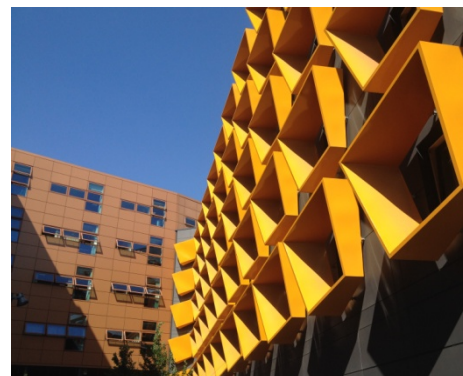


Regulation 18 – Stage 1

Summary of Responses



1 Introduction

- 1.1 This report summarises the comments received during the recent Regulation 18, Stage 1 consultation on Bury Council's intention to produce a Local Plan (6th March 2017 – 17th April 2017). In addition to notifying stakeholders of the emerging Local Plan, the consultation also sought views on what issues the Local Plan ought to contain.
- 1.2 In total, 99 comments were received raising a number of points. Many of these related to the draft Greater Manchester Spatial Framework (GMSF), despite consultation on that document ending in January 2017. Comments which were submitted to the Greater Manchester Combined Authority during the GMSF consultation will be considered as part of that plan's progress. There will be further opportunities to make comments on the GMSF in the next stages of its consultation.
- 1.3 It should be noted that whilst the GMSF and the Bury Local Plan are very much connected and both will form part of Bury's Development Plan, the Local Plan process is separate from the GMSF process.
- 1.4 In addition, some comments received related to matters that are outside the scope of the Local Plan.
- 1.5 Nevertheless, the table in Chapter 2 provides a summary of all the comments received. Matters relating to the GMSF are referenced as 'GMSF' in the table and those outside the scope are marked as 'other'. All comments have been considered as part of the Key Issues and Policy Framework document and Topic Papers.
- 1.6 As its name suggests, the Key Issues and Policy Framework document sets out the key issues which the Council considers the Local Plan will need to address through new and updated planning policies. These issues have largely stemmed from the requirements placed on local authorities through national planning guidance, as well as the need to address more localised issues. However, many of the issues reflect those comments flagged up during the Regulation 18 – Stage 1 consultation.

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- 1.7 Please note, the Key Issues and Policy Framework document only identifies the key issues and does not provide any detail on how these issues will be addressed in the Local Plan. That level of detail will emerge in the draft Local Plan itself and comments received during the Stage 1 consultation which suggested specific policy wording will be considered as part of the development of this.
- 1.8 Instead, the purpose of the Key Issues and Policy Framework is to help ensure that the issues identified are the right issues and that they cover all relevant policy areas. It is an opportunity for stakeholders to agree with the issues and/or to suggest additional issues.
- 1.9 The Key Issues and Policy Framework and supporting evidence can be viewed on the Council's web site at www.bury.gov.uk/localplan. This includes a series of Topic Papers which provide more detail relating to the specific issues that are contained in the Key Issues and Policy Framework. These Topic Papers cover the following matters and, where relevant, these papers will include issues that were raised during the Regulation 18 – Stage 1 consultation:
- 1 – Housing
 - 2 – Economy and Employment
 - 3 – Town Centres and Main Town Centre Uses
 - 4 – Health and Wellbeing
 - 5 – Energy and Physical Infrastructure
 - 6 – Flood Risk
 - 7 – Natural Environment
 - 8 – Open Land
 - 9 – Built Environment
 - 10 – Transport
 - 11 – Community Facilities

2 Responses

2.1 In summary, the main themes of the comments made during the Regulation 18 Stage 1 consultation were:

- The need for revised local housing and employment land requirement figures;
- The need to adopt a 'brownfield land first' approach and protect all Green Belt sites;
- The need to identify additional, deliverable sites to maintain a five year supply;
- The need to ensure that accessible recreation areas and greenspaces are included within new developments;
- The need to increase the provision of social infrastructure (schools, doctors, hospitals, dentists, community centres) to service the requirements of the existing residents and in advance of any new development;
- The need to consider the risk of flooding to new properties and existing properties who maybe subject to flood risk as a result of new development;
- The need to afford greater protection and enhancement to the natural environment;
- The need to improve air quality;
- The need to protect all land designated as Open Land in the UDP and the need to protect all greenfield sites;
- The need to protect the Borough's heritage assets;
- The need to improve the physical infrastructure throughout the Borough, in advance of any new development taking place;
- The need to maximise the use of sustainable and active modes of transport, reducing the need to travel;
- The Local Plan should specify all infrastructure requirements must be in place before any development takes place and establish the approach to the delivery of the required infrastructure;

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- A number of sites were suggested for future re-development. In addition, a number of sites were suggested for future protection from new development.

The following table sets out the comments raised in more detail.

General Comments

GMSF
<p>Opposition to the draft GMSF;</p> <p>The GMSF should set out exactly how it will interact with the local plans for individual boroughs;</p> <p>The GMSF has overlooked the role of small/medium sized greenbelt sites;</p> <p>The GMSF should not impose excess development and green belt building on Bury in comparison to other areas;</p> <p>If the GMSF fails, what happens to the Local Plan, will it simply subsume relevant GMSF policies? Will it be subject to a wholesale review? Or will it be drafted in such a way that it can continue to operate effectively without the GMSF?</p>
Local Plan
<p>The Local Plan should fully explain the methodology used to calculate the demographic and economic forecast;</p> <p>The Local Plan should cover a more realistic period – 5/10 years;</p> <p>The Local Plan should cover a period of 20 years;</p> <p>The Local Plan should try and embrace the opportunity that the GMSF provides rather than dwell on some of the perceived impacts of development;</p> <p>The Local Plan policies should mirror those within the GMSF, without seeking to duplicate it;</p> <p>The Local Plan should require developers to build out existing permissions and stop land banking;</p> <p>The Local Plan should use powers to require land owners to develop or demolish disused buildings;</p> <p>The Local Plan should include a contingency policy to review the plan and greenbelt policy;</p> <p>The Local Plan should include a call for brownfield sites;</p>

<p>The Local Plan should include a review of S106 funds;</p> <p>The Local Plan should pursue additional growth opportunities which are not catered for in the emerging GMSF;</p> <p>A cross party committee of councillors should supervise the development of the Local Plan;</p> <p>The Local Plan should be based on adequate, up-to-date and relevant evidence; Options for production of the Local Plan if the GMSF were to experience any significant delays should be identified;</p> <p>Each strategic allocation in the Local Plan should have a specific policy which sets out in detail the nature of the land uses proposed, their broad location within the site and the requirements for infrastructure and any phasing or triggers that are necessary to ensure the development can be progressed;</p> <p>The Local Plan should include a viability assessment of the cumulative impact of standards and policies identified.</p> <p>Will the Local Plan provide more detail on exactly how the strategic allocations in the GMSF are expected to come forward?</p>
<p>Other</p>
<p>Acceptance of the CPRE figures for future housing and development needs, however government guidelines state you can deviate from them if justifiable;</p> <p>Local Residents should be consulted on the Local Plan by letters to their houses;</p> <p>Money should not be wasted on the preparation of the Local Plan when it could be better spent on mending potholes and improving business prospects.</p>
<p>Sustainable Development</p>
<p>Local Plan</p>
<p>The Local Plan should disassociate itself from the predicted population figures in the GMSF and rather the Council should commission an independent report to assess housing need in the Borough over the next 20 years;</p> <p>The Local Plan should set out an appropriate and justifiable methodology for the spatial distribution and site selection process, including the exceptional circumstances that exist for greenbelt release;</p>

<p>The Local Plan should seek to regenerate aging areas including Radcliffe;</p> <p>The Local Plan should include sustainable urban planning;</p> <p>The Local Plan should ensure that materials and labour should be sourced locally with the aim for all development to either be carbon neutral or negative;</p> <p>The Local Plan should provide a 'policy hook' for the policies and allocations within the Waste and Minerals Plans. This should include support of the requirements of the two plans;</p> <p>The Local Plan should take account of the allocations in the Minerals and Waste Plans.</p>
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Housing

GMSF

<p>The housing requirements in the draft GMSF are flawed and should be reconsidered;</p> <p>Development densities in the draft GMSF are skewed towards low density/high value developments, terraces/medium rise apartments would reduce required footprint.</p>
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Local Plan

<p>Local housing numbers should be investigated;</p> <p>The housing requirement identified in the Local Plan need to be increased substantially to reflect the evidence base and the ambitions of the Council;</p> <p>The Local Plan should use the residential requirements identified in the Core Strategy, with a reduction to reflect Brexit;</p> <p>The Local Plan should ensure the objectively assessed need (OAN) is met, having regard to any standardised methodology that may emerge;</p> <p>The Local Plan should allocate additional sites, to those in the GMSF, to ensure that the Council can maintain a 5 year land supply during the plan period;</p> <p>The housing supply in the Local Plan should diversified through the allocation of alternative deliverable sites;</p> <p>Will the Local Plan identify small, non-strategic sites to meet housing requirements;</p>
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A significant amount of safeguarded land should be identified in the Local Plan to meet development needs post 2035;

The Local Plan housing policies should: seek to meet 100% of the identified OAN with a 20% buffer; ensure site selection is founded on strong evidence; allocate a range of site sizes offering a variety of densities; deliver housing across all sectors;

The Local Plan should identify how many people are homeless or waiting for an affordable property to purchase, how many council homes remain empty, how many privately owned homes remain unsold for over a year, how many homes have planning permission but are not build;

The Local Plan should consider the level of social housing required;

The Local Plan should ensure affordable housing is built close to where jobs are being created;

Affordable housing needs to be truly affordable and not a percentage off new houses. The Local Plan should work with charities and non profit making companies to develop affordable housing;

The Local Plan should prioritise the building of affordable starter and small family homes;

The Local Plan should provide housing to meet the need of an aging population and ensure it is built near to local services. In addition it should encourage the ageing population to move out of family sized housing;

The Local Plan should concentrate on higher density brownfield development, closer to public transport links and provide suitable affordable housing for those on low incomes;

The Local Plan should ensure brownfield sites are developed first and all developments are built to a high environmental quality;

The Local Plan should include a policy to bring empty homes, underused or public sector land back into use;

The Local Plan should include a policy requiring new development to take place wholly on brownfield sites before any greenspace is used;

The Local Plan should include a policy which sets minimum densities and maximum size of developments;

The Local Plan should review all new single storey commercial properties and town centre spaces with a view to adding to the housing stock;

The Local Plan should include a carefully planned building plan which includes a feasibility study covering all sites which are likely to become

<p>brownfield in the next 20 years;</p> <p>The Local Plan should implement the Licensed Landlord scheme.</p>
<p>Other</p>
<p>The needs of home owners should be met before the needs to developers;</p>
<p>Economy and Employment</p>
<p>GMSF</p>
<p>The employment requirements in the GMSF need to be re-considered;</p>
<p>Local Plan</p>
<p>The Local Plan should use the employment requirements identified in the Core Strategy, with a reduction to reflect Brexit;</p> <p>The Local Plan should remove existing employment allocations, quantify the amount of employment land that is anticipated to be lost and provide specific policies setting out the circumstances in which change of use applications would be acceptable;</p> <p>The Local Plan should ensure the provision of jobs;</p> <p>The Local Plan should promote, develop and encourage opportunities for high value jobs and not rely on the creation of low value warehousing and distribution jobs;</p> <p>The Local Plan should take into account developments in ICT infrastructure which will create more opportunities for employees to work from home and reducing the need to travel to work.</p>
<p>Retail and Town Centres</p>
<p>Local Plan</p>
<p>The Local Plan should ensure that town centre properties are used for new retail development;</p> <p>The Local Plan should include a policy which supports arts and culture at all levels to support the local economy and ensure that all residents and visitors, and future generations, have access to cultural opportunities. Policies should protect, support and enhance cultural facilities and activities, particularly those which might otherwise be traded in for more commercially lucrative developments, and promote cultural led development as a catalyst for regeneration in town centres. A draft policy</p>

has been submitted.
Other
Too many out of town retail parks could make the town centre a ghost town.
Community Facilities
Local Plan
The Local Plan should increase the provision of social infrastructure (schools, doctors, hospitals, dentists, community centres) to service the requirements of the existing residents and in advance of any new development;
Health and Wellbeing
Local Plan
<p>The Local Plan should ensure more accessible recreation areas and greenspaces are included within any future re-developments;</p> <p>The Local Plan should be based on a robust and up-to-date assessment of the needs for sport and recreational facilities as well as opportunities for new provision;</p> <p>The Local Plan should incorporate Sport England's Planning Objectives;</p> <p>The Local Plan should consider public health issues when formulating new policies;</p> <p>The Local Plan should contain a Public Health Plan.</p>
Climate Change and Flood Risk
Local Plan
<p>The Local Plan should consider the effect of persistent or heavy rain;</p> <p>The Local Plan should identify what the overall strategy will be for reducing flood risk in high risk areas;</p> <p>The Local Plan should consider the risk of flooding to new properties and existing properties who maybe subject to flood risk as a result of new development;</p> <p>The Local Plan will need to consider how the approach of allocating sites</p>

<p>sequentially can be applied to brownfield sites/windfall sites;</p> <p>The Local Plan should include programmes of extensive tree planting and changes in land management in upland and lowland areas to improve drainage and reduce the amount of surface water run-off;</p> <p>The Local Plan should consider whether water can drain away from proposed sites;</p> <p>The Local Plan should ensure new developments include a well designed Sustainable Drainage System and ensure its suitable maintenance;</p> <p>The Local Plan should include a Climate Change Plan;</p> <p>The Local Plan should include a Flood Risk Plan;</p> <p>The Local Plan should ensure that all development including infrastructure and transport include solutions to reduce the effect of greenhouse gasses which contribute to climate change. They should incorporate low carbon energy for heating and utilise renewable energy sources;</p> <p>The Local Plan should require new developments to meet the highest energy efficiency ratings we can feasibly demand (Passivhaus or zero carbon);</p> <p>The Local Plan should deliver heat networks utilising local waste heat where feasible and provide renewable generation in domestic and commercial developments;</p> <p>The Local Plan should include a policy relating to the protection and restoration of the line of the Manchester Bury and Bolton Canal;</p> <p>The Local Plan should consider the inclusion of policies to promote pedestrian and cycling routes along waterways and creating a frontage to watersides.</p>

Natural Environment

Local Plan

<p>The Local Plan should afford greater protection and enhancement to the natural environment;</p> <p>The Local Plan should include the protection, conservation and enhancement of Bury's natural assets as a key issue;</p> <p>The Local Plan should include policies for the protection and enhancement of designated sites;</p> <p>Air quality in Bury is poor and needs to be improved through the Local</p>

Plan;

The Local Plan should carry out air quality surveys of existing and potential development sites and increase the number of air quality monitoring stations;

The Local Plan should set clean air targets;

The Local Plan should retain and improve the existing tree areas and hedgerows to support the air quality of the locality;

The Local Plan should ensure no long term detrimental impact or harm to the environment in terms of air quality and noise;

The Local Plan should seek to ensure natural flood management techniques are implemented;

The Local Plan should be mindful of the Water Framework Directive and ensure no deterioration of water quality;

The Local Plan should maintain the land areas as working farmland and support the local farming industry;

The Local Plan should retain existing hedgerows to support their wildlife corridor;

The Local Plan should protect sites of geological importance and presence of valuable minerals;

The Local Plan should ensure that all the site allocations are screened for ecological issues;

A Supplementary Planning Document should be produced which outlines how to determine the ecological impacts of a development and on-site mitigation or off-site compensation;

The Local Plan should allocate strategic biodiversity opportunity areas where off-site compensation should be directed;

The Local Plan should set meaningful targets to determine whether the Council is compliant with S109 of the NPPF;

The Local Plan should ensure that priority habitats are protected;

The Local Plan should identify a second tier of sites for wildlife;

The Local Plan should extend the areas considered as wildlife corridors;

The Local Plan should embrace the multi-benefits that the Irwell Valley and West Pennine Moors offer;

<p>The Local Plan should seek to reduce pollution levels in Bury;</p> <p>The Local Plan should aim to reduce the area of contaminated land.</p>
Open Land
Local Plan
<p>The Local Plan should define 'Open Land';</p> <p>The Local Plan should protect all the land designated as Open Land in the UDP;</p> <p>The Local Plan should ensure that no new development takes place on designated Greenfield sites;</p> <p>The Local Plan should not contain any commitment to remove greenbelt status unless extenuating circumstances can be demonstrated to remove greenbelt status;</p> <p>The Local Plan should retain the greenbelt identified in the UDP;</p> <p>The Local Plan should be based on a robust Green Belt Review to justify all greenbelt releases;</p> <p>The Local Plan should ensure that high quality and multifunctional green infrastructure are seen as an integral element of all riparian new development;</p> <p>The Local Plan should protect and enhance public rights of way;</p> <p>The Local Plan should protect existing bridleways and byways from new developments;</p> <p>The Local Plan includes a policy which requires consideration of whether a route can be provided which allows horse riders to by-pass a busy main road;</p> <p>The Local Plan should not use compulsory purchase orders against any active farmers.</p>
Built Environment and Heritage
Local Plan
<p>The Local Plan should include a proper description, identification and assessment of the historic environment and the supporting evidence base should include heritage information;</p>

The Local Plan should evaluate the impact which allocated sites may have upon those elements that contribute to the significance of a heritage asset including their setting, through undertaking a heritage impact assessment;

The Local Plan should consider new conservation areas;

The Local Plan should ensure developments are sustainable and reflect local character;

The Local Plan should encourage derelict period buildings to be renovated and converted into living spaces to celebrate local history and provide further housing;

The Local Plan should ensure that any land under the ownership of Bury MBC should be put out to tender, encouraging innovative development from local architects;

The Local Plan should incorporate the principles of Active Design;

The Local Plan should apply stricter controls to provide reasonable living space.

Transport and Accessibility

Local Plan

The Local Plan should include good transport links to employment;

The Local Plan should significantly improve the physical infrastructure throughout the Borough, in advance of any new development taking place;

The Local Plan should include a policy to require developers to contribute to highway maintenance and a sustainable transport system;

The Local Plan should ensure that new development does not impact adversely on existing infrastructure;

The Local Plan should explain how infrastructure will be provided and issues such as increased traffic will be addressed

The Local Plan should include an amenity and services plan which would significantly reduce the need to travel;

The Local Plan should give preference to energy efficient means of transport such as railways for haulage and railways, light trams and buses should be given preference over road transport for passenger traffic;

The Local Plan should give consideration to the improvements that can

realistically be made to sustainable modes of travel (bus, tram and train), including infrastructure, routing and capacity, and the feasibility and timescales for such improvements when considering the phasing of allocated sites;

The Local Plan should ensure that new houses have a minimum of two off road car parking spaces;

The Local Plan should integrate active travel into the design of new developments or contribute to infrastructure/community measures via section 106 agreements;

The Local Plan should maximise the use of sustainable and active modes of transport, reducing the need to travel long distances for everyday purposes;

The Local Plan should provide infrastructure for ultra low emissions vehicles and low emissions vehicles (ULEV/LEVs) for example providing electric vehicle and electric bike charge points;

The Local Plan should ensure streets are safe for children's play, pedestrians and cyclists and deliver wider walking and cycling infrastructure such as dedicated off road routes connected to new development;

The Local Plan should provide car parking space in Bury Town Centre to encourage people to use public transport;

The Local Plan should give consideration to the Strategic Road Network;

If new roads are to be developed in Bury in conjunction with the GMSF, consideration should be given to separating one lane for walkers, cyclists and horse-riders.

Infrastructure

Local Plan

The Local Plan should specify all infrastructure requirements must be in place before any development takes place;

The Local Plan should establish the approach to the delivery of the required infrastructure, in respect of funding and phasing;

The Local Plan should ensure new developments provide high quality reliable broadband to facilitate working from home and smart household control systems.

Development Management Policies

It is expected that the Local Plan will include development management policies on the following subjects:

- Protection of controlled waters and flood risk management;
- Landscape and visual impact;
- Biological and geological conservation including European sites;
- Best and most versatile agricultural land;
- Historic Environment and built heritage;
- Traffic and access;
- Amenity e.g. noise, dust, vibration, odours and air emissions;
- Air quality;
- Land instability;
- Potential land use conflict;
- Design, phasing and operational details;
- Vermin and birds;
- Litter;
- Design;
- Aviation Safety;
- Impact on infrastructure;

The Local Plan development management policies should be drafted in a positive manner and not seek to provide blanket restrictions or be overly prescriptive.

Site Specific Comments

Sites suggested for new development or protection from development during the Regulation 18 – Stage 1 consultation will be considered alongside the submissions expected through the Key Issues and Policy Framework Call for Sites Consultation (7th August – 2nd October 2017).

Sites suggested for new development

Residential development at land North and East of Cornfield Close/East of Limefield Brow
Residential development at Walmersley; Land off Milbourne Road
Residential development at Walmersley; Land east of Spruce Crescent
Residential development at Land off Bentley Hall Road, Walshaw
Residential development at Land off Bolton Road, Holcombe Brook
Residential development at Land off Bradley Fold Road, Ainsworth
Residential development at Brandlesholme Farm, Bury
Residential development at Site at Redisher Lane
Residential development at Touch Road Farm, Walmersley
Residential development at Land at Heap Bridge
Residential development at Land at Stormer Hill, Tottington
Employment development at Free Town industrial estate and Bury Bridge
Residential and leisure development through restoration and re-opening the Manchester, Bury and Bolton Canal
Hotel and restaurant at Land adjacent to Pilsworth Lake
Leisure development the Manchester Bolton and Bury Canal
Museum of printing press and papermaking at the old Radcliffe Times building

A link road needs to be built from Brandlesholme Road to Walmsley Road.

Solar Farm at Baldingstone;

Extension of Burrs Park throughout all of the current farmland surrounding it;
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Creation of a bridleway from Walmsley Road opposite Rowlands Road, through the Gin Hall site, to Baldingstone on Walmsley Old Road
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Plant and create woodland across the Gin Hall site;

Sites/Areas suggested for protection

Retain both Higher Spen Moor and Pilkington Fold within the greenbelt;
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Greenbelt boundaries should not be altered in the Ramsbottom Ward.
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Protect the draft GMSF allocations at Baldingstone and Holcombe Brook from new development
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Protect the draft GMSF allocation at Walshaw from residential development

Object to the proposal to develop the Greenbelt land around Simister and Bowlee, 'Northern Gateway'

Starling Road site should be considered as a separate entity in terms of deliverability from the wider draft Elton Reservoir allocation;
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Object to building on land between Brandlesholme, Holcombe Brook and Greenmount;
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Secure environmental areas south of Bury/Bolton Road and Starling Road/Pilkington Fold;

Protect the areas adjacent to Elton Vale Sports Club
Maintain a river corridor between Elton Reservoir and Whitehead Lodges, travelling through Spen Moor and Pilkington Fold
Maintain and improve the essential ecological features of Spen Moor and Pilkington Fold
Ensure the preservation of trees/woodland areas at Starling Woods and on the west of Pilkington Fold;
Protect the bat roosting habitat areas in Starling Woods and Pilkington Fold;
Maintain and improve all the public footpaths and right of way along the nature corridor in and around Elton and Within reservoir