

Development Management
Bury Metropolitan Borough Council
Town Hall
Knowsley Street
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Lancashire
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9 July 2024
EP ref: 23-657

By e-mail: development.control@bury.gov.uk

Dear Sir or Madam

Re: EIA Screening Request for Wain Estates (Land) Ltd – Land off Church Street/Scobell Street, Walshaw, Bury

On behalf of our client Wain Estates (Land) Ltd, we write to request a Screening Opinion pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment (EIA) Regulations 2017 in relation to the proposed residential development of 'Land off Church Street/Scobell Street, Walshaw, Bury'.

The intention of this letter is to seek confirmation that an EIA for the purposes of the 2017 regulations is **not required** in respect of the proposed development of the site.

It is envisaged the development would involve the erection of approximately 300 dwellings on 11.3 hectares (ha) of agricultural land. The site forms parts of a wider draft allocation for residential development in the emerging Places for Everyone Joint Development Plan Document (PfE). Policy JP Allocation 9 (Walshaw) (JPA9) of the PfE Modifications Version 2023 is a site allocation for the delivery of around 1,250 dwellings in the Walshaw area of Bury.

As required by the Regulations, this request is accompanied by '*a plan sufficient to identify the land*', as well as a description of the development and the aspects of the environment likely to be significantly affected by the development. To the extent the information is available, we also provide a description of any likely significant effects of the proposed development on the environment and measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment, having regard to paragraph 6, regulation (2)(a)-(e) of the Regulations.

Description of the site and proposals

The proposed development site comprises approximately 11.3 ha of land on the eastern edge of Bury. It is currently in use for pastoral farming. The fields are divided by hedgerows interspersed with trees.

The site is enclosed by Scobell Street and residential properties to the north; Tottington Road and residential properties to the north-east; woodland to the east; the Best Western Bury Bolholt Country Park and Stables Country Club to the south-east; a farm complex, Walshaw Brook and agricultural fields to the south-west (these agricultural fields comprise part of the wider allocation); and Church Street, residential properties, garaging and a cattery to the west.

The proposal would be for a residential development on the land edged red on the enclosed site location plan (also shown in Figure 1 below). The precise quantum of development is yet to be determined but is likely to be approximately 300 dwellings. 25% affordable housing would be provided in accordance with emerging Policy JPA9.

It is envisaged that the application would be made in outline, with all matters reserved save for access. Vehicular access would be taken via Scobell Street to the north.

Figure 1 below identifies the extent of the site:



Figure 1: Site location Plan extract (source: Wain Estates (Land) Ltd)

The site location plan is also enclosed.

The site is currently designated as Green Belt in the Bury Unitary Development Plan (UDP), which was adopted by the Council in 1997. However, the land is part of a strategic site allocation for development in the emerging Places for Everyone (PfE) Plan as discussed above. Therefore, assuming that the PfE is adopted, the site will be removed from the designated Green Belt and allocated for housing development.

The land is privately owned. Several public rights of way cross or adjoin the site, including 91TOT, 92TOT, 93TOT, 94TOT, 125BUR, 126BUR AND 129BUR. These are shown on Figure 2 below:

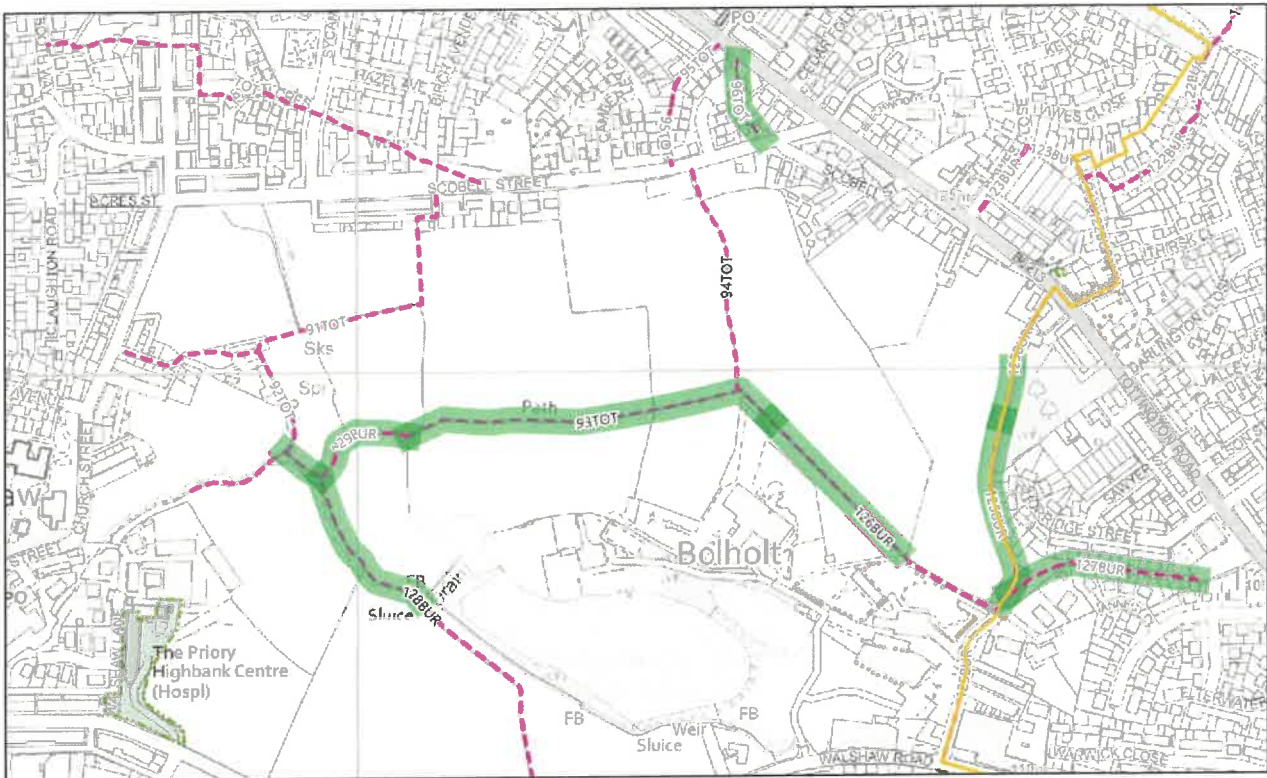


Figure 2: Public Right of Way map (source: Bury Council online map system)

Other than the public footpaths, there is no permitted public access to the site. There is no notable woodland within the site, but there are four trees in the south-west corner of the site which are subject to Tree Preservation Orders. These trees could be retained as part of the proposed development. An extract from the Council's online mapping system is provided below:

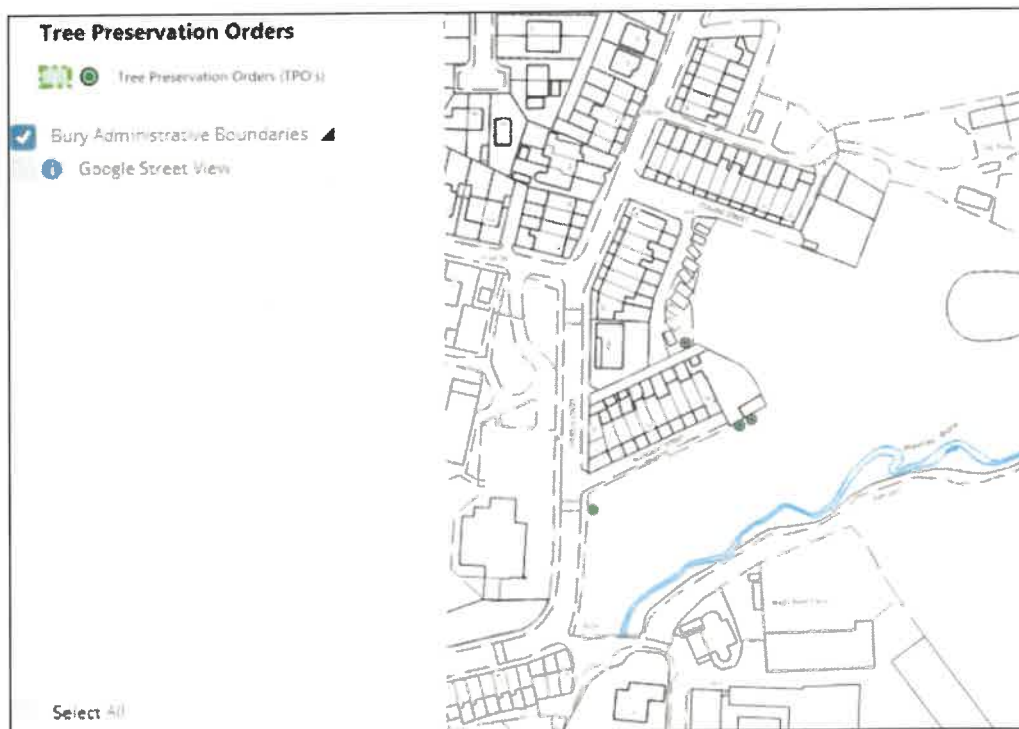


Figure 3: Tree Preservation Order Map (source: Bury Council online map system)

Defining the project in the context of the wider allocation

The site forms part of a wider allocation in the emerging PfE under Policy JPA9: Walshaw. The total wider allocation is for 1,250 dwellings and associated infrastructure, including the provision of a new strategic through road (to enable an alternative to Church Street, Bank Street and High Street), a new one-form entry primary school, a new local centre to serve purely local needs, and green and blue infrastructure.

Paragraph 4-025 of the NPPG states:

“How should multiple applications be treated?”

An application should not be considered in isolation if, in reality, it is an integral part of a more substantial development (Judgment in the case of *R v Swale BC ex parte RSPB* [1991] 1PLR 6). In such cases, the need for Environmental Impact Assessment must be considered in the context of the whole development. In other cases, it is appropriate to establish whether each of the proposed developments could proceed independently (*R (Candlish) v Hastings Borough Council* [2005] All ER (D) 178 (Jul); *Baker v Bath & North East Somerset Council* [2009] All ER (D) 169 (Jul)).”

We do not consider that the wider allocation can be considered as a single project for the purposes of the EIA Regulations. The case of *R (Leckhampton Green Land Action Group Ltd) v Tewkesbury BC* [2017]¹ involved the development of part of a wider draft allocation. The Judgment concluded that the development of part of the draft allocation was not dependent upon development on the remainder of the strategic site. The question as to what constitutes the 'project' is further addressed in the judgement of *Wingfield, R v Canterbury City Council* [2019]². The Judgement identifies at paragraph 64 that relevant factors to this include the following:

- Common ownership - where two sites are owned or promoted by the same person, this may indicate that they constitute a single project.
- Simultaneous determinations - where two applications are considered and determined by the same committee on the same day and subject to reports which cross refer to one another, this may indicate that they constitute a single project.
- Functional interdependence - where one part of a development could not function without another, this may indicate that they constitute a single project.
- Stand-alone projects - where a development is justified on its own merits and would be pursued independently of another development, this may indicate that it constitutes a single individual project that is not an integral part of a more substantial scheme.

In this case:

- The application is made by Wain Estates (Land) Ltd. The company does not control any other parts of the wider allocation or any other land within the local area. The site can be delineated from the wider site by Walshaw Brook which runs along the southern boundary.
- It cannot be known whether other applications from within the allocation will be submitted and/or determined at the same time as this proposal, but it can be reasonably assumed that the not all of the allocated site will be brought forward concurrently given that the parcels are being promoted separately.

¹ *Leckhampton Green Land Action Group Ltd, R (On the Application Of) v Tewkesbury Borough Council* [2017] EWHC 198 (Admin) (09 February 2017)

² *Wingfield, R (On the Application Of) v Canterbury City Council* [2019] EWHC 1975 (Admin) (24 July 2019)

- Whilst there will be a degree of interdependency between parts of the allocation in relation to infrastructure provision (the through road, school and local centre), fundamentally development within the application site can function and be delivered independently of the wider allocation.

Therefore, the tests set out in *Wingfield, R v Canterbury City Council* [2019] are met and the development can be considered as a separate project from the wider allocation for the purpose of the EIA Regulations and this screening request. However, cumulative impacts (including the wider allocation) must still be considered, and we address this in the cumulative impacts section of this request. Furthermore, even if the Council takes an alternative view and considers that the development of the allocation comprises one project for the purpose of the EIA Regulations, we consider that an EIA is still not required for the reasons we set out in the cumulative impacts section of this request.

EIA Screening Analysis

In accordance with the 2017 Regulations, it is a requirement of all local planning authorities to consider whether planning applications submitted to them are significant enough in effect to require an EIA.

In assessing whether an EIA is required, we have followed the Regulations and guidance published in the National Planning Practice Guidance (NPPG). The main considerations are set out in a logical order as follows:

Step 1 – Is the proposal Schedule 1 development?

According to the EIA Regulations and Guidance, the application does not constitute Schedule 1 development.

Step 2 – Is the proposal Schedule 2 development?

The proposed development would exceed the 150 dwelling threshold and the developed site area at approximately 11.3 ha would exceed the 5ha size threshold. The development is therefore Schedule 2 development by virtue of its nature and size (i.e. an Urban Development Project relating to section 10(b) of Schedule 2). We have therefore applied the appropriate tests laid down in Schedule 3 of the Regulations and the NPPG below.

Step 3 – Is the proposal in a sensitive area?

According to the Regulations and NPPG sensitive areas are defined as:

- Sites of Special Scientific Interest (SSSI's);
- National Parks;
- The Broads;
- Areas of Outstanding Natural Beauty;
- World Heritage Sites;
- Scheduled Monuments; and,
- European sites within the meaning of regulation 8 of the Conservation of Habitats and Species Regulations 2010.

The NPPG makes clear that all developments in, or partly in, such areas should be screened. It goes on to state: *“An Environmental Impact Assessment is more likely to be required if the project affects the features for which the sensitive area was designated. However, it does not follow that every Schedule 2 development in (or affecting) these areas will automatically require an Environmental Impact Assessment. It will be necessary to judge whether the likely effects on the environment of that particular development will be significant in that particular location.”*³

The site is not within, or partly within, a National Park, Area of Outstanding Natural Beauty, World Heritage Site or a Scheduled Monument.

An Ecology Technical Note by Tyler Grange forms part of the PFE evidence base⁴. This confirms that there are no European designated sites within 10km of the site.

Therefore, the site is not within a sensitive area as defined within the Regulations and the NPPG. The sensitivities relating to the ecology of the area (as well as all the other material considerations) can be dealt with through adherence to the Council's adopted planning policies, without the necessity for a full Environmental Statement to be prepared.

As such, a full EIA is not necessary in these circumstances in relation to Step 3.

Step 4 – Is the proposal likely to have ‘Significant Effects’ on the environment?

To address this, it is necessary to screen Schedule 2 developments against the specific ‘indicative criteria and thresholds’ listed in the Annex: Indicative Screening Thresholds of the NPPG (paragraphs 4-057 & 4-058). In addition, Schedule 3 of the EIA Regulations sets out the selection criteria which must be applied when determining whether a development is likely to have significant effects on the environment which may justify an EIA.

There are three key tests which are to be undertaken:

- consideration of the characteristics of the development;
- consideration of the location of the development; and,
- consideration of the characteristics of the potential impact.

Accordingly, we have considered these tests and applied the sub-criteria for each in turn:

Characteristics of the Development

(i) Size of the development

In relation to the size thresholds identified in the Annex, the site is over 5 hectares. However, the development would not yield in excess of 1,000 dwellings (indeed it falls significantly below that threshold). Therefore, the proposed development itself would not have a significant urbanising effect as defined by the guidance of the NPPG Annex reference above.

(ii) Cumulative effects with other developments

Paragraph 4-024 of the NPPG states:

³ Paragraph: 032 Reference ID: 4-032-20170728

⁴ [10.03.40 - JPA9 - Walshaw HIMOR and VHW Ecology Technical Note, 2020.pdf](#)

“When should cumulative effects be assessed?”

Each application (or request for a screening opinion) should be considered on its own merits. There are occasions, however, when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development.”

Cumulatively, the allocation is for a quantum of development which exceeds the indicative threshold of 1,000 dwellings identified in the Annex, potentially triggering the need for an EIA. However, even if the allocation is considered as one project for the purpose of the EIA Regulations, the NPPG makes clear that it should not be presumed that developments above the indicative thresholds should always be subject to assessment. Paragraph 4-057 of the NPPG states:

“Thresholds and Criteria for the identification of Schedule 2 development requiring Environmental Impact Assessment and indicative values for determining significant effects

The criteria and thresholds in column 2 represent the ‘exclusion thresholds’ in Schedule 2 of the Regulations, below which Environmental Impact Assessment does not need to be considered (subject to the proposal not being in a sensitive area). The figures in column 3 are indicative only and are intended to help determine whether significant effects are likely. However, when considering the thresholds, it is important to also consider the location of the proposed development.

In general, the more environmentally sensitive the location, the lower the threshold will be at which significant effects are likely. It follows, therefore, that the thresholds below should only be used in conjunction with the general guidance on determining whether Environmental Impact Assessment is required and, in particular, the guidance on environmentally sensitive areas. Column 4 illustrates the issues that are most likely to need to be considered for different development types. However, there will be other issues which will be specific to the nature of the environmental receptor. For example, ecological impacts are likely to be an issue for all development which is proposed to be located in a Site of Special Scientific Interest designated for its wildlife value.”

As such, it is necessary to consider the location, wider context and likely effects of a specific development on the environment in more detail. In particular, it is necessary to establish whether the proposed development is within a sensitive area.

In this case, the entirety of the allocation is not located within a sensitive area as defined within the Regulations and the NPPG, and there is unlikely to be any adverse impacts upon any sensitive areas. That is of critical importance when screening a development which only just exceeds the indicative threshold in the Annex.

In considering the location and wider context of the entire allocated site and whether its development would have significant urbanising effects in a previously non-urbanised area, it is important to note that the allocation is for an urban extension adjacent to an existing urban area, with site being effectively surrounded by existing development on all sides. Clearly, the development would have urbanising effects in a previously non-urbanised area, but those effects would be largely limited to the change on the site itself, viewed within a much wider urban context. Therefore, in terms of the EIA Regulations and the screening thresholds, we do not consider that the urbanising effects would be significant.

The EIA Thresholds Table also sets out the key issues to consider if a development does exceed the indicative thresholds. For an urban development project, the table identifies the key issues to consider as being the “physical scale of such developments, potential increase in traffic, emissions and noise”. In relation to the wider allocation:

- At 1,250 dwellings, the scale of the allocation is only marginally above the indicative screening threshold of 1,000 dwellings.
- The increase in traffic arising from the proposed development can be adequately assessed as part of a Transport Assessment. However, it is important to note that the evidence base for the PfE has already assessed traffic impacts through a borough wide Locality Assessment⁵. This demonstrates that allocations (including JPA9: Walshaw) can be accommodated without significant adverse impacts on the highways network, subject to further assessment via a Transport Assessment at the planning application stage.
- The increase in emissions and noise would largely be limited to, and inextricably linked with, the increase in traffic associated with the proposed residential use. The new through road may assist in alleviating existing local issues. These matters can be adequately assessed through the normal development management process. Furthermore, the PfE evidence base includes:
 - A Noise Screening Assessment⁶, which concludes that the noise impact of the development is limited to road traffic noise and is unlikely to be significant. Wardell Armstrong reviewed the Noise Screening Assessment in February 2024, and have confirmed that using just local mitigation measures if required, and the noise impact is unlikely to be significant.
 - An Air Quality Assessment⁷, which concludes that concentrations of NO₂ and PM₁₀ are likely to be below the relevant air quality objectives (AQOs) at the development location and, as such, the site is suitable for the proposed use from an air quality perspective.

A range of other technical documents relating to ecology, flood risk, drainage, ground conditions, the historic environment, landscape and visual impact, trees and utilities are included within the PfE evidence base⁸. None of the reports indicate that development of the wider allocation is likely to result in significant environmental effects for the purpose of the EIA Regulations.

In terms of cumulative impacts with other planned development in the wider area, there are three other allocations in the emerging PfE within 5km of the site:

- JPA7 Elton Reservoir (1.5km to the south): The draft allocation is for around 3,500 dwellings. There is potential for some cumulative impacts in relation to highways, due to the scale of the proposed allocations and their proximity. Cumulative highways impacts would be assessed through a Transport Assessment, which would then inform other assessments such as air quality. No other cumulative impacts leading to significant environmental effects are considered likely.

⁵ [09.01.09 Transport Locality Assessments - Bury - GMSF 2020.pdf](#)

⁶ [10.03.36 - JPA9 - Walshaw Noise Screening Assessment, 2020.pdf](#)

⁷ [10.03.42 - JPA9 - Walshaw Air Quality Assessment, 2019.pdf](#)

⁸ [Supporting documents 2021: 10.03 Site Allocations - Bury\JPA9 Walshaw](#)

- JPA8 Seedfield (2km to the east): The draft allocation is for 140 dwellings. Site JPA8 is sufficiently distant from the subject site such that other cumulative impacts leading to significant environmental effects are considered unlikely.
- JPA1.1 Heywood / Pilsworth (Northern Gateway) (5km to the south-east): The draft allocation is for 1,200,000 sqm of industrial and warehousing floorspace and 1,200 dwellings. Site JPA1.1 is sufficiently distant from the subject site such that other cumulative impacts leading to significant environmental effects are considered unlikely.

Aside from the schemes listed above, we consider that there are no other significant developments planned in the surrounding area which would generate any significant cumulative impacts.

Having regard to the above, whilst any relevant potential cumulative effects will be addressed in the relevant technical assessments and considered as part of the normal planning process, it is not considered that the proposed development would have any adverse cumulative impact on the area for the purposes of an EIA.

Finally, it is important to note that all PfE allocations (including site JPA9: Walshaw), have been subject to Strategic Environmental Assessment (SEA) through the PfE process, via the 'Integrated Assessment' reports. The only negative impacts identified in the Integrated Assessment of site JPA9: Walshaw are in relation to using and regenerating previously developed land (i.e., the score is negative because the site is greenfield)⁹. These negatives are related to the plan-making objective of using land efficiently, and do not give rise to the need for an EIA on an individual planning application.

(iii) Use of natural resources

The site is Grade 4 agricultural land¹⁰ primarily used for pastoral farming. It is not considered that the loss of this relatively small area of Grade 4 agricultural land, which is not Best and Most Versatile agricultural land, would have a significant impact on local or national agricultural purposes.

Whilst the site is located within a Mineral Safeguarding Area, it is also allocated for residential development. Furthermore, the site has a number of constraints that make mineral extract of the underlying sand & gravels and shallow coal both environmentally unacceptable or uneconomically viable. The site is bounded by residential properties to the north and west, is likely to contain shallow groundwater, and has previously been used as an extraction site for a neighbouring brickworks. This matter would be addressed further through the planning application process via a Minerals Assessment Report.

The proposals will not result in the use of any natural resources that are of short supply and there are no other likely effects on the use of natural resources in the area and it is not considered that the loss of the land would be significant for the purposes of an EIA.

The declaration of Bury Council of a climate emergency is noted and as part of any planning application consideration would be given to reducing the impacts of the proposal on climate change in terms of energy efficiency and low carbon design or use of renewable technologies where possible. The application will be accompanied by documentation addressing compliance with emerging PfE policies in relation to energy efficiency and climate change.

(iv) Production of waste

The proposed development will inevitably generate waste during the construction and operational stages, and this will be recycled and re used wherever possible.

⁹ [Main Modifications: Integrated Assessment \(Appendix D, pages 51-57\)](#)

¹⁰ Provisional Agricultural Land Classification (ALC) dataset, Natural England (December 2023)

The proposed development would not result in the significant production of waste, hazardous materials or polluting materials during the construction period nor through the operational phase.

Such matters can be managed through normal planning processes using SWMP/CEMP. As such, it is not considered that production of waste would be significant for the purposes of EIA.

(v) Pollution and nuisances

Due to the proposed residential end use, there is no likelihood of significant pollution or nuisance arising from the proposed development for purposes of an EIA.

The Noise Screening Assessment identifies that road traffic noise from the surrounding road network will be the only source of noise which is likely to affect the proposed residential units. However, the daytime and night-time noise guideline criteria could be achieved across the entire development, using just local mitigation measures if required, and the noise impact is unlikely to be significant. Additional road traffic generated by the development is unlikely to result in a perceptible change in noise levels at existing sensitive receptors.

The application would also be accompanied by an Air Quality Assessment, the content of which will be agreed with the council's Air Quality Officer. As set out above, the PFE evidence base includes an Air Quality Assessment¹¹, which concludes that concentrations of NO₂ and PM₁₀ are likely to be below the relevant AQOs at the development location and, as such, the site is suitable for the proposed use from an air quality perspective. Again, no significant effects for the purposes of EIA are anticipated.

The site clearance and construction of operations can be controlled through suitable Environmental Management Plans (EMPs) or Construction Standards, which can be required and easily enforced by planning conditions.

(vi) The risk of accident

As far as we are aware there are no hazardous installation consultation zones within the vicinity of the site.

(vii) Risks to human health

As far as we are aware there are no risks to human health within the vicinity of the site and none would arise from the proposed residential development.

Location of the development

(i) The existing land use

The existing land use is described as above.

It is not located in a 'Sensitive Area' as defined by the EIA Regulations.

It will be shown through the application that the incorporation of such land for the development package would accord with the relevant provisions of the Framework and would not significantly affect the setting of any protected or significant buildings, features or landscapes or public rights of way.

ii) Impact on a relevant abundance, quality and regenerative capacity of natural resources in the area

¹¹ [10.03.42 - JPA9 - Walshaw Air Quality Assessment, 2019.pdf](#)

The site is Grade 4 agricultural land used for pastoral farming. As set out above, agricultural land is abundant in the local area and the loss of this relatively small parcel, which is not Best and Most Versatile agricultural land, is not considered to be significant for the purposes of EIA.

iii) Absorption of the natural environment

There are no known features of historical or archaeological importance within the application site.

The site lies within Flood Zone 1 and is a low risk of flooding. It is however, more than 1ha in size and as such the proposals will be accompanied by a Flood Risk Assessment in accordance with the requirements of the Framework/NPPG.

Heritage consultants Lanpro have considered available archaeological, historical, topographic and land-use information in order to clarify the significance and archaeological potential of the site. In summary:

- Christ Church on High Street is a Grade II* listed building. Views of the church dominating its surrounding landscape can be maintained within the study site with consideration of the height of the proposed built form in order to maintain its prominence over the roofscapes of the dwellings, rather than narrowing the views into 'key views' along the proposed road network. Due to the importance of the interrelationship within its environs, any impact on the setting of the Grade II* Christ Church by the proposed development is likely to affect its significance but this can be mitigated by appropriate design. Further consideration of the effects of the proposed development on the setting of the designated heritage asset of Christ Church will be needed once the final detailed layout is issued.
- There is no evidence to suggest that the study site contains, or has the potential to contain, any archaeological remains of sufficient importance to preclude or constrain development.

The application would be supported by a Historic Environment Assessment which considers potential impacts and necessary mitigation further, in accordance with the requirements of the Framework/NPPG. However, none of the heritage issues identified suggest that the proposed development would have significant environmental effects such that the requirement for an EIA is triggered.

Therefore, in terms of the absorption capacity of the natural environment, there are not considered to be any significant impacts that cannot be managed through normal planning procedures and therefore does not necessarily trigger the requirement for EIA.

Characteristics of potential impact

(i) Extent of impact

The magnitude and spatial extent of impacts is considered to be local except in the case of impacts on climate change which in all cases would have transboundary impacts.

The extent of likely impacts is not considered to be significant for the purposes of an EIA.

(ii) Nature of the impact

The majority of impacts will be associated with the construction phase of the development. Visual and potentially ecological impacts continuing into the operational phase, as well as highways related impacts (traffic, noise and air quality). Good construction and site operations will ensure minimal effect to the local environment. Possible impacts can be dealt with through the normal planning process.

(iii) Transboundary nature of the impact

The scale of the proposed development ensures that transfrontier impacts will be not applicable in EIA terms. Good construction and site operations will ensure minimal effect to the local environment.

Ground contamination can be dealt with through the normal planning process. Any affects will be mainly limited to the site itself.

(iv) Intensity and complexity of the impact

The proposed development will likely involve a single phase of development which is not considered as complex or significant for the purposes of EIA.

(v) Probability of the impact

It is certain that the proposed development will generate impacts which will require some level of mitigation. It is however, considered that these can be addressed through the normal planning process.

(vi) Expected onset, duration, frequency and reversibility of impact

As set out above the majority of impacts will be associated with the construction phase of the development and will therefore be relatively short term.

It is considered that any impacts can be managed through the normal planning process and the use of ecological mitigation plans, SWMP/CEMP etc.

(vii) Cumulation of the impact with other existing and /or approved development

As set out above, cumulative impacts will be assessed by each technical discipline as relevant. However, it is not considered that cumulative impacts of known committed or planned development are likely to be significant for the purposes of EIA.

(viii) Possibility of effectively reducing the impact

It is considered that all likely impacts of the proposed development can be adequately mitigated through the normal planning process and use of planning conditions to secure any necessary mitigation such as ecology, highways, noise, flood risk and air quality. As such, it is considered that mitigation options exist which would ensure the development does not require EIA.

Summary/Conclusions

In summary, the proposed development falls outside Schedule 1 and may be referred to as Schedule 2 development within the EIA Regulations. As such, the tests as set out in Schedule 3 of the EIA Regulations were applied through this screening exercise to ensure that the likelihood of significant effects warranting an EIA were considered.

The site forms part of a wider draft allocation in the emerging PfE (JPA9: Walshaw), the totality of which (1,250 dwellings) is of a slightly greater scale than the indicative EIA threshold for this type of development (1,000 dwellings). However, taking into account the scale of the development proposals, the environmental sensitivity of the site (including the absence of any sensitive areas for the purpose of the EIA Regulations) and the mitigation measures that will be put in place to minimise any impacts, it is considered unlikely that the development poses a risk of having significant adverse effects on the environment in this location and **would not be significant** for the purposes of the EIA Regulations 2017. The same conclusion can be formed whether the site is considered individually, or cumulatively with the entirety of draft allocation JPA9: Walshaw.

Any future application will be prepared in full accordance with relevant policies of the adopted and emerging development plan, as well as all the other material planning considerations. We therefore consider that these matters can be adequately addressed through the normal planning process.

We would be grateful to receive the council's opinion of this by way of a formal 'screening opinion' within the requisite 21 days of receipt. If you require any additional information in order to adopt an opinion, please do not hesitate to contact me.

Yours sincerely
Emery Planning

John Coxon

John Coxon BSc (Hons), MRTPI
Director

Enc: Site location plan (plan ref: 333100672-DWG01, dated 22.02.2024)

[REDACTED]