

**Minutes of: OVERVIEW AND SCRUTINY COMMITTEE**

**Date of Meeting:** 20 July 2021

**Present:** Councillor R Bernstein (in the Chair)  
Councillors C Birchmore, N Boroda, LJ Dean, G McGill, M Powell, L Smith, , D Vernon, C Walsh

**Also in Attendance:** Councillor O'Brien – Leader of the Council and Cabinet Member for Finance and Growth  
Councillor Quinn – Cabinet Member, Environment, Climate Change and Operations  
Jacqui Dennis – Council Solicitor and Monitoring Officer  
Donna Ball – Executive Director, Operations  
Crispian Logue – Assistant Director, Strategy Planning and Regulation  
Simon Warburton – TfGM Representative  
Chad McDowell – Climate Change Officer  
Julie Gallagher – Democratic Services Officer

**Public Attendance:** There were three members of the public present at the meeting.

**Apologies for Absence:**  
Councillor Peel and Farooq

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**OSC.01 DECLARATIONS OF INTEREST**

Councillor C Birchmore declared a personal interest in item OSC.6, Submission of the places for everyone plan as a member of the group Bury Folk Keep it Green.

**OSC.02 MINUTES**

Responding to a query from Councillor Bernstein, the Monitoring Officer reported that she had ruled out a request for a Call-in in relation to Cabinet Minute CA.100 Future of the Civics Venues reporting that call in should not be used as a mechanism for voicing objections or dislike for a particular decision and should only be used in exceptional circumstances.

**It was agreed:**

That the minutes of the last meeting, held on 25 March 2021, be approved as a correct record.

**OSC.03 PUBLIC QUESTION TIME**

The following questions from members of the public were received in advance of the meeting:

**Question one:** Taken the Places For Everyone plan is before the council, over the next 3 years exactly how many social and affordable to rent homes will the council be building on brownfield land/sites owned by the council, either as the master developer or under a joint venture with an external social and affordable to rent housing developer? **Mr P Smith-Lawrence**

**Supplementary question:** As the leader of the council has previously stated that the council would enter into joint ventures for the development of social and affordable to rent homes in the borough, exactly how many joint ventures regarding social and affordable to rent homes are the council exploring as of today, and will these new social and affordable to rent homes be constructed to the Passivhaus Standard?

In response Councillor O'Brien, Leader of the Council reported there are a number of Council owned brownfield sites coming forward for development, including land at School Street in Radcliffe, the Wheatfield site in Whitefield and William Kemp Heaton and Fletcher Fold Road in Bury, all of which will be expected to provide at least 25% affordable housing, and some of these are likely to be developed for 100% affordable housing, including affordable rent and shared ownership.

We are also exploring opportunities to provide specialist accommodation in conjunction with Adult Social Care. These proposals will be subject to sign off by Cabinet in due course.

We are working in partnership with Homes England to bring forward the East Lancashire Paper Mill Site in Radcliffe, which will include the provision of affordable housing.

Through our Joint Commissioning Partnership, we are working with Registered Providers of affordable housing to facilitate joint working and increase the delivery of affordable homes.

We have had strong interest from Registered Providers in delivering affordable housing in Bury, including on some of the sites that the Council is disposing of, and this will help to increase delivery of a range of tenures of affordable homes. Affordable housing for rent is just one form of affordable housing, and there is a clear ambition from Government, both through planning policy and Affordable Homes Programme funding to increase opportunities for affordable home ownership, including shared ownership and discount sale.

The Housing Strategy proposes the development of a Bury Eco Standard which will reflect a fully retrofitted home with a renewable energy source. In order to meet the targets for all new homes to be carbon neutral by 2028 and all existing homes by 2038, a significant step change is needed. This will require high standards to be achieved and Passivhaus is seen as the level we need to be aiming for. In developing the Bury Eco standard all options including Passivhaus will be considered and we will certainly include the principles of quality installation which Passivhaus embodies.

**Question Two:** The Council's Climate Strategy and Plan contain several statements and actions which are in conflict with elements of Places for Everyone (PfE). How will the Overview and Scrutiny Committee ensure Bury Council brings PfE in line with its zero carbon aims and similar aims across Greater Manchester?  
**Ms S Solazzi**

**Supplementary question** Would it be appropriate to form an Environment Scrutiny Committee to be the vehicle for ensuring that this climate change is given the necessary priority?

Councillor Bernstein in his role as Chair of the Committee reported that the Council recently undertook a review of the scrutiny function, following this review Full Council agreed to establish a Children and Young Peoples Scrutiny Committee. Councillor Bernstein reported that there is sufficient capacity to ensure effective scrutiny of environmental matters under the current arrangements without the necessity to establish an additional scrutiny committee.

The Leader reported that climate change is a key theme running throughout the PFE and it is only through a combination of actions that it can be properly addressed. The PFE, in particular sets out:

- Methods to de-carbonise the city region through new and existing development, effective land management and through the provision of infrastructure and new technologies;
- The aim of delivering a carbon neutral Greater Manchester no later than 2038, with a dramatic reduction in greenhouse gas emissions, including measures to ensure that all new homes and commercial/industrial buildings achieve net zero carbon by 2028;
- The delivery of renewable and low carbon energy schemes through heat and energy networks;
- Measures that will be taken in Greater Manchester to future proof the city region by mitigating and making it more resilient to environmental challenges, including climate change;
- Water based measures, such as reducing flood risk, to adapt and reduce the impacts of climate change; and
- Measures to support improvements in air quality.

The PFE, if adopted, will form part of the Council's statutory development plan and will allow the Council to require certain standards within new development to ensure that the climate change targets are achieved. This will include ensuring that new housing is carbon neutral and encouraging active travel – road layouts to prioritise walking and cycling, improved cycling infrastructure, integrated EV charge point infrastructure etc

Without a statutory plan in place, it will be very difficult to refuse planning applications which don't meet these requirements.

**Question three** - Clean Air – What funding will be available to support the taxi trade? **Mr S Raja**

The Leader wanted to place on record his thanks for the crucial and important key work that taxi drivers undertake and he is proud of the support the Council has provided to them during the pandemic. Additional monies have been made available to support the Clean Air plan and this will help to support and encourage taxi drivers to retrofit and replace.

Cllr Quinn added that Greater Manchester Combined Authority are under a ministerial directive to deliver the Clean Air Plan and additional monies have been agreed from central government for a;

- Clean bus fund
- Clean freight fund
- Taxi Fund
- Ten million pounds has been made available which will enable more electric charging points and a try before you buy electric fund, as well as an extension period for taxi driver compliance.

- The TfGM Representative reported that there is support available to upgrade vehicles to complaint diesel and petrol vehicles.
- Funding available will include:
- Replacement funding for Hackney Carriages up £10k
- Hackney Carriages Retrofit up to £5k
- Private Hire replacement funding up to 6k
- Private Hire replacement funding up to 5k

#### **OSC.04 MEMBER QUESTION TIME**

The following questions from members of the public were received in advance of the meeting:

**Question ONE:** The Crostons Road junction, at which traffic from Brandlesholme Road, Tottington Road and Walshaw Road, the three main arteries for traffic going into and out of Bury, converge, already experiences significant delays during rush hour. Has the Council carried out a full assessment of potential impact on traffic levels at the junction with over a thousand houses to be placed in Walshaw under the revised Places for Everyone plan?" Cllr J Rydeheard

In response the Leader reported; All the PfE allocations are supported by a Transport Locality Assessment. These assessments examine the likely local impact of the development of the allocation on the transport network and identifies where mitigation is needed.

The Crostons Road junction was included within the transport modelling for the Walshaw allocation and mitigation for the junction has been identified. It is a requirement of the Walshaw allocation policy that off site highway works are provided to ensure acceptable travel movement.

Responding to Cllr Rydeheard supplementary question, Councillor Quinn reported that the places for Everyone submission has taken into account proposed increases in traffic.

How many independent and Small to Medium Enterprises (SMEs) will the clean air charge impact in Bury and what engagement has there been with these stakeholders. Councillor N Jones

In response Councillor Quinn reported that Across Greater Manchester, we've been meeting and engaging with key stakeholders including bus, freight transport, taxi and private hire industry bodies, for some time (before the GM Clean Air Plan conversation in May 2019) to raise awareness and get their feedback on the measures in place.

Marketing and communications activity has taken place during the 2019 conversation on the GM CAP and the 2020 consultation on the GM CAP. This has included extensive marketing, using radio ads, local press, digital advertising, social media and local authority channels.

#### **OSC.05 PUBLICATION OF THE PLACES FOR EVERYONE PLAN**

The Leader of the Council attended the meeting to present an overview prior to publication of the Places for Everyone Joint Plan.

Documents had been shared with Members prior to the meeting which contained information in respect of the rationale for the proposal. The Leader reported that continuing to work collaboratively on a joint plan across the nine districts brings significant benefits to Bury including a stronger local economy; reduced impact on the Green Belt; an up-to-date plan; significant infrastructure investment and affordable housing.

The reports circulated in advance of the meeting provided information in respect of:

- Publication plan and consultation
- Plans for Homes
- Plans for the environment
- Plans for jobs
- Plans for the greenbelt and a brownfield land preference

Questions and comments were invited from Members of the Committee and the following issues were raised:

Following a commitment from the Leader at the meeting a summary of the questions and responses received are appended to the minutes; the responses will also be made available on the Council's website

1. Councillor Birchmore raised concerns in respect of the criteria used to select the sites including concerns in relation to Radcliffe/Elton Reservoir and the effect on green belt.

Responding, the Leader reported that the criteria was developed using national planning policy principles and the wider strategic context of Greater Manchester's ambitions to boost the competitiveness of northern districts, create more opportunities for employment and improve the housing offer and market.

The Elton Reservoir site meets criterion 6 as it is in close proximity to the existing tram line and has the potential to provide a comprehensive public transport hub as part of a new tram stop. This is proposed to include a park and ride facility as well as well as active travel facilities (e.g. cycle hub / electric vehicles etc).

2. Councillor LJ Dean sought clarification in relation to previously undertaken consultation and also whether the Council could choose to have a local plan

The Leader reported without an up-to-date plan in place we would be at serious risk of:

- Planning by appeal - rather than development being planned and managed properly, we would be likely to get inundated by smaller-scale ad-hoc planning applications on Green Belt land with developers appealing against any refusal of planning permission - with a greater likelihood of success given the recent appeal decision in Welwyn.
- Government intervention - Government has indicated that it will use sanctions for districts that do not have an up-to-date plan by December 2023 meaning that Bury's planning powers could be removed and for us to have a plan produced for us - which could mean higher housing targets than currently set out by the PFE.

3. Councillor Lucy Smith asked for clarification in relation to the number of houses that may be required if Bury Council, like Stockport chose to develop a local plan rather than partake in the GM PFE report

The Leader reported that the Council would be in a much worse position and may be required to build more housing than those committed to in the PFE proposal,

Bury have been able to reduce the housing commitment following cooperation with the other 8 districts.

4. Councillor Vernon sought clarification in respect of the number of houses expected to be built at Elton Reservoir.

The Leader reported that The Elton Reservoir site is key to delivering significant early investment into essential infrastructure and the site needs to be able to provide the long-term certainty on the scale of development to withstand the considerable costs.

In total, the site could deliver around 3,500 units but only around 1,900 are considered to be deliverable within the plan period. This figure is based on aspirational delivery rates from the site and will be dependent on the infrastructure being provided to allow the site to come forward.

5. Councillor Vernon sought assurances as to why the Council is insisting that they have no choice but to build on greenbelt.

The evidence from local plan examinations is that where the scale of housing need cannot be met within the urban area, and neighbouring authorities are unable to meet some of that need, a failure to identify potential green belt sites risks the plan being found unsound.

Recent planning appeal decisions have shown that in the absence of an up-to-date plan, Green Belt sites are at risk of unplanned and uncoordinated development which fails to deliver the necessary infrastructure. Without an up-to-date plan in place, we are at serious risk of planning by appeal and Government intervention.

6. Councillor Birchmore raised concerns in respect of the number of homes expected to be built in the green belt surrounding Elton Reservoir and the concerns that the infrastructure is not there to support the housing developments.

The Leader reported that the development of the Radcliffe Strategic Framework will allow for short, medium and long term inclusive growth and will include infrastructure projects in addition to the new high school; including two new primary schools, support for, public transport, highways, health as well as creating new economic centres.

7. Councillor LJ Dean sought clarification as to how the numbers of brownfield Sites had been calculated and why Bury had only received £1.3million in brownfield regeneration monies and why the proposed fire station building has not been set aside for housing development.

In response the Leader reported that each district has prepared their own Strategic Housing Land Availability Assessment (SHLAA), in line with Government guidance.

A summary of the supply and the approach taken are provided in the PfE Housing Topic Paper – Housing Land Supply Statement appendix available on the GMCA website and Bury's Strategic Housing Land Availability Assessment is published on the Council's website with a full site listing and an online map showing the location of all the sites that have been assessed.

The Leader reported that the fire station site will bring new economic activity to the Town Centre and create jobs and help to re-balance the economy.

8. Councillor Powell sought assurances in respect of the Plans for Bowlee and Simister in particular that there would be no proposals to allow through traffic via Simister village and no infill developments at Simister village

The Leader confirmed that he could guarantee there would be no through road through Simister, master planning work undertaken acknowledged that it would not be appropriate to use a single-track road but that it would be permeable to enable people to walk and cycle. Traffic as a result of the Bowlee developments would feed in, instead, through Middleton

The Leader reported that the plan had been changed to protect Simister village and there would be no risk of any infill developments, and he would like to reassure residents in Simister, that the housing development will be at Bowlee.

9. Councillor Birchmore asked for clarification in relation to the brownfield first policy.

Responding the Leader reported that the development of suitable brownfield sites remains a priority for the Council. The Brownfield Land Statement affirms our commitment to the regeneration of brownfield sites and sets out some of the key tools that the Council is using to support the regeneration and re-use of brownfield sites.

We are continuing to make progress in bringing forward the East Lancashire Paper Mill (ELPM) site for housing and have agreed to enter into a Collaboration Agreement with Homes England and a delivery strategy as set out in the report to Cabinet on 26 May 2021. A number of brownfield sites are identified within the strategy for redevelopment, including East Lancashire Paper Mill, School Street adjacent to Millwood Primary School and Blackburn Street Gateway. We successfully secured brownfield land funding to de-risk the School Street site, with work well under way to address some of the abnormal costs associated with developing sites of this nature.

The Leader confirmed that as well as the School Street Site funding was also made available for Fletcher Fold.

10. Councillor Bernstein asked if there was any scope to move the consultation deadline back to 1<sup>st</sup> September 2021.

The Leader reported due to the 2023 deadline for getting a plan in place and the length of time it is likely to take for the PfE plan to go through an Examination in Public, it is not proposed that consultation is delayed until September.

A lot of the information to support the plan has been in the public domain for many months, and there have already been several rounds of extensive consultation. An 8-week consultation period is considered to give sufficient time for all those who wish to respond to do so.

11. Councillor Bernstein asked for clarification as to what was meant by the term "major new issue".

Responding the Leader reported public opposition to building on the Green Belt cannot be considered to be major new issue, although if representations are made to this effect, the Planning Inspectorate will give this the appropriate consideration and weight.

A major new issue could, for example, be major changes to national planning policy with no applicable transitional arrangements up to and throughout the Examination. Another example could be updated evidence which may influence the plan. The plan, therefore, may evolve through the Examination process, as the Inspector takes a view on the submitted evidence and the representations made as a result of this consultation.

12. Councillor Boroda asked what the position would be if the Council fails to adopt a plan.

The Leader reported that if we do not adopt a plan by 2023 the Council would be outside of the protection of the current arrangements. The protections allow the Council to insist on high standards of development, infrastructure plans as well as restricting build on green belt. The concern would be if the Council are operating outside of the plan there would be a developer free for all. The Assistant Director, Strategy Planning and Regulation reported that 2023 is a government imposed deadline and if not met the Government may appoint planning inspectors and planning decisions maybe taken out of local planning authority control, other sanctions may be imposed.

13. Councillor McGill asked if there is criteria to ascertain/determine if a brownfield site is suitable for housing and if so have these been applied?

The Leader reported that the biggest challenge is that it is very expensive to remediate and prepare a brownfield site for development. The Assistant Director, Strategy Planning and Regulation reported that each Brownfield site has to be considered on its own merits, for example how the plans mitigate air quality and noise quality; the whole purpose of this plan is to allocate land for housing and infrastructure and employment. Therefore not all brownfield site needs to be allocated for housing.

Councillor Vernon moved, and Councillor Birchmore seconded, that the following recommendation:

*"The scrutiny committee advises the Cabinet to reject the Places For Everyone model like Stockport has and pursue a Bury local plan."*

Be forwarded from Overview and Scrutiny to Cabinet, and **On being put, with 5 voting for, 4 against**

**It was agreed:**

The scrutiny committee advises the Cabinet to reject the Places For Everyone model like Stockport has and pursue a Bury local plan.

**COUNCILLOR R BERNSTEIN**  
**Chair**

**(Note: The meeting started at 6.pm and ended at 9.35pm)**

Question (O&S)	Response
<p><b>Overview and Scrutiny 20th July 2021</b></p>	
<p><b>QUESTION ONE: (Cllr Birchmore)</b></p> <p>How can Bury Council justify its choice of sites in Places for Everyone?</p> <p>Sites chosen had to meet the site selection criteria laid out by the GMCA however if you look at the sites chosen they did not meet most of the site selection criteria whereas other sites in the original call for sites met many of the selection criteria (see attached site selection criteria used by the GMCA).</p> <p>It is claimed that Elton Reservoir meets criteria 6 and 7, the reasons given and counter arguments are detailed below:</p> <ul style="list-style-type: none"> <li>The proposals would deliver additional public transport investment by the creation of a new park and ride Metrolink tram stop – investment in the tram network is provided by Transport for Greater Manchester not developers, for example in the case of the new level on the car park at Radcliffe Metrolink Station. What is the argument here, If you build all the houses on this site you will need a new Metrolink stop? Bury Council owns land next to the Metrolink in Bury and could expand availability of the park and ride in Bury or alternatively Whitefield, Prestwich etc. If you don't build the houses you won't need the Metrolink stop in the proposed location since Radcliffe Metrolink will have already been</li> </ul>	<p>The site selection criteria was developed to help identify the strategic allocations for development.</p> <p>The criteria was developed using national planning policy principles and the wider strategic context of Greater Manchester's ambitions to boost the competitiveness of northern districts, create more opportunities for employment and improve the housing offer and market.</p> <p>The site selection criteria formed part of the consultation documents in in previous stages of the plan.</p> <p>Criterion 6 seeks to exploit opportunities for integrated transport and land use planning where it is likely that development will be of such a scale that it will deliver significant wider public benefits.</p> <p>The Elton Reservoir site meets criterion 6 as it is in close proximity to the existing tram line and has the potential to provide a comprehensive public transport hub as part of a new tram stop. This is proposed to include a park and ride facility as well as well as active travel facilities (e.g. cycle hub / electric vehicles etc).</p> <p>This new tram stop would provide public transport to the new and existing residents. The line between Radcliffe and Bury is one of the longest on the network without a stop and the proposal would help to encourage wider use of public transport</p>

<p>expanded.</p> <ul style="list-style-type: none"> <li>• It will deliver a secondary school for Radcliffe – Radcliffe already has 2,000 young people going out of Radcliffe to school so already needs a school. Radcliffe has had a new secondary school approved without the plans in PfE being included. This therefore is not a justification for building on the site and should be removed. All townships other than Radcliffe already have at least one secondary school and some have more than one. I recently read that Heys School in Prestwich is taking pupils from Salford to fill school places.</li> <li>• It will deliver regeneration benefits for Radcliffe – Radcliffe has been promised that it will get regeneration funding irrelevant of whether PfE goes ahead. The council has already concluded that with the existing housing numbers Radcliffe is in need of additional investment to bring it in line with the infrastructure offered elsewhere in the borough. So again this is not a justification and should be removed.</li> <li>• The only justification that remains is that it would provide investment in the road network. If you do not build all the proposed houses you will not need the road network, so this is a cyclical argument not a justification.</li> </ul> <p>Walshaw only meets criteria 7</p> <p>The reasons given and the counter arguments are detailed</p>	<p>/ active travel beyond the proposed development site.</p> <p>The site is well placed to help provide this new facility, which will be linked with the wider strategic highway and associated cycle lanes. There are no alternative sites in the Borough that would be able to exploit the opportunities of the existing tram line. Likewise, the location of the site allows for a strategic highway link within the Borough and will help to alleviate some existing highway issues and provide resilience in the network.</p> <p>The Walshaw site is also located in a position that provides an opportunity to deliver extra capacity, resilience and improvements to the local highway – with a new through route that will help to alleviate existing highway issues in and around Walshaw.</p> <p>It should be noted that not all of the criteria needs to be met for a site to be proposed and the site selection process is just one part of the wider evidence base which has been considered to ensure that sites are deliverable.</p> <p>Ultimately, the decision on whether the sites are appropriate will be tested at the Examination. One of the key tests is where the plan is 'Justified' – which has to look at reasonable alternatives.</p> <p>It is considered that the alternative sites put forward do not</p>
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below:

- It provides an opportunity for a new link road – if you do not build 1,250 houses you will not need a link road for the traffic. This is a cyclical argument not a justification.
- The scale of the development requires a new primary school – if you do not build the houses you will not need a primary school here. If you built houses for example in Ramsbottom or Prestwich you could justify building a primary school there or at least have an argument for expanding the capacity of a local primary school. It is not a justification for building on that particular site. Again it is a cyclical argument.
- There would be an element of affordable housing – if you build anywhere there is a requirement to include affordable housing. Do not forget according to the Council's own documents it is proposed that this site is split into 4 separate developer sites so it is not one large site and affordable housing, Section 106 payments or community infrastructure levy payments (CIL) will be limited. Often developers will avoid building affordable housing, paying portions of 106 or CIL payments by claiming failure to achieve predicted profits.

You therefore have to ask why these sites and not other sites were chosen. However the public will never know because according to the response to a Freedom of Information request I received discussions on the choice of sites describes

offer the same scale of opportunity to improve the physical and social infrastructure as well as address existing issues.

The evidence that supports the plan and the proposed sites includes details of the site selection methodology and this information is already publicly available

<https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/supporting-documents//?folder=\01%20Thematic%20Papers#fList>

<p>the meetings as:</p> <p>“meetings were informal, no minutes were taken and no record exists of the specific attendees at each meeting.”</p> <p>Therefore the Council is not able to provide the public with a clear and open explanation of why the sites were chosen and why other sites that better met the site selection criteria were rejected. Maybe the Council would commit to doing so and making the documents publicly available not just in terms of sites chosen but also in terms of why all the other sites identified in the call for sites were not chosen.</p>	
<p><b>QUESTION TWO: (Cllr Birchmore)</b></p> <p>Why is it acceptable on the Elton Reservoir site as part of the proposed Places for Everyone to include enough greenbelt to build 1,600 homes post plan? It has been admitted by Bury Council Planning department that if the greenbelt is released from greenbelt protection developers can apply to build on the land. It would therefore be open to developers in the same way that brownfield land is. This could mean that by the end of the plan the Elton Reservoir development could see all 3,500 homes built. When questioned about this Bury Council said that if more than the projected 1,900 homes were built on the Elton Reservoir site they would simply deduct the extra houses from the quota for other sites. That is not acceptable. The Council is claiming that they need a site that size to</p>	<p>The development of the Elton Reservoir site requires considerable investment in infrastructure, including the provision of a new metrolink stop with park and ride facilities, link road, walking and cycling provision, two new primary schools, and considerable areas of publicly accessible recreation land.</p> <p>This level of infrastructure provision could not be delivered if only half the site was developed, but it would still be necessary to support 1900 homes on this site.</p> <p>Any proposals for the allocation will have to be in accordance with a comprehensive masterplan to be developed and approved by the Local Planning Authority. This will include a clear phasing strategy as part of an integrated approach to the</p>

<p>ensure that the infrastructure is put in place however, in their own plans the Council has proposed that the site is to be split up amongst 5 developers so the chances of getting infrastructure in place are significantly diminished. Why does the Council not simply cut the proposed development site in half?</p>	<p>delivery of infrastructure to support the scale of the whole development.</p> <p>This will include the delivery of highways infrastructure, surface water drainage, grey infrastructure including utilities provision, green and blue infrastructure, broadband, electric vehicle charging points, recreation provision and social infrastructure and ensure coordination between phases of development.</p> <p>This approach will ensure that even if the site is split amongst multiple developers, a coordinated approach will be taken which will ensure the infrastructure is in place when it is needed.</p>
<p><b>QUESTION THREE: (Cllr Birchmore)</b></p> <p>Bury Council have currently only achieved 52% of their housing development target which puts them into “presumption in favour of development”. This is the poorest achievement out of all the Greater Manchester authorities. The failure to meet the housing targets is down to a failure to build on brownfield land. However, we are being told that Bury Council is following a brownfield first policy. You do have to question how well Bury Council are doing in achieving this when you realise that out of the £97 million Greater Manchester Brownfield Housing fund Bury Council have managed to secure only £1.4 million when four other authorities have secured over £10 million each. I have also been told that Bury Council failed to get funding for the largest</p>	<p>The Council is subject to the “tilted balance” of the NPPF “presumption in favour of sustainable development” as a result of the lack of five year housing land supply and past delivery rates.</p> <p>Progressing the Places for Everyone plan will help to ensure that the “tilted balance” will no longer apply and that we will be able to demonstrate sufficient housing land supply, increase delivery rates and ensure that the necessary infrastructure is provided to support development.</p> <p>The tests for a five year supply and the housing delivery test, are set against the Governments identified Local Housing Need (currently at 591 units per annum). This is a high bar to</p>

brownfield site in the whole of Bury (400 houses) in tranche 1. Alongside this I have been informed that work on developing a master plan for Bury Town Centre brownfield sites is at a “relatively early stage”.

According to the Council’s own topic papers for the Elton Reservoir and Walshaw sites they are predicting first completions (i.e. houses for sale) in 2025. Assuming PfE was approved next year and knowing the time taken for processing planning applications and site preparation work this would mean that the application and building process for these sites would start immediately PfE was approved.

Does this really strike people as a Council committed to brownfield development and what are the Council going to do to ensure that all brownfield land is developed before any greenbelt is built on?

meet.

Getting an up to date plan in place through the PfE will mean that, instead of being based on the Government’s figures, our Housing Delivery Test and our five year supply calculations will be based on the much lower figure (i.e. 452 units per annum). This lowers the bar considerably.

In addition, the plan also proposes to use stepped targets which are lower at the start of the plan period, enabling us to demonstrate a 5 year supply / reach the required delivery rates in the early years of the plan.

The development of suitable brownfield sites remains a priority for the Council. The Brownfield Land Statement affirms our commitment to the regeneration of brownfield sites and sets out some of the key tools that the Council is using to support the regeneration and re-use of brownfield sites.

We are continuing to make progress in bringing forward the East Lancs Paper Mill (ELPM) site for housing, and have agreed to enter into a Collaboration Agreement with Homes England and a delivery strategy as set out in the report to Cabinet on 26 May 2021. This is a complex site with considerable abnormal costs that have historically presented a viability challenge in the context of housing development. Several attempts in the past by previous owners to bring the site forward have failed. A new collaborative approach will ensure that the procurement of a developer and the delivery of much

	<p>needed homes will ensure the site is comprehensively developed to the highest environmental and social standard.</p> <p>For Radcliffe specifically, the Radcliffe Strategic Regeneration Framework identifies a clear set of interventions and wider strategies to guide growth and help deliver the transformation change that is required through the regeneration of the town. A number of brownfield sites are identified within the strategy for redevelopment, including East Lancs Paper Mill, School Street adjacent to Millwood Primary School and Blackburn Street Gateway. We successfully secured brownfield land funding to de-risk the School Street site, with work well under way to address some of the abnormal costs associated with developing sites of this nature.</p> <p>Brownfield Land Funding is also being used to fund works which are underway to de-risk:</p> <ul style="list-style-type: none"><li>- the former Millwood site at Fletcher Fold, Bury and has been secured to support housing delivery at the former</li><li>- William Kemp Heaton, St. Peters Road, Bury and</li><li>- the brownfield element of the Seedfield site, Bury.</li></ul> <p>We are developing a masterplan for Bury Town Centre. Whilst this is still at a relatively early stage, it is an opportunity to set a clear direction for the redevelopment of brownfield sites within the town and provide developers with the confidence to invest and deliver brownfield regeneration within the town.</p> <p>The Council's ambitions for Prestwich, which will support the</p>
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	<p>delivery of housing on brownfield land, were advanced by the Cabinet approval on 26th May 2021 to acquire the Longfield Shopping Centre. This is the first step to pave the way for the delivery of new homes, a library and Community Hub, small business workspace, outdoor space / public realm and market hall.</p> <p>The Accelerated Land and Property Disposals Programme was approved by Cabinet at their meetings on 24 November 2020, 24 March 2021 (Phase 1) and 30 June 2021 (Phase 2). This allows surplus non-strategic sites to be released, providing revenue to the Council and includes opportunities for brownfield development, including the provision of affordable housing by registered providers.</p> <p>It should be noted that private brownfield sites that have previously been stalled are now currently coming forward for housing including:</p> <ul style="list-style-type: none"><li>• Mountheath, Prestwich – under construction for 124 homes by Bellway</li><li>• Former Tetrosyl Site, Bevis Green, Bury – under construction for 268 homes by Barratt</li><li>• Former Cussons site, Kersal Vale, Prestwich – under construction for 109 homes by Cube / Great Places</li><li>• Former Andrews Textiles, Walshaw Road, Bury – recent planning permission for 97 homes by Bellway</li></ul> <p>Whilst this is not a comprehensive list, as you can see a broad range of activities are being undertaken to support the</p>
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	<p>delivery of brownfield sites, demonstrating the Council's commitment to prioritising brownfield sites for development.</p> <p>We do, however, have a finite amount of available brownfield land for development in the Borough.</p> <p>We have identified enough land to accommodate 3,776 homes from 2021-2037. This largely consists of brownfield sites within the existing urban area, including the potential development sites within our town centres and other brownfield sites such as the former ELPM site and the former Tetrosyl site at Bevis Green in Walmersley. However, not all of these sites homes are deliverable within the first five years of the plan – large and complex brownfield sites can take many years to be completed.</p> <p>National planning policy prevents us from restricting greenfield sites when we do not have a sufficient supply of brownfield sites to meet even a five year supply. However, as demonstrated above, the Council is bringing the brownfield sites forward first before the PfE has even gone through its Examination / Adoption.</p> <p>And as mentioned elsewhere, the PfE means that we are reducing the amount of Green Belt release that would otherwise be required if we had to meet the full Government Local Housing Needs through a Local Plan – both in the short term and over the plan period.</p>
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<p><b>Cllr Bernstein</b></p> <p>The report puts the 'substantially the same' argument for justifying moving forward with PfE 2021. Have these arguments been successfully tested in the Courts or is it uncharted territory?</p>	<p>S.28 (6)-(9) of the Planning and Compulsory Purchase Act 2004 and regulation 32 of the Town and Country Planning Local Plan Regulations apply where one authority withdraws from an agreement to prepare a joint DPD.</p> <p>These Planning Regulations allow a joint plan to continue to be progressed in the event of an authority withdraws from the joint plan. The plan can continue with the remaining districts, providing that the plan has "substantially the same effect" on the remaining authorities as the original joint plan.</p> <p>Legal advice has been sought which has advised that the current plan as drafted can proceed on this basis, in accordance with the Planning Regulations.</p> <p>The Joint Committee decided that the Plan has substantially the same effect, and, assuming that the districts all agree, then the challenge to this – should there be one – would take place at the Public Examination.</p>
<p><b>Cllr Bernstein</b></p> <p>Point 2.12 says 'the impact of the revisions is not an issue to be considered in this report' if that is the case when is the appropriate time and by what process will there be to consider the impact of the revisions?</p>	<p>Following the AGMA meeting in March, Bury along with the other eight districts, agreed to establish a Joint Committee to progress and to delegate <b>plan preparation powers</b> to that Joint Cabinet.</p> <p>As part of the delegated plan preparation powers, the determination of whether the amended plan would have substantially the same effect on the remaining nine districts is something that the newly established Places for Everyone Joint Committee had to consider lawfully.</p>

	<p>The Cabinet Paper was worded in this way on the basis that it is the responsibility of the Joint Committee that must lawfully decide that that the Plan has substantially the same effect – as part of their plan preparation remit (rather than the individual authorities).</p> <p>All nine districts were represented at their meeting on the 20<sup>th</sup> July and the collective decision of all of the Joint Committee was that the plan did have substantially the same effect on the remaining districts.</p> <p>They have therefore recommended the plan to the nine districts for consideration to move it to the Publication stage and then to formally Submit the Plan to Government thereafter.</p> <p>Had they not decided that the plan did not have substantially the same effect on the remaining districts, they would not have recommended it to the districts.</p> <p>If there was a challenge to this, it could be addressed at the Examination process.</p>
<p><b>Cllr Bernstein</b></p> <p>In point 13.4 it outlines that 'the 9 districts do not have an understanding of what the Stockport land position is ..... until this position is known how wise is it to progress with PfE</p>	<p>Stockport made the decision to withdraw from the joint plan and will have to progress their own Local Plan.</p> <p>Previously, some of Stockport's need was being met within other districts in the conurbation and, like Bury, they were one</p>

<p>2021?</p>	<p>of the net beneficiaries of the joint plan process.</p> <p>They will now need to consider how that housing need will be met.</p> <p>Stockport have formally requested that the nine remaining districts take some of their housing needs and they have been informed that the PfE does not seek to do this.</p> <p>How they proceed with the plan does not directly impact on the joint plan procedurally or in terms of content. However, given that they are an adjoining authority, the nine districts will continue to cooperate with them and work with Stockport on a number of wider GM plans (e.g. the 2040 Transport Plan).</p> <p>The Government has set a deadline of December 2023 for up to date local plans to be put in place, and the PfE cannot be put on hold until Stockport determine their own position.</p>
<p><b>Cllr Bernstein</b></p> <p>Point 15.2 outlines an eight-week period of consultation commencing not earlier than 9 August. Bearing in mind that August even in the current climate is likely to be a holiday period would it not strengthen consultation and make it more meaningful for this to commence on 1 September?</p>	<p>Due to the 2023 deadline for getting a plan in place and the length of time it is likely to take for the PfE plan to go through an Examination in Public, it is not proposed that consultation is delayed until September.</p> <p>A lot of the information to support the plan has been in the public domain for many months, and there have already been several rounds of extensive consultation.</p>

	<p>An 8-week consultation period is considered to give sufficient time for all those who wish to respond to do so.</p>
<p><b>Cllr Bernstein</b></p> <p>In point 15.10 what does 'major new issues' mean could for instance significant public opposition to building on the green belt be deemed 'a major new issue'</p>	<p>Public opposition to building on the Green Belt cannot be considered to be major new issue, although if representations are made to this effect, the Planning Inspectorate will give this the appropriate consideration and weight.</p> <p>A major new issue could, for example, be major changes to national planning policy with no applicable transitional arrangements up to and throughout the Examination. Another example could be updated evidence which may influence the plan.</p> <p>The plan, therefore, may evolve through the Examination process, as the Inspector takes a view on the submitted evidence and the representations made as a result of this consultation.</p>
<p><b>Cllr Bernstein</b></p> <p>Will there be a commitment to bring for pre-scrutiny the post-consultation report which is to be submitted to the Secretary of State.</p>	<p>There are no requirements to bring the post-consultation report back to the Council for consideration.</p> <p>Full Council is being asked to approve the Submission stage on the 28 July 2021. This will include the plan itself, its supporting evidence and all the representations that will have been received in response to consultation.</p> <p>A post-consultation report will provide a factual summary of the representations made on the material that will be Submitted to the Secretary of State for Examination.</p>

	<p>In effect, the representations will be scrutinised at the Examination process itself.</p> <p>If there are representations made that are considered to impact of the tests of soundness then this is likely to mean that the Plan would not be Submitted.</p> <p>It should be noted, that following the Examination, a Full Council decision will be required before the plan can formally be adopted.</p>
<p><b>Cllr LJ Dean</b></p> <p>The council chose not to have a local plan in 2014. Could it now choose to create one instead of the PfE?</p>	<p>Withdrawing from PfE to prepare a Local Plan would require the Council to start at the beginning of the process and it would be more challenging to get this in place before the Government-imposed deadline of December 2023.</p> <p>Without an up-to-date plan in place we would be at serious risk of:</p> <ul style="list-style-type: none"> <li>• Planning by appeal - rather than development being planned and managed properly, we would be likely to get inundated by smaller-scale ad-hoc planning applications on Green Belt land with developers appealing against any refusal of planning permission - with a greater likelihood of success given the recent appeal decision in Welwyn.</li> <li>• Government intervention - Government has indicated that it will use sanctions for districts that do not have an up-to-date plan by December 2023 meaning that Bury's</li> </ul>

planning powers could be removed and for us to have a plan produced for us - which could mean higher housing targets than currently set out by the PfE.

The Council has twice tried and failed to get a plan through the Examination process, that protected Green Belt and which didn't meet development needs.

If Bury was not participating in PfE, the Local Plan would be required to cover both the strategic policies (currently covered by PfE) and the non-strategic policies. This means that the Local Plan would need to include the relevant strategic policies and proposals that are currently covered by PfE, such as the release of Green Belt to meet Bury's development needs. In line with national guidance, it would still need to cover a minimum period of 15 years on plan adoption.

It should also be noted that, through the Joint Planning process, Bury has been able to off-set 2,228 of its housing need to other Greater Manchester districts. This would be significantly more difficult to achieve in the absence of a joint plan as district local plans would be processed in different timeframes and it would be more difficult to get districts to specifically identify and agree that they would meet the needs of another district.

This may mean that Bury could have to meet its full housing need and would therefore have to identify more Green Belt land to accommodate the 2,228 additional homes that are

	<p>currently proposed to be offset under PfE (with further Green Belt loss for an appropriate Buffer).</p>
<p><b>Cllr LJ Dean</b></p> <p>In 7 years since the council chose not to have a local plan – how many legal battles/appeals has it fought on speculative planning applications?</p> <p>Could we have a breakdown on how many it has won/lost/ongoing on speculative planning applications?</p>	<p>The fact that we are producing a plan and seen to be producing a plan that seeks to meet Bury’s housing target (albeit partially outside of the Borough) is helping to hold back planning applications and appeals on the Green Belt.</p> <p>This is because it is likely that Planning Inspectors are likely to view such applications / appeals as premature.</p> <p>Therefore, there have been no planning applications for sizable developments on Bury’s Green Belt and there have been no appeals to date.</p> <p>The threat would be more significant if we were not progressing a plan or progressing a plan that clearly did not seek to meet needs.</p> <p>A recent planning appeal approved 100 houses in the Green Belt on the basis that the district had an acute housing need and out of date plan, and this outweighed the harm that the proposal would have on the Green Belt. This has significant implications nationally and may signal a more bullish approach by the development industry in areas that do not have enough housing land supply and up to date plans (which in themselves need to provide sufficient land for housing). It may open the door to speculative developers taking planning refusals to</p>

	<p>appeal (<a href="https://www.planninginspectorate.gov.uk/applications/APP/B1930/W/20/3265925">Reference: APP/B1930/W/20/3265925 (planninginspectorate.gov.uk)</a>).</p>
<p><b>Cllr LJ Dean</b></p> <p>The sites within the GMSF/PfE – are these the only sites that are being looked at for development?</p>	<p>Only 11% of the total identified PfE housing land supply is on sites proposed to be allocated through the plan.</p> <p>The majority of sites to be developed over the plan period are part of the existing supply identified through each districts’ Strategic Housing Land Availability Assessment, which is predominantly within the urban area on previously developed brownfield land.</p> <p>It is likely that there will be challenges at the Examination from land owners and developers who would like to see their sites allocated through Places for Everyone.</p>
<p><b>Cllr LJ Dean</b></p> <p>How has the numbers of Brownfield homes been calculated? Has a list of sites been produced?</p>	<p>Each district has prepared their own Strategic Housing Land Availability Assessment (SHLAA), in line with Government guidance.</p> <p>A summary of the supply and the approach taken are provided in the PfE Housing Topic Paper – Housing Land Supply Statement appendix available on the <a href="#">GMCA website here</a>.</p> <p>Bury’s Strategic Housing Land Availability Assessment is published on the Council’s website <a href="#">here</a>, with a full site listing and an online map showing the location of all the sites that have been assessed.</p>
<p><b>Cllr LJ Dean</b></p>	<p>Buffers are a standard requirement in development plans to</p>

<p>Is the buffer allocated reasonable?</p>	<p>provide flexibility in the supply.</p> <p>This buffer allows for sites not coming forward as envisaged over the plan period.</p> <p>There is no guidance in national policy as to the level of buffer that should be applied in development plans.</p> <p>However, for districts that are not able to demonstrate a five year supply, the Government stipulates that an additional buffer of 20% is applied to the rolling five year target – which gives a guide as to what constitutes a ‘flexible buffer’.</p> <p>In a recent Examination into Guilfords Local Plan, the Planning Inspector accepted that a 37% buffer was appropriate. <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/supporting-documents/?folder=\09%20Connected%20Places#fList">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/supporting-documents/?folder=\09%20Connected%20Places#fList</a></p>
<p><b>Cllr LJ Dean</b></p> <p>Given there will be a post-consultation report. Will we get a chance to scrutinise it before submission to SoS?</p>	<p>The consultation report will be available as part of the package of documents submitted to the Secretary of State for Examination.</p> <p>There will be no requirement for additional Council approval following the end of the consultation period, subject to approval by full Council on 28 July 2021 to submit the plan, its supporting evidence and the representations received in response to consultation.</p>

	<p>Following the Examination, a Full Council decision will be required to adopt the plan.</p>
<p><b>Cllr D Vernon</b></p> <p>In Bury's Development Plan, 1.1 "Why were the Council unable to write an acceptable Local Plan in both 2011 and 2014?"</p>	<p>The Council previously progressed two versions of a plan that sought to retain all the Borough's Green Belt in its entirety.</p> <p>In doing so, the two plans did not propose to meet the Borough's housing targets, which at the time, were set by regional planning guidance.</p> <p>This faced significant challenge and scrutiny at both of the Examinations and the Council had to withdraw the plans as it was clear that they would be found unsound.</p> <p>Meeting housing needs is seen as one of the key strategic purposes of a development plan. A key test as to whether a plan is found sound or otherwise in the National Planning Policy Framework, is whether, as a minimum, the plan meets at least the <u>minimum housing needs</u> for the Borough. On both occasions, the plan did not propose to meet the full needs and this was the focus of the challenge to the plan.</p> <p>At the last Examination, in 2014, the Planning Inspector advised the local authority to work with the other Greater Manchester authorities to develop a joint plan that dealt with the key strategic issues across the conurbation, including addressing the sub-regions housing needs.</p> <p>The Places for Everyone is a joint plan that meets the housing</p>

	<p>targets of the nine participating local authorities – albeit with some districts being able to offset some of its targets to other parts of the conurbation. Bury is one of those beneficiaries, with over 2,220 of our housing target being met elsewhere in the conurbation.</p> <p>On this basis, it is considered that this plan will be able to demonstrate that the nine districts housing needs are being met and therefore, meets this test of soundness.</p>
<p><b>Cllr D Vernon</b></p> <p>1.3 The Council chose concentrate on preparation of the GMSF, before making significant progress on a Local Plan. " Could Bury proceed with a Local Plan without the GMSF/places for Everyone but has chosen not too?"</p>	<p>The Council made the decision to progress a joint plan with the other nine Greater Manchester districts on the basis that it largely functions as a single conurbation and that the strategic issues its faces transcend across district boundaries.</p> <p>There are already joint planning documents at the Greater Manchester level that deal with Minerals and Waste. Likewise, there are also a range of other Greater Manchester documents that are produced to cover all of the GM districts, including transport plans.</p> <p>It is not uncommon for large conurbations to work together to produce joint plan’s and there are examples throughout the Country – including the London Plan.</p> <p>Bury is one of the net beneficiaries of the GMSF and subsequently the Places for Everyone as it is able to offset some of its housing need to other parts of the conurbation.</p> <p>This means that more Green Belt land can be protected in the</p>

	Borough.
<p><b>Cllr D Vernon</b></p> <p>6.3 - 2.3 "Stockport withdrew from the GMSF, is there any reason why Bury could not do the same if we wanted too?"</p>	<p>There are significant benefits for the Borough in continuing to participate in a joint plan as opposed to withdrawing from the process.</p> <p>Through the joint plan, Bury is able to offset some 2,220 units from its housing target to other parts of the conurbation. If Bury were to withdraw from the PfE, then the Local Plan would need to identify how it could meet its housing targets over the next 15 years. Therefore, the starting point for a Local Plan would be how a target of 9,456 new homes could be met, rather than the PfE target of 7,228.</p> <p>As a consequence of working on a joint plan, the Council is able to protect more Green Belt land than would otherwise be the case if all of the housing needs needed to be met through a Local Plan. For illustration purposes only, if the gap of 2,220 units had to be accommodated on Bury's Green Belt, this would equate to a minimum of 74 hectares of land (at 30 dwellings per hectare), before additional land for physical and social infrastructure were factored in.</p> <p>The Government has set a deadline for all local authorities to get a plan in place by December 2023. They have threatened to impose restrictions on those authorities that do not meet this date, which could include the removal of plan making powers from the authority and having a plan imposed.</p>

	<p>Withdrawing from the joint plan would mean that Bury would need to go back to some of the early stages of plan making and this could have implications for meeting the Government's deadline.</p> <p>The joint plan proposes to create a major employment site across Bury and Rochdale. The fact that this is being brought forward in a joint plan that covers both districts helps to demonstrate its deliverability and the benefits across the two districts and beyond. Withdrawing from the plan and producing a local plan would create difficulties in showing how the inter-dependencies across the districts are joined up.</p>
<p><b>Cllr D Vernon</b></p> <p>4.12 " In the table Elton Reservoir is allocated 1900 homes but also 1600 post plan. In other words the target is actually 3500?"</p>	<p>The Government's housing target for Bury is 591 dwellings per annum, which equates to 9,456 dwellings over the plan period.</p> <p>The Places for Everyone plan proposes to reduce this to 452 units per annum, which equates to 7,228 over the plan period.</p> <p>A Planning Inspector will assess how the targets will be met over the plan period. The evidence shows that part of the target will be met through existing sites within the urban area plus the proposed sites coming through the joint plan.</p> <p>The Elton Reservoir site is key to delivering significant early investment into essential infrastructure and the site needs to be able to provide the long-term certainty on the scale of</p>

	<p>development to withstand the considerable costs.</p> <p>In total, the site could deliver around 3,500 units but only around 1,900 are considered to be deliverable within the plan period. This figure is based on aspirational delivery rates from the site and will be dependent on the infrastructure being provided to allow the site to come forward.</p> <p>Therefore, the evidence supporting the plan states that the site can only contribute 1,900 units to meeting the housing target over the plan period.</p> <p>The 1,600 beyond the plan period would help to meet future housing targets.</p> <p>It is not uncommon for large strategic sites to be earmarked for longer term delivery beyond the plan period, particularly when the site provide strategic infrastructure. The Carrington site in Trafford and the employment site at the Northern Gateway are two other strategic sites that extend development beyond the plan period.</p> <p>Recent changes to the National Planning Policy Framework indicate that Development Plans (including Local Plans), may need to plan for 30 years for key strategic sites to take into account the timescales for delivery.</p>
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**Cllr D Vernon**

6.5 - 4.17 The Government have made it clear that Local Housing Need, using the standard method, does not trump the need to protect the greenbelt. The standard method is not a binding target and the greenbelt is a constraint and provides a starting point. Why is the Council insisting that they have no choice but to build on our greenbelt?

Although the Green Belt constraints mean that we are unable to meet the local housing need without removing land from the Green Belt, they do not result in a reduction in the number of homes needed to ensure that everyone has a suitable and affordable place to live.

The evidence from local plan examinations is that where the scale of housing need cannot be met within the urban area, and neighbouring authorities are unable to meet some of that need, a failure to identify potential green belt sites risks the plan being found unsound.

Recent planning appeal decisions have shown that in the absence of an up to date plan, Green Belt sites are at risk of unplanned and uncoordinated development which fails to deliver the necessary infrastructure.

Without an up to date plan in place we are at serious risk of planning by appeal and Government intervention.

The Planning Inspector considering the submitted Plan at Welwyn Hatfield has requested that the authority identify Green Belt sites to meet the full housing targets for the area. This is strong evidence that demonstrates that plans need to meet their full housing targets – either within their Borough or through agreement with others (as the case is in Bury). (See: [Welwyn Hatfield Council - Examination into the Welwyn-Hatfield Local Plan 2013-2032 - Inspector's Supplementary Conclusions and Advice](#)).

<p><b>Cllr D Vernon</b></p> <p>New link roads, junction improvements and large scale development on the green belt equates to more cars and a corresponding increase in pollution. How does that square with efforts to reduce emissions and the clean air plan?</p>	<p>The PfE is seeking to locate development in the most sustainable locations which reduce the need for car travel, for example by maximising residential densities around transport hubs. This links to the joint Clean Air Plan which has been developed by all ten Greater Manchester local authority areas and seeks to bring NO2 levels on local roads within legal limits as soon as possible, as directed by Government.</p> <p>The PfE reduces the amount of Green Belt needed to meet the Borough’s housing target, and therefore helps to reduce the number of vehicle movement over the plan period than would otherwise be the case.</p> <p>The PfE provides a policy basis on which to ensure that new developments are built to certain standards and help to address climate change issues (e.g. all new properties to have electricity charging points).</p> <p>This will to ensure that all new developments are ready for the national move towards less polluting vehicles.</p>
<p><b>Cllr D Vernon</b></p>	<p>It is important to get an up-to-date plan in place, particularly given that Bury’s current development plan was adopted back in 1997 (Unitary Development Plan).</p>

<p>8.9 Without an up to date Local Plan we would be at risk of getting inundated by speculative planning applications. In that case would it not be better to have a Local Plan?</p>	<p>The PfE is at an advanced stage and is therefore in a better position to get it through to Examination and ultimately adoption before the deadline of December 2023 – and therefore helping to avoid Government sanctions.</p> <p>Withdrawing from the plan would mean that we would need to start the local plan process from an earlier stage – and this may have implications for meeting the deadline.</p> <p>The risk of speculative planning applications would be heightened by withdrawing from the PfE, as this would signal further delays to getting an up to date plan in place.</p> <p>The content would also be a factor – if the Local Plan was being progressed on the basis that the Borough’s housing needs were not being addressed.</p> <p>The recent example from the appeal at St Albans indicates that housing needs can outweigh Green Belt designations.</p>
<p><b>Cllr D Vernon</b></p> <p>15.2 Why is it a plan to 2037 and not say, a 10year plan that would not need any greenbelt release and would allow potential changes in demographics/ economy to be considered?</p>	<p>All development plans have to be prepared within the context of the Government’s planning policies. These are primarily set out within the National Planning Policy Framework (NPPF) as well as supporting Planning Practice Guidance (PPG).</p> <p>The NPPF requires development plans to comprise a combination of strategic and non-strategic policies, which cover a <b>minimum 15 year period from adoption.</b></p>

	<p>One of the key tests of soundness is whether a planning is in accordance with the NPPF – and a ten-year plan would not be.</p> <p>Regarding Green Belt, the Council has twice tried and failed to get a plan through that protected Green Belt and which didn't meet development needs.</p> <p>Recent changes to the National Planning Policy Framework (20 July 2021) indicate that Development Plans (including Local Plans), may need to plan for <b>at least 30 years</b> for key strategic sites to take into account the timescales for delivery and implementation of major improvements in infrastructure.</p>
<p><b>Cllr J Rydeheard</b></p> <p>The Crostons Road junction, at which traffic from Brandlesholme Road, Tottington Road and Walshaw Road, the three main arteries for traffic going into and out of Bury, converge, already experiences significant delays during rush hour. Has the Council carried out a full assessment of potential impact on traffic levels at the junction with over a thousand houses to be placed in Walshaw under the revised Places for Everyone plan?"</p>	<p>All the PfE allocations are supported by a Transport Locality Assessment. These assessments examine the likely local impact of the development of the allocation on the transport network and identifies where mitigation is needed.</p> <p>The Crostons Road junction was included within the transport modelling for the Walshaw allocation and mitigation for the junction has been identified. It is a requirement of the Walshaw allocation policy that off site highway works are provided to ensure acceptable travel movement.</p>
<p><b>Public Questions</b></p>	

**S Sollazzi**

The Council's Climate Strategy and Plan contain several statements and actions which are in conflict with elements of Places for Everyone (PfE). How will the Overview and Scrutiny Committee ensure Bury Council brings PfE in line with its zero carbon aims and similar aims across Greater Manchester?

Climate change is a key theme running throughout PfE and it is only through a combination of actions that it can be properly addressed. The PfE, in particular sets out:

- Methods to de-carbonise the city region through new and existing development, effective land management and through the provision of infrastructure and new technologies;
- The aim of delivering a carbon neutral Greater Manchester no later than 2038, with a dramatic reduction in greenhouse gas emissions, including measures to ensure that all new homes and commercial/industrial buildings achieve net zero carbon by 2028;
- The delivery of renewable and low carbon energy schemes through heat and energy networks;
- Measures that will be taken in Greater Manchester to future proof the city region by mitigating and making it more resilient to environmental challenges, including climate change;
- Water based measures, such as reducing flood risk, to adapt and reduce the impacts of climate change; and
- Measures to support improvements in air quality.

The PfE, if adopted, will form part of the Council's statutory development plan and will allow the Council to require certain standards within new development to ensure that the climate change targets are achieved. This will include ensuring that

	<p>new housing is carbon neutral and encouraging active travel – road layouts to prioritise walking and cycling, improved cycling infrastructure, integrated EV charge point infrastructure etc</p> <p>Without a statutory plan in place, it will be very difficult to refuse planning applications which don't meet these requirements.</p>
<p><b>Philip Smith-Lawrence</b></p> <p>Taken the Places For Everyone plan is before the council, over the next 3 years exactly how many social and affordable to rent homes will the council be building on brownfield land/sites owned by the council, either as the master developer or under a joint venture with an external social and affordable to rent housing developer?</p> <p><b>Supplementary question:</b> As the leader of the council has previously stated that the council would enter into joint ventures for the development of social and affordable to rent homes in the borough, exactly how many joint ventures regarding social and affordable to rent homes are the council exploring as of today, and will these new social and affordable to rent homes be constructed to the Passivhaus Standard?</p>	<p>There are a number of Council owned brownfield sites coming forward for development, including land at:</p> <ul style="list-style-type: none"> <li>- School Street, Radcliffe (circa 90 units);</li> <li>- Wheatfield, Whitefield (circa 30 units);</li> <li>- William Kemp Heaton (circa 30 units); and</li> <li>- Fletcher Fold, Bury (circa 30 units).</li> </ul> <p>All of which will be expected to provide at least 25% affordable housing, and some of these are likely to be developed for 100% affordable housing, including affordable rent and shared ownership.</p> <p>We are also exploring opportunities to provide specialist accommodation in conjunction with Adult Social Care. These proposals will be subject to sign off by Cabinet in due course.</p> <p>We are working in partnership with Homes England to bring forward the East Lancs Paper Mill Site in Radcliffe, which will include the provision of affordable housing.</p> <p>Through our Joint Commissioning Partnership, we are working with Registered Providers of affordable housing to facilitate</p>

	<p>joint working and increase the delivery of affordable homes.</p> <p>We have had strong interest from Registered Providers in delivering affordable housing in Bury, including on some of the sites that the Council is disposing of, and this will help to increase delivery of a range of tenures of affordable homes. Affordable housing for rent is just one form of affordable housing, and there is a clear ambition from Government, both through planning policy and Affordable Homes Programme funding to increase opportunities for affordable home ownership, including shared ownership and discount sale.</p> <p>The Housing Strategy proposes the development of a Bury Eco Standard which will reflect a fully retrofitted home with a renewable energy source. In order to meet the targets for all new homes to be carbon neutral by 2028 and all existing homes by 2038, a significant step change is needed. This will require high standards to be achieved and Passivhaus is seen as the level we need to be aiming for. In developing the Bury Eco standard all options including Passivhaus will be considered and we will certainly include the principles of quality installation which Passivhaus embodies.</p>
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