

Name/Org	Proposal	Summary of Representations to the Interim Housing Figure	Rep No
Arnold Laver	Proposal C	In summary, we would like to register our strong objection to the proposals to reduce the overall housing targets for the City. The Government have adopted a strong pro-growth agenda which would seek to encourage residential development. Furthermore, it has been demonstrated that the reasoning behind the reduction in the housing figures is not justified as it is not based on a credible evidence base. We would therefore strongly recommend that the RSS housing targets remain in place until formally revoked and it has been demonstrated that there is a robust evidence base underpinning new targets, which as of yet there is not.	11
Jamie McWhir	Proposal C	<p>The housing figures contained not only in the Regional Spatial Strategy, and the Core strategy changes report, seem to bear little relevance to the UK economic climate.</p> <p>From information contained in the reports, there is no direct link within the modelling used to assess current and medium term economic conditions and how they relate to the requirement and need for housing.</p> <p>To imagine a need for 25-30K new homes in the area in the next decades, when we are under 70-80K homes in total now seems a ludicrous increase in the figures. The current economic climate is also hitting the NW (and the whole country, quite hard).</p> <p>The need for homes for incoming skilled workers, is lower than it will have been for decades. Equally, we have not only hundred, possibly thousands of properties on the market locally, which are not selling, and properties, in Salford and the City centre standing empty with no buyers.</p> <p>The figures do, I admit require a fair bit of crystal ball gazing, and medium term views, where hopefully the economic climate will have improved. However, they must also consider the need for housing locally and regionally.</p> <p>Therefore the figures being spread around the Salford area seem way too high. The governments strategy was more politically driven than based upon fact and need, and equally the council must demonstrate a more real world figure (or postpone the figures until a more accurate real world modelling system can be used) that can be used constructively in the region.</p> <p>We should be focusing more in improvement to existing areas and improving the current housing stock instead of building thousands upon thousands of homes in the area in such a short space of time</p>	15
D and BA Marsh	Proposal C	We do not agree with your proposal that the housing requirement and phasing contained in your Core Strategy Pre Publication Changes Report should be used by the Council on an interim basis from the date that the Regional Strategy is revoked until the Core Strategy is adopted.	24
H Sullivan	Proposal C	<p>I am writing to oppose the Core Strategy and the Interim Housing Figure.</p> <p>I am in complete agreement that the above farm is beneficial for the community. If the council's plans went ahead, the majority of the households would have a car. This would cause a great deal of air pollution, which the open farm does not. The roads would be congested and at peak times grid locked. The buses, trains and schools would have overcrowding problems leading to a lesser quality of life for all concerned. Overcrowding would also be prevalent in</p>	45

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		<p>the few parks with people vying for the facilities, which leads to frustration and trouble all round.</p> <p>I would like to say that the council do not plan for amenities in the town ie nowhere for teenagers to go to get off the streets, hence more population in the area, more trouble all round for the public and the police whose numbers you are reducing. Does not bode well for a better community. The council must look to all peoples needs and facilitate the majority for a better society.</p>	
Barbara Keeley MP	Proposal C	<p>I am writing in response to Salford Council's consultation on whether to adopt a particular Housing Interim Figure.</p> <p>I understand that due to the possible revocation of the Regional Spatial Strategy that there is a need to adopt an Interim Housing Figure for Salford, whilst the Council's Core Strategy is being finalised. I recognise that the Council does need to have an interim figure, but I am objecting to the implications of the proposed figure for areas such as Walkden, Boothstown and Worsley.</p> <p>I understand that the amended figure for housing figures is a net increase of at least 22,000 dwellings over the period 2010 -2030 and that this figure has been reduced due to the proposed revocation of the Regional Spatial Strategy. However I have concerns about a number of the sites that could be earmarked for housing if the housing figures which are contained in the Core Strategy Pre-Publication document be adopted. These areas are the greenfield sites at Burgess Farm in Walkden and the proposals to identify greenfield land at Worsley and Boothstown. The combined total of potential housing on these sites is around 850 houses.</p> <p>I have already objected to these proposals in detail, in response to the Core Strategy Pre-Publication document. I would urge the Council to take my concerns into account when considering what interim figure to adopt.</p> <p>I do not believe it is fair to remove greenfield land for housing development in order to meet Salford's overall housing target. I am concerned about the impact these proposals will have on the areas in question and on local residents who would lose this important land, and who would be adversely impacted by such a large increase in population.</p> <p>As there has been a reduction in the citywide target, I would urge Salford Council to consider whether this valuable open land needs to be removed from the greenfield and designated for housing.</p> <p>My constituents believe, as do I, that this greenfield land needs to be protected for future generations. Therefore I would ask Salford Council to remove these proposals from both the Interim Housing Figure and from the final Core Strategy so that local residents continue to have access to these green open spaces.</p> <p>Finally given the strength of opposition from local people in response to the proposals for Burgess Farm and the greenfield land in Worsley and Boothstown, I do not believe any decisions should be taken until the comments of local people have been fully considered.</p> <p>I object, on behalf of my constituents, to Salford Council's proposals to designate land at Burgess Farm and greenfield land in Worsley and Boothstown for housing and to the proposals to include these sites in the Council's</p>	22

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		Interim Housing Figure.	
House Builders Federation	Proposal C	<p>We agree with the Council that it is unable to replace the housing requirement derived from the North West RSS before this time. The position regarding the status of Regional Strategies has been clarified in the series of High Court and Appeal rulings against the Government. It does not follow, however, that the Council will be able to immediately adopt the Interim Housing Figure once the RS has been revoked and use this as its housing policy until its Core Strategy has been adopted (as the Council proposes it is able to do on page one of its Community Impact Assessment Report).</p> <p>We would advance three arguments as to why it is not legitimate to use an interim policy statements as a way of establishing new housing targets.</p> <p><u>1.The approach is contrary to Government guidance</u></p> <p>Firstly, such an approach would be at odds with the Government's own guidance as issued by the Chief Planner on 6 July 2010 entitled <i>Guidance for Local Planning Authorities following the revocation of Regional Strategies</i>. In this advice the Chief Planner states in Point 11 that "local authorities should collect and use reliable information to justify their housing supply policies and defend them during the LDF examination process". Point 12 further advises that "any target selected may be tested during the examination process especially if challenged and authorities will need to be ready to defend them".</p> <p>From these points it is clear that the Government expects new housing targets to be established as part of the formal LDF process subject to public examination. The adoption of untested Interim Targets, established without the formal planning process is clearly not acceptable.</p> <p>This line of reasoning was upheld by the Planning Inspectorate in a series of appeal decisions in Leeds in recent months, including the most recent decision which was also called-in by the Secretary of State (the case of <i>Persimmon Homes and Taylor Wimpey v Leeds City Council</i> (APP/N4720/A/09/2117920)). In this case the Inspector concluded that the Chief Planners' guidance did not provide any basis for suggesting that interim targets could be adopted in advance of undertaking a proper review (paragraph 5.20). This view was reiterated by statements made by the Minister for Decentralisation to the House of Commons Communities and Local Government Committee on 13 September 2010.</p> <p><u>2.There is little evidence for the reduced housing requirement</u></p> <p>Secondly, the evidence supporting the new housing target is weak. The Chief Planner's guidance of the 6 July is very clear that new targets should be evidence based (point 11). We have not been able to detect any significant evidence to support the interim target in either the <i>Community Impact Assessment Screening Process</i>, or the <i>Proposed Interim Housing Figure Sustainability Appraisal</i> other than an argument that the target for Salford in the RS</p>	2

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		<p>was set significantly higher than its forecast household growth to support the regeneration of Manchester City centre. Because it is unclear to what extent Salford Council has discussed the implications of reducing its housing requirement with Manchester City Council, Trafford or other councils in the Manchester City sub-region the Council would be unwise to unilaterally decide to reduce its housing requirement before such an assessment has been undertaken. The need to consult with other authorities that might be affected by decisions made in Salford is something which the Planning Officers Society has promoted as good practice in its <i>Planning Post RSS Revocation</i> guidance (this was a view upheld by the Inspector at the Boston Spa appeal case in Leeds, APP/N4720/A/09/2117381, see paragraph 34, and by the Inspector in the aforementioned Leeds appeal decision, see paragraph 5.22).</p> <p>The Council will also be aware that the Localism Bill and the National Planning Policy Framework (NPPF) are both likely to include provisions that will place a formal duty on local planning authorities to cooperate with other councils on planning matters of a strategic nature. As the NPPF is scheduled to become policy at the same time that the relevant part of the Localism Bill dealing with the revocation of the RS is enacted, this duty to cooperate will become binding.</p> <p><u>3.Planning for Growth</u></p> <p>Lastly, the Council's proposal would appear to be at odds with the Ministerial Statement on <i>Planning for Growth</i>. The statement encourages local planning authorities to adopt a positive approach to planning in order to support enterprise and facilitate housing development. Until an assessment has been carried out exploring the economic consequences of the decision to reduce Salford's housing requirement it is premature for the Council to propose this Interim Target for adoption once the RS has been revoked.</p> <p>I trust the Council will respond to the issues raised above and will reconsider its current approach to adopting an interim housing target following the revocation of the RS as and when it actually occurs.</p>	
Neil Stapleton	Proposal C	<p>I am writing as a resident of Newearth Road, Walkden to register my objection to proposals to build several hundred houses on the site of Burgess Farm.</p> <p>It should be perfectly obvious to anyone who has tried to travel through Walkden in the morning or afternoon rush-hours that the local road and rail networks are already over-crowded and unable to cope with present levels of demand. To add several hundred more households in the heart of the area will greatly exacerbate the road congestion on major routes like Newearth Road, Walkden Road, Manchester Road, and will mean even more local people are unable to board over-crowded trains. The notion that a shuttle bus service to/from the new estate will greatly mitigate the transport problems is pure fantasy.</p> <p>The Burgess Farm land is also a valued local green space that provides welcome respite from the ever encroaching</p>	20

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		<p>suburban spread. I am quite sure Salford councillors would not support such a huge and unwelcome development so close to their own homes.</p>	
Dr Forbes Mackenzie and Mrs Gillian Mackenzie	Proposal C	<p>Dr Forbes Mackenzie and Mrs Gillian Mackenzie wish to register their strong opposition to any development on Greenfield Land, especially in Worsley and Boothstown. These areas are already suffering from traffic congestion on a grand scale, with consequent air, noise and light pollution. Furthermore, any wildlife corridors which exist must be maintained. The few green "lungs" in the City of Salford are of inestimable value to all the populace, and deserve to be guarded from further development.</p>	19
Trevor Davies	Proposal C	<p>General Comments - I do think it is necessary to increase our housing stock and in order to fill them we need excellent schools, which will attract parents who want the best education for their children. With also an increase in retail and industrial parks, to provide employment. And an enhancement of our places of interest such as Worsley canal basin and Ordsall Hall. Also making Swinton Town Hall as a centre of Salford by improving its surroundings. We must accept we are a satellite of Manchester and use this to our advantage. By providing quality accomodation to reduce commuting for Manchester workers. I am unable to offer any figures but again I hope this is of help.</p>	25
McCarthy and Stone Retirement Lifestyles Ltd	Proposal C	<p>As the market leader in the provision of sheltered housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its extensive experience in providing developments of this nature, it is well placed to provide informed comments insofar as it affects or relates to housing for the elderly. McCarthy & Stone Retirement Lifestyles Ltd would argue that retirement schemes are beneficial and heavily assist in delivering much needed specialist accommodation. This is emphasised in a new report, by Professor Michael Ball of the University of Reading, titled 'Housing Markets and Independence in Old Age Expanding the Opportunities', which was successfully presented at a House Commons launch event in May 2011. This report highlights how owner-occupied retirement housing (OORH), such as that built by McCarthy & Stone Retirement Lifestyles Ltd, helps to address the challenges of housing an ageing population. It states that OORH provides numerous benefits to communities including increasing the availability of much needed family houses in areas of shortage as most OORH residents will have freed up family homes they were previously under-occupying. With regards to the Core Strategy Pre-Publication Changes Report and the Interim Housing figures, my Client appreciates the need to revise the housing figure in light of the revocation of the regional strategy and the withdrawal of Growth Point designation funding. However, we endorse the opinion of the Home Builder's Federation in that we</p>	16

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		<p>do not feel that it is legitimate to use an interim policy statement as a way of establishing new housing targets for the following reasons;</p> <ul style="list-style-type: none"> i) It is contrary to the Government Guidance, 'Guidance for Local Planning Authorities following the revocation of Regional Strategies' as issued by the Chief Planner in July 2010 which states that it expects new housing targets to be established as part of the formal LDF process ii) ii) The evidence supporting the reduced housing target does not take into consideration the implications of a reduced housing target on both Manchester City and Trafford Borough Councils. iii) iii) The decision to reduce Salford's housing requirement is at odds with the Ministerial Statement ' Planning for Growth'. <p>My client would also highlight the need to consider the role of specialist accommodation for the elderly within the City of Salford and the factors to be taken into account when identifying sites When selecting sites McCarthy & Stone Retirement Lifestyles Ltd take into account the location criteria recommended in the Joint Advisory Note of the National House Builders' Federation and the National Housing and Town Planning Council entitled – 'Sheltered Housing for Sale' (2nd Edition - 1988). Whilst this relates to sheltered housing, the same principles apply to extra care accommodation. The five location criteria identified are; Topography, Environment (including safety and security), Mobility, Services and Community Facilities. The NHBF/NHTPC Advisory Note acknowledges that the "ideal" site for sheltered housing is difficult to find. The location for McCarthy and Stone Retirement Lifestyles Ltd developments need to be within easy reach of a shopping centre, public transport and other essential services, all of which contribute to the residents maintaining an independent lifestyle. As a consequence of this, sites that meet the criteria for Specialist Housing for the Elderly are often town centre, or edge of town centre, windfall sites. Consideration should therefore be given to the type of windfall site that my client normally develops, due to the specific requirements of specialist elderly accommodation.</p> <p>In conclusion, my Client would like to reiterate our support for the representation submitted by the Home Builders Federation and stress the need to take into consideration the current and future housing needs of older people within your Local Authority.</p>	
J R Hennessy	Proposal C	<p>I recently received a letter from Barbara Keeley MP advising me about the changes in the future of greenfield land in Worsley and Boothstown.</p> <p>Yet again we are being confronted with this problem of land for housing development, greenfield land in these areas is being eroded and the areas left must be protected. We are told to protect the environment at all times of</p>	23

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		<p>development this we must do. Greenfield land adjacent to Hazelhurst Road is now seen to have wildlife and is used by the public for recreation.</p> <p>Hazelhurst Road has over the past few years become a road, both am and pm, for traffic between Worsley village (M60) and Wardley Ind site causing congestion. Any adjacent housing development needing access to and from would worsen the situation.</p> <p>The public must be made openly aware of the Council's intentions in respect of using up some of the remaining areas of greenfield land, to enable more debate to take place.</p> <p>As things stand I and many others must object to the proposals to develop greenfield land in all areas.</p>	
Arnold Laver	Proposal C	<p>Proposal C of the Pre-Publication Core Strategy suggests that there should be a net increase of at least 22,000 dwellings in Salford over the period 2010-2030. However, this is significantly lower than the net housing requirement proposed in the Draft Core Strategy (2010) that was 33,750 dwellings for the period 2007-2027. The rationale for the lowering of the housing targets is based on the revocation of the RSS which will remove the requirement for Salford to deliver 1,600 dwellings per annum and the fact that no further Growth Point funding will be available.</p> <p>However Dear Chief Planning Officer Letter dated June 2010 provided guidance to LPAs following the announcement to revoke RSS and clearly states that with regards to local housing numbers LPAs should continue to collect and use reliable information to justify their housing supply policies and defend them during the LDF examination process in line with current guidance in PPS3. This is re-enforced by PPS12 which sets out the tests of soundness which Core Strategies must meet. Paragraph 4.52 of PPS12 states:</p> <p><i>"To be "sound" a Core Strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY"</i></p> <p>The definition of justified includes a requirement for the document to be founded on a robust evidence base.</p> <p>As outlined in section 5 of the Pre-Publication Core Strategy, the Greater Manchester Forecasting Model (GMFM) household forecasts are being utilised as the basis for calculating Salford's housing requirement. The latest run of the GMFM (Autumn 2010) estimated that there would be a growth of 17,759 households in Salford over the period 2010-2030. However, the New Economy: Greater Manchester Forecasting Model website states:</p> <p><i>"Primarily the value of a model is in highlighting likely trends rather than making detailed predictions about the scale and nature of growth"¹.</i></p>	14

¹ http://neweconomymanchester.com/stories/1119-greater_manchester_forecasting_model

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		<p>This therefore re-enforces that model data should be used to highlight anticipate trends rather than being used as the evidence base for detailed growth predications and policies such as the Core Strategy or interim policies. It is therefore considered that Salford don't have a credible evidence base to justify the significant reduction in housing figures proposed.</p> <p>At the Examination in Public (EiP) of the Central Lancashire Core Strategy, where housing targets had been reduced from those in the RSS, held in July 2011, the Inspector confirmed that the Plan was found to be unsound in its housing policies and stated:</p> <p><i>"I am not convinced that, in matters of housing, the Core Strategy generally confirms with the RSS". Although I have obviously not had time since the previous hearings to put these intended recommendations in a precise form of words, I would expect them to be along the lines of the Core Strategy having to adopt the annual housing completions indicated in the RSS throughout the plan period".</i></p> <p>This is a very recent decision that has advised against the reduction of housing figures from those outlined in the RSS as until formally revoked there is still a legal requirement for future policies to be in conformity with these targets.</p> <p>Given the Governments clear intention for sustainable growth it was surprising that the Council are proposing to lower the housing requirement for the City. In March 2011, Mr Greg Clark issued a Written Ministerial Statement: Planning for Growth. The Statement outlined that the Government's top priority in reforming the planning system is to promote sustainable economic growth and jobs and specifically states:</p> <p><i>"Government's clear expectation is that the answer to development and growth should wherever possible be 'yes', except where this would compromise the key sustainable development principles set out in national planning policy"</i></p> <p>The Inspector at the Central Lancashire Core Strategy EiP re-iterated the pro-growth agenda noting that the RSS housing figures should be regarded as a minimum mainly because of such considerations as the Government's agenda for growth and the relationship between housing and the economy.</p> <p>Taking into account the Government's pro-growth agenda, presumption in favour of sustainable development and the lack of a robust evidence base for Salford if housing figures contained within the RSS are abandoned, it is</p>	

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		considered that any deviation from the higher anticipated growth rates suggested for Salford would not be in line with government objectives and possibly open to challenge at Examination. We therefore strongly object to proposal C to reduce the housing figures and do not support the adoption of an interim policy to implement these reduced targets.	
United Utilities	Proposal C	<p>Proposal C of the Core Strategy states that there should be a net increase of at least 22,000 dwellings in Salford over the period 2010-2030. This equates to an annual figure of 1,100 dwellings per year. The figure of 22,000 dwellings over the plan period is significantly below the housing requirement of 28,800 dwellings previously adopted within Policy L4 of the North West Regional Spatial Strategy (RSS). This equated to 1,600 dwellings per annum. Although the Core Strategy notes that RSS is likely to be revoked in November, it still remains part of the Development Plan at the present time, and should be referred to as such.</p> <p>Furthermore, the housing requirements adopted within RSS were informed by Option 1 Figures submitted by the Council. Although some Local Authorities' Option 1 Figures were increased within the final adopted RSS, Salford's were not, and those submitted by the Council equalled those finally adopted. The proposed reduction in the planned number of new houses required by the Authority is not supported by any evidence and consequently the Authority must justify this proposition as required by the guidance issued by the Chief Planner (dated 6th July 2010), entitled 'Guidance for Local Planning Authorities following the Revocation of Regional Spatial Strategies. In this Guidance, paragraph 11 states that:</p> <p style="padding-left: 40px;">'Local Planning Authorities should collect and use reliable information to justify their housing supply policies and defend them during the LDF examination process.'</p> <p>An example of the application of this guidance was evidenced in practice by the Inspector sitting on the Central Lancashire Core Strategy examination, who in his letter dated 15th June, stated that the Core Strategy did not conform with the RSS housing figures without an evidence base to support an alternative set of numbers. Consequently he reported that the Core Strategy is unsound. Furthermore, paragraph 32 of PPS3 'Housing' states that:</p> <p style="padding-left: 40px;">'The level of housing provision should be determined taking a strategic, evidencebased approach that takes into account relevant local, sub-regional, regional and national policies and strategies achieved through widespread collaboration with stakeholders.'</p>	9

² Office of National Statistics (ONS), Dwelling Stock by Council Band 2009 (updated 2011)

³ Oxford Economics, Greater Manchester Forecast Model (GMFM) – Data for 2009 (published 2010)

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		<p>This requirement of PPS3 has not been adhered to by the Council as the Core Strategy does not acknowledge the presence of RSS as current adopted policy within the Development Plan, nor is the full SHLAA 2011 update available.</p> <p>From paragraph 5.4 of the Core Strategy, it is clear that the household projections published in August from the Greater Manchester Forecasting Model (GMFM) have been used by the Council as the base data to inform Policy C. However, there appears to be an error when used to calculate the estimated increase in household numbers. The GMFM states that there were 100,400 households within Salford in 2010, which is predicted to rise to 118,200 households in 2030. This is in fact a rise of 17,800, and not 17,759 as quoted within paragraph 5.4 of the Core Strategy.</p> <p>Using Council Tax Bands, the Office of National Statistics (ONS) records the number of dwellings within Salford as being 107,212 in 2009². This is significantly above the comparative figure from GMFM's data for 2009 (99,500)³, and their 2010 figure used to calculate the likely increase in households within the Core Strategy plan period (i.e. 2010-2030). This suggests that that baseline figure for calculating the required number of additional dwellings in Salford is arguable, and potentially incorrect.</p> <p>Support is given to paragraph 5.5, where it states that household projections are not the only factor that should be considered in determining the housing requirements for Salford over the plan period. However, although factors such as increases in employment floor space, vacancy rates and the number of second homes are factored into the assessment, issues such as migration are not. Furthermore, no reference is given to the RSS annual requirement for Salford (Policy L4), which forms part of the Development Plan for Salford. Policy L4 states that LPAs should assume that the average annual requirement set out in Table 7.1 will continue for a limited period beyond 2021.</p> <p>Paragraph 3.9 of Salford's latest Annual Monitoring Report (AMR) 2009/10, states that internal migration has been the principle driver of population growth within Salford since 2003. It should therefore be considered when calculating the housing requirement for the City.</p> <p>The Core Strategy Housing Supply Paper (June 2011) published in conjunction with the Core Strategy notes that the Council is currently updating Salford's Strategic Housing Land Availability Assessment (SHLAA), which is due to be published later in 2011. Although it is stated that this work has been used to inform the Core Strategy Housing Supply Paper, further information relating to the nature of this information is not given, and it is therefore unclear what exactly has been taken from it. Paragraph 54 of PPS3 states that LPAs should identify sufficient specific deliverable sites to deliver housing, by drawing on information from their SHLAA, however this information is not provided. Without access to this updated SHLAA, it is somewhat difficult to assess its findings in relation to the number of sites proposed, their potential dwelling yield and their deliverability.</p>	

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		<p>Furthermore, the Housing Supply Paper states that the list of sites identified within it, is not completely comprehensive. Whilst it is understood that additional sites may well be put forward during the Plan period, by limiting the housing requirement within Salford, Proposal C does not appear to take this into consideration as clearly as it could. Paragraph 59 of PPS3 states that an allowance for windfall sites should be included within an LPA's housing figures. As such, greater emphasis should be placed on the fact that Proposal C puts forward a minimum requirement that could be exceeded.</p>	
Susan E Occleston	Proposal C	<p>Subject: Development Plan Document - Core Strategy Pre-Publication Consultation and Interim Housing Figure Consultation</p> <p>We welcome the proposal to reduce the total net housing requirement over the period 2010-2030. It is understood that the new figure of 22,000 has been derived from the Greater Manchester Forecasting Model 2010 (GMFM) which estimates that there would be a growth of 17,759 households in Salford over the period 2010-2030. However, for reasons which are not clear, the Core Strategy is proposing a higher increase in the amount of office floor space than would be expected from the GMFM jobs forecasts and as a result the Core Strategy proposes a higher figure of household growth.</p> <p>We are therefore very concerned that, despite the proposed 35% reduction over the previous figure and the even lower GMFM figure, the Burgess Farm site in Walkden and Little Hulton is still included in the latest Development Plan Document (DPD). Also there is a breakdown of the numbers of the type of housing that is required in the 22,000 which is an essential element in planning the future housing needs.</p> <p>The Proposed Interim Housing Figure Sustainability Appraisal states that <i>"consultation responses on the Core Strategy suggest that concerns over very large amounts of new housing development could impact negatively on mental health, particularly if it requires the loss of Greenfield or Green Belt land that people value..... potential need to release such land for housing development would be lower with the interim housing figure than the Regional Strategy figure"</i>.</p> <p>The Draft Core Strategy DPD stated that the Burgess Farm site was the <u>only</u> major Greenfield site which would <u>need</u> to be developed to meet the suggested housing requirement at that time. With such a significant reduction in the interim housing figure there is clearly no longer that <u>need</u>.</p> <p>The latest DPD states that <i>"the overall identified potential supply is above the scale of housing development proposed in the Pre-Publication Consultation, indicating that it should be possible to deliver the Core Strategy proposals"</i>.</p> <p>In February Feb 2010 a lead member of the council, in response to proposals from a major land developer, said, <i>"The proposals seem to fly in the face of the vision that the council wants for the city. The inner parts of our city have had a dramatic loss of population over the past 50 years and we want to regain some of that population and regenerate areas like Chapel Street, Greengate and Ordsall. At first sight, the proposals seem to be for suburban</i></p>	7

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		<p><i>sprawl which will generate massive commuter journeys and destroy the openness which we think is one of Salford's major attractions."</i></p> <p>The Interim Housing Figure Community Impact Assessment points out that "local communities raised major concerns regarding the scale of housing development originally proposed and the potential impact this would have on their neighbourhood and quality of life".</p> <p>The DPD (1.4) states that the purpose of this consultation stage is "to review the contents of the Draft Core Strategy in light of ongoing updates to its evidence base and comments received during previous public consultations..... This consultation offers people the opportunity to comment on these changes before the city council finalises its proposals".</p> <p>To date the council appear to have totally ignored earlier public comments with regards to the development of Burgess Farm.</p> <p>In 2008 the Core Strategy - Issues and Options report (Option 4) included proposals to develop Greenbelt/Greenfield land in Salford West. In response to the Draft Core Strategy DPD in November 2009 it was identified that, although the household response rate for the whole of Salford Borough was low, nearly 40% of the total responses were from the M28 area alone. Also, over 42% of the total responses from Salford residents were explicit in their opposition to any development of Greenbelt and Greenfield land and over 30% of all respondents were opposed to at least one of the options and in particular option 4.</p> <p>Council plans to denote the Burgess Farm site a house building priority have been met with strong opposition from Salford West residents over the past 2 -3 years as part of the consultation for the Draft Core Strategy. In addition to the personal comments providing reasoned justification as to why the site was not suitable for development an 800 signature petition was submitted opposing the inclusion of the Burgess Farm site in the Draft Core Strategy DPD. Furthermore, the suitability of the site has long been questioned as is demonstrated by the fact that, over the past 30 years, a number of planning applications (including the most recent - July 2011) have been refused for sound reasons. It is highly unlikely that anything will change over the next 20 years which would negate any of the previous grounds for refusal.</p> <p>The sites identified in the Core Strategy Housing Supply have been taken from the Salford's Strategic Housing Land Availability Assessment 2010 (SHLAA). It is also noted from the SHLAA that the Burgess Farm sites (SHLAA Ref: SS23 & 852) are <u>not</u> considered to be deliverable or developable at this time whereas other sites in Walkden and Little Hulton (SHLAA Ref: 204 & 206) which <u>are</u> considered to be deliverable and developable are <u>not</u> included in the Core Strategy Housing Supply.</p> <p>In summary, we consider that the Burgess Farm site is not needed to meet the suggested future housing demand for Salford. In addition, serious consideration should be given to the fact that the Burgess Farm site has for many</p>	

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		years been proven to be unsuitable for development.	
Mr and Mrs P. Burke	Proposal C	<p>We strongly object to the proposals and the inclusion of Burgess Farm in the interim figures. This unique greenfield land should not be developed with housing. Previous objections have clearly articulated strong arguments against development.</p> <p>Having lived in this area for some 40 years we fully understand how overstretched transport infrastructure and roads are in this area.</p> <p>Such proposals would significantly increase traffic and pollution and would have a major detrimental impact upon residents in this area. Please think again and register our strong objection.</p>	4
Mr and Mrs Jones	Proposal C	<p>We are writing with regard to the proposed 600 properties on sites in both Worsley and Boothstown and to strongly object against these proposed developments.</p> <p>We have lived on Godmond Hall Drive in Boothstown for over 12 years now, the main reason for moving into Boothstown was the amount of green belt land around where we live instead of living in an area where you are totally surrounded by houses upon houses.</p> <p>Over the years of living here one of the negatives is the traffic leading up from Leigh Road to the motorway, it is horrendous in the mornings and evenings and junction 13 is very dangerous.</p> <p>The proposal to build a further 600 properties without a proper infrastructure for the traffic in this area is absolutely ludicrous. One of the other serious issues is there is just not enough schools around this area as it is at the moment and to build more properties with more families would just put complete pressure not only on the already heavy traffic around this area but also families trying to get their children into the schools.</p> <p>We run a company in Salford employing over 100 people and the reason for us keeping the business alive in Salford is because we have always loved where we live and when coming home from very busy days and nights it is very relaxing to come off the motorway and be surrounded by lots of green belt and is very pleasurable to see whilst driving home. We could have easily moved the business to the South of Manchester but upto now we haven't done this as I said because we love living in this area but we feel that if this was to go ahead then we would seriously consider moving not only from our home but moving our business also.</p> <p>Lastly I would like to say that I drive around the Salford area and notice the amount of houses that are either boarded up or derelict, surely would it not make financial sense to refurbish these houses and ensure that the areas are cleaned up instead of going to the hugely costly expense of building more houses.</p>	3
P and A Hall	Proposal C	<p>We are writing to express our concerns and objection to the proposed development of land at Burgess Farm located off Hilton Lane, Worsley as contained in the recent Interim Housing Figure Consultation report.</p> <p>Despite the recent planning application being rejected, again, we find that the council continue to include this unwanted development in its interim housing figures.</p>	18

Name/Org	Proposal	Summary of Representations to the Interim Housing Figure	Rep No
		<p>As the Core Strategy consultation process has not been concluded we would challenge how the council can include a proposed development that has already gone through the planning process and been rejected in any interim strategy.</p> <p>We have previous raised our objects to the proposed plans and again raise those same objections, this time in relation to this potential development despite it not being an agreed strategy.</p> <p>We understand from literature published that this is the only active farm land in the area and that this land has no specific designation, which given the recent past extensive development of the land at Ellenbrook is the only remaining expansive area of undeveloped land in the vicinity.</p> <p>It would seem that the land adjacent which comes within the boundary of Wigan MBC is designated as Green Belt and therefore raises the question why the City of Salford has failed to give this land similar designation.</p> <p>In our opinion this is an unnecessary development particularly as there is significant numbers of brown field sites within the city boundary which could and should be considered for development before yet more erosion of the city's limited green and rural landscape.</p> <p>Based on the Core Strategy document and the proposal to use this document in the interim until the Core Strategy is adopted, the effect on the local area is both in further road congestion of the already busy road system particularly during the busy morning and evening 'rush hour' periods.</p> <p>One questions how a single access in such a development would be sufficient with the likelihood of in excess of 500 vehicles leaving or entering the development during these 'rush hour' periods.</p> <p>We would also highlight that the recent traffic calming measures that have been introduced to Hilton Lane is an abject failure as it has been ill conceived and if anything creates greater dangers than before particularly to the North end of the road.</p> <p>This is before the potentially addition number of vehicles from this proposed scheme.</p> <p>Given the profile of the proposed development it is anticipated that the new housing will facilitate families which by their very nature suggests that between 500-1000 children will need schooling provision.</p> <p>Given the local authorities recent view that there was insufficient numbers in the area to maintain St Georges High School, it seems strange that the council is now considering additional housing which will cause additional burden to both the local primary and secondary schools.</p> <p>The fact that St Georges will remain open doesn't necessarily mean that there is an excess of places as by its nature being a Catholic school will limit the numbers from this development being accepted.</p> <p>It is well documented that the secondary school nearest to this development, Harrop Fold has had some difficulties over the years with the standards of education provided, which would therefore suggest that families living on this proposed development will, in the first instance select other local schools such as Walkden High as its preferred choice.</p>	

Name/Org	Proposal	Summary of Representations to the Interim Housing Figure	Rep No
		<p>Traditionally Walkden High as been the school of choice for local residents in both the Worsley and Boothstown areas and it would seem unfair that these residents find the chances of their child's allocation to their preferred choice diminished as a result of a new development of this size.</p> <p>From previous documentation issued by the council it is apparent that the development on Burgess Farm is one option being considered and from results of the consultation it would seem this option was generally felt to be without endorsement from the public.</p> <p>The Government Planning Policy [2005] states that: Good planning ensures that we get the right development, in the right place and at the right time. This proposed development fails on all counts Good planning ensures that the natural environment is protected and enhanced This proposed development fails on both counts Poor planning results in the loss of our Countryside due to development This proposed development will result in a loss of countryside Good planning is a positive and proactive process, operating in the public interest. If this is the case then the development of this area will be removed from the Strategy and as such should not be included within any interim document.</p> <p>We ask the Local Planning Committee to fully consider the wishes of local residents, the impact on the environment, the effect on our roads and schools and ask that this planning application be rejected as it is neither necessary nor wanted.</p>	
Anne Hector	Proposal C	<p>Whilst welcoming the reduction in the total number of houses proposed in the revised Core Strategy Pre Publication document. I consider that the Burgess Farm site (SHLAA Ref SS23 and 852) is not needed to meet the suggested future housing demand for Salford.</p> <p>Even if additional land was needed, serious consideration should be given to the fact that the Burgess Farm site has for many years been considered unsuitable for development. It would be tragic for the farm to disappear and additional housing would deprive the area of green space. The extra volume of traffic which would be involved would be horrendous. Hilton Lane is already hazardous.</p>	37
Gary McMahon	Proposal C	<p>Comments attached re core strategy pre-publication changes report, and interim housing figure Re:- Salford Core Strategy Document which includes proposals for new housing development in Worsley and Boothstown.</p> <p>I would like to voice my concerns re the increase from 250 to 600 homes to be built in this area and also the</p>	42

Name/Org	Proposal	Summary of Representations to the Interim Housing Figure	Rep No
		<p>proposals to build 300 of those on Greenfield sites.</p> <p>The area has lost a large percentage of Greenfield sites (farmland) to Ellenbrook development, Marriott Hotel and Golf Course and Boothstown developments all of which have contributed to major traffic problems in this area.</p> <p>I would urge the Council to only build on the Greenfield sites that are left as a last resort once all the brown sites have been exhausted. Worsley and Boothstown are appealing due to their rural appearance in what is a built up city. Once this green land has been destroyed it can never be restored to its original beauty, it should be preserved for future generations.</p> <p>Your document also states that 'Greenfield sites are to be identified in a separate plan', I would appreciate a copy of this for my perusal. Your new strategy only came to my attention by Barbara Keeley posting the information through the door. I feel that you should have notified all local residents of Worsley and Boothstown regarding the changes, in order that every resident could have their say on this matter.</p>	
Ian and Irene Bailey	Proposal C	<p>As a Worsley resident I am greatly concerned to hear that proposals for a new Housing Development are being discussed for Worsley and Boothstown. My objections relate particularly to the area between Crossfield Drive and Worsley Woods bordering the M60 motorway and are on a number of grounds as follows :</p> <p>Loss of Greenfield Land -This area is situated only 7 miles from the centre of Manchester and its importance cannot be underestimated. It is currently farmed and is one of the few areas of Greenfield Land so close to one of the UKs largest conurbations. There are precious few green spaces in and around many of our city centres and Manchester / Salford is no exception. The loss of yet another green space would be an absolutely terrible shame.</p> <p>Farmed land –We are constantly reminded in the media that population numbers are on the rise and that food production is becoming increasingly important. Whilst I appreciate that additional housing may be required to cope with the population increases, building a housing development on a field which currently produces crops is surely not a sensible option. This is not waste ground it is a farmer's field and as such should be protected at all costs. We are constantly reminded of the importance of locally produced food so it would be a travesty to remove one of the few working farmer's fields in Salford.</p> <p>Road Congestion – The building of a large number of houses is proposed (approx 600) and this brings with it the direct impact of the additional vehicles which will require access to the site. Walkden Road running past the Marriott is the main direct link between the two main arterial routes coming from the west of the city (M62 and A580 East Lancs Road) As such it is already gridlocked in both directions in the morning and often in the evening due to the proximity of the motorway. The congestion that the additional cars will bring will make it virtually impossible to reach the motorway (a distance of about half a mile) in a reasonable time during the morning and evening rush hours.</p> <p>Road / Child Safety – I understand that the proposed access point to the site would be at the junction of Crossfield Drive and Woodlands Road. This raises serious questions about Child Safety since Crossfield Drive is used daily by a large number of young children walking from the direction of Roe Green on their way to school. In an age when it is</p>	40

Name/Org	Proposal	Summary of Representations to the Interim Housing Figure	Rep No
		<p>all too easy to use the car to make even the shortest journeys it would be a terrible shame to prompt concerned parents to drive to school rather than to walk as they currently do.</p> <p>Access point to the site – A further concern about the access point is that there is such a limited amount of space at the junction of Crossfield Drive and Woodlands Road. 600 additional “higher value” houses with potentially over 1000 additional cars all converging on this junction just as a large number of cars are arriving at St Marks School is a recipe for a huge amount of daily localised congestion.</p> <p>Local Schools –St Marks School is already vastly oversubscribed. (Children living within walking distance of the school have been unable to secure a place this year) The introduction of a huge number of houses on its doorstep would greatly impact on the existing local community. The knock on effect of this would be for parents to try to secure places at the next nearest schools. However this is not an easy option as St Andrews, Boothstown / Ellenbrook / Mesne Lea are also oversubscribed. This would prompt parents to look further afield increasing the number of car journeys with its obvious implications for congestion and associated carbon footprint.</p> <p>Local amenities- There are currently no local doctors / dentists etc within walking distance. The additional housing would necessitate the residents having to travel to the surrounding districts to obtain these services from already overstretched providers, if they can get them at all.</p> <p>Wildlife – The neighbouring Worsley Woods are home to a vast number of different species of animals, birds and insects. Birds of prey, woodpeckers, jays, bats, foxes, rabbits etc are regularly seen in the area and the field provides a habitat for many of the food sources for these creatures. Development of the site would seriously impact on the ecology of the area and again is a decision which once made is irreversible.</p> <p>Impact on Worsley Woods – A housing development would run right up to the border with Worsley Woods and consequently change the character and impact on the ecology of the woods themselves.</p> <p>The detrimental impact of the loss of this land to a Housing Development cannot be underestimated. Once this land is developed it is lost as an area of farmland / green space forever. It is a decision that can never be reversed and as such it is a decision that cannot be taken lightly. Please consider the impact that the selling off of School Playing Fields continues to have on local communities. It is a decision that continues to be regretted to this day. The development of this site will have a similar impact and is equally irreversible. I believe that developing this land will be regretted for many years to come. The land was designated as a Greenfield Site for a very good reason and the reversal of this decision would make a mockery of the good intentions of a piece of positive and well meaning legislation.</p>	
Wendy Howarth	Proposal C	I welcome the proposal to reduce the total net housing requirement over the period 2010-2030. It is understood that the new figure of 22,000 has been derived from the Greater Manchester Forecasting Model 2010 (GMFM) which estimates that there would be a growth of 17,759 households in Salford over the period 2010-2030. However, for	43

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		<p>reasons which are not clear, the Core Strategy is proposing a higher increase in the amount of office floor space than would be expected from the GMFM jobs forecasts and as a result the Core Strategy proposes a higher figure of household growth.</p> <p>I am therefore very concerned that, despite the proposed 35% reduction over the previous figure and the even lower GMFM figure, the Burgess Farm site in Walkden and Little Hulton is still included in the latest Development Plan Document (DPD).</p> <p>The Proposed Interim Housing Figure Sustainability Appraisal states that <i>“consultation responses on the Core Strategy suggest that concerns over very large amounts of new housing development could impact negatively on mental health, particularly if it requires the loss of Greenfield or Green Belt land that people value..... potential need to release such land for housing development would be lower with the interim housing figure than the Regional Strategy figure”</i>.</p> <p>The Draft Core Strategy DPD stated that the Burgess Farm site was the <u>only</u> major Greenfield site which would <u>need</u> to be developed to meet the suggested housing requirement at that time. With such a significant reduction in the interim housing figure there is clearly no longer that <u>need</u>.</p> <p>The latest DPD states that <i>“the overall identified potential supply is <u>above</u> the scale of housing development proposed in the Pre-Publication Consultation, indicating that it should be possible to deliver the Core Strategy proposals”</i>. In February Feb 2010 a lead member of the council, in response to proposals from a major land developer, said, <i>“The proposals seem to fly in the face of the vision that the council wants for the city. The inner parts of our city have had a dramatic loss of population over the past 50 years and we want to regain some of that population and regenerate areas like Chapel Street, Greengate and Ordsall. At first sight, the proposals seem to be for suburban sprawl which will generate massive commuter journeys and destroy the openness which we think is one of Salford's major attractions.”</i></p> <p>The Interim Housing Figure Community Impact Assessment points out that <i>“local communities raised major concerns regarding the scale of housing development originally proposed and the potential impact this would have on their neighbourhood and quality of life”</i>.</p> <p>The DPD (1.4) states that the purpose of this consultation stage is <i>“to review the contents of the Draft Core Strategy in light of ongoing updates to its evidence base and comments received during previous public consultations..... This consultation offers people the opportunity to comment on these changes before the city council finalises its proposals”</i>.</p> <p>To date the council appear to have totally ignored earlier public comments with regards to the development of Burgess Farm.</p> <p>In 2008 the Core Strategy - Issues and Options report (Option 4) included proposals to develop Greenbelt/Greenfield land in Salford West. In response to the Draft Core Strategy DPD in November 2009 it was</p>	

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		<p>identified that, although the household response rate for the whole of Salford Borough was low, nearly 40% of the total responses were from the M28 area alone. Also, over 42% of the total responses from Salford residents were explicit in their opposition to any development of Greenbelt and Greenfield land and over 30% of all respondents were opposed to at least one of the options and in particular option 4.</p> <p>Council plans to denote the Burgess Farm site a house building priority have been met with strong opposition from Salford West residents over the past 2 -3 years as part of the consultation for the Draft Core Strategy. In addition to the personal comments providing reasoned justification as to why the site was not suitable for development an 800 signature petition was submitted opposing the inclusion of the Burgess Farm site in the Draft Core Strategy DPD. Furthermore, the suitability of the site has long been questioned as is demonstrated by the fact that, over the past 30 years, a number of planning applications (including the most recent - July 2011) have been refused for sound reasons. In addition to the questioned 'need' to develop the site the increased traffic and dangerous location of the only single point of access to the site were cited in the latest planning application refusal. There are already frequent RTA's on Hilton Lane particularly where the road bends and passes under the railway bridge adjacent to the farm and proposed site access. It is highly unlikely that anything will change over the next 20 years which would negate any of the previous grounds for refusal.</p> <p>The sites identified in the Core Strategy Housing Supply for possible development have been taken from the Salford's Strategic Housing Land Availability Assessment 2010 (SHLAA). It is also noted from the SHLAA that the Burgess Farm sites (SHLAA Ref: SS23 & 852) are <u>not</u> considered to be deliverable or developable at this time whereas other sites in Walkden and Little Hulton (SHLAA Ref: 204 & 206) which <u>are</u> considered to be deliverable and developable are <u>not</u> included in the Core Strategy Housing Supply. This begs the question as to why 'vacant' land is not being considered before a working livestock farm?</p> <p>In summary, I consider that the Burgess Farm site is not needed to meet the suggested future housing demand for Salford. In addition, serious consideration should be given to the fact that the Burgess Farm site has for many years been proven to be unsuitable for development.</p>	
R Ford	Proposal C	I have heard of the proposed planning development of thousands of homes on the Burgess Farm site on Hilton Lane, Salford and wish to object to these proposals as the area is already congested and there will be one less green space in the area. Please take the above into consideration and reject the application.	29
Trafford MBC	Proposal C	Total housing requirement The document states that there should be a net increase of at least 22,000 dwellings in Salford over the period 2010 – 30. This is equivalent to an average of 1,100 dwellings per annum, compared to 1,688 (including allowance for	38

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		<p>New Growth Point) in Salford's Draft Core Strategy. Whilst it is acknowledged that this is represented as a minimum, it does equate to a sizable reduction and it is unclear what allowance is made for the Housing Growth Point initiative through to 2016. Such an approach could potentially undermine the delivery of housing within the City Region and therefore impact upon meeting the housing needs of the conurbation.</p> <p>Trafford's Core Strategy is currently at its Examination stage and Manchester has now submitted their Core Strategy to the Secretary of State. Both Plans include housing requirements that are in general conformity with Regional Spatial Strategy. The evidence appearing to underpin the reduction in the total housing requirement within Salford is not considered to be sufficiently robust or transparent. It is therefore considered that the adoption of an interim housing figure is premature because it could potentially impact on the delivery of housing policy across the conurbation.</p>	
Gordon Shepley	Proposal C	<p>I welcome the proposal to reduce the total net housing requirement over the period 2010-2030. It is understood that the new figure of 22,000 has been derived from the Greater Manchester Forecasting Model 2010 (GMFM) which estimates that there would be a growth of 17,759 households in Salford over the period 2010-2030. However, for reasons which are not clear, the Core Strategy is proposing a higher increase in the amount of office floor space than would be expected from the GMFM jobs forecasts and as a result the Core Strategy proposes a higher figure of household growth.</p> <p>I am therefore very concerned that, despite the proposed 35% reduction over the previous figure and the even lower GMFM figure, the Burgess Farm site in Walkden and Little Hulton is still included in the latest Development Plan Document (DPD).</p> <p>The Proposed Interim Housing Figure Sustainability Appraisal states that <i>"consultation responses on the Core Strategy suggest that concerns over very large amounts of new housing development could impact negatively on mental health, particularly if it requires the loss of Greenfield or Green Belt land that people value..... potential need to release such land for housing development would be lower with the interim housing figure than the Regional Strategy figure"</i>.</p> <p>The Draft Core Strategy DPD stated that the Burgess Farm site was the <u>only</u> major Greenfield site which would <u>need</u> to be developed to meet the suggested housing requirement at that time. With such a significant reduction in the interim housing figure there is clearly no longer that <u>need</u>.</p> <p>The latest DPD states that <i>"the overall identified potential supply is <u>above</u> the scale of housing development proposed in the Pre-Publication Consultation, indicating that it should be possible to deliver the Core Strategy proposals"</i>.</p> <p>In February Feb 2010 a lead member of the council, in response to proposals from a major land developer, said, <i>"The proposals seem to fly in the face of the vision that the council wants for the city. The inner parts of our city have had a dramatic loss of population over the past 50 years and we want to regain some of that population and</i></p>	41

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		<p><i>regenerate areas like Chapel Street, Greengate and Ordsall. At first sight, the proposals seem to be for suburban sprawl which will generate massive commuter journeys and destroy the openness which we think is one of Salford's major attractions."</i></p> <p>The Interim Housing Figure Community Impact Assessment points out that "<i>local communities raised major concerns regarding the scale of housing development originally proposed and the potential impact this would have on their neighbourhood and quality of life</i>".</p> <p>The DPD (1.4) states that the purpose of this consultation stage is "<i>to review the contents of the Draft Core Strategy in light of ongoing updates to its evidence base and comments received during previous public consultations..... This consultation offers people the opportunity to comment on these changes before the city council finalises its proposals</i>".</p> <p>To date the council appear to have totally ignored earlier public comments with regards to the development of Burgess Farm.</p> <p>In 2008 the Core Strategy - Issues and Options report (Option 4) included proposals to develop Greenbelt/Greenfield land in Salford West. In response to the Draft Core Strategy DPD in November 2009 it was identified that, although the household response rate for the whole of Salford Borough was low, nearly 40% of the total responses were from the M28 area alone. Also, over 42% of the total responses from Salford residents were explicit in their opposition to any development of Greenbelt and Greenfield land and over 30% of all respondents were opposed to at least one of the options and in particular option 4.</p> <p>Council plans to denote the Burgess Farm site a house building priority have been met with strong opposition from Salford West residents over the past 2 -3 years as part of the consultation for the Draft Core Strategy. In addition to the personal comments providing reasoned justification as to why the site was not suitable for development an 800 signature petition was submitted opposing the inclusion of the Burgess Farm site in the Draft Core Strategy DPD.</p> <p>Furthermore, the suitability of the site has long been questioned as is demonstrated by the fact that, over the past 30 years, a number of planning applications (including the most recent - July 2011) have been refused for sound reasons. It is highly unlikely that anything will change over the next 20 years which would negate any of the previous grounds for refusal.</p> <p>The sites identified in the Core Strategy Housing Supply have been taken from the Salford's Strategic Housing Land Availability Assessment 2010 (SHLAA).</p> <p>It is also noted from the SHLAA that the Burgess Farm sites (SHLAA Ref: SS23 & 852) are <u>not</u> considered to be deliverable or developable at this time whereas other sites in Walkden and Little Hulton (SHLAA Ref: 204 & 206) which <u>are</u> considered to be deliverable and developable are <u>not</u> included in the Core Strategy Housing Supply.</p> <p>In summary, I consider that the Burgess Farm site is not needed to meet the suggested future housing demand for</p>	

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		Salford. In addition, serious consideration should be given to the fact that the Burgess Farm site has for many years been proven to be unsuitable for development.	
E J Howarth	Proposal C	<p>I welcome the proposal to reduce the total net housing requirement in Salford for the period 2010-2030 from 33,750 to 22,000.</p> <p>I understand, from the above documents, that the new figure of 22,000 has been derived from the Greater Manchester Forecasting Model 2010 (GMFM) which estimates that there would be a growth of 17,759 households in Salford over the period 2010-2030. However, for reasons which are not clear, the Core Strategy Pre-Publication DPD is proposing a higher increase in the amount of office floor space than that which would be expected from the GMFM jobs forecasts. As a result the council are suggesting an even higher figure of household growth. If a higher increase in the amount office floor space is justified the DPD states that most of this will be in the Centre and Regional Centre of the City, ie. <u>the Eastern parts of the region</u>.</p> <p>I am very concerned that, despite the GMFM figure of 17,759, which is 48% below the previous figure, and the council's own figure, which is still a significant 35% reduction over the previous figure, the Core Strategy Pre-Publication DPD makes a specific point of identifying for development the Burgess Farm site in Walkden and Little Hulton, ie. on <u>the Western boundary of the region</u>.</p> <p>Furthermore, the Draft Core Strategy DPD and the Core Strategy Pre-Publication DPD both 'single out' Burgess Farm as a site which would 'need' to be developed. Firstly, this goes against the whole ethos of the Core Strategy which states that its purpose is not to identify or allocate particular sites for development. Also, the Core Strategy Pre-Publication DPD states that it only covers the changes from the Draft Core Strategy DPD. I fail to see where anything has changed with regards to Burgess Farm and yet the council appear to have felt the need to specify this site again in this latest document! I can only assume that this is because the council are aware of the large public opposition to the development of this site!</p> <p>The Draft Core Strategy DPD stated that the Burgess Farm site was the <u>only</u> major Greenfield site which would need to be developed to meet the suggested housing requirement at that time. With such a significant reduction in the housing figure that 'need' cannot be justified!</p> <p>The following comments support my last statement:-</p> <p>The Proposed Interim Housing Figure Sustainability Appraisal states that <i>"consultation responses on the Core Strategy suggest that concerns over very large amounts of new housing development could impact negatively on mental health, particularly if it requires the loss of Greenfield or Green Belt land that people value..... potential need to release such land for housing development would be lower with the interim housing figure than the Regional Strategy figure"</i>.</p> <p>The Core Strategy Pre-Publication DPD states that <i>"the overall identified potential supply is above the scale of</i></p>	44

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		<p><i>housing development proposed in the Pre-Publication Consultation, indicating that it should be possible to deliver the Core Strategy proposals".</i>In February Feb 2010 a lead member of the council, in response to proposals from a major land developer, said, <i>"The proposals seem to fly in the face of the vision that the council wants for the city. The inner parts of our city have had a dramatic loss of population over the past 50 years and we want to regain some of that population and regenerate areas like Chapel Street, Greengate and Ordsall. At first sight, the proposals seem to be for suburban sprawl which will generate massive commuter journeys and destroy the openness which we think is one of Salford's major attractions."</i></p> <p>The comments by that particular lead member of the council are very pertinent in relation to Burgess Farm which is on the far <u>w</u>estern boundary of Salford. The vast majority of office developments and other jobs are towards the <u>e</u>ast of the city <i>"which will generate massive commuter journeys"</i>.</p> <p>To date, the council appear to have totally ignored earlier public comments with regards to the development of Burgess Farm.</p> <p>In the Draft Core Strategy Sustainability Appraisal: 3.157<i>"The city council's adopted Statement of Community Involvement sets out consultation requirements for the production of planning documents and the determination of planning applications..... Comments received through these methods were taken into account during the formation of the Draft Core Strategy"</i>.</p> <p>The Interim Housing Figure Community Impact Assessment recognises that <i>"local communities raised major concerns regarding the scale of housing development originally proposed and the potential impact this would have on their neighbourhood and quality of life"</i>.</p> <p>The Core Strategy Pre-Publication DPD (1.4) states that the purpose of this consultation stage is <i>"to review the contents of the Draft Core Strategy in light of ongoing updates to its evidence base and comments received during previous public consultations..... This consultation offers people the opportunity to comment on these changes before the city council finalises its proposals"</i>.</p> <p>In the timing plan for the Core Strategy DPD under 'Publication of a full Draft Core Strategy October-November 2009' it states that <i>"All of the views expressed in the initial consultation period together with any new technical information will be taken into account when developing a full draft version of the Core Strategy."</i></p> <p>The Core Strategy Issues and Options Report set out four possible strategic options for how the city could develop. The Draft Core Strategy DPD states that <i>"a significant number of comments were received through the consultation, which ended on 23 January 2009"</i>. In fact nearly 40% of the total responses were from the M28 area alone (Burgess Farm is in M28). Also, over 42% of the total responses from Salford residents were explicit in their opposition to any development of Greenbelt and Greenfield land.</p> <p>Council plans to denote the Burgess Farm site a house building priority have been met with strong opposition from</p>	

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		<p>Salford West residents over the past 2 -3 years as part of the consultation for the Core Strategy DPD. In addition to the personal comments providing reasoned justification as to why the site was not suitable for development an 800 signature petition was submitted opposing the inclusion of the Burgess Farm site in the Draft Core Strategy DPD. This fact is recognised in the Planning Inspectors Advisory Visit Note dated 24/02/10 - Consultation</p> <p>Responses: <i>“Certain provisions in the Draft CS had led to a large number of adverse representations. Clearly the Council needs to take these into account and, so far as is possible, it should seek to resolve the issues raised: public support for, and ownership’ of, the CS is more likely to lead to deliverability.....”</i> <u>These are the Planning Inspectors comments, not mine!</u></p> <p>In the Draft Core Strategy Sustainability Appraisal the following are most relevant when considering Burgess Farm:-</p> <p>3.12..... <i>“Population loss has been less significant from Salford West, although has still been an issue in some localities. parts of Salford West already have pressures on some services such as schools, and so this might not be wholly positive and is a cause of concern for local communities”.</i></p> <p>3.35 <i>“the impacts on individual sites/resources could be more mixed, as development of some sites (both brownfield and greenfield) could result in a loss of habitat and/or increased disturbance to wildlife..... the release of 21 hectares of greenfield land at Burgess Farm, Walkden for housing could have a negative impact on biodiversity through disturbance and loss of habitat”.</i></p> <p>3.69 <i>“the scale of residential development it proposes around the edges of the city could lead to increased car movements.....increased development on the edge of the city would lead to increased car movements as the public transport improvements would be unlikely to be sufficient to fully mitigate against an increase in traffic. No matter how much development takes place at the edge of the city it will never be as accessible in terms of number of public transport routes as the highly accessible Regional Centre.”</i></p> <p>3.149..... <i>“which would also see major greenfield housing development in less accessible locations around the edge of the urban area in Salford West.”</i></p> <p>To some extent the council have provided its own evidence that Burgess Farm is not suitable for housing development. In Annex ‘A’: Sustainability Matrix for Greenfield and Greenbelt under Housing Sites the following questions and answers are identified against Burgess Farm:-</p>	

Name/Org	Proposal	Summary of Representations to the Interim Housing Figure	Rep No
		<p>Would it be likely to increase or decrease car use? it is not immediately adjacent to good public transport services, and so could still be quite car reliant. Significant increase in traffic on Hilton Lane, with access between two existing houses.</p> <p>Would it maintain tranquil areas? Relatively tranquil site at present.....Development would change character of the site significantly</p> <p>To enhance economic inclusion: Would it improve physical accessibility to jobs? Not particularly well located in terms of employment areas</p> <p>Would it improve economic performance in disadvantaged areas? Some disadvantaged areas nearby, but unlikely to benefit them.</p> <p>The proposed Burgess Farm site is 'divided' by the boundary between Little Hulton and Walkden South. According to the Little Hulton and Walkden Community Action Plan 2009/2010, Little Hulton has the highest population in Salford. It is the 5th most deprived area in Salford. Unemployment is high. The proportion of working age people who are unemployed is higher than average, as is the proportion of people who have never worked. The development of Burgess Farm will not benefit anybody in this or the surrounding areas.</p> <p>Furthermore, the suitability of the site has long been questioned as is demonstrated by the fact that, over the past 40 years, a number of planning applications (including the most recent - July 2011) have been refused for sound reasons. I do not intend to go over the many reasons but suffice to say, it is highly unlikely that anything will change over the next 20 years which would negate any of the previous grounds for refusal.</p> <p>In summary, the council appear to be totally ignoring the objections from residents to the proposed development of this site despite the fact that many of these objections have supporting evidence which is included within the council's own prepared documents. I believe that the information provided above identifies clearly that the Burgess Farm site is not needed in order to meet the suggested future housing demand for Salford. In addition, serious consideration should be given to the fact that the Burgess Farm site has for many years been proven to be, and still is, unsuitable for development.</p>	
Larry Merryweather	Proposal C	I object to the Interim Housing Figure Consultation because Salford has been left with out an identified housing requirement plan and intends as an intrim to use the Core strategy Pre-publication Changes report,this seems to be	39

Name/Org	Proposal	Summary of Representations to the Interim Housing Figure	Rep No
		an undemocratic way of deciding what the new build numbers are going to be in The Worsley and Boothstown areas with out proper consultaion	
R MacLennan	Proposal C	I have read both the above consultation documents on the Council website. I am a resident of Worsley and feel that I have to express my objections to any proposals or developments on greenfield land within the Worsley/Boothstown district. Greenfield land is important for environmental protection and for the pleasure of current and future generations.	36
Robert Seddon	Proposal C	I'm writing to object to the proposed planning application to build houses on current Burgess Farm land on Hilton Lane, Walkden. Hilton Lane and the surrounding roads are already suffering from too much traffic, especially during the rush hour and school run time. Hilton lane is particularly bad as traffic has to negotiate the ridiculous traffic calming measures. It is also a main link to Walkden from Little Hulton as well as the only route to Harrop Fold High School and one of just two routes to St Georges RC High School. The prospect of a possible extra 1000 vehicles added to the already unacceptable congestion is quite simply madness. The knock on effect if this proposal goes ahead is more gridlock on other nearby roads and junctions as people avoid Hilton Lane in their vehicles. I'm a BT Engineer and I travel all around Walkden and Little Hulton every day. Hilton Lane is without doubt by far the worst road I've ever known and this is before these new houses have been built. I currently have to negotiate speed humps that encourage head on collisions as vehicles move to the centre of the road to position the hump between their wheels. The first chicane is just before a blind bend near the bridge. Then there is a raised platform near Harrop Fold school with a Lollipop Lady and groups of schoolchildren playing chicken, then finally another chicane close to the junction with Manchester Road on the brow of the hill where there is regularly a Mexican stand off leading to road rage. And you want to introduce the prospect of dozens of building waggons and then 1000 plus vehicles; you're kidding right ! After the traffic chaos we are then faced with the loss of more green field land to add to the relatively recent loss of all the green space we once had at ellenbrook. So to recap, this whole idea is just crazy so I fully expect it to go through without a hitch !!	35
Karen Fisher	Proposal C	With reference to the above development plan for Burgess Farm, Hilton Lane, I wish to oppose it on the following grounds: 1. Congestion is already a problem at times 2. Possible flooding - current drainage system appears inadequate during heavy rainfall 3. Extra burden on current amenities i.e. schools, services, drainage system	34

Name/Org	Proposal	Summary of Representations to the Interim Housing Figure	Rep No
		<p>4. Poor air quality with a possible extra 4,000 vehicles in the area</p> <p>5. The loss of further green spaces where children can connect with nature/animals</p> <p>6. Reduction in pleasant walks in the area</p> <p>7. Suburbia will soon feel like inner cities with the loss of green spaces as every available piece of land is developed for housing</p> <p>8. The area may be less attractive to residents due to over development - soulless housing estates with no heart.</p> <p>I hope that the above will be taken into consideration and look forward to hearing from you in due course.</p>	
Anne-Marie Gardener	Proposal C	<p>It is appreciated that a reduction to the number of houses proposed to be developed on the site of Burgess Farm site on Hilton Lane is welcome, however I believe it better to have no development of houses on this green belt land. The site is a working farm and welcome green area in a neighbourhood when green spaces are few and far between. Therefore I hope this objection is taken into consideration before any progress to the development plan is approved.</p>	33
Adrienne Ford	Proposal C	<p>I have heard of the proposed planning suggestion of homes on the Burgess Farm site on Hilton Lane, Salford and wish to object to this proposal as the area is already congested and an increase in heavy traffic during construction will be unbearable and extremely inconvenient as Newearth Rd is already a busy road.</p> <p>Please take the above into consideration and reject the application.</p>	31
E Fisher	Proposal C	<p>I have heard of the proposed development of thousands of homes on the Burgess Farm site, Hilton Lane, Salford and wish to object to these proposals as over the years all the farms/green spaces in the area have been developed for housing, changing the feel of the community with excessive strain on existing facilities.</p> <p>Please take the above into consideration and reject the planning application.</p>	30
Bellway Homes Ltd	Proposal C	<p>Thank you for your letter of 15th June inviting comments in respect of these 2 important planning documents. We support the submission of the HBF in their letter to you of 28th June 2011. Our concern is that the RSS target (Table 7.1 of RSS) of 28,800 was also the Council's Option 1 position at the RSS EiP and therefore was not an imposed requirement but one that the planning authority sought. With the impending abolition of RSS through the Localism Act, your Option 1 position remains as a reflection of your housing strategy and housing needs.</p> <p>With the abolition of RSS it will also remain the case that Salford is an important part of the Manchester City Region and therefore needs to have a short and longer term policy position that supports growth and regeneration. The interim policy sends out the wrong signal to the development industry, your partner in delivering these objectives. Whatever housing target is settled upon has to be based upon robust evidence and has to be a minimum target, as advocated in the Planning for Growth national agenda.</p> <p>Whilst recognising that higher density (apartment) schemes have effectively ended with no sign of a return, due to financial constraints, this should affect the types of developments that the Council should support rather than the level of total investment that you aspire to. If this has implications for Greenfield land release / Green Belt review</p>	1

Name/Org	Proposal	Summary of Representations to the Interim Housing Figure	Rep No
		<p>then this should be addressed positively as has been the case in Sefton, West Lancashire, Halton, Knowsley and other Councils nationally. Policies can be drafted that protect regeneration objectives should such land be required.</p> <p>We therefore OBJECT to your Interim Housing Figure and ask that you revert to your Option 1/RSS (minimum) target with immediate effect and for that to inform your Core Strategy, along with the evolving national planning agenda.</p>	
<p>The following response has been submitted individually by the consultees listed below:</p> <p>A and G Boxer</p> <p>AE Sullivan and M Sullivan</p> <p>Alex Moore and David Worsley</p> <p>B A Blackburn</p> <p>B Holer</p> <p>B Warrell</p> <p>Barbara Carney and M Carney</p> <p>Barbara Kershaw</p> <p>Carole A Wood</p> <p>Caroline Gleeson</p> <p>Christine Booth</p> <p>Christopher J</p>	<p>Proposal C</p>	<p>The following response has been submitted individually by the consultees listed</p> <p>Re: Development Plan Document - Core Strategy Pre-Publication Consultation and Interim Housing Figure Consultation</p> <p>Whilst welcoming the reduction in the total number of houses proposed in the revised Core Strategy Pre-Publication Consultation document, we are still concerned that a number of comments made in previous consultations do not appear to have been taken into account. Our comments at this stage of the consultation process are summarised as follows:-</p> <ul style="list-style-type: none"> • A large number of objections already raised by the general public to the proposed development of the Burgess Farm site: Nearly 40% of the total responses to the Issues and Options Report came from the M28 area; over 42% of the total responses from Salford residents were explicit in their opposition to any development of Greenbelt and Greenfield land; an 800 signature petition was submitted opposing the inclusion of the Burgess Farm site in the Draft Core Strategy DPD. The council have received hundreds of public and business responses identifying the negative impacts of this development. • The latest DPD states that <i>“the overall identified potential supply is <u>above</u> the scale of housing development proposed in the Pre-Publication Consultation”</i>. Despite this and the identified 35% reduction in the housing requirement, the Burgess Farm site in Walkden and Little Hulton is <u>still</u> included in the latest DPD. • Previously in the Draft Core Strategy DPD a <u>need</u> was expressed to develop the <i>“only major Greenfield site”</i> at Burgess Farm, the fact that this <u>need</u> is removed by the reduction in housing numbers required is not acknowledged. A lead Council member commented in February 2010 that development of Greenfield sites in Salford West would <i>“generate massive commuter journeys and destroy the openness which we think is one of Salford’s major attractions”</i>. • The suitability of the site has long been questioned: Over the past 30 years a number of planning applications on the Burgess Farm site (including the most recent - July 2011) have been refused for sound reasons. It is highly unlikely that anything will change over the next 20 years which would negate any of the 	<p>46</p>

Name/Org	Proposal	Summary of Representations to the Interim Housing Figure	Rep No
Blackburn CM Ogden D Holer Eleanor Hill Iain Yardley J Harcroft J Houghton Jackie M Hughes JJ Absalom and LB Wynne JL Berry Joel Hughes Joshua Hughes J & P Farquhar Kathleen Morris L Houghton Lucy A Blackburn M Houghton Mary Walker Miss K Griffith Mr and Mrs A		<p>previous grounds for refusal.</p> <ul style="list-style-type: none"> Salford's Strategic Housing Land Availability Assessment 2010 states that: the Burgess Farm sites (SHLAA Ref: SS23 & 852) are <u>not</u> considered to be deliverable or developable at this time. Other sites in Walkden and Little Hulton (SHLAA Ref: 204 & 206) which <u>are</u> considered to be deliverable and developable are <u>not</u> included in the Core Strategy Housing Supply and the latest DPD. <p>In conclusion, we consider that the Burgess Farm site is not needed to meet the suggested future housing demand for Salford. Furthermore, even if additional land was needed, serious consideration should be given to the fact that the Burgess Farm site has for many years been considered unsuitable for development.</p>	

Name/Org	Proposal	Summary of Representations to the Interim Housing Figure	Rep No
Lawman			
Mr M and Mrs G Watson			
Mr and Mrs H Isherwood			
Mr J and Mrs and B Deacon			
Mr and Mrs PM Sharpe			
Mr B Houghton			
Mr B Kilner			
Mr D Fidler and Miss S L Grice			
Mr J Banks			
Mr K E Barry			
Mr M H Wilson			
Mr R Halford			
Mrs EM Fulford			
Mrs J Byrom			
Mrs J Houghton			
Mr and Mrs J Heap			
Mrs M Rawcliffe			
Mrs P Fisher			

Name/Org	Proposal	Summary of Representations to the Interim Housing Figure	Rep No
<p>Ms H Cooper Naomi Hughes P Kempster P Schofield PET Houghton Peter Pascall R Doyle and D Doyle R Paley and A Kenyon S Miller and L Miller Stephen P Jones Tony Jackson Valerie Moore W and S Halliday Wendy Barlow</p>			
Carole A Wood	Proposal C	<p>See comments to ref 46 (Proposal C). In addition the following comments were also submitted: I am writing again with particular reference to the proposed development of lane on Burgess Farm and further to my previous communications on this subject sent on 06/01/10 and 10/04/10. I have attached a document which expresses the concerns of the 'Burgess Farm Residential Group', concerns with which I fully concur. In the light of issues raised in my previous communications, the reduction in proposed housing requirements as now shown in the DPD and the refusal (on sound grounds) to grant permission to develop land at Burgess Farm by the Council Planning Panel at their meeting earlier this month, I strongly appeal to you to remove Burgess Farm from the</p>	47

Name/Org	Proposal	Summary of Representations to the Interim Housing Figure	Rep No
		<p>Draft Core Strategy DPD.</p> <p>Once Burgess Farm is lost, it is lost forever and its value as a producer of food and its enormous environmental benefits to this City are gone for good. Any error of judgement re this proposed development will permanently decimate the quality of life of residents in this area, from the air we breathe to the already intolerable congestion on our roads.</p>	
B Warrell	Proposal C	<p>See comments to ref 46 (Proposal C). In addition the following comments were also submitted: It would be a travesty if you agree to this planning application by Peel Holdings as it would be devastating to the whole locality.</p> <ol style="list-style-type: none"> 1. Not only increasing the local population by some 700 plus, 2. But also increasing the vehicle numbers, also to some 700, on to an infrastructure that cannot cope with the present number. 3. But also deprive the farmer, and future farmers of their livelihood, by reducing their land by almost one third. 4. With the latter point in mind, it appears that the farmer's access to his other pastures is removed as the track way becomes within the curtilage of the new estate. 5. This would mean that any stock movement would have to be via the public road making farming the remainder almost unviable. 6. Or is that the ultimate plan? Remove the farmer and not allow future tenant farmers, so that the rest of the land becomes available for more sprawling development? 7. The 170 acres plus the area to Tumcoft Farm is an invaluable stretch of land not only for the residents of the locality but also for the abundant wild life, which at long last has established itself there. 8. There are large number of uncommon birds, animals and butterflies in this domain including buzzards, peregrines, water rail, great crested newts, foxes etc, etc. 9. Wild life needs a large area, not a trifling patch as suggested by Peel Holdings (or is this the sweetener for their bitter pill?) and a buffer zones away from the Urban sprawl. 10. The area proposed for development provides a buffer zone to this side of this nature area. 11. This whole area needs to be designated a conservation area and protected farm land as in 10 years time the whole county will be desparate for farm land as our farm land is reduced and imports become more difficult and costly to procure. <p>If you have not done so already I would recommend that you walk from either Hilton Lane or Newearth Road along one of many footpaths to Tumcoft Farm, then you will appreciate the tranquillity of this area. Please think to the future and preserve this land for future farming and public enjoyment, food source and nature, and reject this planning application. We are constantly being urged to subscribe to wild life disasters allover the world.</p>	48

Name/Org	Proposal	Summary of Representations to the Interim Housing Figure	Rep No
		<p>The plight of the jaguar in the Amazon rain forests and the devastation of forest fires in New Zealand, Australia and California, to name but a few.</p> <p>It shouldn't be allowed, tragic everyone says, but what about British wild life?</p> <p>There are many programmes on the television warning of the problems facing our wild life, eg. the current survey on butterflies.</p> <p>You are the Trustees of Salford and we look to you to act responsibly, and save what is left of the countryside and farm-land in this area.</p> <p>If you must build more houses, use land that is not green field sites, use those like the County High School site, which is far more suited to development and is complete with comprehensive shopping precincts. Yes there are Parks but these are too well manicured for Nature Reserves.</p> <p>The semi-unmanaged track of land from Newearth Road to Mort Lane is a haven for a much more diverse species of birds, insects and animals than Blackleach Country Park.</p> <p>It is probably the only farmed land in Salford. Children today rarely see farm animals in a natural habitat.</p>	
J Harcroft	Proposal C	See comments to ref 46 (Proposal C). In addition the following comments were also submitted: Hilton Lane is already unsafe with the volume of traffic and two blind bends.	49
Barbara Kershaw	Proposal C	See comments to ref 46 (Proposal C). In addition the following comments were also submitted: I have friends who live on Hilton Lane and Newearth Rd, so have walked round the fields behind their homes quite often. Salford doesn't have many "green" credentials. Why spoil this green oasis when there are so many brownfield sites (eyesores) that could be cleared and used for housing? Please leave it alone.	50
J & P Farquhar	Proposal C	See comments to ref 46 (Proposal C). In addition the following comments were also submitted: How many times do we, the people who pay your wages, have to object to the same thing (ie the development of Burgess Farm) before you actually pay attention. You are behaving like Ireland did over the EU vote ie keep making people vote until you get the answer you want. Democracy, what a joke!	51
M H Wilson	Proposal C	See comments to ref 46 (Proposal C). In addition the following comments were also submitted: Any development of that area for housing would create traffic chaos on Hilton Lane and surrounding roads.	52
P Fisher	Proposal C	See comments to ref 46 (Proposal C). In addition the following comments were also submitted: I wholeheartedly give my support to save Burgess Farm and to keep it how it has been.	53
Arnold Laver	Proposal C&D	It is understood that the Council are seeking to adopt Proposals C (Total Housing Requirement) and D (Phasing of New Housing Development) of the Pre-Publication Core Strategy as an interim measure following the revocation of the Regional Spatial Strategy (RSS) until such a time as the Core Strategy is adopted. Representations have also	13

Name/Org	Proposal	Summary of Representations to the Interim Housing Figure	Rep No
		<p>been prepared towards the Pre-Publication Core Strategy on behalf of Arnold Laver which outlined strong objections to both Proposals C and D. We would therefore not support the implementation of these proposals as an interim measure. Our comments on Proposals C and D are re-iterated below.</p> <p>Whilst the Government have announced their intention to abolish RSS, this has not yet been formally revoked and therefore still remains part of the Statutory Development Plan for Salford. Paragraph 4.32 of Planning Policy Statement 12 'Local Spatial Planning' (PPS12) (2008) states:</p> <p><i>"In devising its strategy however, the local planning authority should be consistent with national policy and in general conformity with the regional spatial strategy. This means that the choices made regarding, for example where growth should take place should follow national and regional policy".</i></p> <p>It would therefore appear premature to revise elements of the emerging Core Strategy or adopt an interim policy that might deviate from the RSS until it has formally been revoked. This is discussed further below.</p>	
Peel Group	Proposal C&D	<p>PROPOSED SALFORD INTERIM HOUSING POLICY REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD JULY 2011</p> <p>Peel agrees with the Council that it must derive the requirement for the assessment of the five year requirement under PPS3 from the North West Regional Spatial Strategy (RSS), at least until RSS is formally removed from the development plan. After this date, Peel must emphasise that the Council is not free to choose whatever housing requirement it likes by means of an informal policy. For the purposes of the five year requirement, any figure must be based on a sound evidence base and must be fully consistent with national policy. Preferably, it should have been tested by independent examination or be based upon an emerging development plan document that has reached an advanced stage of preparation.</p> <p>The Interim Housing Policy seeks to calculate the five year requirement until the adoption of the Core Strategy by reference to Proposals C and D of the Core Strategy Pre-Publication Consultation. This would mean that for the period 2020-2015 the five year requirement would be 2000 dwellings (400 dwellings per annum) compared to a minimum of 8000 dwellings based on the current RSS (1600 dwellings per annum).</p> <p>The Core Strategy and its housing policies are not at an advanced stage of preparation. The Council has repeatedly said that little or no weight can be given to the Core Strategy in development management decisions. It is therefore perverse for the Council to rely on the Pre-Publication Version to derive the very important five year requirement, especially as Proposals C and D represent such a major departure from current strategic policy over which there has</p>	17

Name/Org	Proposal	Summary of Representations to the Interim Housing Figure	Rep No
		<p>been no consultation.</p> <p>Peel has made substantial and lengthy representations about Proposals C and D in its response to the Pre-Publication Consultation. These representations show that the evidence base for the figures are unreliable and that the proposals are not sound within the meaning of PPS12 as they are not in accordance with national policy, are not properly justified and would not be effective in meeting identified housing needs and demand. In particular, Peel has demonstrated:-</p> <ol style="list-style-type: none"> 1. In the light of the Cala Homes Court of Appeal decision, the Core Strategy should not be progressed on the basis of a housing requirement that would represent a major departure from RSS policy and would not be in general accordance with RSS. 2. Proposals C and D are based upon a major departure from the existing planning strategy for Greater Manchester which has been agreed amongst the ten Authorities making up the former County. For reasons of regeneration and sustainability, this strategy envisages Salford taking a much higher proportion of Greater Manchester's housing provision than would be required to meet its own needs,. The other Authorities in Greater Manchester have progressed their own core strategies based on this County-wide strategy, with the result that many do not fully meet their own identified needs and demand. As these other Core Strategies are at Submission stage or in some cases have been adopted, they cannot be easily amended. Therefore the result of Proposals C and D if progressed would be that either housing needs and demand over the County are not fully met, or development plan preparation over much of Greater Manchester would be unduly delayed whilst the new strategic framework for housing is resolved. In this context, Peel must emphasise that there has been no agreement with the other nine Greater Manchester Authorities over the change of strategy nor has there been any consultation at the County level about it. Until there has been agreement about a change in the Greater Manchester strategy and widespread consultation about it, there must be significant doubt over the credibility of Proposals C and D. Consultation in Salford alone would be insufficient because of the implications of the change in strategy for the whole of Greater Manchester. 3. The overall level of housing provision set out in Proposals C and D does not accurately reflect Salford's own needs and demand for additional housing. In particular, it would result in unsustainable travel patterns as new housing provision would not match employment growth. Also it would be inconsistent with the general thrust of the other policies of the emerging Core Strategy which promote the success of Salford as a place to live, work and relax. 	

Name/Org	Proposal	Summary of Representations to the Interim Housing Figure	Rep No
		<p>4. The Council's assessment of housing needs and demand is technically flawed.</p> <p>5. The phasing set out in Proposal D has no substantial evidence base and is not related in any way to housing needs or demand. Its sole rationale seems to be an attempt by the Council to reduce the five year requirement under PPS3 to a level which the Authority thinks it can meet without identifying additional land for housing in the foreseeable future. If adopted, Proposal D would lead to a gross under-supply of housing land in Salford over the next 10 years.</p> <p>6. Proposals C and D are insufficient to allow for the diversification of Salford's housing offer which is seen as very important by the City Council. In particular, Proposal D would not allow sufficient aspirational and family housing to come forward in the first part of the plan period to meet demand, contrary to Core Strategy objectives.</p> <p>7. The proposals would act as a major constraint upon the growth of Salford and the ability of the Council to meet important planning objectives. As such, they are not compatible with Government objectives for housing which are set out in PPS3 and Planning for Growth.</p> <p>Following from this, Peel considers that the Council should not rely on Proposals C and D for the calculation of the five year supply required by PPS3. In particular, these proposals can carry very little weight as they represent such a major departure from established policy and have not been the subject of any independent examination.</p> <p>Peel accepts that there has to be a basis from which to assess whether the Council has a five year supply in accordance with paragraphs 70 to 73 of PPS3. Peel considers that in the intervening period before the adoption of the Core Strategy, the Council should use the RSS figure of 1600 dwellings per annum between 2003 and 2021 to calculate the five year requirement. This figure has the benefits that it is consistent with established strategic policy for Greater Manchester; is based on sound and reliable evidence; and has been the subject of independent testing at an examination. It has also been fully supported by Salford Council as being an appropriate assessment of housing requirements in the period to 2021.</p> <p>Finally Peel must question the weight which can be attached to any Interim Policy of this type. It is not a development plan document nor is it a supplementary planning document. In these circumstances, the guidance of PPS12 paragraph 6.4 applies to it:-</p>	

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		<p style="text-align: center;">“District/borough/city councils should not produce planning guidance other than SPD where the guidance is intended to be used in decision-making or the coordination of development. This could be construed as wishing to circumvent the provisions for consultation and sustainability appraisal which SPDs have...”</p>	
United Utilities	Proposal D	<p>Proposal D states that the phasing of Salford’s net increase of 22,000 dwellings will be broadly along the following lines, and the City’s 5 year housing land requirement will be calculated on this basis:</p> <ul style="list-style-type: none"> • 2010-2015 2,000 dwellings • 2015-2020 6,000 dwellings • 2020-2025 7,000 dwellings • 2025-2030 7,000 dwellings <p>Support is given to paragraph 6.1 which acknowledges the impact of the current economic downturn on the housing market, and the potential constraint this may impose on residential development.</p> <p>Support is given to paragraph 6.2 which notes that it may be possible to bring forward some sites identified within the SHLAA quicker than is identified within the phasing as referenced above, and the fact that this proposal should not preclude this. Although support is given to this point, it should also be noted that the SHLAA update has not yet been made available, and so the phasing as identified within this cannot be commented upon.</p> <p>The fact that some sites could be brought forward faster than is currently envisaged should be given more emphasis within the Core Strategy to ensure that residential proposals being delivered sooner than expected are not prohibited by this proposal. In addition, greater clarity is required by developers and the public and indeed those tasked with providing crucial infrastructure to deliver housing at the specified times. In turn, the Core Strategy needs to provide clarity on the level of housing that is expected to take place and the delivery mechanism that will be in place to assist this.</p> <p>United Utilities object to the reference in paragraph 3.6 which states that the 5 year housing supply would be based upon the phasing as proposed by Proposal D. This pre-empts the market needs and is not in line with the Government’s Pro Growth Agenda and the need to deliver housing.</p> <p>There is no requirement to base the 5 year housing supply on the above planning. This severely restricts each phase</p>	10

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		<p>when the emphasis of RSS (paragraph 7.19) which states that its:</p> <p style="padding-left: 40px;">‘...annual average figures are not absolute targets and may be exceeded where justified by evidence of need, demand, affordability and sustainability issues and fit with relevant local and sub-regional strategies.’</p> <p>In turn, PPS3 requires LPAs to maintain a flexible, responsive supply of land and that to ensure there is a continuous 5 year housing land supply of deliverable sites, LPAs should monitor the supply. Paragraph 6.3 does not provide sufficient flexibility in this respect and should be amended accordingly.</p>	
Arnold Laver	Proposal D	<p>In terms of phasing, it is considered that there should not be strict requirements that prevent suitable sites from coming forward. The phasing suggested in Proposal D of the Pre-Publication Core Strategy is based on the net increase of 22,000 dwellings over the Plan. We have already outlined our objections to this figure and how it has been arrived at. We therefore do not support the suggested phasing figures as we believe they are based on housing targets derived from an evidence base which is not credible.</p> <p>Furthermore, given the current economic climate it is important that deliverable development, such as the redevelopment proposed at the Arnold Laver site, are encouraged and not hindered by onerous restrictive policies.</p>	12
Dr Martin & Mrs Susan Seely	SA	<p>Comments on the Interim Housing Figure Consultation document:</p> <p>2. “To improve physical and mental health” – “... <i>Could impact negatively on mental health, particularly if it requires the loss of Greenfield or Greenbelt land that people value...</i>”</p> <p>This plan may improve the health of the rest of Salford, but will have the opposite effect in Worsley and Boothstown where Greenfield and Greenbelt erosion will take place, thus <u>increasing</u> the impact on mental and physical health.</p> <p>3. “To protect, enhance and restore biodiversity resources” – “...<i>lead to fewer existing habitats being adversely affected by residential development in Salford...</i>”</p> <p>Again this may be true overall for Salford, but is totally untrue for Worsley and Boothstown where the habitats will be adversely affected as many already have been by previous developments, with a marked decline in flora and fauna in this area.</p> <p>4. “To protect and improve soil and land resources” – ‘... <i>Some limited Greenfield land release may be required ...</i>’ and ‘...<i>but significantly less ...</i>’</p> <p>Again this may be true for the rest of Salford, but is definitely not the case for Worsley and Boothstown where the Greenfield erosion would take place.</p>	8

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		<p>8. "To improve air quality" - '<i>... generate fewer traffic movements within Salford ...</i>' This may be true overall for Salford, but is very much not true for Worsley and Boothstowm where there will be a considerable worsening of the present unacceptable situation. Junction 13 on the M60 is notoriously nationally for grid locked traffic creating pollution, and the proposed extra 600 houses with accompanying cars will only make the matter worse. The present traffic situation was used by the Council when objecting to Peel Holdings Race Course. Why isn't it now being used to prevent further housing?</p> <p>11. "To protect, enhance and enable the appreciation of the city's heritage" Is not Worsley and Boothstowm, the cradle of one of the most important parts of the Industrial Revolution, worthy of protection?</p> <p>12. "To maintain and enhance the quality and character of landscape and town-scape" - '<i>... A reduction in the housing figure would be expected to reduce the pressure to permit schemes that would detract from the quality of the town-scape and landscape ...</i>' Certainly the proposed increase in houses will definitely affect adversely the landscape and town-scape of Worsley and Boothstowm, upsetting the balance of open land (the lungs of the area) and housing.</p> <p>13. "To protect and enhance amenity" - '<i>...A lower housing figure should reduce the need to permit developments that adversely impact on existing residents ...</i>' And an increase in housing in the Worsley and Boothstowm area would <u>not adversely</u> affect the residents??? There are no good shopping or recreational amenities. This area has no parks like other areas of Salford. The Public Transport is appalling with only one hourly bus from Boothstowm to Manchester a 3 mile walk to the nearest train station with no convenient, reliable connecting public transport from Boothstowm and a 7 mile drive to the nearest Metro station. No wonder Boothstowm and Worsley is gridlocked with cars!</p> <p>19. "To improve the accessibility of facilities and opportunities" - '<i>...A lower housing figure would be expected to result in a lower population increase ...</i>' Surely then in Worsley and Boothstowm a higher housing figure would be expected to result in a higher population growth, in an area where the amenities and public transport are minimal.</p> <p>Why are Salford Council hell bent on ruining the few green areas left in Worsley and Boothstowm? Our area is being discriminated against in favour of other areas. We are happy for other areas to be improved but not</p>	

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		at the expense of Worsley and Boothstown.	
Suzanne Doig	SA	<p>I object to the use of the interim figure as there is no basis presented for the figure and it is disproportional to the local residents of Worsley and Boothstown. It also leads to the loss of greenfields in this area.</p> <p>Sustainability objective and the impact of interim housing figure compared to continuing to use the Regional Strategy Figure:</p> <p>2. To improve physical and mental health ‘...could impact negatively on mental health, particularly if it requires the loss of Greenfield or Green Belt land that people value ...’ and ‘...would be lower with the interim housing figure” This may be true overall for Salford, but is very much not true for Worsley and Boothstown where the greenbelt erosion will take place.</p> <p>3. To protect, enhance and restore biodiversity resources ‘... lead to fewer existing habitats being adversely affected by residential development in Salford ...’ This may be true overall for Salford, but is very much not true for Worsley and Boothstown where the habitats will be adversely affected.</p> <p>4. To protect and improve soil and land resources ‘... Some limited Greenfield land release may be required ...’ and ‘...but significantly less ...’ This may be true overall for Salford, but is very much not true for Worsley and Boothstown where the greenbelt erosion will take place.</p> <p>8. To improve air Quality ‘ ... generate fewer traffic movements within Salford ...’ This may be true overall for Salford, but is very much not true for Worsley and Boothstown where there will be a considerable worsening of the present unacceptable situation.</p> <p>11. To protect, enhance, and enable the appreciation of, the city’s heritage. Is not Worsley and Boothstown, the cradle of one of the most important parts the industrial revolution, worthy of protection?</p> <p>12. to maintain and enhance the quality and character of landscape and</p>	6

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		<p>' ... A reduction in the housing figure would be expected to reduce the pressure to permit schemes that would detract from the quality of the townscape and landscape ...'</p> <p>And an increase in the Worsley and Boothstown area would not adversely affect the landscape?</p> <p>13. To protect and enhance amenity '...A lower housing figure should reduce the need to permit developments that adversely impact on existing residents ...'</p> <p>And an increase in the Worsley and Boothstown area would not adversely affect the residents.</p> <p>19. To improve the accessibility of facilities and opportunities '...A lower housing figure would be expected to result in a lower population increase, ...'</p> <p>But it would locally in Worsley and Boothstown.</p>	
Ray Doig	SA	<p>I object to the use of the interim figure as there is no basis presented for the figure and it is disproportional to the local residents of Worsley and Boothstown. It also leads to the erosion of greenbelt in this area.</p> <p>Sustainability objective and the impact of interim housing figure compared to continuing to use the Regional Strategy Figure:</p> <p>2. To improve physical and mental health "...could impact negatively on mental health, particularly if it requires the loss of Greenfield or Green Belt land that people value ..." and "...would be lower with the interim housing figure"</p> <p>This may be true overall for Salford, but is very much not true for Worsley and Boothstown where the greenbelt erosion will take place.</p> <p>3. To protect, enhance and restore biodiversity resources "... lead to fewer existing habitats being adversely affected by residential development in Salford ..."</p> <p>This may be true overall for Salford, but is very much not true for Worsley and Boothstown where the habitats will be adversely affected.</p> <p>4. To protect and improve soil and land resources "... Some limited Greenfield land release may be required ..." and "...but significantly less ..."</p> <p>This may be true overall for Salford, but is very much not true for Worsley and Boothstown where the</p>	5

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