

Planning Validation

Report by Consultation & Research Team

October 2022



1. Background & Methodology

Between 31st October and 12th October 2022, the Council ran a 6-week public consultation, seeking to engage residents and stakeholders on providing feedback on the draft Planning Validation Checklist. Residents and stakeholders were advised that a Planning Validation Checklist is an important document, which details the information required when submitting an application for planning permission. Therefore, the authority was keen to seek the opinion of residents and stakeholders that may use it.

During the consultation period key stakeholders were made aware of the consultation and were invited to make comment. Supporting documentation was also made accessible on the Council's consultation webpage and social media was utilised throughout the period to share key messages about the consultation with residents. E-View, the Council's consultation database, made-up of over 600 residents, were also informed and asked to comment on the Validation Checklist.

Consultation responses

Throughout the consultation period 15 formal responses from residents and stakeholders were received. Of those that responded, 8 were key stakeholders and 1 is a Council Member. The remaining 6 responses are made up of a member of the public, 3 local authority officers and 3 national agencies.

Formal responses were received from the following organisations, with their responses located in Appendix 1:

- The Environment Agency
- Network Rail
- Historic England
- Blackrod Town Council
- The Emerson Group
- The Ramblers Association
- National Highways
- The Coal Society

Responses from individual officers, Members and residents have been anonymised, with feedback outlined in Appendix 2.

Appendix 1

Organisational Responses

- **Environment Agency**

The WFD divides the water environment into water bodies. These can include lakes, reservoirs, streams, rivers, canals, groundwater, transitional waters (estuaries) and coastal waters.

The WFD is a European directive which aims to protect and improve the water environment.

The following should be included as part of the Validation Requirements – Water Framework Directive (WFD)

The WFD divides the water environment into water bodies. These can include lakes, reservoirs, streams, rivers, canals, groundwater, transitional waters (estuaries) and coastal waters.

The WFD is a European directive which aims to protect and improve the water environment.

<https://www.gov.uk/guidance/water-framework-directive-assessment-estuarine-and-coastal-waters>.

- **Network Rail**

Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order).

Network Rail is also a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates and develops the main rail network. Network Rail aims to protect and enhance the railway infrastructure, therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests will need to be carefully considered.

Consideration of the impact on the existing railway infrastructure and on level crossing should be included in the Validation Checklist.

- **Historic England**

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Thank you for consulting Historic England on the above document. At this stage we have no comments to make on its content.

- **The Emerson Group**

I write in relation to the above-mentioned public consultation to provide representations on behalf of The Emerson Group, who own an extensive range of office, retail and commercial buildings in Bolton and who also have a large residential portfolio in the borough. With the various interests in Bolton, we are pleased to be given the opportunity to comment on the Council's draft validation checklist.

We consider that the structure and the format of the document reads well but our comments on the following two matters are as follows:

17. Ecological Assessment – Section 17 states that a Biodiversity Net Gain Assessment is required for all major developments as a validation requirement. We consider that a Biodiversity Net Gain Assessment should not be a validation requirement and should be dealt with by a suitably worded planning condition (if the development were to be approved). DEFRA's recent consultation on 'Biodiversity Net Gain Regulations and Implementation' states that the requirement to achieve biodiversity net gain increase should be framed as a pre-commencement planning condition and that the biodiversity net gain condition could then be discharged before the development begins. It is therefore considered that it would be entirely appropriate (as suggested by a recent government consultation) for the Biodiversity Net Gain Assessment to be controlled by a pre-commencement planning condition rather than being a validation requirement.

The Ecological Assessment, which is already a validation requirement, would cover the main matters relating to ecology and could refer to the principles of how Biodiversity Net Gain is to be achieved on site but it is considered that any detailed assessment should form part of a pre-commencement planning condition rather than being a validation requirement.

33. Fire Statement – Section 33 states that Fire Statements should be submitted for planning applications 'for two or more dwellings'. This is a very onerous requirement for minor developments and for low rise developments. The guidance referred to in the Planning Validation Checklist (Fire Safety and High-Rise Residential Buildings (from 1 August 2021)) to justify this validation requirement relates to measures to ensure fire safety matters are incorporated at the planning stage for schemes involving a relevant high-rise residential building.

A Fire Statement should therefore only be required for high rise residential buildings and not for planning applications for two or more dwellings, which are unlikely to be higher than three storeys. Information provided in a Fire Statement is also likely to form part of any Building Regulations approval for a development and would be covered under separate legislation and should not be a planning validation requirement for small and low rise residential and commercial schemes.

- **The Ramblers Association**

Thank you for giving me the opportunity to contribute to this exercise. I am making my comments as the Footpath Secretary of Bolton Ramblers and I am a Consultee on Planning Applications that involve public rights of way.

I have found this role quite difficult because so many planning applications are accepted in which PROWs are affected but they are not drawn on the plans and because when they are drawn on the plans, they are not identified by the Bolton Council's name for the PROW. In the past this has been alleviated to some extent because the site of the planning application was drawn on the Bolton Council's "MY Maps" webpage which clearly showed the site of the planning application and all the PROWs.

Under the new planning process, the site of planning applications is no longer available to me and I find it really hard to be accurate in locating the site and its relationship to the network of PROWs. Therefore, it is essential that all PROWs potentially affected by a planning application are clearly displayed in the plans.

The legislation says that all PROWs going through the site and adjoining the site should be clearly identified in the plans even if remote from the actual building work. This is often not done and when I mention it in my report, I am expecting new plans showing the PROWs to be produced and for me to have an opportunity to comment on these new plans. That rarely happens but, to be fair, has happened once recently.

Unfortunately the legislation [Government Circular 1/09 Rights of Way, paragraph 7.4], using the word adjoining, is inadequate or unclear. I believe adjoining means that the PROW touches the boundary of the site and it can be argued that there is almost always a gap between a PROW and the boundary and so the PROW can be left out of the plans and usually is unless the PROW

crosses the site and even then it often is omitted. This seems to be recognised in the Council's document [Development and Public Rights of Way] where, although in paragraph (1) it talks about "adjoining", in paragraph (2) it talks about "adjacent" to the site. "Adjacent" is a much better word but it is still unclear. Is 100m adjacent, 10m adjacent or 1m adjacent? Probably 100m is normally too big to be called adjacent, but PROWs a lot further away from the boundary than 1m should be considered adjacent especially if the PROW is on land owned by the developer.

What I would ideally like to see and what would be most helpful in my Consultee role as a result of this exercise is

1. The Council's document [Development and Public Rights of Way] being specific about the term adjacent which I think might be different if the PROW is on land owned by the developer or on land owned by someone unconnected to the planning application. And I would like to see the developer asked to put not only adjoining PROWs but also adjacent PROWs on their plans
2. Because I suspect few applicants actually look at the Council's document, a question on the planning application form concerning PROWs crossing and adjacent to the site of the planning application should be added to the application form.
3. If the PROWs are not put on the plans and a request is received asking for them to be put on the plans, then the application should not be considered until they are. Any new plans should be sent to the Consultee for comment. If the Planner thinks that the request for clarity concerning the PROWs is unreasonable, the Planner should let the person making the request know.

- **Blackrod Town Council**

Members have met to discuss the draft and offer the following update:-

1. On list of contents it is suggested that there be a category on fire safety and fire safety feature somewhere in the document.
2. There needs to be some information on timescales for each section of the planning process (In the introduction) e.g. you will receive info/ acknowledgement within so many days etc.
3. The document needs proof reading as there are a few grammatical and spelling errors for example see page 3.
4. Town Councils with a neighbourhood plan in place needs some mention of this in the dialogue.
5. Page 5 Quest 1 – needs to be clearly documented who the owner is of the property not just the agent.
6. Page 7 there needs to be a design statement which is completed fully.
7. Page 35, No 24 should read suspected archaeological...not just known!
8. Parking on properties should be more in line with wigan's policy wording on parking spaces and give indicative figures not just a minimum or maximum of.

Not too much but it is rather a long document and perhaps should be made a touch more concise.

- National Highways



Our ref:
Your ref: Planning Validation 2022

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3 October 2022

Dear Sir / Madam

Validation Requirements for Planning Applications (Update to the Planning Validation Checklist)

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015. National Highways is responsible for operating, maintaining and improving the Strategic Road Network (SRN) in England, in accordance with the Licence issued by the Secretary of State for Transport (April 2015) and Government policies and objectives.

National Highways' approach to engaging with the planning system is governed by the advice and guidance set out in *The Strategic Road Network Planning for the Future - A guide to working with Highways England on planning matters* (2015).

Our response to Bolton's update to the Planning Validation Checklist consultation is written in the context of statutory responsibilities as set out in National Highways' Licence, and in the light of Government policy and regulation, including the:

- National Planning Policy Framework (NPPF);
- Town and Country Planning Development Management (Procedure) Order (England) 2015 (DMPO); and
- DfT Circular 02/2013 The Strategic Road Network and the delivery of sustainable development ('the Circular').

As a statutory consultee in the planning system, National Highways has a regulatory duty to co-operate. Consequently, National Highways are obliged to give consideration to all proposals received and to provide appropriate, timely and substantive responses.

National Highways' desire to be a proactive planning partner goes beyond this statutory role, but follows the spirit of the Licence which stipulates that National Highways should: "Support local and national economic growth and regeneration".

National Highways encourages all parties promoting and preparing Plans that may have an impact on the SRN to engage with it as early as possible, to enable collaborative working and to deliver positive outcomes as quickly as possible.

National Highways is committed to working with local authorities and plan-making bodies prior to and between formal consultation periods to contribute to the thinking, and support the analysis of options and development of strong plans and proposals that take full account of highways issues.

The Update to the Planning Validation Checklist

In respect of the updated checklist, our only comment relates to Local Requirements section 5, which refers to Transport Assessments, Transport Statements and Travel Plans.

We acknowledge that where developments are small in scale there may not need to be a review undertaken to determine whether there would be significant impacts to the surrounding highway network. We also acknowledge that the purpose of this document is to enable the Local Planning Authority to determine whether sufficient documentation has been provided by an applicant to allow the application to be validated.

However, this may not satisfy the requirements of National Highways in making a determination as to the impact on the SRN. For example, the requirement that an assessment may only be required if a development is likely to increase traffic on an adjoining highway by 10% or more is unlikely to meet our requirements for assessment, where an increase in traffic on a motorway by any amount up to 10% may lead to increased congestion and significant safety risks.

We would therefore recommend that the following change be made to Local Requirements section 5 to include reference to the application having to satisfy National Highways requirements regarding traffic impact assessments. The original text is in black, with our suggested amendment in red:

Local Requirement:

If traffic to and from the proposed development is likely to exceed 10% of the existing two-way traffic flow on the adjoining highway; or if traffic to and from the proposed development is likely to exceed 5% of the existing two-way traffic flow on the adjoining highway, where traffic congestion exists or will exist within the assessment period or in other sensitive locations; 16 or If the application is for a significant scheme, i.e. more than 200 residential units, business ground floor area of over 5000sq m, warehousing over 10,000sqm, retail over 1000sqm, over 100 in/out peak hour trips, or 100 on-site parking spaces. However, these thresholds will not compromise any assessment by National Highways that a Transport Assessment/Statement is required where there is potential for new development to negatively impact the Strategic Road Network. In such instances, the applicant is

advised to contact National Highways at the pre-application stage to determine the necessary submission requirements.

Thank you for consulting National Highways regarding the update to the Planning Validation Checklist. If you would like to discuss this recommendation, please contact me directly at the email address below.

Yours faithfully



Adam Johnson
Spatial Planning Team
Email: Adam.Johnson@nationalhighways.co.uk



Bolton Metropolitan Borough Council - Draft Planning Validation Checklist Consultation

Contact Details

Planning and Development Team

The Coal Authority

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MANSFIELD

Nottinghamshire

NG18 4RG

Planning Email: planningconsultation@coal.gov.uk

Planning Enquiries: 01623 637 119

Date

11th October 2022

Draft Planning Validation Checklist Consultation

Thank you for your notification received on the 30th August 2022 in respect of the above consultation. The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that within the Bolton area there are recorded coal mining features present at surface and shallow depth including; mine entries, shallow coal workings, coal extraction by surface mining methods and reported surface hazards. These features pose a potential risk to surface stability and public safety.

The Coal Authority's records indicate that surface coal resource is present in the area, although this should not be taken to imply that mineral extraction would be economically viable, technically feasible or environmentally acceptable. As you will be aware those authorities with responsibility for minerals planning and safeguarding will have identified where they consider minerals of national importance are present in your area and related policy considerations. As part of the planning process consideration should be given to such advice in respect of the indicated surface coal resource.

In light of the coal mining legacy present in the Bolton area we are pleased to see that the Local Validation List includes reference to the requirements for the submission of coal mining information and an assessment of the risks posed to the development by past coal mining activity.

In order to ensure that the information requirements, in this regard, are clear and to assist the developer as much as possible in obtaining the correct information first time I have suggested some amendments to the wording proposed in the draft document. For clarity, a Coal report is a factual document only and is not a Coal Mining Risk Assessment.

9.	Coal Report Coal Mining Risk Assessment (CMRA)	NPPF Core Strategy Policy CG4	If your proposal is within a coal mining high risk area If your proposal is within a coal mining high risk area you will need to submit a coal mining risk assessment prepared by a competent person. ~~The Coalfields is~~ ~~are~~ divided into high and low risk areas. A high risk area is where there are coal mining features recorded as being present at surface and shallow depth hazards that are likely to affect a new development. You do not need a coal mining risk assessment if your site is in a low risk area. To find out if your site is in a high risk area you can use the coalfield plans for your local council area that show high and low risk areas (shown by dark and light hatching) and identify specific hazards. The coal authority's interactive map viewer provides a high risk area option. The maps and interactive map viewer data are updated annually from the coal authority mining records. http://mapapps2.bgs.ac.uk/coalauthority/home.html Further Information including those developments exempt from the Coal Authority requiring the submission of a CMRA https://www.gov.uk/guidance/planning-applications-coal-mining-risk-assessments ~~The Coal Authority website:~~ www.coal.gov.uk/services/planning ~~The Coal Authority Planning and Local Authority Liaison~~ Department: Telephone 01623 637 119 (direct) or email planningconsultation@coal.gov.uk
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			The Local Planning Authority has been provided with Coal Mining Development High and Low Risk Area GIS data ~~Referral Areas~~ by The Coal Authority.
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I hope this is helpful but please do not hesitate to contact me should you wish to discuss this further.

Development Team Leader (Planning)

Appendix 2: Individual responses

- *"I agree with the need for this. My only comment would be to emphasis the possible length of time it might take for the application to be completed".*
- *"All I require is the naming and numbering of streets, from Building Control. I'm not interested in the Planning side of things, as we have highway planning officers for that job".*
- *"Following my receipt of the above draft document and my detailed review of its vast contents, I wish to comment as follows.*
 - 1. The majority of my work is domestic and can be considered for planning using the House-Holder Application form.*
 - 2. The approach I take is to always provide a 1:1250 or 1:500 Site Location type plan edged in red and blue if necessary for land that the applicant owns but not part of the application.*
 - 3. From this I then produce both existing and proposed Block Plans to show a detailed plan of the property inc dimensions to buildings/boundaries/exiting buildings both original and extended areas aswell as the proposed Block plan detailing the proposed extension.*
 - 4. Next is to draw up the existing elevations of the property and the existing ground and/or 1st floor plans.*
 - 5. Followed by proposed elevations, Floor Plans..ETC*
 - 6. The completion of the application form is usually straight forward once the ownership status of the applicant has been established and encroachment over a boundary from any part of the proposed structure may require Notice Number 1 to be served.. As required by Certificate B.*
 - 7. The fees are set @ £206.00 for House-Holder Apps,*
 - 8. As discussed @ length I will continue NOT to be a user of the Planning Portal and will continue to deposit applications by post inc a cheque payment.*

All the plans are numbered from 1 upwards starting from the existing and up to the proposed in numeric order.

A date is added on drawing 1 adjacent to the site address.

I feel that the requirement in Local Requirements, section 2 " Tree-Survey" is somewhat onerous...my personal knowledge of trees is limited, I do know there a lot of them around and to request a tree survey on all applications for house extensions is a little unfair, usually the planning department would contact the councils tree officer and he would advise of any requirements, extra info' deemed required.

Wigan require scale bars to be added to each drawing.

Some other authorities also request 1:200 or 1:500 site plans to show the site in more detail in relation to the adjacent and/or adjoining properties and this can add to the mapping costs in addition to maybe having to purchase a 1:1250 Location Plan...

Bury Council ask for a volume calculation for extensions to properties in a green belt area and if the volume exceeds one third a green belt statement is required in order to justify the proposal.. ETC.

In summary I don't see too much on this draft proposal that will adversely impact on myself, However should I fall foul and fail in some instances then as soon as your planning department advise me accordingly of the error , as a so-called responsible agent I will do all in my power to facilitate and duly provide the information requested at my earliest opportunity in order to assist and get the application fully processed and validated accordingly.

I do hope my feed-back to this draft report is of some use and can be considered before its adoption into the system, occurs”.

- *“I would like to request that planning applications sites that have any outdoor space attached, be it gardens or any other outdoors setting, should be accompanied by a detailed hard and soft landscape scheme, produced to scale with details of proposed materials, inc a detailed planting schedule, with plant names, sizes, planting densities and numbers.”*
- *“Thank you for giving me the opportunity to comment on the draft Planning Validation checklist. Having viewed the Local Requirements: paragraph 6 p16 ‘Public Rights of Way’. The content for PRow is fine and I have nothing further to add.*

Just a general comment. There does appear to be a typo, the content sheet reads 2. National Requirements this however being labelled 1. National Requirements p.5. The same being for 3. Local Requirements shown on the contents page but being labelled 2. Local Requirements p.10. Haven't checked anything else!”

- *“Will this be connected to supporting documents etc. as the refuse section is very minimal and inadequate. There is no mention of adequate storage/provisions/bin sizes/safe collection access/egress etc.”*
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1. Introduction

This is a response to the consultation on Bolton Council's draft planning validation checklist, focussing on changes needed to support efforts to enable people to shift from car travel to active travel for the significant proportion of journeys where it is practical.

It is of concern that the updated checklist has been created in the context of local planning policies that are very much out of date regarding active travel relative to national and regional policies, which have undergone significant change in the last three years. It would be wise to address this issue prior to releasing a checklist dated 2022. The danger if this is not done is that planning submissions may be brought forward that are not compliant with those national and regional policies, resulting in objections.

2. National Planning Policy Framework

(Note, in this section all boldface emphasis within quotations has been added to draw attention to relevant text.)

This response draws on the National Planning Policy Framework¹ (NPPF), which “sets out the Government's planning policies for England and how these should be applied”. In particular, it is stated in the Framework that:

*“Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. **The National Planning Policy Framework** must be taken into account in preparing the development plan, and **is a material consideration in planning decisions.**”*

Therefore, it is essential that the provisions of the Framework are included in the development plan, and consequently covered in this checklist.

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- 1 National Planning Policy Framework. <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Section 2 of the Framework states:

*“So that sustainable development is pursued in a positive way, at the heart of the Framework is **a presumption in favour of sustainable development**”.*

This presumption should be reflected at all times in the planning checklist.

In relation to active travel (primarily walking and cycling), the following passages in the framework are of note.

Section 8 of the Framework covers “*Prompting healthy and safe communities*”, and includes a number of provisions regarding active travel in Paragraph 92 , which states that:

*“Planning policies and decisions should aim to achieve **healthy, inclusive and safe places** which:*

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, **street layouts that allow for easy pedestrian and cycle connections** within and between neighbourhoods, and active street frontages;*
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of **attractive, well-designed, clear and legible pedestrian and cycle routes**, and high quality public space, which **encourage the active and continual use of public areas**; and*
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and **layouts that encourage walking and cycling.**”*

Section 9 of the Framework covers: “*Promoting sustainable transport*” and contains a number of provisions relevant to active travel throughout.

Paragraph 104 c) calls for planning and development proposals to ensure that:

*“opportunities to **promote walking, cycling and public transport use** are identified and pursued;”*

Paragraph 105 calls for significant developments to be: “*made sustainable, through limiting the need to travel and offering **a genuine choice of transport modes***”

Paragraph 106 states that: “*Planning policies should:*

- a) support an appropriate mix of uses across an area, and within larger scale sites, to **minimise the number and length of journeys needed** for employment, shopping, leisure, education and other activities;*

d) provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);”

Paragraph 108, on parking provision, calls for “... measures to promote **accessibility for pedestrians and cyclists.**”

The section headed “Considering development proposals” (which is not numbered in the document) is especially relevant to this checklist.

Paragraph 110 states that: “*In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users;”*

This section also requires that:

“c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance”.

In the case of cycling provision, the current national guidance is contained in Local Transport Note 1/20 “Cycle Infrastructure Design”² (LTN1/20).

Paragraph 112 states that: “... applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) create places that are safe, secure and attractive – which **minimise the scope for conflicts between pedestrians, cyclists and vehicles**, avoid unnecessary street clutter, and respond to local character and design standards;”*

Paragraph 113 requires that:

“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.”

² Local Transport Note 1/20 Cycle Infrastructure Design. <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>

It is essential that references to active travel are included in these Travel Plans in a meaningful way. There have been instances in the past in which travel plans have referred to the Bee Network aspirations, using them to justify active travel aspects of the plan as if they were existing provision.

Section 12 of the Framework covers: “Achieving well-designed places”.

Paragraph 134 in this section is of particular note, stating that:

*“Development that is not well designed should be refused, especially **where it fails to reflect local design policies and government guidance on design**, taking into account any local design guidance and supplementary planning documents such as design guides and codes.”*

Again, the government guidance on cycle provision is LTN1/20 and the local guidance on active travel is the Greater Manchester Interim Active Travel Design Guide³.

3. The Bolton draft planning checklist

The following are suggestions for improvements to the Checklist to address better the provision of facilities for active travel.

Section 5. Transport Assessments, Transport Statements and Travel Plans

In the description of a “Transport assessment”, change “*particularly for alternatives to the car such as walking, cycling and public transport*” to “*giving priority first to pedestrian and cycle movements, then public transport, as alternatives to the car*”. This to bring the guidance into closer alignment with Paragraph 112 of NPPF.

Section 6. Public Rights of Way

Rather than referring to the outdated guidance in Core Strategy Policy p5, or in addition to that, paragraph should be added: “*NPPF 2021 paragraph 112. Developments must give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas.*”

SPD: Accessibility, Transport and Road Safety

In conjunction with these changes to the Checklist, it is essential that the Supplementary Planning Document on Accessibility, Transport and Road Safety⁴, currently dated October 2003, is revised to bring it into line with the updated NPPF, the LTN1/20 Cycle Infrastructure Design guidance (July 2000) and the Greater Manchester Interim Active Travel Design Guide (2021).

³ Greater Manchester Interim Active Travel Design Guide.
<https://democracy.greatermanchester-ca.gov.uk/documents/s13857/GMCA%2020210326%20Active%20Travel%20Update%20-%20Appendix%20C.pdf>

⁴ Supplementary Planning Document on Accessibility, Transport and Road Safety
<https://www.bolton.gov.uk/downloads/file/858/accessibility-transport-and-road-safety>