

Walshaw Development Framework Consultation

Response from The Friends of Bury Folk

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Drop in Sessions

Before responding to the Consultation, The Friends of Bury Folk wish to make it clear that they consider this Consultation process to be an appalling failure for the reasons set out in email correspondence between the Chair and Secretary of The Friends of Bury Folk and members of the Council. A copy of the correspondence from The Friends of Bury Folk can be accessed via the following links:

<https://www.saveburysgreenbelt.co.uk/app/download/12691401/ConsultationComplaint2026vfinal.pdf>

<https://www.saveburysgreenbelt.co.uk/app/download/12691403/Draft+Walshaw+Development+Framework+Additions+to+Complaint.pdf>

Problems with Consultation Documentation

The first problem encountered is finding the Consultation on the Council's website. A link to the Consultation is not available on the "Home" page of the Council's website and nor was it listed on the website's list of active consultations at the start of the Consultation period. Initially, we were only able to find it by searching for "strategic sites," which is not a commonly used phrase. Whilst the WDF is a technical document and will therefore incorporate technical language, this should not extend to the Public Consultation itself. As usual, residents are being deterred from participating in the Consultation by the difficulties encountered in trying to access it.

Nevertheless, The Friends of Bury Folk respond to the draft Walshaw Development Framework (WDF) Consultation as follows:

Failure to Observe PfE Policy JPA9

The overriding impression after reading the Consultation documentation is that whilst the utmost consideration has been given to the prospective new residents on the site, there is little or no thought given to the existing residents who live bordering the sites and in the immediate locality.

Pg 12 of the draft WDF states,

“PfE Policy JPA9

*Walshaw Development at the Walshaw Site is guided by Policy JPA9. Policy JPA9 sets out the policy requirements to ensure development is delivered which, together with other relevant development plan policies, seek to ensure this takes place in a sustainable and coherent manner, whilst **maintaining the amenity of existing residents and business in the surrounding area.**”*

It is telling that the phrase “existing residents” only occurs four times across the 90 page draft WDF document, one occurrence of which is in the above quotation which references the policy requirement within PfE.

Pg 16 of the draft WDF states

“There is a unique opportunity to better connect these existing communities, through the preservation and enhancement of the current landscape features allied with the creation of new modern residential development to form new neighbourhoods with high quality amenity and open space”

Contrary to PfE Policy JPA9 as quoted above, no indication has been given of the consideration of the retention of high quality amenity and open space for **existing residents** and their properties. We would go so far as to say that some proposals deliberately destroy the amenity of existing residents, such as the proposal to place the highest density accommodation opposite existing properties on and behind Walshaw Road thus obliterating the character and the current sense of openness of the area for these particular residents.

In addition, existing businesses on Church Street will be affected to their detriment by the poorly publicised proposal of blocking off Church Street at its junction with Booth Street. The Booth Way estate opposite will be used as a rat run by traffic coming from Affetside, thus also negatively affecting existing residents there. Our concerns about this proposal are detailed in correspondence which can be accessed by the following link,

<https://www.saveburysgreenbelt.co.uk/app/download/12691403/Draft+Walshaw+Development+Framework+Additions+to+Complaint.pdf>

Local Character

We strongly disagree with the definitions of “local character” at pages 22-23 of the draft WDF. The five circled areas have caused the true picture to become oversimplified. This has resulted in some of the areas which will be most affected by the new development being left out of the area descriptions on page 22. In particular, this applies to the ribbon development on Walshaw Road falling between Walshaw Village and Elton and the ribbon development on Scobell Street between Walshaw Village and Woolfold. This is important as the draft WDF fails to take account of the characteristics of these areas and the existing properties within them when planning for the new development.

The area referred to above on Walshaw Road between Walshaw Village and Elton is a distinctive area marked by large, detached homes of individual character built from the early 1900s through to the mid twentieth century. These are mixed with several 1930s semi detached properties. Most of the properties are built from red brick and have front gardens bordered by low walls and/or hedges. The properties have off road parking and currently enjoy an open aspect to the front with views of fields and Holcombe Hill in the distance. The failure to acknowledge the existence of these properties in the draft WDF has led to the proposal that incongruous, high-density housing is sited across from and next to these existing homes on Walshaw Road, Brookthorpe Road and Sharples Drive.

The area on referred to above on Scobell Street between Walshaw Village and Woolfold consists predominantly of larger, modern detached properties with large driveways for off road parking, which have an open aspect to the front with views over the fields opposite. There are also some mid-century semi-detached houses and bungalows, again with front gardens bordered with low walls and/or hedging and with off road parking, with open aspects to the rear overlooking the fields. Again, it is proposed that the second highest density of housing is situated in this location due to the failure to include the existing properties in the description of the local character.

The draft WDF needs to be amended to describe these areas as detailed above so that any future planning applications properly take the characteristics of existing properties in the area into account.

Site Characteristics, Opportunities and Constraints.

Transport and Highways

At page 24 of the WDF, it states that there will be the opportunity for “*new, high quality bus infrastructure.*” However, given that, as stated in the constraints, “*parts of the existing network already experience congestion, particularly at peak hour*” any additional traffic, including buses, will simply contribute towards this congestion.

“*Future connectivity to the Metrolink network via the new stop at Elton Reservoir*” is also stated as an opportunity. However, the proposed Metrolink stop is some distance away from Walshaw and will necessitate travel by car. Even with a new link road through the new development, most people will travel by car to the Metrolink stops as active travel will not be an option for most, especially as bikes cannot be taken on the Metrolink. The Metrolink stop in Bury, even with its lack of parking space, will still be the closest option for most residents. This also begs the question as to whether there will be an increase in Metrolink services on the already overcrowded, unreliable and outdated Metrolink line to Bury.

Ecology characteristics

Page 26 of the WDF describes the site in the following way,

“The site comprises of predominately modified grassland in poor condition, interspersed with hedgerow networks, woodland edges, drainage ditches, ponds and a small patch of wet woodland”

At page 32, the WDF states,

“Much of the scattered tree stock is in a state of naturalised dilapidation”

In addition, we do not think that the map on page 33 accurately represents the size and number of trees around the western edge of the large lake near The Bolholt.

These descriptions and errors greatly undermine the ecological value of the site. The Extended Preliminary Ecological Assessment dated 21st May 2025 commissioned by The Friends of Bury Folk and carried out by the ecologist, Dave Bentley, identifies a huge amount of flora and animal species present. The report can be accessed via the following link:

<https://www.saveburysgreenbelt.co.uk/app/download/12691398/DPB+Eco+logy+Report+Walshaw+Scobell+Street+V2.pdf>

The report identifies, amongst others, Priority Habitats, Red Listed bird species, Priority Species amphibians, species of interest as well as bats and hedgehogs. It is Dave Bentley’s opinion that best practice in ecology was not followed with regard to documentation submitted for Places for Everyone.

No constraints are listed under the “ecology characteristics” section of the WDF. However, we submit that constraints should be included and should be formulated in accordance with Dave Bentley’s ecological assessment in order to protect the ecological value of the site.

In addition, PfE Policy JP-G8 states that,

“A Net Enhancement of Biodiversity and Geodiversity requires development to follow the mitigation hierarchy of:

- *Avoiding significant harm to biodiversity, particularly where it is irreplaceable, through consideration of alternative sites with less harmful impacts”*

Dave Bentley’s report should be considered with this in mind, and no planning applications should be passed until full, ecological surveys have been carried out in accordance with best practice.

Masterplan

The Indicative Illustrative Masterplan

Allotments

On pages 42 and 43 of the WDF, reference is made to Community Allotments. At the Elton drop in session, the owner of the land upon which it is proposed that the allotments are sited stated that he had not been asked about this and he would not be selling the land to the Council. If this is the case, the map is incorrect and needs to be amended to show an alternative site for the allotments. The public should then be given the opportunity to comment upon this. This issue has already been raised in the correspondence from The Friends of Bury Folk which can be accessed by the following link,

[Draft Walshaw Development Framework Additions to Complaint.pdf](#)

Character Strategy

Building heights and Density

We do not agree that building heights should be any higher than 2.5 storeys in any part of the site in order to retain the openness and character of the existing residential areas. As stated at page 32 of the WDF, one of the current landscape features is,

“Panoramic views...intertwined with the influence of more urbanising features”.

Higher buildings would obscure these panoramic views for all and destroy one of the characteristics of the area.

If buildings over 2.5 storeys are to be built, then these should be sited well within the proposed new developments to allow for sufficient parking and open space around them and for dispersal of the traffic more evenly through the site. In accordance with JPA9, this would help to preserve the amenity of the location for existing residents and minimise the effect on the existing roads.

In addition, PfE only requires a minimum density of 35 dph, whereas the draft WDF states at page 44 that the average density for the Walshaw site will be 37.7 dph. This indicates that some properties will be built at a density well in excess of the required density under PfE, which is unnecessary and avoidable.

The draft WDF also states at page 44, that,

“Primary streets will have a higher density than the outer edges of the site. This principle will also ensure a sensitive response to the site’s surrounding landscape.”

The proposals for the Walshaw site do not accord with this principle. High density housing has been proposed well away from the new Through Road and sited along many of the outer edges of the site. In some cases, the proposed development proposes high density housing along the outer edges bordering existing properties.

This is also contrary to PfE Policy H4 as outlined at page 66 of the WDF, which states,

“The approach to residential density should in accordance with PfE Policy H4, with the highest densities delivered in the most accessible locations.”

According to the map on page 47, not all of the highest density housing has been placed in the most accessible locations, especially the new properties proposed behind existing homes on Brookthorpe Road and Sharples Drive.

The difficulty with the Walshaw site is that it is split into two sections by Walshaw Road. The WDF treats the site as two separate halves, referring to it as “the Northern Zone” and “the Southern Zone.” This effectively gives the site two separate centre points with “outer edges” along Walshaw Road. This defined break in the proposed development should mean that the entire boundary with Walshaw Road itself should be considered as an “outer edge” when considering the character of the area. To accord with the principle on page 44, higher density housing should be sited in the centre of each of the two sections and along the Through Road, with lower density housing spreading out to and along Walshaw Road and the other outer edges.

On this same point, the proposed development along the length of Scobell Street consists of higher density housing even though it is an “outer edge” of the site. Again, this is contrary to the principle described on page 44.

Strategic Through Road Frontage

Whilst the proposed frontage for the new road has been discussed, this issue has not been considered for where the proposed new buildings meet existing roads. This must be included and must emphasise the need to retain the character and amenity of existing properties in accordance with JPA9.

Character Areas

“The Avenue” and “Woolfold”

We strongly disagree with the siting of the highest density housing along Walshaw Road and in its locality, and also along Scobell Street, due to the reasons already given for the detrimental effect upon the amenity of existing residents and for the incongruous appearance of such properties against the existing buildings.

At page 48, it is asserted that,

“Scale and density will be higher in ‘The Avenue’ and its core area due to their proximity to transport links such as the Strategic Through Road at approximately 35 dph to 40 dph.

Whereas, the scale and density in Woolfold will decrease to the eastern and western edges. Here the development will be in closer proximity to community and transport infrastructure with an average density of 35 dph”

However, if transport links, such as the Strategic Through Road, really are the reason for higher density housing being situated in “The Avenue,” why is it that the Through Road has areas with lower density housing and green space sited along it and some higher density housing is situated well away from it? The positioning of the highest density housing next to or near to existing properties really is beginning to look like a deliberate move designed to aggravate those most vocal in their opposition to the building plans. If the concern for new residents really is their access to transport links, then higher density housing should be maximised along the Through Road.

The top of Walshaw Road is already very crowded, consisting of terraced houses with parked cars all day long on both sides of the road. Vehicles travelling through this area can only pass in one direction at a time, and waiting traffic tails back down Walshaw Road and along High Street. The addition of community facilities and a school in this area will increase vehicle activity, thus increasing the danger from vehicles and causing additional congestion. To avoid this, and for safety reasons, it would be better to site the higher density properties away from this area well within the boundaries of the new site. There appears to be scope to site the highest density housing entirely along the new Through Road. This would still give the new residents the best access to the school and community facilities and new transport links. Lower density housing could be situated along Walshaw Road and bordering the areas behind existing properties on Brookthorpe Road and Sharples Drive instead, if necessary.

If it is not considered feasible to relocate the higher density housing in this way, then the proposed new houses along Walshaw Road ought to be set well enough back from the road to allow for a wide grass verge being incorporated into the design, planted with hedgerows and trees to screen the development. A bus stop situated near the Through Road could be added, with a “pull in” stop to minimise traffic flow interruption. There would also be scope for the verge to be wide enough to incorporate a cycle lane to promote active travel, which, given that *“the existing transport network*

already faces...a lack of safe dedicated active travel infrastructure reducing viable alternatives to car use” (pg36) would be of benefit to new and existing residents. This could also encourage active travel for students travelling to The Elton High School if a cycle lane was taken down Walshaw Road as far as the entrance to the school, helping students to avoid travelling amongst heavy traffic at peak times and reducing car use by parents.

This proposal would also incorporate one of the key design principles for green infrastructure as stated on page 60, whereby it would,

“Reflect the existing settlement edge patterns and character through structural planting, land use, and appropriate transitions in scale and massing at the settlement boundaries, responding to the surrounding context.”

These suggested improvements to the boundary of the proposed development with Walshaw Road would help to maintain the openness and views for existing residents, present an opportunity to enhance nature and wildlife, improve drainage and incorporate a safety element for the new residents so that their homes do not directly front a busy main road. Cars could then disperse through the new development and onto the new Through Road. Walshaw Road is not wide enough to accommodate on street parking for any new properties and so parking facilities must be provided on the new estate to minimise congestion. A similar approach could be taken for the proposed new properties along Scobell Street.

Movement and Street Hierarchy

At the Elton drop in session, it was explained that Church Street and Scobell Street will be closed off at their junction with Booth Street to allow for the Through Road. Although remodelling of the junction is mentioned in passing in the Bury West Transport Framework Document, the blocking of these roads is not mentioned at all in the draft Walshaw Development Framework and is barely apparent on the maps even when they are enlarged significantly. This proposal is a major change to the current situation and will have an impact on existing residents contrary to JPA9, which refers to *“maintaining the amenity of existing residents and business in the surrounding area.”* In particular, those who live on the Booth Way estate will

be impacted negatively as it will be turned into a “rat run” by those travelling by car to and from Affetside, as well as having an adverse effect on businesses on Church Street due to the reduction in through traffic.

We maintain that the public has been denied the opportunity to comment upon these proposals as the proposed change is not apparent in the draft WDF. The public cannot comment on something they are not aware of.

It was also mentioned at the drop in session that there would be road blocks on some roads to prevent “rat runs” being created but no locations were confirmed. Whilst the draft WDF mentions that care will be taken not to create rat runs, it does not indicate that some roads will be blocked. The maps therefore need to be amended to reflect this and the public given the opportunity to comment.

In addition, the draft WDF does not show any directional traffic flow on the maps or any proposed road width restrictions. It is important that residents are informed about whether roads will carry one way or two way traffic so that they can comment effectively.

There are concerns about the location of the proposed Through Road affecting existing water main infrastructure. We refer to a letter to Bury Council from United Utilities dated 21st May 2025 sent in relation to the outline planning application on land off Church Street and Scobell Street.

https://www.saveburysgreenbelt.co.uk/app/download/12691867/UU+report+71645_CONSCORR_22052025.pdf

The letter states that,

*“A large diameter trunk main crosses the site. It must not be built over, or our access to the pipeline compromised in any way...The water main is located alongside the route of the new link road to the west of the site. There may be issues regarding the road in the future should it not be designed with considerations for the water main as **there are risks designing a road parallel to water main infrastructure**. The necessary distances must be agreed to not place any unnecessary loading on the main as part of the proposed link road.”*

We therefore question whether the position of the Through Road will affect the integrity of the water main.

The proposed Through Road will join Booth Street. Booth Street is a narrow residential street lined with terraced houses. Cars are parked on both sides of the road all day long and the road has high speed bumps, mini roundabouts and a 20mph speed limit. Cars have to pull in to allow traffic travelling in the opposite direction to pass, especially in the areas around the mini roundabouts near Tottington Primary School. Booth Street joins Tottington Road at yet another mini roundabout, where visibility is poor and traffic is not easily able to turn right towards Bury due to the flow of traffic along the main road. We submit that Booth Street is not an appropriate highway to join onto the Through Road as it will not be able to cope with the volume of traffic generated by the new estate. Residents along Booth Street will be subjected to a significant increase in noise, vibration and pollution levels caused by the additional traffic.

At the other end of the proposed Through Road, the exit will be in the area of Dow Lane onto Lowercroft Road. The road at this point is steep and narrow, with barely sufficient room for two vehicles to pass safely. Water flows down the road all year long, making it treacherous in winter. The road has existing housing and businesses along the majority of its length, making it difficult to widen. Once again, residents living along the road will be subjected to noise, vibration and pollution from the increased volume of traffic.

The Through Road will also meet Walshaw Road where the road is already constricted by on street parking for the terraced houses. The junction at Walshaw Cross is dangerous, with accidents taking place several times a year due to very poor visibility and speeding traffic. The levels of traffic in this area will also be greatly increased by the existence of a school and community and retail facilities. Once again, existing residents will be negatively impacted by the increase in traffic.

All of the above goes to show that the Walshaw site is severely constrained by existing housing and narrow roads which were never meant to support such a vast anticipated increase in traffic. The Through Road will not alleviate the existing traffic difficulties; it will simply add to them. As we have argued from the beginning, the area is wholly unsuitable for the scale of the proposed development. Despite this, no viable or firm proposals have been made about improvements to the local and wider road network and how they will be funded.

JPA9.4 states that development in Walshaw must,

“make provision for other new and improved sustainable transport and highways infrastructure having regard to the indicative transport interventions set out in Appendix D in accordance with Policy JP-C8”

Appendix D requires necessary transport interventions at:

“Crostones Road/ Tottington Road junction

Tottington Road/Walshaw Road priority junction

Cockey Moor Road junction

A58 Bolton Road / Ainsworth Road junction improvement

A58 Bolton & Bury Road/Starling Road junction improvement”

All that has been suggested under the Bury West Transport Framework is the provision of active travel options and crossing points at some of the above. This will not alleviate the difficulties that already exist at these points, let alone provide solutions for the increase in traffic flow once the development has been completed. We therefore submit that the Council is in breach of JPA9.4.

Education

The WDF states that,

“PfE Policy JPA9 requires the ‘provision of one new one-form entry primary schools to meet needs generated by the development”

However, the summary of the Walshaw development on the Council’s website incorrectly states that there will be provision for a “New two-form entry primary school”

Ecology

Pg 56 of the WDF states that,

“The development will deliver at least the statutory 10% Biodiversity Net Gain (BNG) through a mix of on-site enhanced areas of green spaces and landscaping, and off-site mitigation”.

Pg 69 of the WDF states, in relation to off-site mitigation,

“These will be delivered in the first instance through Bury Council’s local offsetting capacity, supplemented by strategic offsetting sites if needed.”

Places for Everyone was deemed so harmful to our countryside and wildlife that 49 new greenbelt allocations were proposed to offset the damage and to make it appear less harmful. However, during the Examination in Public, 30 of the proposed 49 additional greenbelt sites were removed.

Now that the additional greenbelt allocations no longer exist in their entirety, how does the Council propose to achieve the mandatory legal requirement under the NPPF for a minimum 10% biodiversity net gain? This has not been properly addressed in the draft WDF and vague terms such as “off-site mitigation” do not give enough detail. If off-site mitigation is to occur, it should firstly be located in an area as close as possible to the affected site to help to accommodate displaced wildlife rather than to benefit the residents of other areas of the Borough, as per JPA9.10 of Places for Everyone,

“Make provision for compensatory improvements to the environmental quality and accessibility of remaining Green Belt in the vicinity of the site in accordance with Policy JP-G2; “

Flood risk and Drainage

We refer to the letter to Bury Council from United Utilities dated 21st May 2025 sent in relation to the outline planning application on land off Church Street and Scobell Street. The letter states that,

“As the applicant and LPA are aware, there is modelled flood risk from the sewers located in close proximity to the site. Further consideration needs to be given as to how this flood risk can be managed and mitigated from the proposed housing without increasing the flood risk or displacing the flood risk elsewhere”.

JPA9 11.150 of Places for Everyone states that,

“To reduce the risk of flooding, the development should minimise the risk associated with inadequate sewer capacity, and minimise and control the rate of surface water run off through an appropriate drainage strategy in accordance with Policy JP-S4, and, where possible, safeguard land within the allocation for flood storage.”

The Council must ensure that the flood risk and drainage policy for the site accord with the extensive recommendations within the aforesaid letter from United Utilities and JPA9 11.150. The draft WDF does not appear to contain sufficient detail about the plans to mitigate the flood risk and drainage capacity of the site, both for run off and sewerage, ensuring that run off will not interfere with foul drainage due to lack of capacity in the surrounding systems.

Open space, sport and recreation

Contrary to JPA9, the proposed development puts greater emphasis upon the creation of open space for new residents than on the retention of open space for existing residents. At page 60, the WDF talks of creating,

“an attractive, legible, and secure environment for the proposed residential development, supported by quality green connections and well-overlooked spaces. Design spaces that integrate both formal and informal recreational areas, connected by active travel routes, all within a vibrant natural green setting”

There is little to no consideration given to the loss of amenity and “natural green setting” for existing residents. Green spaces should be incorporated where the proposed new homes border existing homes to enhance the natural environment for existing residents and minimise the visual impact of the new buildings.

Green and Blue Infrastructure Network

The map on page 62 of the WDF refers to “the green link”. We cannot see that this is explained anywhere within the document. Presumably, it refers to green space incorporated along the Through Road. If this is the case, then similar green space provision ought to be made along Scobell Street and

Walshaw Road where the new development borders these roads as proposed above under “Character Areas.”

Phasing

Even before the plan has begun, delivery rates are nowhere near proposed plan targets. All 3 local sites will miss targets, and the first completions are not expected until late 2027/2028. The amount of land allocated is far and above what is achievable during the plan period. Some of the site promoters have not yet responded to the Council with predicted build rates, so it is not appropriate to even consider a local draft Framework at this point in time. Without having the fundamental information and clear projections for the Framework, infrastructure cannot be planned for in an informed manner. Using the word “phasing” is no better than guessing!

Conclusion

Apart from the obvious errors and omissions in the draft WDF, the document fails to take proper account of the amenity of existing residents and businesses and to properly consider the local character of the area. The siting of the highest density housing is incongruous and inappropriate and not necessarily in the most accessible locations. The proposed Through Road poses a high risk to the existing main water main as it traverses the site closely parallel to it. There is a failure to make improvements to the wider road network to accommodate the anticipated increase in traffic. There is a lack of detail about drainage and flood mitigation. The ecological value of the site has been largely dismissed. Without a proper assessment of this, significant harm will be caused to the biodiversity rather than the creation of the statutory 10% biodiversity net gain.

For the reasons set out above, The Friends of Bury Folk do not consider the draft Walshaw Development Framework to be compliant with the policies set out in Places for Everyone Joint Development Plan JPA9. Should the Council choose to adopt the draft WDF in its current format it will be open to legal challenge.

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