

**COUNCIL QUESTIONS - PUBLIC**  
**GREATER MANCHESTER SPATIAL FRAMEWORK**  
**25 NOVEMBER 2020**

## **Responses**

### **1 - H LEES**

#### **Question:**

**The traffic of Heywood Old Road at the moment at peak times is dreadful. My concern is that more houses and the proposed school (Edgar Wood Academy) will increase the amount of traffic and it will become gridlocked.**

**There is no way of widening the road - it is crazy to think that you are considering making more traffic. Also the speed that people drive on the road is an accident waiting to happen.**

**We have already got more houses in our area on Langley Lane - we have lost so much green area. You are ruining the landscape!!!!**

#### **Response:**

Detailed transport evidence has been carried out as part of the proposed allocation (this is known as a Locality Assessment). This looks at the site's potential impacts on both the local and strategic road network, as well as identifying possible forms of mitigation. The proposed policy wording for the proposed allocation at Simister and Bowlee has been informed by the Locality Assessment and requires mitigation measures to be implemented to enable the proposed level of development to be accommodated. This will include junction improvements to provide additional capacity and more free flowing traffic.

The proposed policy wording supporting the allocation at Simister and Bowlee states that development must be in accordance with a comprehensive masterplan that has been previously approved by the Council and must facilitate the required supporting transport services and infrastructure including traffic restrictions on Simister Lane to prevent this route from being a form of access/egress to and from the allocation.

### **2 - P ROCHFORD**

#### **Question:**

**Why are you classing Simister as an area of deprivation? It is not nor has ever been?**

**Response:**

It is not entirely clear where the assertion that we are classing Simister as an area of deprivation stems from.

However, if it is referring to the GMSF and its description of the Northern Gateway proposal being located in what is currently an area that includes significant pockets of high deprivation, then this is not to say that Simister itself suffers from deprivation but that the wider area includes some notable concentrations of deprivation.

In particular, the Northern Gateway is accessible to people living within the 10% most deprived areas in England, including parts of East Bury and Whitefield.

**Supplementary Question:**

**Where will the traffic head when the traffic at Heywood old road is not moving which is doesn't now at peak times? Evidence already provided. Also has any thought been given to the fact that you refer to these new residents as potentially working in Pilsworth, would they simply not drive through Simister, cut through Unsworth and on to Pilsworth without the need for any lights? and therefore potentially endangering the lives of the children at parrenthorn and at Margerets with increased traffic on the road near to those?**

**Response:**

Detailed transport evidence has been carried out as part of the proposed allocation (this is known as a Locality Assessment). This looks the site's potential impacts on both the local and strategic road network, as well as identifying possible forms of mitigation. The proposed policy wording for the proposed allocation at Simister/Bowlee has been informed by the Locality Assessment and requires mitigation measures to be implemented to enable the proposed level of development to be accommodated. This will include junction improvements to provide additional capacity and more free flowing traffic.

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**3 - L HOLLAND**

**Question:**

**Please can we see the evidence base that Bury council have used to show that they have explored all brownfield sites options for Bury? As I am aware that there is brownfield sites across Bury that have not been explored as part of proposals in this plan.**

**Response:**

The Council's Strategic Housing Land Availability Assessment (SHLAA) is published on the Council's website and identifies all the housing sites that have been considered by the Council. The SHLAA summary report provides details of the methodology used. This includes consideration of employment sites, public sector land, town centre sites and sites suggested as part of previous call for sites exercises, as well as other sources.

If there are considered to be other sites that might be suitable for development but that have not been considered, we would welcome information being provided so that they can be assessed and considered as part of the next update of the SHLAA. There is a form available on the Council's website to suggest additional sites.

**Supplementary question:**

**Industrial northern gateway. Why would you have an area in purple on the plan that is for outside the plan period but you are stating it will be for employment space? And why are there already houses proposed to be built in the centre of it on the plan now if it is all to be employment space in the future?**

**Response:**

When reviewing Green Belt boundaries, national planning policies requires us to consider their intended permanence in the long term, so that they can endure beyond the plan period.

It is considered necessary to release the site in full at this stage given that the scale of the proposed development means that it will need to be supported by significant strategic infrastructure and this level of investment needs the certainty that the remaining development and associated economic benefits will still be able to come forward beyond the plan period.

The proposed houses identified in the centre of the Heywood Pilsworth allocation are live-work units at Brick House Farm with existing planning permission and are under construction. They were granted planning permission because they are in accordance with the current adopted Bury Unitary Development Plan, which will continue to be used to assess planning applications until the GMSF is adopted (which is dependent on the outcomes of the Examination).

**4 - A GILDEA**

**Question:**

**On the current plan, building will include an area around Heywood Old Road and Bluebell lane. This is of deep concern. The natural way for future dwellers to get into Manchester when Heywood Old Rd is busy is to take the short cut through Simister. The road is not wide enough to take extra traffic and any possible reconfigurations will spoil the nature**

**of the village as well as increase the level of pollution we already suffer from due to the motorway network. Could you make further reductions to building here or ensure that traffic does not use Simister Lane?**

**Response:**

The proposed policy wording supporting the allocation at Simister and Bowlee states that development must be in accordance with a comprehensive masterplan that has been previously approved by the Council and must facilitate the required supporting transport services and infrastructure including traffic restrictions on Simister Lane to prevent this route from being a form of access/egress to and from the allocation.

**5 – A CROSS**

**Question:**

**Why does the Council support these proposals when almost 1 in 10 of Bury's precious and irreplaceable green belt land will be lost forever under the plans? Does the Leader not agree with me, that if we have learned anything from the current pandemic, it is just how vital our outdoor spaces are for our personal physical and mental health, and for our social and familial well-being too.**

**Response:**

For Bury, the Government's standard methodology gives a Local Housing Need target of 10,217 homes over the plan period. However, the GMSF process allows for a redistribution of Bury's need within Greater Manchester and Bury has been able to reduce the housing target to 7,670 homes. This reduced target allows us to protect more Green Belt than would be the case if we had to meet our full needs.

The original 2016 draft of the GMSF proposed the release of 1,210 hectares (20%) of the Borough's Green Belt. However, we have sought to minimise the impact on Bury's Green Belt as far as possible and have made a number of amendments meaning that the Publication GMSF is now proposing a net loss of 520 hectares (9%) of the Borough's Green Belt.

The proposals in the Publication GMSF would mean that 55% of the Borough would remain Green Belt land, which is the third highest proportion of any district in Greater Manchester, behind only Rochdale and Wigan.

Essentially, the GMSF allows us to plan and manage future growth in Bury. Without a plan we run a very real risk of a developer 'free-for-all' and planning by appeal which could lead to a greater loss of Green Belt and development taking place in inappropriate locations without the supporting infrastructure it needs.

**Supplementary Question:**

**Why isn't ALL building in Greater Manchester on brownfield sites and from town centre regeneration?**

**Response:**

The vast majority of new housing in Greater Manchester will continue to be on brownfield land and there is a strong focus in the GMSF on directing new housing towards sites within the existing urban area. This will help to address existing dereliction and poorly used sites, as well as reducing the need to release greenfield and Green Belt land for development.

However, there is simply not enough land within the urban area or on brownfield sites which means that we have no option but to consider Green Belt sites in order to meet the housing targets and to provide a defensible buffer on top of the supply.

**6 - M WILLIAMS**

**Question:**

**The GMSF is a hugely important change to our region and Borough. It is essential as many people as possible get to have a say on it. As such, why is the Council only providing a consultation over Christmas during the middle of a pandemic?**

**Response:**

It should be noted that the proposed start date for consulting on the GMSF in early December is no longer an option, given recent events.

There is a need to review the next steps for the plan and this will take some time. However, the Government has been clear that the challenge posed by Covid-19 is not a sufficient reason to delay plan preparation. In terms of Local Plans, the guidance is clear that the Government want to see Local Plans progressing through the system as a vital means for supporting economic recovery in line with the Government's aspirations to have up-to date plans in place across the country by 2023.

**Supplementary Question:**

**What would be the implications, financial and otherwise, of moving the consultation to a time people are not focused on protecting their loved ones, and perhaps even seeing them for the first time this year?**

**Response:**

As with the original question, this is no longer an option.

**7 - R FALLON**

**Question:**

**Has the air quality in Simister been taken into account in the above plans? Simister currently has unhealthy levels of particulates.**

**Response:**

A wide range of actions will be required to improve air quality to appropriate levels, and support objectives relating to health and quality places. Many of these actions are beyond the scope of the GMSF, but the primary focus will need to be on transport given its primary contribution to air pollution.

An initial Air Quality Assessment has been undertaken to support the allocation and this identifies that any stand-off from the motorways required due to the noise constraints for residential elements of the scheme is likely to be sufficient as a form of mitigation to prevent any future receptors experiencing levels of pollution greater than the Air Quality Objective limits.

However, there will be a requirement for more detailed work on air quality to inform detailed masterplanning of the proposed allocation and any subsequent planning application.

Alongside the GMSF consultation, the GMCA are also consulting on The Greater Manchester Clean Air Plan which aims to bring nitrogen dioxide (NO<sub>2</sub>) air pollution levels from road vehicles within legal limits by 2024 at the latest, as directed by Government.

**8 - C BIRCHMORE**

**Question:**

**According to the Bury Council website the GMSF target for Bury is 7,670 homes. Bury Council has previously confirmed that it can build 4,100 homes on brownfield sites. Given the GMSF target of 7,670 this means that Bury Council would be required to build 3,570 homes on greenbelt. In the table with the heading "Bury's proposals for new housing" the total number of homes to be built on greenbelt is 6,440 homes. This means that Bury Council is proposing allowing enough greenbelt to build 2,870 homes more than is required as part of the GMSF. If both the proposed Elton Reservoir and Walshaw sites were cut in half that would reduce the amount of homes that could be built on greenbelt by 2,375 homes which is still less than the proposed over release of land. Why are none of the councillors asking about this?**

**Response:**

For Bury, the Government's standard methodology gives a Local Housing Need for 10,217 homes over the plan period. The GMSF process allows for a redistribution of Bury's housing need within the conurbation to reflect the availability of land or to reflect strategic policies. As a result, Bury has been able to reduce the baseline housing target over the plan period to 7,670 homes.

However, as a Borough, we do not have enough land within the urban area or on brownfield sites to meet even this reduced target. Bury's Strategic Housing Land Availability Assessment identifies that there is only enough land to accommodate 3,963 homes. This supply 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 East Lancashire Paper Mill site and the former Tetrosyl site at Bevis Green in Walmersley.

This supply shortfall means that Green Belt sites are proposed to be released through the GMSF to meet the reduced target as well as providing a defensible buffer on top of the supply.

The sites in Bury that are proposed for housing in the GMSF have the capacity to deliver 4,840 homes within the plan period with an additional 1,600 homes beyond the plan period on the Elton Reservoir site.

Together, the baseline supply and the proposed housing within the plan period on Green Belt sites are estimated to have the capacity to deliver around 8,803 units. This provides a 14.8% buffer on top of the supply to allow for sites not coming forward as envisaged over the plan period. Buffers are a standard requirement in development plans to provide flexibility in the supply and there is a 17% buffer against the total Greater Manchester target.

The GMSF proposals include the release of Green Belt land beyond the plan period for residential development at the Elton Reservoir site. This is because the site is key to delivering significant upfront investment into essential strategic infrastructure and the site needs long term certainty on the scale of development to withstand these initial costs. The natural development of this site, using standard build out rates, will mean that the scale of delivery will extend beyond the plan period.

It should be noted that if the GMSF had a baseline housing target for Bury that reflected the minimum Government target of 10,217 homes, there would still be a need for a buffer to be identified on top of this. At 14.8% this would equate to an additional 1,514 units. It would still only be feasible for the Elton Reservoir site to deliver 1,900 within the plan period, with 1,600 post plan. The total housing figures (including post-plan) would therefore equate to 13,331 as opposed to the current GMSF figures of 10,406 (an increase of 2,925).

## **9 - G STAPLES-JONES**

### **Question:**

**Question to the leader of the council Eamonn O'Brien; Given that only 2,000 people replied to the GMSF consultation out of a Borough of roughly 189,000, which is a 1.05% response - how do Bury Council feel justified in having fairly consulted the local population, when they havant even consulted a quarter of the people who live here on these plans to concrete over large parts of Borough?**

**Response:**

The Council undertook extensive consultation on the revised draft of the GMSF in 2019. This included writing to every household in the Borough, making relevant material available for inspection at all libraries and other public buildings and holding a number of public drop-in sessions where people could come and speak to Council officers about the proposals.

The consultation and engagement that we undertook exceeded all statutory requirements – particularly notifying every household in the Borough. In my view, therefore, I feel that the Council did all it could to engage with local residents and stakeholders and to inform them how to make their views known if they wished to do so.

**Supplementary Question:**

**If this is fair and acceptable to the council then why do we bother having 51 councillors and not just one councillor, as according to the precedent set with the GMSF we do not need a majority or a democratic mandate within the Borough anymore.**

**Response:**

As mentioned in my previous response, the Council notified every household in the Borough of consultation on the revised draft of the GMSF in 2019 and exceeded statutory requirements for consultation.

**10 - S CLUER**

**Question:**

**In light of what is happening in both Salford and Stockport, will the council leader be making the sensible decision to postpone any further decisions on the GMSF?**

**Response:**

I can confirm that the GMSF item on the agenda for this evening's business will not be moved and the decision on this will therefore be postponed.

**11 - J SHEPPARD**

**Question:**

**In September 2019, in response to a question asking how much Bury Council had spent on the GMSF, I was informed the Council had contributed £147,596 to commission a joint consultation team with other Councils. It was stated that the money used had come from a ring-fenced account of contributions from developers set up to mitigate loss of employment opportunities. Firstly, who are those developers? and now, 14 months on, can you please give an updated breakdown of the**

**expenditure on the GMSF and more detail on how the money from the ring-fenced account has actually been used since then.**

**Response:**

The previous response highlighted that Bury Council jointly commissioned a consultancy team, with Rochdale and Oldham, to produce a high-level masterplan of the sites that collectively make up the sites that are collectively referred to in the latest GMSF as the M62 North East Corridor. Bury Council's total contribution to this joint-commission was £147,596.20.

Since then, a joint bid by Bury and Rochdale Councils has been successful in securing £250,000 from Evergreen funding to support the establishment of a fund to cover the costs of further work required on the Northern Gateway site to ensure that Bury and Rochdale Councils fully understand issues such as necessary highways and transport interventions and to help the districts shape and control elements of the site going forward – such as identifying potential development plots, phasing, target sectors and value capture.

Access to the £250,000 Evergreen Fund was subject to match-funding from both districts (£125,000 from each district). However, Bury's previous contribution of £147,596.20 qualified as our match funding.

The money used came from a ring-fenced account made up of developer contributions that have been paid to the Council to mitigate against the loss of employment land to other, higher value types of development, such as housing or retail.

**12 - C SMITH**

**Question:**

**Please can the committee explain in detail how the GMSF, the inherent loss of Greenbelt land and the extra pollution that will be produced by the addition of over 10,000 homes fits in with the plans to introduce a clean air tax within Bury?**

**Response:**

Clearly air quality is an important consideration and one which Bury, along with the other Greater Manchester authorities is seeking to address.

This is evident in Greater Manchester's Clean Air Plan, which proposes to introduce Clean Air Zones right across the conurbation.

In terms of the GMSF, its roll is to locate sites in the most sustainable locations, with increased densities in locations that are immediately close to public transport, such as urban centres or in and around public transport hubs.

The GMSF also includes the policy basis for requiring new technology in developments, such as requirements for new properties to have electric vehicle charging points and good designs and use of sustainable materials.

We know that the Government is due to ban diesel and petrol cars in the next decade and this will accelerate the growth in less polluting vehicles on our roads.

**Supplementary Question:**

**Radcliffe has no secondary school. Where will the children of the new houses proposed within the GMSF be educated? No new schools are proposed in this area within the GMSF, so presumably they will have to travel to neighbouring areas. Again, how does this increase in commuting fit in with a clean air policy?**

**Response:**

The GMSF will need to be supported by significant investment in the sub-region's infrastructure including roads, public transport, energy and utilities as well as schools and health facilities.

The Policy supporting the proposed housing allocation at Elton Reservoir includes a requirement for the development to make provision for a new secondary school to meet the needs of the prospective school-aged residents. Any planning applications for development on this sites will need to be in line with this policy requirement for them to be approved.

**13 - C HEATON**

**Question:**

**Why are you not working hard enough to find sites to spread out the house builds instead of cramming thousands into 3 areas...surely smaller numbers in more areas is the way forward.. this would ease congestion in of people and cars and not have such a major impact.**

**Don't destroy whole areas of greenbelt leave parts of it in all areas not total destruction**

**Response:**

Bury Council remains committed to prioritising the development of brownfield land and these are spread across the existing urban area.

However, the proposed GMSF sites are designed of a scale that will enable them to deliver essential social and physical infrastructure within and around the site.

If the GMSF proposed multiple smaller sites across the Borough, these would not be able to deliver the investment needed to deliver the infrastructure required.

**14 - A DRURY**

**Question:**

**Please explain how failure to adopt GMSF will lead to a developer free for all? Surely each development would then be judged individually on**

**its own merit by the Council with input from local residents as they are now? And we don't have a developer free for all now so please justify this assertion**

**Response:**

We understand that a plan of this kind will never be universally popular but it is vital that we get a plan in place that allows us to properly plan and manage future growth and to ensure that new development is supported by the infrastructure needed.

Without a strong plan in place, there is a serious risk that we will get inundated by speculative planning applications on Green Belt. Even if the Council were to refuse these applications, there is a very real chance that developers would appeal against these refusals and that future development will be determined through the appeal process. This could lead to a greater loss of Green Belt and unplanned and unmanaged development with inadequate supporting infrastructure.

The reason that we don't currently have a developer free-for-all is because we are fairly advanced in the process of getting a plan in place. Because of this, an appeal would be less likely to succeed. However, if the GMSF were abandoned and there was no chance of getting a plan in place, it is likely that developers will submit speculative applications for development across the Borough, including other sites currently designated as Green Belt.

**15 - B WILKINSON**

**Question:**

**Now that Stockport have been promised changes to the GMSF, and Salford have postponed the decision, how can Bury vote on the GMSF as the Council can now have no idea what the changes will show? If the plan is to be changed, it must go out for public consultation again, or be abandoned. Bury can have no alternative but to adjourn the vote until the amendments are clear and the plan has been put to all the Councils again, and the voters, for consultation.**

**Response:**

The Council no longer intends to vote on this item at this meeting.

**16 - K CAMERON**

**Question:**

**Why will the Council not disclose minutes of all meetings taken place to decide which areas are being allocated to the GMSF? Building on Walshaw is so unbelievably ridiculous and I would like to see how this was decided.**

**Response:**

Naturally, meetings did take place between Council Officers and Members to discuss the GMSF, including the sites that are proposed for development. However, these meetings were held on an informal basis and no minutes were taken so this information is not held.

It is important to point out that a public authority needs a safe space to develop ideas, debate live issues, and reach decisions away from external interference and distraction, particularly when part of the process of formulating and developing policy.

The need for public authorities to have a "thinking space" for policy development still in the course of completion is important and it protects the integrity of the formal decision-making process and public consultation which follows. The disclosure of information on meetings would inhibit free and frank discussions in the future, and that loss of frankness and candour would damage the quality of advice and lead to poorer decision making.

It is not judged to be in the interest of the public to make information available on sites that may or may not be proposed as a site allocation, nor to publish draft development proposals that are 'work in progress' and therefore subject to change.

Such an action would only serve to cause confusion as to what is the most up-to-date position, and could contradict the efforts of the GMCA and Bury Council to communicate the proposals in a proportionate and effective manner.

**Supplementary Question:**

**How will the Council deal with all of the angry residents if they continue to try and push through building on Walshaw when they are preparing to go legal?**

**Response:**

Once a plan has been submitted to the Government, the appointed Inspector will take control of the examination process from start to finish. The Inspector's role is to examine whether the submitted plan meets the tests of soundness defined in the NPPF and meets all the relevant legislative requirements, including the duty to co-operate.

The Examination would take into account all comments raised during consultation on the Publication version of the plan and, if requested by the Inspector, there may be an opportunity for participants to submit more detailed statements to support the comments made during consultation on the Publication plan. Hearing sessions may also be arranged and these may provide an opportunity for participants to make verbal representations.

Any participant in the process is entitled to instruct legal assistance to inform any representation and, if given the opportunity, to verbally present their case at the Hearing sessions.

## **17 – G BOOTH**

### **Question:**

**How is it in 46 years Bury's population has only risen by 8430 yet you want to build as many houses in 15 years which would mean less than 1 person per house,Why?**

### **Response:**

It is important that we plan to provide a range of new homes to accommodate the housing needs of a growing population, including much needed affordable homes.

The Government has introduced a standard methodology for calculating Local Housing Needs to provide local authorities with a clear and consistent understanding of the number of new homes needed in an area.

For Bury, the Government's standard methodology gives a Local Housing Need target of 10,217 homes over the plan period. This is the baseline starting point for a plan to consider.

The GMSF process allows for a redistribution of Bury's target within the conurbation to reflect the availability of land or to reflect strategic policies. As a result, Bury has been able to reduce the baseline housing target over the plan period to 7,670 homes

### **Supplementary Question:**

**Why do you all insist the GMSF is good for everyone when you keep trying to sugar coat it by adding green spaces, surely common sense tells you that we already have green spaces and 100's of houses for sale or empty as for industrial we have over 20 sites sat empty and rotting?**

### **Response:**

Bury Council remains committed to prioritising the development of brownfield land.

We have included all brownfield sites that we are aware of within the existing supply of housing land within the Borough. However, there is simply not enough brownfield land available to meet even the reduced housing targets identified in the GMSF let alone the higher level of housing need that we would be required to provide for using the Government methodology.

## **18 - L SWYERS**

### **Question:**

**Do you agree that building on greenbelt land helps to reduce pollution and if so, why?**

### **Response:**

The GMSF proposals for Bury include a number of strategic transport interventions, including improved public transport that will help the movement of our residents.

The GMSF also plans for development to be in the most sustainable locations, with increased densities in locations that are immediately close to public transport, such as urban centres or in and around public transport hubs.

It also introduces a policy basis for requiring new technology in developments, such as requirements for new properties to have electric vehicle charging points and good designs and use of sustainable materials.

Conversely without the planned delivery of sites it is possible that we would lose control of where development occurred and would be unable to secure much needed infrastructure. Likewise, we would be unable to introduce new standards and requirements in new developments.

**Supplementary Question:**

**Do you also agree that by destroying places of ecological value helps with our mental health and well-being - if you disagree why are you in favour of building over it?**

**Response:**

The proposed site allocations in the GMSF are supported by a wide range of detailed evidence. This includes various wildlife surveys of both species and habitats as well as proposals for ecological mitigation and enhancement.

In addition, policies supporting the proposed site allocations in the GMSF require development proposals to minimise impact on and provide net gains for biodiversity assets within the allocation.

**19 - C BOWDLER**

**Question:**

**Why are the council determined to build over our greenbelt land when there is other space available without having to touch greenbelt land?**

**Response:**

Bury Council remains committed to prioritising the development of brownfield land.

Indeed the Council has been successful in delivering housing on brownfield sites, with around 90% of housing completions in the past decade being on brownfield land.

As a result, Bury does not have the large swathes of brownfield land that exists in other local authority areas up and down the country and in parts of Greater Manchester. In fact, we have the lowest amount of available brownfield land of the ten Greater Manchester authorities.

We have included all suitable brownfield sites within the existing supply of housing land identified in the Borough.

However, there is simply not enough brownfield land available to meet our housing needs – whether that be measured by the Governments housing target or the reduced housing target that the GMSF proposes.

This is evidenced in the Strategic Housing Land Availability Assessment. If there are considered to be other sites that might be suitable for development but that have not been considered, we would welcome information being provided so that they can be assessed and considered.

**Supplementary Question:**

**Is it for profit?**

**Response:**

No. The preparation of the GMSF is not a profit-driven exercise. The Council has a statutory obligation to produce a development plan that makes provision for future development needs.

**20 – J DARBYSHIRE**

**Question:**

**The destruction of the green belt is a very serious crisis that we face. Why is Bury Council on the one hand recognising the need to develop policy and actions to improve air quality, advice regarding the dangers of flooding and provide support services for our current physical and mental health crisis and yet at the same time PLANNING TO CREATE THE MAJOR CAUSE of each of these crisis? All research is overwhelming on what the impact of our green belt loss will do to each of these and Bury Council will not have the funds to repair the damage they have caused let alone improve upon the position we are already in.**

**Response:**

The GMSF is not being prepared in isolation. It is one of the suite of strategic documents setting out how Greater Manchester can achieve the ambition set out in the Greater Manchester Strategy.

One of the key aims of the GMSF is to assist in tackling health inequalities across the sub-region. Greater Manchester has a wide range of attributes and enormous potential, but its long-term prospects will be contingent on delivering major improvements in public health. It cannot be considered a success unless existing health inequalities are addressed.

This will require a diverse range of coordinated measures, many of which lie outside the scope of the GMSF.

The GMSF does, however, provide a strong policy framework that includes measures to reduce risks to human health, including addressing flood risk and

reducing levels of air pollution. These policies will ensure that appropriate mitigation will need to be delivered as part of any new developments.

## **21 - A DAISLEY**

### **Question:**

**What other sites have been considered?**

### **Response:**

In November 2015, a 'Call for Sites' exercise was launched whereby local residents, businesses, land owners and developers were invited to identify sites that they think could be suitable for housing or employment development. The suggested sites within the Green Belt are shown on the following plan.

Across Greater Manchester, there were hundreds of sites put forward for development. Around 80 sites in Bury have been put forward for development that are currently designated as Green Belt land. These sites amount to over 500 hectares and would have the potential to deliver thousands of new homes if released. These sites were all considered as part of the GMSF process.

### **Supplementary Question:**

**Do any Bury labour councillors live near the proposed sites in Walshaw/Elton**

### **Response:**

The tone of this question would appear to be an attempt to undermine the integrity of Labour Councillors and is not helpful in discussion around the GMSF.

## **22 - P COOKE**

### **Question:**

**Have the council considered the health and wellbeing of the electorate in seeming to be intent on destroying the Green Belt, especially considering the recent pandemic lockdowns?**

### **Response:**

One of the key aims of the GMSF is to assist in tackling health inequalities across the sub-region.

Greater Manchester has a wide range of attributes and enormous potential, but its long-term prospects will be contingent on delivering major improvements in public health. It cannot be considered a success unless existing health inequalities are addressed.

This will require a diverse range of coordinated measures, many of which lie outside the scope of the GMSF, but it will be vital that the positive contribution

of the GMSF is maximised as far as possible. As a result, the overall strategy and many of the policies and proposals in other parts of the plan will support improvements in health and wellbeing, and reductions in health inequalities, including:

- Promoting a successful economy for Greater Manchester, where everyone is able to share in the benefits of growth, given that household income is a key determinant of good health;
- Increasing the supply of high quality and affordable homes that meet minimum size and accessibility standards, helping to ensure that everyone has a decent place to live;
- Enabling people to adopt healthier lifestyles, including through the development of a high quality green infrastructure network, encouraging the provision of a wide range of recreation and sports facilities, including supporting an increase in walking and cycling; and
- Reducing the risks to human health, including through taking an integrated catchment-based approach to addressing flood risk, reducing levels of air pollution, providing cooling and shading to combat high temperatures, promoting high levels of fire safety, and designing places to minimise opportunities for crime, terrorism and anti-social behaviour.

**Supplementary Question:**

**Why are some councillors seemingly intent on ruining our green and pleasant land for future generations for a very shortsighted quick profit when enough affordable housing can be provided using brownfield sites?**

**Response:**

First and foremost, the preparation of the GMSF is not a profit-driven exercise. The Council has a statutory obligation to produce a development plan that makes provision for future development needs.

Bury Council remains committed to prioritising the development of brownfield land but simply does not have sufficient sites to meet the needs of a growing population.

**23 - J DUCKWORTH**

**Question:**

**Can every councillor answer this question honestly with hand on heart?**

**Has every empty house been filled, and every single brown field site been considered before using greenbelt?**

**Response:**

In terms of empty homes, returning these to a useful purpose would not count towards the Borough's housing requirement, so even if all of the Borough's

empty properties were occupied, there would still be a requirement to build the new homes to meet needs.

Bury Council remains committed to prioritising the development of brownfield land but simply does not have sufficient sites to meet the needs of a growing population.

## **24 - M HOLDER**

### **Question:**

**Do you think the destruction of precious greenbelt land is absolutely necessary and in the best interest of your constituents even though there are brownfield sites which have not been considered?**

### **Response:**

Bury Council remains committed to prioritising the development of brownfield land.

Indeed the Council has been successful in delivering housing on brownfield sites, with around 90% of housing completions in the past decade being on brownfield land.

As a result, Bury does not have the large swathes of brownfield land that exists in other local authority areas up and down the country and in parts of Greater Manchester. In fact, we have the lowest amount of available brownfield land of the ten Greater Manchester authorities.

We have included all suitable brownfield sites within the existing supply of housing land identified in the Borough.

However, there is simply not enough brownfield land available to meet our housing needs – whether that be measured by the Governments housing target or the reduced housing target that the GMSF proposes.

This is evidenced in the Strategic Housing Land Availability Assessment. If there are considered to be other sites that might be suitable for development but that have not been considered, we would welcome information being provided so that they can be assessed and considered.

### **Supplementary Question:**

**Have you thought about how the extra traffic on our roads will be managed when Bury already becomes gridlocked so easily? As well as the extra air noise and fumes**

**Do the right thing**

**How involved have developers been in the planning meetings? Could it be construed as 'bribery'? Don't let money be your incentive for ruining the countryside**

### **Response:**

The GMSF is not being prepared in isolation. It is one of the suite of strategic documents setting out how Greater Manchester can achieve the ambition set out in the Greater Manchester Strategy. It sits alongside other plans and strategies, including the Transport 2040 Delivery Plan.

It is acknowledged that future growth and development will need to be supported by investment in infrastructure including roads, public transport, energy and utilities as well as schools and health facilities.

This will include a need for a range of transport and highway interventions that will be required to support the new development proposals in Bury, including new link roads, junction improvements, improved access to public transport and measures to encourage more walking and cycling.

The preparation of the plan is not a money-driven exercise. The Council has a statutory obligation to produce a development plan that makes provision for future development needs.

We have included all brownfield sites that we are aware of within the existing supply of housing land within the Borough. However, there is simply not enough brownfield land available to meet even the reduced housing targets identified in the GMSF let alone the higher level of housing need that we would be required to provide for using the Government methodology.

## **25 - J HOLT**

### **Question:**

**It has been said that if the GMSF is not adopted the alternative of a 'free for all' will be worse.**

**What other options for a fairer distribution of sites have been put forward or discussed?**

### **Response:**

The sites in Bury that have been proposed for employment and housing development in the GMSF have evolved as the GMSF has progressed through its various stages of preparation and these have all been subject to extensive consultation. The changes to the sites have been made to reflect new and updated evidence and public views expressed in response to consultation on the previous drafts.

The changes have resulted in a significant reduction in the proposed net loss of Green Belt in the current Publication GMSF compared to what was originally proposed in the first draft in 2016 and what was subsequently proposed in the revised draft in 2019.

We understand that a plan of this kind will face some objection but it is vital that we get a plan in place that allows us to properly plan and manage future growth and to ensure that new development is supported by the infrastructure needed.

Without a strong plan, there is a serious risk that we will get inundated by speculative planning applications on Green Belt and that future development will be determined through the appeal process. This could lead to a greater loss of Green Belt and unplanned and unmanaged development with inadequate supporting infrastructure.

**Supplementary Question:**

**Can you give an HONEST answer to how the sites were selected?**

**Response:**

In November 2015, a 'Call for Sites' exercise was launched whereby local residents, businesses, land owners and developers were invited to identify sites that they think could be suitable for housing or employment development. The aim of this was to identify all suitable brownfield sites and urban sites to feed into the supply.

Following the 'Call for Sites', all sites were initially assessed against a series of key principles as described in a Background Paper entitled 'Approach to Accommodating the Land Supply Shortfall' (October 2016).

The approach to site selection used for the 2016 draft has subsequently been reviewed and refined at each stage. This was partly in response to comments raised during consultation and also because the preparation of a development plan is, by its very nature, an iterative process that needs to evolve and be justifiable as 'an appropriate strategy' in accordance the National Planning Policy Framework.

Furthermore, it should also be noted that, as part of the process of preparing the drafts of the GMSF, it is also necessary to consider *all* the evidence base to ensure that sites are deliverable. The site selection process is just one part of that evidence.

**26 - M WALSH**

**Question:**

**Under The Wildlife & Countryside Act 1981, it is vital that wildlife & habitats are considered as part of the project to avoid habitat loss, fragmentation & the damaging impact of daily human activity on nature. As part of choosing the sites, where I understand Elton Reservoir Basin Country Park is home to five of the UK's native species of amphibians - Great Crested Newts, Palmate Newts, Smoot Newts, Common Frog, Common Toad and other sites, what Reports regarding wildlife, state of nature & biodiversity, taking into account the protected & priority species was and has been carried out?**

**Response:**

The proposal at Elton Reservoir, as with other sites proposed for development through the GMSF, is supported by a wide range of detailed evidence. This

includes various wildlife surveys of both species and habitats as well as proposals for ecological mitigation and enhancement.

This evidence is all available on the Greater Manchester Combined Authority's web site.

**Supplementary question:**

**Do Councillors, presently in favour of these developments, under the GMSF, realise that over 1,200 species have become extinct or threatened with extinction (State of Nature Report 2016) and that there are 1,150 priority 'species' in the UK which are threatened species and require conservation, and accordingly, need humans and those elected, to help protect them?**

**Response:**

The State of Nature Report does present some concerning findings about changes to the UK's wildlife.

However, many factors have led to these changes over recent decades, but the Report is clear that changes to agricultural practice has been by far the most significant driver of species decline.

Climate change has had a significant impact too, although its impact has been mixed, with both beneficial and detrimental effects on species.

The GMSF is not just about development. It also includes a wide range of other policies designed to create a greener Greater Manchester including policies on green infrastructure, biodiversity and geodiversity.

In addition, policies supporting the proposed site allocations in the GMSF require development proposals to minimise impact on and provide net gains for biodiversity assets within the allocation.