Road Network including improvements to Chequerbent roundabout or other improvements identified through a transport assessment'. At paragraph 11.99 it rightly recognises that 'Other developments in the vicinity may change the layout of the Chequerbent roundabout before the development of this site, and the requirements of this site to contribute to improving the roundabout will be considered at the time of any planning application'. The policy is therefore contradictory to the reasoned justification by making financial contributions a requirement, when such contributions may not in fact be necessary. The policy should be modified to better reflect the reasoned justification.</p> <p>The wording of the fourth criterion should be modified as follows:</p> <p>Provide financial contribution to 'Mitigate impacts on the Local Road Network including any necessary improvements to Chequerbent roundabout and/or other improvements identified through a transport assessment'.</p>	<p>As outlined in the Locality Assessments [09.01.08] and [09.01.20], under current circumstances mitigation may be required at Chequerbent Roundabout. If at the time of a planning application sufficient mitigation has already occurred financial contributions will not be necessary.</p>	Peel L&P Investments North Ltd
	Access		
JPA5.13	<p>Access is stated as being required to be obtained from the A6 to the south of the site with no detail set out the site will interact with the SRN, with M61 Junction 5 being located within close proximity to the proposed development site allocation. The allocation does however highlight that the proposed site allocation has excellent access to M61 Junction 5."</p>	<p>Impact and mitigation on the Strategic Road Network is addressed in the Locality Assessments:</p> <p>[09.01.08] Transport Locality Assessments – Bolton – GMSF 2020 (Appendix B).</p> <p>[09.01.20] Transport Locality Assessments Addendum – Bolton (Section 5, page 20).</p>	National Highways

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>We are also working alongside National Highways to prepare a further piece of work examining a “policy-off/worst-case” impact on the SRN to help address National Highways remaining concerns.</p> <p>No change is considered necessary.</p>	
JPA5.14	<p>The design of the site provides for access on the A58 (left in and left out) and on the A6 (either way in and out). This means that virtually all HGV and car movements have to use Chequerbent roundabout to either enter or leave the site. All these HGV movements impose considerable risk of accidents on the roundabout and contribute to congestion.</p> <p>A more effective design would be for the main exit from the site to be on the north edge of it, close to the M61 westbound off-ramp. With suitable addition of lanes, the site-leaving traffic would merge with the off-ramp traffic and could then use the M61 roundabout to join either eastbound or westbound.</p>	<p>Access arrangements are addressed in criteria 2 and 3 of Policy JPA5. Policy JPA5 is considered to be a robust policy supported by a proportionate evidence base, which can be found here:</p> <p>[10.02.06] JPA5 Chequerbent North Allocation Topic Paper (Section 10, page 12)</p> <p>[09.01.08] Transport Locality Assessments – Bolton (Appendix B – paragraphs 10.1.1 – 10.1.4).</p> <p>[10.02.02] JPA5 – Development Framework (page 26)</p>	Phil Wood
JPA5.15	<p>Access should not be given from Snyderdale Way, which is already overwhelmed with traffic during peaks travelling times.</p>	<p>See response in row JPA5.14</p>	Carole Dawson
JPA5.16	<p>Criterion 2 is unnecessarily prescriptive, such that it is not considered effective (NPPF paragraph 35) or sound.</p> <p>Deliverable vehicular access can be achieved from:</p> <p>(a) the A6 to the south, and</p> <p>(b) from the north /north-west from either the A58 Snyderdale Way or directly from Junction 5 of the M61.</p> <p>The wording of the second criterion should be modified as follows:</p>	<p>See response in row JPA5.14</p>	Peel L&P Investments North LTD

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	'Be accessed from the A6, with a potential additional access via directly off Junction 5 of the M61, and/or from Snydale Way, subject to detailed design considerations'.		
	Environment		
JPA5.17	With a decline in wildlife and habitats, we need to ensure some net biodiversity gain.	<p>A number of policies in the Plan provide a sufficient policy framework to address this matter, such as policy JP-G9. Policy JP-G9 is considered to be robust and supported by a proportionate evidence base. Further information on the allocation and policy can be found here:</p> <p>[07.01.26] Natural Environment Topic Paper</p> <p>[10.02.06] JPA5 Chequerbent North Allocation Topic Paper (paragraph's 18-18.3)</p> <p>[10.02.01] JPA5 Ecological Assessment</p> <p>[10.02.02] JPA5 Development Framework</p> <p>The Plan needs to be read as a whole, therefore no change is considered necessary.</p>	Vicky Harper
JPA5.18	The Ecological Reports [10.02.01] recommendations that identified wildlife corridors, woodlands, hedgerows, ponds and high value habitat existing within the site should be retained and protected by habitat buffers are agreed with. However, there are no specific allocation policies to deliver this.	See response in row JPA5.17	The Wildlife Trusts
JPA5.19	The 10.02.01 JPA5 Ecological Assessment concludes that the majority of the site has relatively low ecological value as it is dominated by species poor arable monoculture and semi-improved grassland. While this might be true in botanical terms, the report highlights the importance of the grasslands for farmland bird species. It further states that this loss of grassland would result in a reduction	See response in row JPA5.17	Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	in range for farmland bird species and Brown Hare along with a reduction in foraging habitat for badger.		
JPA5.20	No specific bird surveys have been carried out. Desktop searches reveal that Section 41 bird species are present. S41 species are a material consideration in planning development. Mitigation and enhancement plans must be provided. If these species cannot be adequately mitigated on site, then off site mitigation must be provided. Suitable compensation areas need to be identified and managed to enhance the populations of the identified S41 bird species. This compensation must be in addition to the biodiversity net gain provided as part of the development.	See response in row JPA5.17	Wildlife Trusts
JPA5.21	The [10.02.01] JPA5 Ecological Assessment claims the effect of the losses of habitat should be balanced by creation of new habitats of value to birds and badgers. The size and character of the grasslands provided must compensate for the impact of the species identified as being present and impacted. It is clear that the mitigation /compensation habitat provided would not be suitable for these species. This approach to mitigation/compensation is unsustainable and would lead to the loss of Section 41 bird species from the site.	See response in row JPA5.17	Wildlife Trusts
JPA5.22	The [10.02.01] JPA5 Ecological Assessment argues that Biodiversity Net Gain is only sought across the plan area as a whole. Disagree with this - Biodiversity Net gain must first be provided within each allocation before progressing the local area and ultimately across the plan area as a whole.	Biodiversity Net Gain is covered by Policy JP-G9. This is a robust policy supported by proportionate evidence as outline in [07.01.26] Natural Environment Topic Paper.	Wildlife Trusts
JPA5.23	There should be a specific requirement within the allocation policy to protect the local brook and buffer and enhance the wetland ecological network that it provides.	A number of policies in the Plan provide a sufficient policy framework to address this matter, particularly policy JP-G9. Policy JP-G9 is considered to be robust and supported by a proportionate evidence base	Wildlife Trusts
JPA5.24	The following additional criteria is recommended:	No change is considered necessary. A Strategic Flood Risk Assessment has been undertaken [04.02.01] across the plan, identifying the allocation as less vulnerable to flood risk and the need for a site specific Flood Risk	United Utilities Group PLC

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>'Ensure that sustainable drainage systems are fully incorporated into the development to manage and control surface water run-off, discharging in accordance with the hierarchy of drainage options. Applicants should consider site topography, any naturally occurring flow paths and any low lying areas where water will naturally accumulate. Resultant layouts should take account of such existing circumstances to ensure the most sustainable and flood resilient solution is achieved. Landscaping proposals will be expected to be integrated with the strategy for surface water management. Natural and multi-functional SuDS should be utilised (in preference to traditional piped and tanked storage systems), prioritising the use of ponds, swales and other infrastructure which mimic natural drainage and connect to the wider green and blue infrastructure network. They will be designed in accordance with nationally recognised SuDS design standards. There should be a clear allocation-wide strategy for foul and surface water management which demonstrates a holistic approach with co-ordination between phases of development and no surface water discharging to public sewer. A proliferation of pumping stations should be avoided'.</p>	<p>Assessment [04.02.12] at the planning application stage in accordance with national policy and guidance. Policy JP-S5 provides further detailed policy in relation to Flood Risk. Therefore, the Plan as a whole, is considered to provide an appropriate policy framework to deal with this matter.</p>	
JPA5.25	<p>The following additional criteria is recommended:</p> <p>'The proposed development will be expected to incorporate water saving measures and equipment in accordance with the requirements of BREEAM or any other best practice targets as appropriate'.</p>	<p>Water efficiency measures in new developments will be a matter for district local plans to determine. This approach is considered consistent with the NPPF, particularly paragraph 28 which confirms that it is for local planning authorities 'to set out more detailed policies for specific areas, neighbourhoods or types of development'. Therefore, no change to the plan is considered as necessary.</p>	United Utilities Group PLC
JPA5.26	<p>This proposal at this allocation is unsustainable</p>	<p>The allocation has been assessed through the Integrated Appraisal as set out in sections 8 and 9 of [10.02.06] JPA5 Chequerbent North Allocation Topic Paper. This concluded that the Chequerbent North allocation makes a very positive or positive contribution to several objectives of the plan.</p>	Vicky Harper
JPA5.27	<p>Object to the loss of green space</p>	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with</p>	Vicky Harper

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]. The site specific exceptional circumstances for the release of this site from the Green Belt are outlined in paragraph 14.8 of [10.02.06] JPA5 Chequerbent North Allocation Topic Paper.</p>	
JPA5.28	<p>Environment (Loss of farmland) - The site involves the loss of grade 3 farmland. The value of the site to support food and farming is important and the protection and enhancement for future generations food security is a valid consideration</p>	<p>See response in row JPA5.27</p>	CPRE
	<p>Air Quality and Noise Pollution</p>		
JPA5.29	<p>Proposed development would bring about high levels noise and air pollution along the M61 Corridor. This will only worsen due to the increase of HGVs/traffic.</p>	<p>As outlined in [10.02.06] JPA5 Chequerbent North Allocation Topic Paper the site lies immediately adjacent to but outside the Air Quality Management Area.</p> <p>In terms of air pollution mitigation:</p> <ul style="list-style-type: none"> - [10.02.02] JPA5 Development Framework states that the proposed delivery of the Westhoughton bypass will improve traffic flows and enhance air quality - A travel plan will encourage people working at the site to use sustainable travel options. - Criterion 3 of Policy JPA5 requires good access to the site by public transport walking and cycling. - Criterion 4 of Policy JPA4 requires financial contribution to mitigate impacts on the Local Road Network - Criterion 5 requires landscaping and the retention of trees along boundaries. <p>In terms of mitigating noise pollution:</p>	<p>Vicky Harper Sylvia Fewtrell</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>- [10.02.02] JPA5 Development Framework states in paragraph 25 that appropriate buffers and necessary attenuation measures can be incorporated into the development to ensure that noise within the buildings in within acceptable limits</p> <p>- Criterion 5 of Policy JPA5 requires landscaping and retention of trees along boundaries.</p> <p>In addition, a number of policies in the Plan provide a sufficient policy framework to address this matter, such as policy JP-S6 and JP-C7.</p> <p>Also, issues can be dealt with at planning application stage. Any proposals will need to consider appropriate mitigation.</p> <p>No change is considered necessary.</p>	
	Flood Risk		
JPA5.30	Concerned about the increased flood risk these proposals could bring about.	<p>As set out in section 11 of [10.02.06] JPA5 Chequerbent North Allocation Topic Paper the SFRA identifies Chequerbent North as a 'less vulnerable' site to flood risk but states that the layout and design of the development proposed should consider flood risk. The site is located entirely within Flood Zone 1, with low probability of flooding.</p> <p>Peel have suggested implementing a comprehensive Sustainable Urban Drainage System. This is addressed through Policy JP-S5.</p> <p>Other flood risk issues at this site are also considered to be addressed by policy JP-S5. The plan needs to be read as a whole, therefore no change is considered necessary.</p>	Vicky Harper
	Infrastructure		
JPA5.31	Lack of supporting infrastructure. Infrastructure and civil society implications not fully considered.	No change is considered necessary because a number of policies in the plan provide a sufficient policy framework to address this matter, such as JP-P1	Peter Carr M Durbar Vicky Harper

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		(energy, water, drainage and green spaces) and JP-D2 (developer contributions). The plan needs to be read as a whole. As outlined in paragraph 5.27 of [10.02.02] JPA5 Development Framework Chequerbent North can be satisfactorily connected to the key utilities.	
JPA5.32	The following additional criteria should be included: 'Any proposal must have full regard to the existing utility infrastructure that passes through the site which includes significant water supply infrastructure. Early dialogue will be required with United Utilities to understand the implications of this infrastructure on the detailed design and layout including changes in site levels. Consideration and inclusion of appropriate protective measures both during construction and during the lifetime of the development will be required'.	The [10.02.02] JPA5 Development Framework recognises that the site is located immediately adjacent to a longstanding developed area with a range of existing infrastructure including water, gas, electricity and telecommunications. This issue will be fully addressed through further masterplanning and planning applications, including dialogue with the United Utilities.	United Utilities Group PLC
	Consultation		
JPA5.33	I am sure you make these documents deliberately long to stop people responding on purpose	Comment not relevant to the content of Policy JPA5. Matter addressed elsewhere.	Paul Roebuck
JPA5.34	Too much engagement with greedy developers	Comment not relevant to the content of Policy JPA5. Matter addressed elsewhere.	M Durbar Vicky Harper
JPA5.35	Insufficient engagement with local community. A questionnaire should be submitted to every household and member of the community in the area.	Comment not relevant to the content of Policy JPA5. Matter addressed elsewhere.	M Durbar
	Hulton Park Proposals		
JPA5.36	I think it will be essential that any development at Chequerbent and surrounding areas takes full account of any possible development at Hulton Park and the joint impact on roads, traffic, infrastructure and support services.	The approved development at Hulton Park is dependent upon it being awarded the Ryder Cup and a further planning application is still awaiting determination. Due to the uncertainty the housing is not currently included in the PfE land supply. [09.01.20] Transport Locality Assessments Addendum Bolton outlines that the approved Hulton Park development is not included in the model, however, further work is being undertaken by the developers consultants to take account of the modelling work to date and factor in the impact of the Hulton Park development.	Terence Kelly

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Policy JP-C7 requires planning applications to be accompanied by a Transport Assessment where appropriate. Planning applications would therefore be fully assessed in terms of transport including transport issues in the vicinity.	
	Minerals		
JPA5.37	Minerals - It is disappointing that Minerals Safeguarding Areas and Minerals Infrastructure Safeguarding are not shown on the plan.	The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDP and will remain unchanged and applicable once PfE is adopted. Therefore it is not necessary to identify them on the PfE policies map and no change is necessary.	Mineral Products Association
	Duty to Cooperate		
JPA5.38	Failure of duty to cooperate with Wigan MBC. There is a long-established intention to develop the A5225 link road between M61 J5 and the M6 near Wigan. This would have considerable economic benefits to both Bolton and Wigan. Wigan MBC has been making incremental constructions which facilitate the construction of this road. Within Bolton, this proposal in conjunction with the Lee Hall housing project already in construction, make virtually impossible the construction of an effective, free-flowing Westhoughton bypass to connect with the Wigan parts of the A5225 or Atherleigh Way and A580 East Lancs Road. The road design of Snydale Way, M61 roundabout and Chequerbent roundabout will require significant lane widening works, which are adversely affected by this proposal as it stands.	As this is a joint plan involving both Bolton and Wigan the proposals have been prepared in collaboration with Wigan. The [09.01.08] Transport Locality Assessments Bolton and [09.01.20] Transport Locality Assessments Addendum Bolton assesses cross boundary flows with Wigan where necessary.	Phil Wood
	Residential		
JPA5.39	Housing - No affordable or eco homes	This is an employment allocation. No change is considered necessary	Vicky Harper
	Hulton Park		
JPA5.40	Object to residential house building on and adjacent to Hulton Park.	Planning application 00997/17 at Hulton Park was approved by the Secretary of State following call in. A revised planning application has been submitted but it currently undetermined: 12218/21 . The proposals for Hulton Park are addressed in PfE Policy JP-Strat 8.	Graham White

PfE 2021 Policy JP Allocation 6 - West of Wingates / M61 Junction 6

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Existing Planning Permission		
JPA6.1	Planning permission was granted by the Secretary of State in June 2021 for employment development within this prospective allocation. This decision and the evidence upon which it was based confirmed this location is appropriate for employment development and the need to remove land from the Green Belt.	Support noted – The planning permission reference is 04766/18	Harworth Group
	Viability		
JPA6.2	The developer has a very high level of confidence in the viability of development, are confident that development within this site may commence in the short term and that the quantum of development is able to be delivered within the plan period.	Support noted	Harworth Group
	Evidence		
JPA6.3	Supporting Evidence is prepared by Harworth Group, a major landowner in the allocation plot, therefore this document cannot be considered as unbiased.	It is considered that a proportionate evidence base has been provided to support the policy, in line with the NPPF. It can be found here: -[10.02.04] JPA6 Supporting Information -[10.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper [10.02.04] (JPA6 Supporting Information) has been produced by Johnson Mowat Planning and Development Consultants for Harworth Group. This document relates to an alternative site boundary, which the council does not support. However, it is considered that this document still contains useful evidence in relation to the boundary proposed in PfE.	Liam Heavey
JPA6.4	Clean Air cameras are proposed for the region, this factor does not appear to have been considered in the supporting documentation. These cameras will deter new businesses from entering the area.	A strategic viability assessment, [03.01.01] has been published alongside the PfE Plan. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether	Liam Heavey

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		particular circumstances justify the need for a viability assessment at the application stage.	
JPA6.5	Supporting evidence was prepared in April 2020 when the full effects of the COVID-19 pandemic were not known. There is now a labour shortage and it appears that the need for warehousing will be reduced. In addition more business are using robots.	<p>No change is considered necessary because a proportionate evidence base has been provided to support the employment need. It can be found here:</p> <ul style="list-style-type: none"> - [05.01.04] Employment Topic Paper (Section 4) - [05.01.01] Economic Forecasts for Greater Manchester - [05.01.02] Employment Land Needs in Greater Manchester <p>As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03].</p>	Liam Heavey
	Principle of Development		
JPA6.6	Bolton already has large industrial development at Logistics North and Wingates. Westhoughton and surrounding area (Wingates to Logistics North) is bearing the complete load of industrial development on green space for Bolton.	<p>It is considered that a proportionate evidence base has been provided to support the employment need. It can be found here:</p> <ul style="list-style-type: none"> - [05.01.04] Employment Topic Paper (Section 4) - [05.01.01] Economic Forecasts for Greater Manchester - [05.01.02] Employment Land Needs in Greater Manchester <p>No change is considered necessary because the Wigan to Bolton growth corridor is an excellent location for logistics and industrial uses. Strong demand for employment uses in the M61 corridor is evidenced by the success of other developments including Logistics North. Developing the land to the West of Wingates would allow a continuing supply of land for warehousing and distribution in the M61 corridor and would assist in</p>	Graham Kelly Jean Kelly Phil Wood

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		boosting the competitiveness of northern districts, in line with the spatial strategy.	
JPA6.7	A shedscape is being developed in this part of Bolton	<p>Criteria 6 and 7 of Policy JPA6 provide mitigation in relation to this issue. Criterion 2 requires development to be in accordance with an agreed comprehensive masterplan. Policy JPA6 is considered to be a robust policy supported by proportionate evidence.</p> <p>[10.02.04] JPA6 - Supporting Information (paragraph 5.41) outlines that means of mitigating and softening impact on the landscape are to be incorporated in the masterplanning process, including the retention and creation of buffer strips, amenity areas and screen planting.</p> <p>Further information can be found in [12.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper (paragraph 17.1-17.2, pages 32-33)</p> <p>No change is considered necessary.</p>	CPRE
	Green Belt		
JPA6.8	There would be no natural break from other nearby communities creating an urban sprawl.	<p>[07.01.09] Stage 2 GM Green Belt Study – Assessment of Proposed 2019 Allocations Appendix B Splits Allocation JPA6 into two parcels – GM6-1 and GM6-2. With regard to Green Belt purpose 1 (check the unrestricted sprawl of large built-up areas) GM6-1 and GM6-2 both have a rating of significant. With regard to Green Belt purpose 2 (prevent merging towns merging into one another) GM6-1 and GM6-2 both have a rating of significant.</p> <p>However, despite the PfE Plan setting out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment</p>	Dorothy Heavey Mrs D Roscoe

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>Topic Paper [05.01.04]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25].</p> <p>There are allocation specific exceptional circumstances for releasing the Green Belt at Allocation JPA6. These are outlined in paragraph 14.13 of the JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper [10.02.07] and fully outlined in the Green Belt Topic paper [07.01.25].</p> <p>The West of Wingates M61 Junction 6 allocation was identified through the site selection process as explained paragraph's 5.1-5.3 of the JPA6 West of Wingates M61 Junction 6 Allocation Topic paper [10.02.07]</p> <p>This allocation will support the aim of boosting the competitiveness of the northern boroughs in Greater Manchester, therefore no change is considered necessary.</p>	
JPA6.9	<p>Industrial and warehousing floorspace employment can be accommodated on brownfield land including vacancies on the current Wingates Industrial Estate. Exceptional circumstances are not justified for Green Belt release.</p>	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25].</p> <p>There are allocation specific exceptional circumstances for releasing the Green Belt at Allocation JPA6. These are outlined in paragraph 14.13 of the JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper [10.02.07] and fully outlined in the Green Belt Topic paper [07.01.25].</p>	<p>Graham Kelly Jean Kelly Dorothy Heavey David Clough Sylvia Fewtrell Mrs D Roscoe</p>
JPA6.10	<p>Too much Green Belt loss in Westhoughton and Fourgates, which has already had its fair share of development. It is unfair that so much industry should be put in one area of the borough because it happens to have a motorway running through it. This will destroy the character</p>	<p>No change is considered necessary because the Wigan to Bolton growth corridor is an excellent location for logistics and industrial uses. Strong demand for employment uses in the M61 corridor is evidenced by the success of other developments including Logistics North. Developing the</p>	<p>Chris Green David Clough CPRE Dorothy Heavey</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	of the area. North east of Bolton has the A666 running through it which links up directly to the M61. Cumulative impacts on Green Belt need to be fully considered.	<p>land to the West of Wingates would allow a continuing supply of land for warehousing and distribution in the M61 corridor and would assist in boosting the competitiveness of northern districts, in line with the spatial strategy. Site selection is summarised in paragraph's 5.1-5.3 of the JPA6 West of Wingates M61 Junction 6 Allocation Topic paper [10.02.07]</p> <p>With regard to destroying the character of the area see response on row JPA6.7</p> <p>Cumulative assessment on Green Belt purpose is assessed in:</p> <ul style="list-style-type: none"> - [07.01.07] Stage 2 GM Green Belt Study – Cumulative Assessment of Proposed 2020 GMSF Allocations and Additions - [07.01.22] Stage 2 GM Green Belt Study – Addendum: Cumulative Assessment of proposed 2021 PfE Allocations and Additions. 	Mrs D Roscoe Jean Kelly
JPA6.11	Green Belt should remain in its entirety for future generations of people and wildlife.	See response in rows JPA6.9 and JPA6.32	Graham Kelly Jean Kelly Dorothy Heavey David Clough Vicky Harper
JPA6.12	The NPPF states that “a LPA should regard the construction of new buildings as inappropriate in the Green Belt”. The exceptions listed do not include huge warehouses and factories. (Paragraph 149)	The release of Green Belt for employment use at Allocation JPA6 complies with the NPPF. Details of the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] . Details of the site specific exceptional circumstances for releasing Green Belt can be found in the [12.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper (paragraph14.13). .	Dorothy Heavey Mrs D Roscoe
JPA6.13	The M61 should remain within a greenbelt corridor, to separate Wigan from Bolton, to create a breathing space and continued perception of open space to anyone using the public rights of way or highways in the area. The space between the A6 and the M61 should not be built on.	The [07.01.07] Stage 2 Green Belt Study Cumulative Assessment demonstrates that the wider Green Belt still meets the purposes of the Green Belt. In this study Allocation JPA6 falls within Strategic Green Belt Area 1. In summary:	Faith Crompton

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<ul style="list-style-type: none"> - Green Belt Purpose 1: Release of the Allocation JPA6 would in itself constitute significant urban sprawl, however, release of Allocation JPA6 would not weaken the contribution of the remaining Green Belt. - Green Belt Purpose 2: Release of Allocation JPA6 would narrow the gap, however, the size of the gap and the separating features that would remain means that the Green Belt would continue to contribute to preventing the settlements from merging. - Green Belt Purpose 3: Release of Allocation JPA6 would in itself encroach on the countryside, however, the remainder of the strategic area would continue to safeguard the countryside from encroachment. - Green Belt Purpose 4: Release of Allocation JPA6 may detract from the setting and special character of Westhoughton but would not have an effect on preserving the setting and special character of other historic towns. 	
	Location of Development		
JPA6.14	More jobs are needed on the north and east side of the borough, not the west.	<p>No change is considered necessary because the Wigan to Bolton growth corridor is an excellent location for logistics and industrial uses. Strong demand for employment uses in the M61 corridor is evidenced by the success of other developments including Logistics North. Developing the land to the West of Wingates would allow a continuing supply of land for warehousing and distribution in the M61 corridor and would assist in boosting the competitiveness of northern districts, in line with the spatial strategy. Site selection is summarised in paragraph's 5.1-5.3 of the JPA6 West of Wingates M61 Junction 6 Allocation Topic paper [10.02.07]</p> <p>Criteria 3, 4 and 5 of Policy JPA6 ensure good transport links to the allocation. Policy JPA6 is considered to be a robust policy supported by a proportionate evidence base. The evidence base can be found here: it can be found here:</p>	Dorothy Heavey Mrs D Roscoe

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>-[09.01.08] Transport Locality Assessments – Bolton – GMSF (Appendix C)</p> <p>-[09.01.20] Transport Locality Assessments Addendum – Bolton (Section 6)</p>	
	Transport		
JPA6.15	Need impact assessment on locality including likely traffic flows out of area to adjoining areas	<p>It is considered that a proportionate evidence base has been provided including likely flows out of the area to adjoining areas. It can be found here:</p> <p>-[09.01.08] Transport Locality Assessments – Bolton – GMSF (Appendix C)</p> <p>-[09.01.20] Transport Locality Assessments Addendum – Bolton (Section 6)</p>	Peter Carr
JPA6.16	Why is a second link road required to J6 of M61 when the A6 already has this function from existing business areas?	As explained in paragraph 11.103 of PfE this would provide an opportunity for both a link from the site to the residential areas of Westhoughton and a western bypass for Westhoughton.	Faith Crompton
JPA6.17	There is no immediate access to the motorway network	<p>Criterion 4 of Policy JPA6 states that development will take advantage of the sites location near junction 6 of the M61. The supporting text to Policy JPA6 outlines that development would require a new road across the site and to the north to link with junction 6 of the M61. Policy JPA6 is considered to be a robust policy supported by proportionate evidence base. The evidence base can be found here:</p> <p>-[09.01.08] Transport Locality Assessments – Bolton – GMSF (Appendix C)</p> <p>-[09.01.20] Transport Locality Assessments Addendum – Bolton (Section 6)</p> <p>-10.02.04 JPA6 – Supporting Information (page 34)</p>	Graham Kelly Jean Kelly
JPA6.18	Development of the new link road does not solve the problem of crossing the A6 to get to the M61.	As outlined in paragraph 10.11 of [10.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper the Locality Assessments conclude that the traffic impacts of the proposed development are less than severe and	Graham Kelly

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		<p>the allocation is deliverable with the proposed mitigation measures in place. The mitigation measures necessary are summarised in paragraph 10.7. These mitigations are addressed through policies JPA6 and JP-C7.</p> <p>Policy JPA6 is considered to be a robust policy, supported by a proportionate evidence base, which can be found here:</p> <p>-[09.01.08] Transport Locality Assessments – Bolton – GMSF (Appendix C)</p> <p>-[09.01.20] Transport Locality Assessments Addendum – Bolton (Section 6)</p>	
JPA6.19	<p>Policy P6AP does not detail what measures will be implemented to ensure that the proposed development does not have a significantly adverse impact, in traffic terms, on the SRN.</p> <p>The proposed scale of development is likely to impact the SRN in terms of the vehicle trips generated, of which a high proportion will be LGVs and HGVs due to the focus on the site to deliver B2 / B8 use-class development. Development of the site is expected to contribute towards the cumulative traffic impact of development along the M61 corridor.</p>	<p>See response in row JPA6.18</p> <p>In addition paragraph 10.11 of [10.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper outlines that further work will be required in parallel with Highways England (now National Highways) to ensure that the mitigation scheme proposed for Junction 5 of the M61 and A6 De Havilland Way/A6 Chorley Road (impacting on M61 junction 6) can be accommodated and delivered.</p>	National Highways
JPA6.20	<p>At this stage, it is WSP's opinion that the transport evidence underpinning this allocation is incomplete and does not identify in sufficient detail, the nature, scale and timing of the infrastructure requirements at the SRN; or what future assessments and studies that will be required to determine any such infrastructure requirements."</p>	<p>Transport Locality Assessment – [Bolton] [09.01.08] – GMSF2020 and Transport Locality Assessment Addendum – [Bolton] [09.01.20] provide detailed information on the nature, scale and timing of infrastructure requirements at the SRN.</p> <p>With respect to future assessments, the report states that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a</p>	National Highways

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		<p>site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF.</p> <p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in [09.1.01] GM Transport Strategy 2040 and 09.01.02 GM Transport Strategy Our Five Year Delivery Plan 2021-2026. We are also working alongside National Highways to prepare a further piece of work examining a “policy-off/worst-case” impact on the SRN to help address National Highways remaining concerns.</p> <p>No change is considered necessary.</p>	
JPA6.21	Transport – concerns over increased traffic congestion due to increased workforce and HGV’s	See response in row JPA6.18	Graham Kelly Jean Kelly Dorothy Heavey Colin Heyworth Sylvia Fewtrell Phil Wood Mrs D Roscoe
JPA6.22	The developers for Phase 1 have put forward mitigation works for the junctions along the A6 but for the junction of Church Street (B5236) with the A6 at Manchester Road they have admitted that no mitigation at all is possible. Traffic which is already backing up right the way down Church Street and also along the A6 would be far worse.	See response in row JPA6.18. In addition this relates to the approved planning application 04766/18 , rather than proposed allocation JPA6. No change is considered necessary.	Dorothy Heavey Mrs D Roscoe
JPA6.23	Job vacancies have been difficult to fill on the Wingates Industrial Estate because of the problems travelling there.	It is considered that transport issues are sufficiently addressed in criteria 3, 4 and 5 of Policy JPA6 and in Policy JP-C7. These are considered to be robust policies supported by a proportionate evidence base. The evidence base relevant to this allocation can be found here: - [09.01.08] Transport Locality Assessments – Bolton – GMSF (Appendix C)	Dorothy Heavey Mrs D Roscoe

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		<p>- [09.01.20] Transport Locality Assessments Addendum – Bolton (Section 6)</p> <p>- [10.02.04] JPA6 – Supporting Information (page 34)</p> <p>No change is considered necessary.</p>	
JPA6.24	<p>This development seeks to draw in workers from all over the borough as well as Wigan and Salford. So, unless jobs are filled locally, it entails the use of many more cars which runs contrary to sustainable development.</p>	<p>The 2020 Integrated Appraisal found that Allocation JPA6 would make a very positive contribution to several Plan objectives including ‘promoting sustainable modes of transport’.</p> <p>Provision for public transport, demand responsive services, walking and cycling are addressed through Policy JPA6 (criterion 5) and Policy JP-C7. These are considered to be robust policies, supported by a proportionate evidence base. The evidence specific to this allocation is:</p> <p>- [09.01.08] Transport Locality Assessments – Bolton – GMSF (Appendix C)</p> <p>- [09.01.20] Transport Locality Assessments Addendum – Bolton (Section 6)</p> <p>- [10.02.04] JPA6 – Supporting Information (page 34)</p> <p>No change is considered necessary.</p>	<p>Dorothy Heavey Mrs D Roscoe</p>
JPA6.25	<p>It is envisaged that there will be no material impact on the highway network within Chorley. Chorley Council have no objection to the allocation of the site as proposed.</p>	<p>Noted</p>	<p>Chorley Council</p>
JPA6.26	<p>Impacts the use of the area for walking, running, cycling and horse riding.</p>	<p>Use of the site for walking, running, cycling and horse riding is addressed by criteria 5 and 10 of Policy JPA6 and Policy JP-C7. Evidence specific to this Allocation JPA6 includes:</p> <p>-[09.01.08] Transport Locality Assessments – Bolton – GMSF (Appendix C)</p>	<p>Dorothy Heavey Mrs D Roscoe</p>

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		<p>-[09.01.20] Transport Locality Assessments Addendum – Bolton (Section 6)</p> <p>-[10.02.04] JPA6 – Supporting Information (from page 34)</p> <p>Of particular note [10.02.04] JPA6 – Supporting Information states that:</p> <ul style="list-style-type: none"> - any development will be expected to enhance walking and cycling accessibility with the provision of new and upgraded footpaths and cycle paths within the site and surrounding area. - The prospective upgrading of routes from footpaths to bridleways (where appropriate) will facilitate access by a greater range of users with different travel and mobility requirements. <p>No change is considered necessary.</p>	
JPA6.27	The site is close to local nature reserve Borsdane Wood and a site masterplan needs to take into consideration local walkers, cyclist and horse riding in the area to improve connections.	See response in row JPA6.26. In addition criterion 2 of Policy JPA6 requires the site to be developed in accordance with an agreed comprehensive masterplan.	Chris Green David Clough
JPA6.28	Allocations Plan Policy P8AP states that the Council will permit development proposals “provided the integrity of the rights of way is retained” and that “the provision of an equally convenient and pleasant route will usually be required”. Compared to what we have now a pleasant route between massive industrial units is a huge leap of the imagination.	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land.</p> <p>Criterion 10 of Policy JPA6 ensures the integrity of the existing rights of way network is protected and criterion 2 requires an agreed comprehensive masterplan for the site. Policy JPA6 is considered to be a robust policy, supported by a proportionate evidence base.</p> <p>Retaining the integrity of the rights of way network and maximising its convenience and pleasantness will be a matter for the masterplan and planning application. Planning applications will need to be in accordance with the Local Plan as well as Places for Everyone.</p>	Dorothy Heavey Mrs D Roscoe

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		No change is considered necessary.	
JPA6.29	The B5239 (Dicconson Lane) provides a green route from Aspull towards Bolton and Westhoughton.	Dicconson Lane is not designated a green route.	Faith Crompton
	Impact on Neighbouring Properties		
JPA6.30	Negative impact on neighbouring properties, including the valuation of homes.	<p>The impact of the development on neighbours will be mitigated by criteria 6, 7, 8 and 9 of Policy JPA6.</p> <p>In addition, criterion 2 requires an agreed comprehensive masterplan for the site. [10.02.04] JPA6 - Supporting Information (paragraph 5.41) outlines that means of mitigating and softening impact on the landscape are to be incorporated in the masterplanning process, including the retention and creation of buffer strips, amenity areas and screen planting.</p> <p>Further information can be found in [12.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper (paragraph's 17.1-17.2, pages 32-33). No change is considered necessary.</p>	Colin Heyworth
JPA6.31	As the area is on a slope the warehouses will be visible from a great distance. It should be ensured that the siting and scale of buildings minimises the impact on long range views.	See response on row JPA6.7	Carole Dawson Dorothy Heavey Mrs D Roscoe
	Environment		
JPA6.32	<p>Loss of biodiversity. The proposed development would have a negative effect on wildlife, including some rare wildlife, in the area. Cumulative impacts on ecology must be fully considered.</p> <p>The land is important for biological connectivity between species groups and there are many quiet ponds supporting newts, toads and other wildlife. It connects up directly to the fields around the nearby Borsdane Wood - semi natural ancient woodland (1600AD) and LNR.</p>	<p>No change is considered necessary. Criterion 7 of Policy JPA6 protects the Site of Biological Importance at Four Gates and includes the retention of existing woodland, hedgerows and ponds where practicable. Policy JPA6 is considered to be a robust policy, supported by a proportionate evidence base. The evidence base specific to Allocation JPA6 can be found here:</p> <p>- [10.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic paper (paragraph's 18.1-18.8)</p> <p>- [10.02.04] JPA6 – Supporting Information</p>	Graham Kelly Jean Kelly Dorothy Heavy Colin Heyworth David Clough Rebecca Clough Chris Green Vicky Harper Mrs D Roscoe CPRE

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>[10.02.04] JPA6 – Supporting Information states that:</p> <ul style="list-style-type: none"> - Areas of the prospective allocation site are proposed not to be developed in order to retain important features and connectivity for wildlife (paragraph 7.10). - Full habitat and (as appropriate) protected species surveys will be undertaken at an appropriate time to inform the development and assessments (paragraph 18.6). - The key potential effects of the proposed development on ecological features will be fully assessed to inform design of the development to avoid or minimise impact and identify opportunities for enhancement, mitigation or compensation associated with any proposed development (paragraph 18.7). <p>Criterion 2 of Policy JPA6 requires development to be in accordance with an agreed comprehensive masterplan.</p> <p>In addition a number of policies in the Plan address this matter, such as policy JP-G9 and JP-G7. The Plan needs to be read as a whole.</p>	
JPA6.33	At the phase 1 application the TEP ecologists for the developers said that in the case of brown hares the development would cause displacement due to loss of foraging, breeding and refuge habitats and no additional mitigation was available.	See response on row JPA6.32. In addition, this comment relates to the approved planning application 04766/18 , rather than proposed allocation JPA6.	Dorothy Heavey Mrs D Roscoe
JPA6.34	Natural England's Magic Map identifies the area as significant for S41 species which are birds of open grasslands that require undisturbed access.	Biodiversity is addressed through Policy JPA6. In addition a number of policies in the Plan address this matter, such as policy JP-G9 and JP-G7. The Plan needs to be read as a whole. These policies are considered to be robust and supported by a proportionate evidence base. The evidence base specific to this allocation can be found here:	Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>If these species cannot be adequately mitigated on site, then off-site mitigation must be provided. Suitable compensation areas need to be identified and managed to enhance the populations of the identified S41 bird species. This compensation must be in addition to the biodiversity net gain provided as part of the development.</p>	<p>- [10.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic paper (paragraph's 18.1-18.8)</p> <p>- [10.02.04] JPA6 – Supporting Information</p> <p>[10.02.04] JPA6 – Supporting Information states that:</p> <ul style="list-style-type: none"> - Full habitat and (as appropriate) protected species surveys will be undertaken at an appropriate time to inform the development and assessments (paragraph 18.6). - The key potential effects of the proposed development on ecological features will be fully assessed to inform design of the development to avoid or minimise impact and identify opportunities for enhancement, mitigation or compensation associated with any proposed development (paragraph 18.7). <p>Criterion 2 of Policy JPA6 requires development to be in accordance with an agreed comprehensive masterplan. No change is considered necessary.</p>	
JPA6.35	<p>The report concludes that the modified neutral grasslands have limited potential for wildlife without actually having provided any survey information.</p>	<p>It is considered that a proportionate evidence base has been provided, it can be found here:</p> <ul style="list-style-type: none"> - [10.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic paper (paragraph's 18.1-18.8) - [10.02.04] JPA6 – Supporting Information (paragraph's 5.26 – 5.27). <p>[10.02.04] JPA6 – Supporting Information states that:</p> <ul style="list-style-type: none"> - Full habitat and (as appropriate) protected species surveys will be undertaken at an appropriate time to inform the development and assessments (paragraph 18.6). 	Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>- The key potential effects of the proposed development on ecological features will be fully assessed to inform design of the development to avoid or minimise impact and identify opportunities for enhancement, mitigation or compensation associated with any proposed development (paragraph 18.7).</p> <p>Criterion 2 of Policy JPA6 requires development to be in accordance with an agreed comprehensive masterplan. No change is considered necessary.</p>	
JPA6.36	<p>The key potential effects of the proposed development on local ecological features will need to be fully assessed to inform design of the development and to avoid or minimise impact and identify opportunities for enhancement, mitigation or compensation associated with any proposed development. Appropriate habitat and species surveys must be conducted, and the findings used to steer the mitigation/compensation plan. Mitigation and enhancement plans must show how these species are to benefit from the development of the site.</p>	<p>See response in row JPA6.35.</p>	Wildlife Trusts
JPA6.37	<p>There are ecological considerations at Four Gates SBI that must be protected and enhanced in the future. The employment floorspace will fail to do this.</p>	<p>Criterion 7 of Policy JPA6 addresses protecting the Four Gates SBI. No change is considered necessary.</p>	CPRE
JPA6.38	<p>The policy statement that development will be required to protect the Site of Biological Importance at Four Gates from development and incorporate very high levels of landscaping is welcomed. However, where this is not practicable, adequate mitigation habitat must be provided.</p>	<p>It is considered that it is practicable to protect the SBI at Four Gates from development, as stated in criterion 7 of Policy JPA6. Policy JPA6 is considered to be a sound policy, supported by a proportionate evidence base.</p> <p>However, if it is not practicable to protect the SBI at Four Gates from development there are sufficient safeguards in the Plan to ensure mitigation takes place, for example, in Policy JP-G9.</p>	Wildlife Trusts
JPA6.39	<p>The development would put significant access and disturbance pressures onto the Borsdane Wood SBI. To mitigate this, it will be necessary to protect the important features of the SBI by building in</p>	<p>Borsdane Wood is located outside the boundary of Allocation JPA6. Criterion 2 of Policy requires development at the site to be in accordance with an agreed comprehensive masterplan that shows</p>	Wildlife Trusts Dorothy Heavey

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	urban greenspace into the development to reduce public access pressure on its characteristic woodland flora and fauna.	which areas should and should not be developed. In addition there are other policies in the Plan which ensure sufficient safeguards such as Policy JP-G9. No change is considered necessary.	
JPA6.40	The development would affect historic hedgerows and many mature trees.	<p>Criterion 7 of Policy JPA6 addresses the retention of existing trees and hedgerows and criterion 2 requires development to be in accordance with an agreed comprehensive masterplan which shows which areas should and should not be developed. Policy JPA6 is considered to be a robust policy, supported by a proportionate evidence base.</p> <p>Paragraph 5.46 of [10.02.04] JPA6 – Supporting Information states that further work will be undertaken to assess historic hedgerows and whether Holden Wood can be designated as an ancient woodland.</p> <p>Policy JP-G7 also provides safeguards in relation to this matter. The Plan needs to be read as a whole. No change is considered necessary.</p>	Dorothy Heavey David Clough Rebecca Green Chris Green
JPA6.41	There is currently a well-defined boundary of mature trees along the length of the western edge of the present industrial estate and this really should not be breached.	See response in row JPA6.40. In addition criterion 6 of Policy JPA6 ensures that a high quality scheme of landscaping is implemented to minimise the prominence of the development and its impact on the surrounding landscape.	Dorothy Heavey Mrs D Roscoe
JPA6.42	Object to the loss of recreational space.	<p>No change is considered necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land.</p> <p>There are a number of mitigations in place including criterion 10 of Policy JPA6 which protects the existing rights of way network and policy JP-P7. The Plan needs to be read as a whole.</p> <p>Further information can be found in:</p>	Graham Kelly Jean Kelly Dorothy Heavey

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		<p>- 10.02.07 JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper (paragraph 16.1).</p> <p>- [12.02.04] JPA6 – Supporting Information (paragraph's 5.74-5.75)</p>	
JPA6.43	Object to the loss of green space. Removal of green spaces will affect mental and physical health of local residents.	<p>No change is considered necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land.</p> <p>There are a number of mitigations in place including criteria 6,7,8,9 and 10 of Policy JPA6 and policy JP-G2 and JP-Strat 13. The Plan needs to be read as a whole. No change is considered necessary.</p>	Graham Kelly Vicky Harper Dorothy Heavey Rebecca Green Chris Green Mrs D Roscoe
JPA6.44	The proposal contravenes NPPF Paragraph 94b – existing open space should not be built on unless the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.	<p>In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]</p> <p>No change is considered necessary. Policy JPA6 is considered to be consistent with the NPPF and provides an appropriate location to implement Policy JP-J4.</p>	Dorothy Heavey Mrs D Roscoe
JPA6.45	The plan is not consistent with achieving sustainable development as far as the Westhoughton area is concerned (NPPF 15 and 16c).	In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield	Graham Kelly Vicky Harper Mrs D Roscoe

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]</p> <p>The site has been subject to Integrated Assessment. As outlined in section 9 of [10.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper the Integrated Assessment concluded that Allocation JPA6 makes a very positive or positive contribution to many plan objectives.</p>	
JPA6.46	<p>Within Bolton Allocations Plan Policy CG6AP – Other Protected Open Land – it states that “development should generally be small scale to maintain the open character of these areas. Category 3 development would include commercial developments which requires a non-urban location but where the scale of buildings would make it unacceptable in Green Belt”. And yet this is the very thing that we are being asked to accept, that somehow it is acceptable in this area of Green Belt.</p>	<p>Policy CG6AP relates to Other Protected Open Land. The proposed allocation J6AP is Green Belt land.</p> <p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]</p> <p>Details in relation to the site specific case for releasing Green Belt can be found in the [12.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper (paragraph 14.13).</p> <p>No change is considered necessary.</p>	Dorothy Heavey Mrs D Roscoe
JPA6.47	<p>The following additional criteria should be added to Policy JPA6: ‘Ensure that sustainable drainage systems are fully incorporated into the development to manage and control surface water run-off, discharging in accordance with the hierarchy of drainage options.</p>	<p>No change is considered necessary. A Strategic Flood Risk Assessment has been undertaken [04.02.01] across the plan, identifying the allocation as less vulnerable to flood risk and the need for a site specific Flood Risk Assessment [04.02.12] at the planning application stage in accordance with national policy</p>	United Utilities Group PLC

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	<p>Applicants should consider site topography, any naturally occurring flow paths and any low lying areas where water will naturally accumulate. Resultant layouts should take account of such existing circumstances to ensure the most sustainable and flood resilient solution is achieved. Landscaping proposals will be expected to be integrated with the strategy for surface water management. Natural and multi-functional SuDS should be utilised (in preference to traditional piped and tanked storage systems), prioritising the use of ponds, swales and other infrastructure which mimic natural drainage and connect to the wider green and blue infrastructure network. They will be designed in accordance with nationally recognised SuDS design standards. There should be a clear allocation-wide strategy for foul and surface water management which demonstrates a holistic approach with co-ordination between phases of development and no surface water discharging to public sewer. A proliferation of pumping stations should be avoided’.</p>	<p>and guidance. Policy JP-S5 provides further detailed policy in relation to Flood Risk. Therefore, the Plan as a whole, is considered to provide an appropriate policy framework to deal with this matter</p>	
JPA6.48	<p>The following criterion should be added to Policy JPA6: ‘The proposed development will be expected to incorporate water saving measures and equipment in accordance with the requirements of BREEAM or any other best practice targets as appropriate’.</p>	<p>Water efficiency measures in new developments will be a matter for district local plans to determine. This approach is considered consistent with the NPPF, particularly paragraph 28 which confirms that it is for local planning authorities ‘to set out more detailed policies for specific areas, neighbourhoods or types of development’. Therefore, no change to the plan is considered as necessary.</p>	United Utilities Group PLC
JPA6.49	<p>The development will increase carbon emissions, damaging the environment and contributing to climate change. There is also no summary on how much carbon plans at this allocation will produce both during the development stage and operational stage. This information should be provided.</p>	<p>No change is considered necessary. Criterion 5 of policy JPA6 addresses the enhancement of public transport, demand responsive transport and walking and cycling facilities. This issue is also addressed through Policy JP-S2. The Plan needs to be read as a whole. In advance of detailed masterplanning for this site it is not possible to quantify carbon emissions. Carbon emissions are addressed in the Sustainable and Resilient Places chapter of PfE particularly JP-S2 which supports the use of carbon assessment tools to assess long term carbon impact.</p>	<p>Liam Heavy Graham Kelly Jean Kelly Dorothy Heavey Mrs D Roscoe</p>
	Air Quality		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA6.50	Noise, air, light and visual pollution have all been raised as concerns, including the impact of traffic related pollution on physical and mental health.	Criteria 8 and 9 of Policy JPA6 address air, noise and light pollution. Policy JPA6 is considered to be a robust policy, supported by a proportionate evidence base. In addition Policy JP-S6 addresses this issue. The plan needs to be read as a whole. No change is considered necessary.	Carole Dawson Graham Kelly Jean Kelly Dorothy Heavey Colin Heyworth Vicky Harper Sylvia Fewtrell Phil Wood Mrs D Roscoe
	Flood Risk		
JPA6.51	Increased flood risk as open grassland, which will be developed, has the benefit of natural drainage. Also being on a slope there is more risk of flooding further down especially on the Aspull boundary which floods frequently	As outlined in paragraph 11.1 of [10.02.07] of JPA6 West of Wingates M61 Junction 6 Allocation Topic paper, the SFRA identified Allocation JPA6 as a 'less vulnerable' site to flood risk and concludes that a site specific flood risk assessment is required at planning application stage. Pars 5.19 of [10.02.04] JPA6 Supporting Information states that a Flood Risk Assessment and Drainage Strategy will assess the flood risk to the site and ensure that development does not increase the level of flood risk locally and to neighbouring properties. Further information can be found from paragraph 5.13 of [10.02.04] JPA6 Supporting Information. Flood risk at this site is considered to be addressed by policy JP-S5. The plan needs to be read as a whole, therefore no change is considered necessary.	Dorothy Heavey Vicky Harper Mrs D Roscoe
	Infrastructure		
JPA6.52	Lack of consideration for infrastructure. There are no plans to address the education, health and social issues Westhoughton is facing. There is no dedicated leisure centre, just the school out of school hours.	A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies JP-P1 and JP- D2 which states that new development must be supported by the necessary infrastructure. The Plan needs to be read as a whole. As outlined in [12.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper health and education infrastructure is not	Peter Carr M Durbar Dorothy Heavey Chris Green David Clough Vicky Harper Mrs D Roscoe

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		required because the allocation doesn't include any housing (paragraph's 23.1 and 24.1) No change is considered necessary.	
	Buildings Already Erected		
JPA6.53	Demolition of buildings already erected that have not adhered to 'spirit' of the proposal	No employment buildings related to Allocation JPA6 or the planning permission on the land [04766/18] have been constructed, and neither has construction started. If employment buildings are constructed, they will need to be in compliance with the Plan and planning permission.	Carole Dawson
	Consultation		
JPA6.54	I am sure you make these documents deliberately long to stop people responding	Comment not relevant to the content of Policy JPA6. Matter addressed elsewhere.	Paul Roebuck
JPA6.55	We own part of the land within the allocation and have not been consulted and strenuously object until we can have those discussions	See response in row JPA6.54.	Shirley Jennings
JPA6.56	Insufficient consultation and engagement with local community. Press releases were made available but many people don't buy the paper. There should have been local public meetings, notices on Westhoughton Town Hall notice board, notices on lamp posts or a postal notification. A questionnaire should be submitted to every member of the community and household in the area.	See response in row JPA6.54..	M Durbar Dorothy Heavey Chris Green Rebecca Green Mrs D Roscoe
JPA6.57	According to the Dept. of Communities and Local Government "only in exceptional circumstances may councils alter greenbelt boundaries, after consulting local people and submitting the revised local plan for examination". Local people were never consulted about the green belt change and there was no revised plan until this one.	See response in row JPA6.54.	Dorothy Heavey Mrs D Roscoe
JPA6.58	Too much engagement with greedy developers	See response in row JPA6.54.	M Durbar Vicky Harper
	Proposed Allocation Boundary		
JPA6.59	The plan shows that the land I rent is incorporated in the plans for development and this is not the case. Amend the plan to show my land is not included	The allocation has been sufficiently justified in [10.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper and complies with NPPF. Criterion 2 of Policy JPA6 requires development at the site to be in	Sarah Seddon

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		accordance with an agreed comprehensive masterplan that shows which areas should or should not be developed.	
JPA6.60	The site should be reduced in size, or limited to the boundary of the current planning permission. There is an opportunity on this site for planning, developers, councilor's and residents to come together to deliver some development but also to retain the character of the area which is rural and farming focused.	The allocation has been sufficiently justified in [10.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper and complies with NPPF.	Chris Green David Clough Rebecca Green Chris Green
JPA6.61	Allocation JPA6 should be reduced in size to provide a broad visual and physical landscape buffer between the B5239 and the edge of the employment site. It is suggested Dodd Lane is adopted as the boundary of JPA6, to provide a broad landscape buffer and potential for habitat connectivity. Without this buffer, there will be no noticeable separation of Aspull from Westthoughton as experienced by people travelling through the area. i.e. it would remove the function of the greenbelt.	<p>[07.01.09] Stage 2 GM Green Belt Study – Assessment of Proposed 2019 Allocations Appendix B splits Allocation JPA6 into two parcels – GM6-1 and GM6-2. Parcel GM6-1 is most relevant to this comment. With regard to Green Belt purpose 2 (preventing neighbouring towns merging into one another) parcel GM6-1 has a rating of relatively significant with the study recognising that releasing this land would reduce existing separation from Aspull with slightly more impact than for Horwich and Wigan.</p> <p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land.</p> <p>The allocation has been sufficiently justified in [10.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper and complies with NPPF. Criterion 2 of Policy JPA6 states that development will be in accordance with an agreed comprehensive masterplan showing which areas should and should not be developed.</p>	Faith Crompton
JPA6.62	Harworth considers that a revised allocation boundary will result in a better layout of development and undeveloped areas, enhanced deliverability of development and road infrastructure, improved	Harworth's suggested boundary is not supported for the reasons set out in paragraph 5.4 of [12.02.07] JPA6 West of Wingates M61 junction 6 Allocation Topic Paper.	Harworth Group

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>configuration of drainage infrastructure, landscape enhancement and public accessibility.</p> <p>Harworth state that the boundary proposed in PfE 2021 includes minority elements of land which Harworth Group is not in control of. Harworth is concerned that allocation of any substantial proportion of land for development that is beyond the control of a lead developer may frustrate or prevent delivery of a comprehensive and cohesive scheme.</p> <p>A small proportion (6%) of the boundary suggested by Harworth is proposed to follow a currently unmarked alignment through the body of a large agricultural field. In this location there is a lack of existing landscape features. It is therefore proposed that former field boundaries are reinstated and used to form the boundary of the Green Belt. With the exception of this, the Green Belt boundaries which result from the employment allocation proposed by Harworth are all formed of physical features.</p> <p>There will be a substantial buffer strip either side of Dicconson Lane, which may incorporate new landscape features and planting for the benefit of visual screening, biodiversity and public access/amenity. This will preserve residential amenity at the houses on Dicconson Lane.</p> <p>The alternative boundary suggested by Harworth will represent a 3ha or 1.7% reduction in the amount of land being removed from the Green Belt.</p> <p>Whilst the land within the additional part of the site suggested by Harworth is at a higher level and there may be a degree of difference in prominence/visibility:</p>		

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	<p>-it is at a similar or lower level than that within the central and east part of the proposed allocation site;</p> <p>-this is not considered to be sufficient to justify the omission of the land in light of the other relevant considerations.</p> <p>Harworth provided an assessment of the alternative Green Belt boundaries corresponding to its suggested revised allocation boundary. This concludes that the alteration to the Green Belt boundaries results in the surrounding Green Belt being able to serve all relevant purposes of Green Belt.</p>		
	Minerals		
JPA6.63	It is disappointing that Minerals Safeguarding Areas and Minerals Infrastructure Safeguarding are not shown on the plan.	The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDP and will remain unchanged and applicable once PfE is adopted. Therefore it is not necessary to identify them on the PfE policies map and no change is necessary.	Mineral Products Association
	Landscape Character		
JPA6.64	Cumulative impacts on landscape character must be fully considered.	No change is considered necessary. Policies JP-G1 and JP-P1 provide an adequate policy framework. This issue is addressed in [07.01.06] GMSF Landscape Assessment (2018).	CPRE
JPA6.65	This is an area of natural beauty and is very tranquil	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land.</p> <p>Site selection is addressed in section 5 of 10.02.07 JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper. Development of Allocation JPA6 as proposed will help boost the competitiveness of the northern areas of Greater Manchester in line with the Spatial Strategy of the Plan. No change is considered necessary.</p>	Graham Kelly Dorothy Heavey Mrs D Roscoe

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JPA6.66	The site is one of the last remaining large scale rural areas in Westhoughton as development continues to destroy its farming background.	See response in row JPA6.65. In addition Policy JP-G9 includes a requirement to safeguard the 'best and most versatile' agricultural land. No change is considered necessary.	Dorothy Heavey Chris Green David Clough Rebecca Green Chris Green
	Other Opportunities including Agriculture		
JPA6.67	Farmland should be protected for future generations' food security.	There is a sufficient policy framework to address this issue, for example, Policy JP-G9 includes a requirement to safeguard the 'best and most versatile' agricultural land. No change is considered necessary.	Graham Kelly Dorothy Heavey Chris Green David Clough Rebecca Green Chris Green
JPA6.68	A large percentage of the allocation should be given over to a country park and/or the continuity of farming.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. This allocation is required for employment development and to implement the spatial strategy particularly boosting the competitiveness of the northern areas of Greater Manchester. In addition Policy JP-G9 includes a requirement to safeguard the 'best and most versatile' agricultural land. No change is considered necessary.	Chris Green David Clough Rebecca Green Chris Green
JPA6.69	There is an opportunity to do more with this site and give more back in the form of local amenity such as a farmers market, community allotments, improved cycle, bridle and walking paths.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. This allocation is required for employment development and to implement the spatial strategy particularly boosting the competitiveness of the northern areas of Greater Manchester.	Rebecca Green Chris Green

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		Criterion 2 of Policy JPA6 requires development to be in accordance with an agreed comprehensive masterplan. No change is considered necessary.	
	Residential		
JPA6.70	There are no affordable or eco homes within the allocation	This is an employment allocation. No change is considered necessary	Vicky Harper
	Hulton Park		
JPA6.71	Object to residential house building on and adjacent to Hulton Park.	Planning application 00997/17 at Hulton Park was approved by the Secretary of State following call in. A revised planning application has been submitted but it currently undetermined: 12218/21 . The proposals for Hulton Park are addressed in PfE Policy JP-Strat 8.	Graham White