



ROMAN SUMMER



PLANNING SUPPORTING STATEMENT

LAND AT OAK AVENUE, HOLCOMBE BROOK

AUGUST 2026

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APPLICATION SEEKING STAGE 1 PERMISSION IN PRINCIPLE

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1.0 Introduction

- 1.1 This Planning Supporting Statement supports an application on behalf of White Horse LLP seeking Stage 1 Permission in Principle for residential development comprising up to 9 detached dwellings with associated residential curtilages and parking arrangements on land at Oak Avenue, Holcombe Brook, Bury.
- 1.2 The application is accompanied by an Illustrative Masterplan (ref: 1290:03 B) demonstrating one potential means by which the proposed residential development could be integrated with the retention and enhancement of the substantial majority of the wider site as public open space. Those enhancement works do not form part of the Permission in Principle sought, but are presented to illustrate the Applicant's overall development strategy and would be considered further through any subsequent Technical Details Consent application.
- 1.3 As required by the Stage 1 Permission in Principle process, this application is concerned solely with the fundamental principles of development, namely:
- the proposed use;
 - the amount of development; and
 - the broad location of development.
- 1.4 Detailed matters relating to appearance, landscaping, layout, access and scale would, if Stage 1 Permission in Principle is granted, be the subject of a subsequent Technical Details Consent application.
- 1.5 The Applicant's landownership as a whole extends to approximately 0.95 hectare and comprises an undeveloped parcel of land situated within the established urban area of Holcombe Brook. It will be noted that the application site is 0.26 hectare.
- 1.6 Whilst the land is presently characterised by an area of open grassland with a modest extent of trees and other vegetation around its margins, it is almost entirely enclosed by existing residential development and represents an obvious urban infill opportunity within the built up area. A public footpath traverses the northern and eastern parts of the wider land.

- 1.7 As a starting point, the Applicant fully recognises that the site is presently identified within the adopted Bury Unitary Development Plan as a Proposed Recreation Site under Policies RT2/1/1 and RT2/1/3, and that the emerging Bury Local Plan proposes to identify the land as both Strategic Green Infrastructure and a Recreation Site.
- 1.8 This Statement does not seek to downplay those policy designations. Rather, it acknowledges them openly before explaining why, having regard to the Development Plan as a whole, together with material considerations, Permission in Principle should nevertheless be granted.
- 1.9 A key material consideration underpinning this application is Bury Council's inability to demonstrate a deliverable five-year supply of housing land. That position was recently acknowledged by the Planning Inspectorate in the Bass Lane, Walmersley appeal (APP/T4210/W/25/3375135) issued in January 2026, where the Inspector highlighted that Bury could demonstrate only approximately 4.3 years' supply of deliverable housing land, resulting in a demonstrable shortfall against national policy requirements.
- 1.10 That housing land supply deficit is of considerable importance. National planning policy requires local planning authorities to significantly boost the supply of homes, and where housing land supply falls below the required level, this becomes a powerful material consideration in favour of sustainable residential development. It is against that planning context that the present proposal must be assessed.
- 1.11 Importantly, the proposal does not seek to develop the entirety of the application site. Instead, the proposal has been deliberately conceived to achieve an appropriate balance between meeting an identified housing need and respecting the site's existing and emerging policy designations.
- 1.12 Only part (27.4%) of the overall land is proposed to accommodate residential development. The vast majority of the land will remain undeveloped and retained as publicly accessible open space, benefiting from a comprehensive programme of landscape, ecological and recreational enhancements.

- 1.13 The accompanying Illustrative Masterplan demonstrates one possible means by which that balance could be achieved. The Masterplan is not intended to prescribe the detailed form of development. Rather, it demonstrates that the site is capable of accommodating
- up to 9 dwellings;
 - associated residential curtilages;
 - parking arrangements;
 - extensive retained public open space;
 - enhanced structural landscaping;
 - additional tree planting;
 - biodiversity enhancements;
 - formal children's play provision;
 - a 'village pond' feature'
 - seating areas;
 - improved pedestrian routes;
 - discrete lighting of the existing footpath to render it more appealing and safer during hours of darkness; and
 - a significantly enhanced community green space.
- 1.14 Accordingly, rather than simply reducing the extent of existing open land by around one quarter, the proposal seeks to transform the retained areas into a substantially more attractive, accessible and functional community asset than presently exists.
- 1.15 The Applicant considers that this balanced approach reflects the underlying planning philosophy historically applied to the site. The adopted Unitary Development Plan envisaged residential development alongside public recreation facilities through the former adjacent Garden City housing allocation.
- 1.16 Whilst planning policy has subsequently evolved, that historic allocation demonstrates that the principle of combining residential development with recreation provision on this land has long been accepted by the Council.
- 1.17 The present proposal simply revisits that concept at a modest scale, limiting residential development to 9 homes whilst retaining and enhancing the majority of the site for the wider benefit of the local community.

1.18 Accordingly, this Planning Statement seeks to demonstrate that:

- the proposal represents sustainable residential development within the existing urban area;
- the proposal responds positively to Bury's current housing land supply shortfall;
- the proposed density accords with the objectives of Places for Everyone by concentrating development on the net developable area, whilst retaining the majority of the wider site as enhanced open space;
- the proposal delivers significant environmental, recreational and biodiversity enhancements beyond those presently available; and
- when assessed against the Development Plan and material considerations as a whole, the benefits of the proposal significantly outweigh the policy conflict arising from the site's existing and emerging open space designations.

1.19 For those reasons, it is respectfully submitted that Permission in Principle should be granted.

2.0 The Site and its Surroundings

- 2.1 As noted earlier, the land as a whole comprises approximately 0.95 hectare of undeveloped land situated on the eastern side of Oak Avenue, Holcombe Brook, Bury. However the application site itself is just 0.26 hectare.
- 2.2 The site occupies a sustainable accessible location within the existing urban area and is enclosed almost entirely by established residential development, such that the land reads as an integral component of the built-up settlement rather than forming part of the open countryside.
- 2.3 In physical and visual terms, the site represents an urban parcel of land contained within an established residential environment.
- 2.4 The land itself comprises a broadly level area of semi-improved grassland with a modest extent of trees, shrubs and other vegetation concentrated predominantly around its perimeter.
- 2.5 Whilst the site undoubtedly contributes to the visual openness of the surrounding area, it presently offers relatively limited recreational value.
- 2.6 The land is not formally laid out or managed as recreational open space and contains no equipped play facilities, sports pitches, seating, footpath network (aside from the footpath running along its northern edge), habitat enhancement measures or other infrastructure normally associated with a community recreation area.
- 2.7 Instead, the site currently comprises little more than an undeveloped grassed field with relatively limited public functionality.
- 2.8 A public footpath crosses the northern and eastern parts of the site, providing an established pedestrian connection through the land, albeit the quality of the route as it heads westwards beyond the site is poor and narrow.

- 2.9 The Applicant fully recognises the importance of maintaining pedestrian connectivity and has therefore ensured that the accompanying Illustrative Masterplan has been prepared having regard to the continued presence of that route.
- 2.10 Should the principle of residential development ultimately be accepted, the detailed design of the scheme would ensure that existing pedestrian connectivity is maintained and, where possible, enhanced through improved surfacing, landscaping and natural surveillance.
- 2.11 As noted, the surrounding area is overwhelmingly residential in character. The site is bordered by established family housing which has developed incrementally and now forms a mature suburban environment characterised by detached and semi-detached dwellings, landscaped gardens and estate roads.
- 2.12 The site therefore occupies a sustainable location within walking distance of existing residential neighbourhoods and community facilities. Its partial redevelopment would represent a logical continuation of the existing built form rather than an isolated or sporadic encroachment into open countryside.
- 2.13 Holcombe Brook provides an excellent range of day-to-day services and facilities capable of meeting the needs of future residents. These include local shopping facilities, schools, community facilities, public transport services and recreational opportunities, all within convenient walking and cycling distance of the application site.
- 2.14 Accordingly, future occupants would not be wholly reliant upon the private motor car to access everyday services.
- 2.15 The site therefore occupies a location entirely consistent with the core sustainability objectives of national planning policy.
- 2.16 Importantly, residential development is not proposed across the entirety of the land. Only a relatively modest proportion (27.4%) of the overall site is proposed to accommodate housing.

- 2.17 The remaining majority of the site will continue to function as open space, albeit in a significantly enhanced form.
- 2.18 The proposed residential development parcel has been deliberately selected to ensure that development is concentrated within a compact and efficient area capable of achieving an appropriate residential density consistent with the objectives of Places for Everyone Policy JP-H4 (ie a minimum of 35 dph), whilst simultaneously retaining the majority of the land as enhanced green infrastructure.
- 2.19 This approach is entirely intentional. Rather than dispersing development across the whole site, the proposal concentrates housing within a clearly defined development parcel, thereby maximising the extent of retained public open space available for ecological enhancement, structural landscaping, children's play, informal recreation and wider community benefit.
- 2.20 The proposal seeks to combine the delivery of much-needed family housing with the comprehensive enhancement of the retained green infrastructure, thereby creating a significantly more attractive, functional and accessible community asset than presently exists.
- 2.21 In the Applicant's view, this represents an appropriate and proportionate response to both the site's planning designation and the Borough's pressing need for additional housing.

3.0 Planning History

3.1 The planning history of the land is worth considering.

3.2 The adopted Bury Unitary Development Plan identified adjoining land for residential development under housing proposal H1/1/5 – Garden City. The allocation extended to approximately 2.29 hectares and proposed the delivery of approximately 55 dwellings.

3.3 The supporting text to the allocation made clear that the housing proposal was not intended to come forward independently. Residential development was expressly linked to the provision of adjoining recreation land. The supporting text states:

"The developer will be required to provide and lay out a single recreation area, identified on the Proposals Map as Recreation and Tourism Proposal RT2/1/3, suitable for a playing pitch and ancillary facilities such as car parking and clubhouse ..."

3.4 The allocation therefore established a clear planning principle that residential development and recreation provision should be delivered together as complementary land uses.

3.5 The policy also anticipated an extent of 'hard' development in the guise of a clubhouse and a car park.

3.6 That relationship is reinforced by Policy RT2/1/3 – Land North of Holcombe Brook Primary School, which relates to the subject land. The policy explains that the recreation proposal:

"...will be brought forward in conjunction with Housing Proposal H1/1/5 (Garden City)."

3.7 The policy continues:

"The boundary shown between the proposed recreation and new housing areas is indicative and amendments to the boundary may be necessary to integrate the recreation requirement with the adjoining housing development."

- 3.8 Those words demonstrate that the Council did not regard the precise boundary between residential development and recreation land as fixed. Instead, the Development Plan expressly recognised that flexibility would be required to achieve an appropriate overall planning solution.
- 3.9 Although planning policy has evolved since the adoption of the UDP close to three decades ago, the historic Garden City allocation nevertheless remains a consideration. It demonstrates that residential development is capable of co-existing alongside recreational provision on this land. It also demonstrates that an extent of hard development was anticipated on the land.
- 3.10 This proposal essentially seeks to replace the previously anticipated club house and car park with 9 detached family dwellings at a time of housing undersupply. It deliberately confines built development to only a modest proportion of the overall site, enabling the majority of the land to remain as open space and to benefit from comprehensive environmental, ecological and recreational enhancements.

4.0 The Proposed Development

- 4.1 This application seeks Stage 1 Permission in Principle for the erection of 9 detached dwellings together with associated residential curtilages and parking arrangements on land at Oak Avenue, Holcombe Brook.
- 4.2 It is submitted under the provisions of the Town and Country Planning Act 1990 and the Permission in Principle regime introduced by the Housing and Planning Act 2016. Accordingly, the application is concerned solely with establishing the acceptability of the principle of residential development, together with the proposed location and amount of development.
- 4.3 No approval is sought at this stage in respect of detailed matters such as layout, appearance, landscaping, scale or access.
- 4.4 Those matters would be the subject of a subsequent Technical Details Consent application should Permission in Principle be granted.
- 4.5 The proposal demonstrates the scope to provide:
- Up to nine dwellings;
 - Associated private garden curtilages;
 - Parking arrangements to serve the proposed dwellings;
 - Retention of the majority of the wider site as public open space;
 - Significant landscape, ecological and recreational enhancements to the retained land (albeit it is acknowledged that those wider works do not form part of the PiP regime).
- 4.6 The detailed design of the dwellings has deliberately not been prepared at this stage, reflecting the purpose of the Permission in Principle process.
- 4.7 However, it is envisaged that the eventual scheme would comprise high quality family housing appropriate to the established residential character of Holcombe Brook.
- 4.8 The application is accompanied by an Illustrative Masterplan. For the avoidance of doubt, the Masterplan is not submitted for approval. Nor is it intended to prescribe in absolute terms the detailed form or layout of development.

- 4.9 Rather, its purpose is to demonstrate that the site is capable of accommodating the proposed quantum of development whilst simultaneously retaining the majority of the site as enhanced public open space.
- 4.10 The Masterplan illustrates one possible arrangement of:
- 9 dwellings;
 - residential curtilages;
 - internal circulation;
 - retained open space;
 - structural landscaping;
 - children's play provision;
 - a 'village pond';
 - ecological enhancements;
 - new tree planting;
 - informal seating areas;
 - improved lighting for safety purposes; and
 - improved pedestrian connections.
- 4.11 As previously noted, a fundamental component of the proposal is that residential development is intentionally confined to only a relatively small proportion of the overall application site.
- 4.12 Whilst the wider land parcel extends to 0.95 hectare, the proposed residential development parcel extends to only 0.26 ha, representing 27.4% of the total land area.
- 4.13 The remaining 72.6% of the site will remain free from built development.
- 4.14 Rather than leaving that retained land in its current somewhat nondescript condition, the Applicant proposes to undertake a comprehensive programme of environmental and recreational enhancements designed to improve its visual appearance, ecological value and community function.
- 4.15 This approach has been adopted for two principal reasons.

- 4.16 First, it demonstrates clear regard to the site's existing and emerging planning policy designations by ensuring that the majority of the land continues to function as publicly accessible green space.
- 4.17 Second, it enables the proposed housing to be concentrated within a compact development parcel capable of achieving an efficient residential density consistent with the objectives of Places for Everyone Policy JP-H4.
- 4.18 The Applicant considers this to represent a balanced and proportionate response to the competing planning objectives applicable to the site.
- 4.19 The Illustrative Masterplan clearly demonstrates the Applicant's commitment not merely to retain the majority of the existing open space, but to significantly improve its overall quality and functionality as part of a comprehensive scheme.
- 4.20 The Applicant considers that this forms one of the proposal's principal public benefits. At present, whilst the site undoubtedly contributes to the visual openness of the area, it functions largely as an undeveloped grassed field with relatively limited recreational infrastructure or ecological enhancement.
- 4.21 The proposal would fundamentally change that position. Instead of simply preserving the status quo, the retained land would become a significantly more attractive and functional community asset, providing improved recreational opportunities, enhanced biodiversity, stronger landscape structure and a more welcoming environment for local residents.
- 4.22 Accordingly, we suggest that the proposal should not properly be characterised as 'just' of an extent of open space. Rather, it represents the partial redevelopment of a relatively modest proportion of the wider site in order to facilitate the comprehensive enhancement of the substantial majority that remains.
- 4.23 The application has been carefully conceived to ensure that the extent of that loss is minimised, whilst the quality, accessibility and functionality of the retained land is significantly improved.

- 4.24 The proposal therefore seeks to achieve a balanced planning outcome which contributes towards meeting the Borough's pressing housing needs whilst simultaneously delivering meaningful and lasting environmental and recreational benefits for the wider community.
- 4.25 The Applicant respectfully submits that the proposal represents a carefully considered form of development that is wholly consistent with the objectives of the Permission in Principle regime.
- 4.26 It establishes that the site is capable of accommodating a modest amount of high quality residential development without prejudicing the ability to retain and substantially enhance the majority of the land as a valuable community green space.

5.0 The Planning Policy Context

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 Accordingly, the starting point for the determination of this application is the statutory Development Plan.
- 5.3 However, the Development Plan does not operate in isolation. National planning policy, the Borough's housing land supply position, emerging planning policy and other material considerations must also be taken into account in reaching a balanced planning judgement.
- 5.4 It is the Applicant's case that, when all relevant considerations are assessed together, the proposal merits support.
- 5.5 The statutory Development Plan currently comprises:
- The Places for Everyone Joint Development Plan Document (PfE);
 - Saved policies of the Bury Unitary Development Plan (UDP), insofar as they remain extant and are not superseded by Places for Everyone; and
 - National planning policy contained within the National Planning Policy Framework, together with relevant Planning Practice Guidance, as important material considerations.
- 5.6 In addition, regard has been had to the emerging Bury Local Plan. However, that document remains at an early stage of preparation and, whilst it is capable of attracting some weight, that weight is necessarily limited having regard to paragraph 49 of the NPPF.
- 5.7 As explained earlier, the Applicant fully acknowledges that the site benefits from existing planning policy protection, and that, in the emerging Bury Local Plan, it is proposed to be identified as both Strategic Green Infrastructure and a Recreation Site.

- 5.8 Those policy designations are fully recognised. Indeed, the proposal has been deliberately conceived having regard to those designations by retaining the majority of the site as open space and proposing significant recreational, ecological and landscape enhancements.
- 5.9 The Applicant does not therefore seek to argue that those policy designations are unimportant or should simply be disregarded. On the contrary, they are plainly material considerations.
- 5.10 However, they do not represent the entirety of the planning judgement required under Section 38(6). Rather, they must be weighed alongside other Development Plan policies and all other material considerations, including national planning policy and the Borough's present inability to demonstrate an adequate supply of deliverable housing land. It is that wider planning balance which lies at the heart of the application.
- 5.11 It is also important to recognise that planning policy has evolved considerably since many of the site's existing designations were first introduced close to 30 years ago. National planning policy now places significantly greater emphasis upon:
- boosting the supply of housing;
 - making efficient use of previously developed and urban land;
 - delivering sustainable patterns of growth;
 - achieving high quality design;
 - securing measurable biodiversity gains; and
 - creating healthy, attractive and resilient communities.
- 5.12 Accordingly, whilst the existing policy designations remain relevant, they must be considered within the context of the current national planning framework rather than in isolation.
- 5.13 The proposal has therefore been designed not as a conventional housing scheme, but as a balanced land-use proposal seeking to reconcile a number of important planning objectives. Those include:
- contributing towards the Borough's identified housing need;
 - making efficient use of a sustainable urban site;

- retaining the majority of the existing open space;
- significantly enhancing the environmental quality of the retained land;
- improving biodiversity;
- strengthening green infrastructure;
- creating improved recreational opportunities; and
- delivering high quality family housing within an established residential community.

5.14 The Applicant suggests that this integrated approach reflects the objectives of both national and local planning policy.

6.0 Housing land supply and the need to boost the supply of homes

6.1 One of the principal material considerations relevant to the determination of the application is the Borough's current housing land supply position.

6.2 The NPPF places the delivery of new housing at the very heart of the planning system. It requires planning decisions to positively contribute towards increasing housing supply and ensuring that identified housing needs are met. Paragraph 60 of the NPPF states:

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed ..."

6.3 That objective forms a fundamental component of national planning policy and is a material consideration to which substantial weight should be attached in the determination of planning applications.

6.4 The importance of housing delivery is reinforced by the requirement for local planning authorities to maintain a deliverable supply of housing land sufficient to meet identified needs. Where a local planning authority is unable to demonstrate an adequate supply of deliverable housing sites, that deficiency is capable of attracting significant weight in favour of proposals which would contribute towards addressing that shortfall.

6.5 This proposal would contribute directly towards that objective through the delivery of 9 additional family dwellings within an established and highly sustainable residential location.

6.6 The relevance of this issue to Bury has recently been confirmed by the Planning Inspectorate. In determining the appeal relating to Land North of Bass Lane, Manchester Road, Walmersley (Appeal Ref. APP/T4210/W/25/3375135) in January 2026, the Inspector recorded:

"The Council's recent updated Five Year Housing Land Supply Statement says it has a 4.3-year supply of housing, including a 20% buffer, so there is a demonstrable unmet need for housing ..."

- 6.7 The Inspector accepted that evidence and allowed the Permission in Principle appeal. Whilst that appeal related to a different site and raised additional Green Belt considerations, it nevertheless provides a recent and independent confirmation of Bury Council's own housing land supply position.
- 6.8 The Applicant suggests that this is a highly material consideration in the determination of this application.
- 6.9 The Council is presently unable to demonstrate a full five-year supply of deliverable housing land. Accordingly, every sustainable housing proposal capable of making a contribution towards meeting identified housing needs assumes increased importance.
- 6.10 Whilst 9 dwellings will not, individually, resolve that deficit, national planning policy recognises that the cumulative contribution made by smaller sites is an important component of overall housing delivery.
- 6.11 Indeed, Permission in Principle was introduced specifically to encourage the delivery of smaller housing sites capable of contributing towards housing supply.
- 6.12 The application site is particularly well suited to achieving that objective. It is situated wholly within an established residential community. It is surrounded on every side by existing housing. Future residents would benefit from convenient access to local schools, public transport, shopping facilities, employment opportunities and other day-to-day services.
- 6.13 Consequently, the proposal represents sustainable residential development in precisely the type of location that national planning policy seeks to encourage.
- 6.14 The Applicant has fully acknowledged that the site benefits from existing and emerging planning policy designations relating to recreation and green infrastructure. However, the existence of those designations cannot be considered in isolation.
- 6.15 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material

considerations indicate otherwise. The Borough's acknowledged housing land supply shortfall is one such material consideration.

- 6.16 It therefore falls to the decision-maker to weigh the importance of delivering additional housing against the degree of policy conflict arising from the site's existing and emerging designations.
- 6.17 Importantly, however, the Applicant is not seeking to maximise housing numbers across the entirety of their land. The proposal deliberately seeks to strike a careful balance between competing planning objectives.
- 6.18 Only a relatively modest proportion of the application site is proposed for residential development. The majority will remain as open space and will benefit from significant landscape, biodiversity and recreational enhancements for the wider benefit of the local community.
- 6.19 The proposal therefore responds positively to both national housing objectives and the underlying purpose of the site's existing and emerging planning designations.
- 6.20 We suggest that this balanced approach materially distinguishes the proposal from many conventional housing applications. The proposal is not simply seeking to justify the loss of open space on the basis of housing need. Rather, it seeks to secure both objectives simultaneously.
- 6.21 It will deliver 9 much-needed homes whilst retaining and significantly improving the majority of the site as an enhanced community green space. That represents a significantly more sustainable planning outcome than either leaving the site in its current relatively limited form or pursuing substantially more extensive residential development across the entire site.
- 6.22 For those reasons, the Applicant respectfully submits that Bury's current housing land supply position constitutes one of the most significant material considerations relevant to the determination of this application.

6.23 When considered alongside the highly sustainable location of the site, the modest scale of the proposed development and the extensive environmental enhancements proposed across the retained open space, it is suggested that the delivery of 9 additional dwellings should attract substantial positive weight within the overall planning balance.

7.0 Recreation, Green Infrastructure and Public Benefits

- 7.1 The principal planning issue arising from the proposed development concerns the relationship between the delivery of additional housing and the existing recreational and green infrastructure function of the application site.
- 7.2 The Applicant accepts that the site presently contributes towards the openness of the surrounding area and performs an important visual role within the existing residential environment.
- 7.3 However, we suggest that there is an important distinction between the contribution presently made by the site and the contribution that it has the potential to make.
- 7.4 The wider proposal seeks not merely to retain that function across the majority of the site, but to significantly enhance it.
- 7.5 At present, the site comprises little more than an area of open grassland with a modest amount of peripheral vegetation. It was clearly envisaged to offer more to the community in the guise of a sports pitch, a clubhouse and a car park. However, none of that has materialised and we venture will never materialise.
- 7.6 Whilst visually green, reasonably attractive and open, the site currently provides relatively limited recreational infrastructure or ecological interest of note. It contains:
- no formal children's play facilities;
 - no seating areas;
 - no structured pedestrian routes, but rather a somewhat 'lost' unlit footpath that deviates (when heading westwards beyond the site) into a very narrow, oppressive 'tunnel';
 - no ecological enhancement measures;
 - no biodiversity improvements;
 - no areas specifically designed for informal recreation; and
 - no landscape strategy designed to maximise its environmental value.

- 7.7 Accordingly, whilst the site undoubtedly performs an important open space function, its current contribution is relatively passive and limited.
- 7.8 The accompanying Illustrative Masterplan demonstrates how that position could be fundamentally improved. Rather than leaving the retained land in its present condition, the Applicant proposes that it should become a significantly enhanced 'community green' space, incorporating:
- substantial new tree planting;
 - enhanced structural landscaping;
 - additional native planting;
 - biodiversity enhancement measures;
 - habitat creation;
 - improved ecological connectivity;
 - informal children's play facilities;
 - a 'village pond' feature;
 - seating areas;
 - improved pedestrian routes;
 - improved lighting; and
 - enhanced opportunities for informal recreation.
- 7.9 Whilst the detailed specification of those wider enhancements would ultimately be determined through any subsequent application, the Applicant's commitment to delivering meaningful improvements is fundamental to the proposal.
- 7.10 The Applicant respectfully submits that those improvements should properly be regarded as substantial public benefits.
- 7.11 Indeed, one of the principal objectives of the proposal is not simply to accommodate additional housing but to secure a lasting environmental improvement and better management across the retained majority of the site.
- 7.12 Consequently, the proposal should not be characterised as representing simply loss of an extent of open space. Rather, it represents the comprehensive enhancement of the majority of the site, facilitated through the sensitive redevelopment of only a relatively modest proportion.

- 7.13 The proposal has deliberately been designed so that residential development occupies only a compact and carefully defined development parcel. This approach achieves two important planning objectives.
- 7.14 First, it allows the proposed housing to achieve an efficient residential density consistent with the aspirations of Places for Everyone Policy JP-H4.
- 7.15 Second, it maximises the amount of land capable of remaining as publicly accessible green infrastructure.
- 7.16 The Applicant respectfully suggests that this represents a considerably more balanced planning solution than dispersing development across the site.
- 7.17 The Applicant also considers that the proposal would deliver wider environmental benefits extending beyond the application site itself. The proposed landscape enhancements would improve the visual appearance of the retained open space. New tree planting would strengthen the existing landscape framework. Additional biodiversity measures would improve habitat quality and ecological resilience. Improved recreational infrastructure would increase the site's usefulness to the wider community.
- 7.18 Taken together, those measures would result in a materially improved environmental resource compared with the existing situation. The proposed enhancements form an integral component of the development concept from the outset. The proposal has been consciously designed around the principle that any limited loss of open land should be accompanied by a demonstrable enhancement in the quality, accessibility and functionality of the substantial majority that remains. It is that design philosophy which underpins the accompanying Illustrative Masterplan.
- 7.19 So, while the Applicant accepts that the proposal would inevitably result in the loss of part of the existing open land, planning decisions are rarely concerned with absolute choices. Instead, they require a balanced assessment of competing planning objectives.
- 7.20 In this case, those competing objectives comprise:
- the acknowledged need to significantly boost housing delivery;
 - the Borough's inability to demonstrate a five-year housing land supply;

- the protection and enhancement of green infrastructure;
- the efficient use of sustainable urban land;
- biodiversity enhancement;
- and the creation of healthy, attractive communities.

7.21 The proposal has been specifically designed to reconcile those objectives rather than prioritising one at the expense of another.

7.22 Ultimately, the proposal seeks to create a legacy extending well beyond the delivery of just 9 new dwellings. It seeks to establish an enhanced community green space capable of providing lasting recreational, ecological and landscape benefits for existing and future residents alike.

7.23 When viewed in that context, the proposal should properly be regarded as one delivering both housing and environmental enhancement, rather than requiring a choice between the two.

8.0 Why Permission in Principle is the appropriate mechanism

- 8.1 This application has been submitted in the form of Permission in Principle (PiP) because the Applicant seeks to establish at the outset whether the Local Planning Authority accepts the principle of a modest residential development on part of the application site.
- 8.2 The Applicant considers that the PiP process is particularly well suited to the circumstances of the present case.
- 8.3 The principal issue requiring determination is whether the **principle** of residential development is acceptable having regard to the Development Plan and other material considerations.
- 8.4 The detailed design of that development is a separate matter which can properly be addressed through the subsequent Technical Details Consent process.
- 8.5 The Permission in Principle regime was introduced to provide greater certainty in relation to the fundamental acceptability of development proposals before applicants incur the considerable time and expense associated with preparing detailed technical submissions. It deliberately separates the determination of the principle of development from the subsequent consideration of detailed design matters.
- 8.6 Accordingly, the application seeks to establish only the three matters prescribed by legislation, namely:
- the proposed use;
 - the location of development; and
 - the amount of development.
- 8.7 No approval is presently sought in respect of the detailed layout, appearance, landscaping, scale or architectural design of the proposed dwellings. The accompanying Illustrative Masterplan is submitted solely to demonstrate that the proposed quantum of residential development can be successfully accommodated, whilst retaining and enhancing the majority of the application site as public open space. It is not submitted for approval as part of the Permission in Principle application, and nor does the Applicant seek Permission in Principle for the detailed landscape or recreational enhancement

works shown. Those elements are indicative only and would be refined and secured, where appropriate, through the subsequent Technical Details Consent process.

- 8.8 Should Permission in Principle be granted, all detailed design matters would remain capable of amendment through the Technical Details Consent application.
- 8.9 The accompanying Masterplan demonstrates one possible means by which the following can all successfully coexist within the site:
- High quality family housing;
 - retained public open space;
 - enhanced landscaping;
 - biodiversity improvements;
 - children's play provision;
 - improved pedestrian connectivity; and
 - wider environmental enhancements.
- 8.10 However, alternative layouts capable of achieving the same broad planning objectives may equally emerge during the subsequent design process.
- 8.11 The Applicant therefore respectfully requests that the Local Planning Authority assesses the application on the basis of the principle of development rather than the precise arrangement illustrated on the accompanying Masterplan.
- 8.12 The Applicant also considers that the Permission in Principle process provides an appropriate opportunity for the LPA to determine the principal planning question raised by this application. That question is not whether a particular house design, road alignment or landscaping scheme is acceptable. Rather, it is whether a modest amount of residential development can appropriately be accommodated on part of this site, having regard to:
- the Borough's acknowledged housing land supply shortfall;
 - the site's highly sustainable location;
 - the retention of the majority of the site as open space;
 - the significant environmental enhancements proposed; and
 - the wider planning policy framework.

8.13 In the Applicant's view, those are precisely the strategic planning questions which the Permission in Principle process was designed to address.

9.0 Planning Balance and Conclusions

- 9.1 The Applicant fully acknowledges that the application site is currently designated as a Proposed Recreation Site within the adopted Bury Unitary Development Plan and is proposed to be identified as Strategic Green Infrastructure and a Recreation Site within the emerging Bury Local Plan. The proposal therefore gives rise to a degree of conflict with those policy designations through the introduction of residential development onto part of the site.
- 9.2 However, planning decisions require consideration of the Development Plan as a whole together with all other material considerations. The issue is therefore not simply whether policy conflict exists, but whether that conflict is outweighed by the benefits arising from the proposal.
- 9.3 The Applicant respectfully suggests that this proposal has been deliberately designed to minimise that conflict. Rather than seeking comprehensive residential redevelopment, only a relatively modest proportion of the site is proposed for housing, with the substantial majority remaining as open space and capable of significant landscape, biodiversity and recreational enhancement. The proposal therefore seeks to deliver both additional housing and enhanced green infrastructure, rather than one at the expense of the other.
- 9.4 In support of the proposal, considerable weight should be attached to:
- the delivery of up to 9 dwellings in a sustainable location;
 - the Borough's acknowledged five year housing land supply shortfall;
 - the Government's objective of significantly boosting the supply of homes;
 - the efficient use of a sustainable urban site surrounded by existing residential development;
 - the retention and enhancement of the majority of the wider site as public open space;
 - significant landscape, biodiversity and ecological improvements; and
 - the wider social, environmental and recreational benefits delivered through the proposal.
- 9.5 Those are substantial public benefits which weigh significantly in favour of the development.

- 9.6 The degree of policy conflict should also be viewed in its proper context. The proposal retains most of the land as open space, significantly enhances its quality and functionality, and closely reflects the historic planning philosophy previously established by the former 'Garden City' allocation, which envisaged residential development and recreation provision being delivered together, including 'hard' forms of development in the guise of a clubhouse and car park that have failed to transpire.
- 9.7 The application should also be considered against the backdrop of Bury's acknowledged housing land supply shortfall. As confirmed by the Planning Inspector in the recent Bass Lane appeal, the Council is presently unable to demonstrate a full five-year supply of deliverable housing land. The delivery of additional housing in sustainable locations is therefore a matter of considerable importance and represents a significant material consideration in favour of the proposal.
- 9.8 Ultimately, this application does not present the Local Planning Authority with a choice between housing or open space. Rather, it proposes a balanced and sustainable solution capable of delivering both. By concentrating a modest amount of residential development within a carefully defined part of the site, the proposal secures the long-term retention and enhancement of the substantial majority of the land as an improved community green space, whilst making a meaningful contribution towards meeting the Borough's identified housing needs.
- 9.9 Having regard to the Development Plan as a whole and all other material considerations, the Applicant respectfully submits that the benefits of the proposal clearly outweigh the limited policy conflict arising from the development of a relatively small proportion of the site. We therefore suggest that the principle of residential development has been satisfactorily established and the proposal represents a sustainable, proportionate, balanced and policy-responsive form of development.
- 9.10 Accordingly, the Applicant respectfully requests that Permission in Principle be granted for the proposed development, with the detailed design, layout, landscaping, access and other technical matters to be considered through a subsequent Technical Details Consent application.