www.bury.gov.uk/burylocalplan

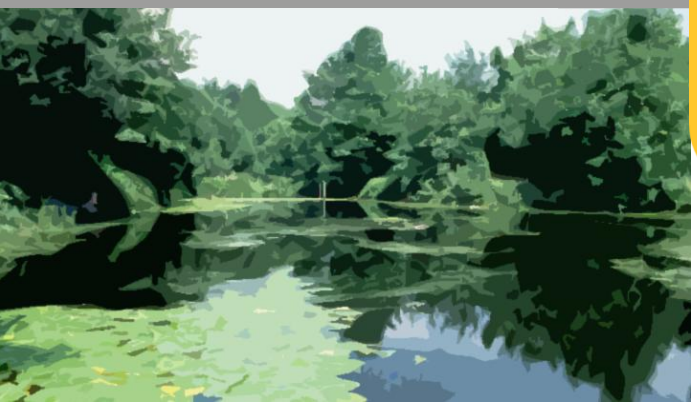
Bury Council






Bury Local Plan: Regulation 22 Consultation Statement

October 2026







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1. Introduction

1.1 This Consultation Statement has been prepared in accordance with Regulation 22 (1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. It sets out how Bury Council (the Council) considers it has fulfilled its statutory duty to consult and engage with the public and key stakeholders on the preparation of the Local Plan under Regulations 18 and 19 as well as Bury's Statement of Community Involvement (SCI)[1] which sets out how and when the community will be involved in planning matters.

1.2 The Council is currently preparing a new Local Plan that sets out long-term framework to manage future growth and development in the Borough, covering from the period of 2022 to 2043. It will form a key part of Bury's wider development plan alongside:

- Places for Everyone Joint Development Plan (adopted in March 2024);
- Greater Manchester Joint Minerals Plan (adopted in April 2013); and
- Greater Manchester Joint Waste Plan (adopted in April 2012).

1.3 Places for Everyone (PfE) is a strategic plan that covers nine of the ten Greater Manchester districts (excluding Stockport). PfE was adopted in March 2024 and provides the strategic framework up to 2039 within which the participating districts need to develop their Local Plans.

1.4 The Local Plan provides a more detailed set of locally specific planning policies to complement the strategic policies within PfE. Once adopted, Bury's Local Plan policies will replace the remaining saved policies in the Unitary Development Plan and will sit alongside Places for Everyone and the joint Greater Manchester Minerals and Waste Plans in forming Bury's wider development plan.

1.5 The Local Plan is accompanied by a draft Policies Map which provides spatial interpretation of the plan, including identifying specific sites and areas where policies will apply.

1.6 This Consultation Statement provides a summary of how the Council has undertaken community participation and stakeholder involvement in the Local Plan to date. It sets out the main issues raised by consultation and how the

[1] This document can be found online at: https://www.bury.gov.uk/planning-building-control/planning-policy/statement-of-community-involvement

Council responded to the issues raised in relation to the draft Local Plan at the Regulation 18 stage.

1.7 The Consultation Statement has been updated to reflect the key issues raised in response to an invitation to submit representations on the Regulation 19 Publication Local Plan.

2. Early engagement

2.1 As an early stage in the preparation of the Local Plan, we began the process of information gathering and we invited comments on what the Local Plan ought to contain, the scope of the Integrated Assessment and issued a Call for Sites over a six-week period from 25 March to 6 May 2024.

2.2 The comments received during this stage have all been considered as part of the preparation of the draft Local Plan and the supporting Integrated Assessment.

3. Draft Local Plan (Regulation 18)

3.1 The draft Local Plan was subject to a period of consultation running from 17th March to 12th May 2025. The following sets out the Council's consultation methods employed for the draft Local Plan.

Inspection of material

3.2 All relevant material was made available for inspection electronically via the Council's planning policy pages of the web site at www.bury.gov.uk/burylocalplan.

3.3 The web site included a downloadable copies of the Plan and supporting evidence base and a series of Frequently Asked Questions that provided answers to common questions such as what a Local Plan is, how the Bury Local Plan relates to Places for Everyone, what it says about certain issues and how people could have their say and stay informed.

3.4 Material was also be made available for inspection electronically at Bury Town Hall between the hours of 8.45am and 5.00pm (Monday to Friday) and at local libraries during their normal opening hours (see Libraries and archives and Tottington Centre for details).

Database contacts

3.5 The Council's Strategic Planning team have developed a consultation database which includes all specific consultation bodies as well as a wide range of other individuals, groups and stakeholders that have expressed an interest in planning policy matters previously. In total, the database contains around 900 active contacts.

3.6 We contact those on the database throughout the process of preparing planning policy documents so that everyone had the opportunity to influence policies and proposals as they emerge.

3.7 Depending on the contact's specified preference, the Council sent letters or emails to all database contacts (see Appendix 1).

Social media

3.8 Social media messages advertising consultation on the draft Local Plan were shared via the Council's official Facebook (16,000 followers) and X (22,000 followers) platforms pages in order to extend the reach of the consultation to a wider demographic (see Appendix 2).

Press release

3.9 The Council also issued a press release at: https://www.mynewsdesk.com/uk/bury-council/pressreleases/setting-out-the-shape-and-ambitions-of-bury-3372116)

3.10 This was reported in both the Bury Times and the Manchester Evening News.

Posters

3.11 The Council produced additional publicity material to advertise consultation on the draft Plan in the form of posters (see Appendix 3) which were placed on town centre notice boards, in the Mill Gate shopping centre, in Ramsbottom Civic Centre, at Bury and Radcliffe Markets, at leisure centres and in notice boards within thirteen of the biggest parks across the Borough.

Summary of responses received on the draft Local Plan

3.12 In response to consultation on the draft Local Plan, the Council received a total of 41 representations which included 480 individual comments from respondents across a variety of areas of the draft Plan.

3.13 The Council has taken account of representations received on the Draft Bury Local Plan in preparing the Publication Local Plan. The consultation generated representations on a range of matters but the most significant number of comments related to housing with a notable amount of comments relating to green infrastructure, transport, the Vision and Strategic Objectives and the built environment and design.

3.14 14 of the representations were promoting existing Green Belt sites for development.

3.15 The following sections summarise the main issues raised under each chapter of the Draft Local Plan and explain how the Council responded in moving to the Publication Local Plan.

Vision and strategic objectives

3.16 Representations generally recognised the importance of sustainable growth, housing delivery, economic development and the protection of Bury's distinctive character. However, comments also questioned whether the Draft Plan's vision was sufficiently specific to the borough and whether its approach would deliver the identified housing and economic objectives.

3.17 Some respondents considered that the vision should give greater prominence to housing delivery. Others argued that it should better reflect Bury's heritage, industrial legacy, market culture, individual townships, natural environment and regeneration priorities. Lancashire Wildlife Trust specifically sought recognition of the biodiversity emergency and a stronger commitment to nature recovery.

3.18 The Council accepted that the vision could be made more distinctive and agreed to amend it accordingly, including a reference to biodiversity. It nevertheless considered that the vision should remain strategic and concise, rather than incorporate detailed aspirations for individual neighbourhoods or matters outside the scope of the Local Plan.

3.19 Landowners and developers also questioned whether reliance on the strategic housing allocations in PfE would provide an appropriate range of housing sites and deliver the required housing supply. These concerns were noted

although they did not result in a fundamental change to the strategic approach at this stage.

3.20 The Publication Local Plan therefore retains the overall direction of the Draft Plan while refining the vision to better reflect Bury's identity and environmental priorities.

The Strategy and Key Diagram

3.21 Representations on the overall strategy raised questions about the scale and distribution of growth, the reliance on strategic allocations, the availability of smaller sites and the relationship between development, infrastructure and environmental protection.

3.22 Some developers argued that the Council should consider additional sustainable locations beyond the strategic allocations in PfE. Others questioned whether the strategic sites alone would provide a sufficient range of deliverable housing opportunities. In the Council's view, the Strategic Housing Land Availability Assessment and Employment Land Availability Assessment adequately identify the borough's potential supply of sites. As such, there was no fundamental change to the strategic approach in response to these comments.

3.23 Comments on the Key Diagram included concerns about the absence of mapped housing allocations, the visibility of the Local Nature Recovery Strategy network, the treatment of the former Manchester, Bolton and Bury Canal, and the distinction between the different levels of town centre in the borough. The Council explained that the Key Diagram was intended to show the strategic elements of the spatial strategy, with more detailed information provided through the evidence base and Policies Map.

3.24 Following a representation from the Prestwich Village Neighbourhood Forum, the Council accepted that the Policies Map should distinguish Bury town centre, as a sub-regional town centre, from Ramsbottom, Radcliffe and Prestwich. Other suggestions, including displaying the Local Nature Recovery Strategy network on the Key Diagram and identifying non-strategic housing and employment sites on that diagram, did not result in changes as the Council considered that these matters were addressed through other plan policies or evidence.

3.25 The Publication Local Plan thus retains the strategic framework while making a specific mapping amendment to clarify the hierarchy of centres.

Climate change

3.26 Representations on draft Policy LP-CC1 raised questions about the policy's clarity, its relationship with other climate-related policies and whether it established an effective framework for decision-making. Some respondents considered that the policy was too aspirational, while others sought more specific requirements relating to energy efficiency, passive design, renewable energy, tree planting and climate adaptation. Viability was also raised as a concern.

3.27 The Council concluded that Policy LP-CC1 was more an expression of aspiration than a clear policy framework for determining planning applications. It therefore decided to delete the policy and replace it with commentary within Chapter 3, The Strategy. The detailed requirements intended to address climate change would instead be provided through other policies in the Local Plan and PfE.

3.28 Natural England's comments on the effects of pollution on natural resources and biodiversity also prompted a proposed addition to the strategic commentary and an amendment to Policy LP-AP1, Air Quality and Pollution Control. The Council considered that the importance of peat and opportunities for rewetting moorland and mossland were already addressed through Policy LP-GI10, Soils. The Woodland Trust's comments on the role of trees in carbon storage, pollution reduction and urban cooling were considered to be addressed through the tree and woodland policy.

3.29 The principal change was therefore structural: the aspirational standalone climate change policy was removed, with relevant requirements addressed through the wider policy framework and supporting text.

Housing

3.30 Representations on housing raised concerns about whether the Draft Plan would deliver sufficient housing to meet the borough's needs, whether the reliance on PfE strategic allocations provided a suitable range of sites, and whether the proposed policies would support housing delivery in practice.

3.31 Developers questioned the deliverability and timing of strategic sites and argued that the Plan should identify opportunities at a wider range of locations. Other representations focused on affordable housing, including the appropriate level of provision, viability and the needs of particular groups.

3.32 The Council's responses referred to the role of the Housing Need and Demand Assessment and the Strategic Housing Land Availability Assessment in supporting the Plan's approach. In response to comments about affordable

housing for NHS and care-sector employees, the Council explained that the Housing Need and Demand Assessment considered affordable housing need in relation to local incomes and that the housing evidence had been prepared in accordance with the relevant planning practice guidance.

3.33 A specific amendment was identified to Policy LP-H4, Affordable Housing Provision, to incorporate viability considerations for major development in the Green Belt, where justified and in accordance with national policy and guidance. This responded to concerns that the policy's affordable housing requirement should recognise the potential role of site-specific viability.

3.34 The Council did not accept that the representations required a wholesale change to the housing strategy. The Publication Local Plan continues to rely on the strategic framework established by PfE, supported by the Council's housing evidence.

Economic growth

3.35 Representations on economic growth considered the amount and type of employment land required, the role of existing employment areas and the opportunities associated with the wider Greater Manchester growth corridor.

3.36 Some respondents questioned whether the proposed employment policies and supporting figures accurately reflected market demand or provided sufficient flexibility for future economic growth. Landowners and developers also highlighted the relationship between Bury's employment opportunities and the strategic growth associated with Northern Gateway and other PfE allocations.

3.37 The Council considered these representations alongside the employment evidence, including the Employment Land Availability Assessment, and the strategic framework established by PfE. The comments were noted but no policy change was considered necessary, with the evidence base providing the basis for assessing employment land supply.

3.38 The representations also emphasised the importance of considering how surrounding land and existing employment sites could respond to the development of strategic locations. These matters require continued coordination through infrastructure planning, masterplanning and engagement with relevant landowners and neighbouring authorities.

3.39 The Publication Local Plan retains the overall approach to economic growth, informed by the evidence base and PfE, while the consultation process helped identify matters requiring continued consideration as strategic development progresses.

Town centres

3.40 Representations on town centres addressed the hierarchy of centres, the role and character of individual centres, retail and other town centre uses, and the regeneration benefits expected from planned growth.

3.41 The status of Prestwich was a particular issue. The Prestwich Village Neighbourhood Forum challenged the way Prestwich was classified in the hierarchy and argued that its role should be distinguished from the other centres. The Council considered that Prestwich should retain its place alongside Ramsbottom and Radcliffe in the hierarchy, while accepting that the Policies Map needed to distinguish Bury town centre as the borough's sub-regional town centre. The map was therefore to be amended accordingly.

3.42 Historic England supported the approach in Policy LP-TC3, Primary Shopping Areas, to considering whether changes of use would restore or enhance the character and appearance of frontages. It also recommended a similar criterion for Policy LP-TC4, Local and Neighbourhood Centres. The Council accepted this recommendation and proposed an amendment to strengthen the policy.

3.43 Other representations sought further information about the delivery, timescales and mechanisms for regeneration across the borough, including the relationship between strategic growth and Radcliffe town centre. The Council noted these comments but that detailed information about the delivery of regeneration proposals would be communicated separately when available, rather than incorporated into the Local Plan policy framework.

3.44 The Publication Local Plan therefore includes a specific clarification to the hierarchy and a policy amendment relating to the character and appearance of local and neighbourhood centres.

Tourism and Culture

3.45 Representations on tourism and cultural assets considered the contribution these make to the borough's economy, local identity and attractiveness as a place to live and visit. Comments also highlighted opportunities to improve the range and quality of tourism and cultural provision.

3.46 The Council considered these representations in the context of the strategic vision and the wider policy framework. There was support for the objectives relating to tourism and cultural assets, alongside suggestions for greater recognition of Bury's distinctive attractions and heritage.

3.47 The principal response was to note these comments and consider them alongside the wider approach to economic growth, centres and heritage. There was no major changes to the overall strategy arising from representations on torism and culture.

Creating healthy and successful communities

3.48 Representations on healthy and successful communities considered the relationship between development and community facilities, health and wellbeing, recreation, social value and the provision of supporting infrastructure.

3.49 Comments included concerns about whether new development would make an adequate contribution to local communities and how the benefits of development would be secured. Other respondents highlighted the contribution of green and blue infrastructure, including the canal and river corridors, to physical activity and wellbeing.

3.50 The Council's responses generally relied on the relevant policies and supporting text already included in the Draft Plan, including the wider green infrastructure framework. Where comments concerned the delivery of specific regeneration or community initiatives, the Council distinguished these matters from the strategic policy role of the Local Plan.

3.51 There were no major changes to the chapter's overall approach, but it helped clarify the relationship between the community objectives, infrastructure provision and the other policies in the Plan.

Transport

3.52 Representations on transport considered walking, wheeling and cycling, public transport, travel hubs, highway capacity and safety, parking and the relationship between new development and the Strategic Road Network.

3.53 National Highways supported the vision-led approach to sustainable transport and the principle of plan-led growth, while seeking clarity about the assessment and mitigation of impacts on the SRN. Other comments sought stronger design standards for active travel routes and secure facilities for non-motorised modes at travel hubs. Some respondents also questioned the need for particular transport interventions or whether specific policy requirements were necessary.

3.54 The Council made a number of targeted amendments:

- Policy LP-TR2 was to include reference to the Greater Manchester Streets for All Design Guide and Checklist.
- Policy LP-TR4 was to be amended to clarify the provision of secure facilities for non-motorised modes.
- Policy LP-TR5 was to clarify the need for measures to mitigate adverse transport impacts where development would significantly increase the need to travel.
- The requirement in Policy LP-TR5 for all proposals generating travel demand to prepare a Transport Assessment was identified for deletion, reflecting the comments advocating a vision-led approach.

3.55 Other comments did not result in changes where the Council considered the matter was adequately covered by PfE, another Local Plan policy or existing supplementary planning guidance. For example, parking standards and accessibility-related matters were considered alongside the existing parking standards in Bury Supplementary Planning Document 11.

3.56 The transport representations also reinforced the importance of ongoing cooperation with National Highways, TfGM, Rochdale Council and other relevant stakeholders on the implications of strategic growth. The Publication Local Plan retains the sustainable transport strategy while refining the wording of individual policies.

Built environment

3.57 Representations on the built environment covered design quality, heritage assets, archaeological remains, local character, natural features within development sites and the relationship between design policies and other parts of the development plan.

3.58 Historic England's comments led to a number of amendments to heritage policies. Policy LP-BE2, Listed Buildings, was revised to clarify the approach to alterations and demolition. Policy LP-BE3, Scheduled Monuments, was amended to remove an unnecessary reference to "future" scheduled monuments. Policy LP-BE4, Archaeological Features, was amended to include additional principles on preservation in situ, avoiding or minimising harm, and excavation and recording where necessary. Policy LP-BE5, Local Non-Designated Heritage Assets, was to recognise that the Local List is not exhaustive and that additional assets may be identified during the planning process.

3.59 The Environment Agency also recommended that new development should integrate existing natural assets such as rivers and wetlands, and seek

opportunities to enhance them. The Council accepted that Policy LP-BE6, Design and Layout of New Development, would benefit from an additional criterion on this matter.

3.60 Other comments, including those concerning landscape character, lighting and the provision of wildlife habitats, were considered alongside existing policies in PfE and the Draft Plan. Where the Council considered that the relevant matter was already addressed, no additional policy change was proposed.

3.61 The Publication Local Plan therefore strengthens specific aspects of design and heritage policy without duplicating provisions already addressed elsewhere in the development plan.

Green infrastructure

3.62 Representations on green infrastructure focused on the protection and enhancement of green and blue infrastructure, biodiversity, ecological connectivity, trees and woodland, open space and the relationship between environmental objectives and recreational use.

3.63 Lancashire Wildlife Trust raised concerns that criterion (i) of draft Policy LP-GI1 could place too much emphasis on other functions of green infrastructure, such as recreation and accessibility, at the expense of sensitive habitats and species. The Council accepted that the policy should be amended and proposed removing the criterion.

3.64 The Environment Agency's comments on the integration of rivers and wetlands into development were addressed through the proposed amendment to Policy LP-BE6, while Natural England's representations on pollution and wildlife informed the proposed change to Policy LP-AP1.

3.65 Other representations proposed changes to the presentation and organisation of green infrastructure and biodiversity policies. The Council considered the merits of separating the protection of biodiversity from policies dealing with open space and recreation, recognising the distinct role of biodiversity protection alongside the wider benefits of green infrastructure.

3.66 Where comments sought further mapping of the Local Nature Recovery Strategy network, the Council explained that the Plan included references to the strategy and a specific policy on the Local Nature Recovery Network, and did not consider additional mapping on the Key Diagram necessary.

3.67 The Publication Local Plan therefore incorporates targeted amendments to strengthen the treatment of biodiversity and natural assets while retaining the broader multifunctional approach to green infrastructure.

Green Belt

3.68 Representations on the Green Belt addressed the strategic boundaries established through PfE, the relationship between Green Belt policy and housing delivery, agricultural diversification and the environmental quality and accessibility of land remaining in the Green Belt.

3.69 Some landowners argued that localised boundary changes should be considered, including in relation to land around existing employment locations. The Council's responses explained that it did not consider there to be exceptional circumstances to justify changes to the Green Belt boundary established through PfE. The Publication Local Plan therefore does not seek to reopen the strategic Green Belt decisions made through the adopted joint plan.

3.70 Natural England highlighted the potential for environmental improvements and better accessibility on remaining Green Belt land, particularly where land had been affected by urban-fringe pressures. The Council referred to the compensatory improvements required through policies associated with the PfE allocations where Green Belt land had been released.

3.71 Historic England identified a minor error in criterion (c) of Policy LP-GB4, Agricultural Diversification in the Green Belt. The Council accepted the correction from "of" to "or" in the phrase referring to unacceptable impacts on amenity, biodiversity or heritage assets.

3.72 Other comments were noted without changes where the Council considered the existing policy approach appropriate. The Publication Local Plan therefore retains the strategic Green Belt framework established through PfE while incorporating a specific drafting correction.

Water and flood risk

3.73 Representations on water and flood risk considered the sequential approach to development, future flood risk, sustainable drainage, the role of natural and multifunctional solutions, and the relationship between development and water management infrastructure.

3.74 The Environment Agency identified the need for Policy LP-W1, New Development and Flood Risk, to reflect future flood risk from all sources. The Council accepted that the policy required substantial revision and recorded

that the Publication Local Plan would include a significantly reworded policy on flood risk and water management.

3.75 The Environment Agency also sought stronger integration of existing natural assets into development, including rivers and wetlands, and opportunities to enhance these features. This informed the proposed amendment to Policy LP-BE6. The wider policy framework also addresses sustainable drainage through Policy LP-W2.

3.76 Lancashire Wildlife Trust supported the consideration of flood risk at an early stage and advocated nature-based drainage solutions that could contribute to biodiversity and ecological connectivity. The Council noted the comments but consider the policy framework for sustainable drainage to be adequate.

3.77 Representations also raised the potential for a more coordinated approach to water storage and flood attenuation, including proposals relating to the former Manchester, Bolton and Bury Canal and adjacent low-lying land. These matters were identified for further discussion with relevant organisations rather than being treated as settled commitments within the Local Plan.

3.78 The Publication Local Plan therefore includes a substantive revision of Policy LP-W1 and strengthens the connection between flood-risk management, natural assets and sustainable drainage.

Air quality, pollution and hazards

3.79 Representations on air quality and pollution considered the effects of development and traffic on human health, natural resources, wildlife and protected sites. Comments also addressed contaminated and unstable land and the need to ensure that development does not create or worsen unacceptable risks.

3.80 Natural England highlighted that pollution can affect ecological receptors as well as human health and recommended that the policy should explicitly recognise impacts on wildlife. The Council accepted that the wording of Policy LP-AP1, Air Quality and Pollution Control, should be amended to refer to the sensitivity of natural resources, wildlife and heritage assets that may be affected.

3.81 Other representations referred to the relationship between traffic, air pollution and protected sites, including Holcroft Moss. The Council considered that the relevant provisions of PfE already addressed this issue and that there was no need to repeat those requirements in the Local Plan.

3.82 The Council also noted comments about the role of trees in reducing pollution and improving air quality, considering these matters to be more appropriately addressed through Policy LP-GI8, Trees, Woodland and Hedgerows. Support for the policy on contaminated and unstable land was noted without a change being required.

3.83 The principal change arising from this chapter was therefore to make the protection of wildlife and other sensitive receptors more explicit within the pollution policy.

Other infrastructure

3.84 Representations on other infrastructure included matters relating to the provision of infrastructure and the circumstances in which statutory consultees should be involved in assessing development proposals.

3.85 National Highways reiterated that it should be consulted where proposals, including telecommunications infrastructure, could affect the SRN. The Council noted this and confirmed that National Highways would be consulted on relevant planning applications.

3.86 In the Council's view, there is a distinction to be made between matters that need to be reflected in strategic policy and those more appropriately dealt with through consultation on individual proposals or through the ongoing infrastructure planning process. As such, no major changes were made to the overall approach in this chapter.

3.87 The representations nevertheless reinforced the importance of ensuring that infrastructure providers are engaged where proposals could affect their networks or operational responsibilities.

Development management

3.88 Representations on development management focused on the role of planning obligations, the relationship between development and infrastructure provision, and the extent to which individual proposals could be required to contribute towards mitigating their impacts.

3.89 The Home Builders Federation raised concerns that development should only be required to mitigate its own impacts and should not be required to address existing deficiencies in infrastructure or services. Regulation 122(2) of the Community Infrastructure Levy Regulations would be referred to in considering the tests governing planning obligations.

3.90 Representations from landowners and developers also highlighted the need for fair and proportionate contributions towards infrastructure supporting strategic development. These matters were considered alongside the wider approach to infrastructure delivery and the relationship between new development and the infrastructure from which it benefits.

3.91 The Council recognise that all development proposals within a strategic site allocated through the Places for Everyone Joint Plan should be required to make a fair and proportionate contribution towards the infrastructure, facilities, services, and mitigation measures needed to support the overall allocation in line with adopted policies in the Places for Everyone Joint Plan. These contributions should be informed by site-wide delivery strategies for each relevant element. In addition, the Council also recognise that some infrastructure delivered on strategic sites allocated through the Places for Everyone Joint Plan will help to support wider development outside of these sites. Where this is the case, development outside of the strategic sites should also be expected to make an appropriate and proportionate contribution towards the delivery of that infrastructure. Policy LP-DM1, Developer Contributions and Infrastructure, was amended accordingly in the Publication version of the Plan.

Duty to Cooperate bodies and neighbouring authorities

3.92 **National Highways** supported the vision-led approach to sustainable transport and plan-led growth but raised the need to understand and mitigate the effects of strategic growth on the Strategic Road Network. The Council recognised that these issues require continued engagement with National Highways, TfGM, Rochdale Council and other stakeholders, particularly in relation to Northern Gateway. The responses informed targeted amendments to Policies LP-TR2, LP-TR4 and LP-TR5, while wider transport and infrastructure issues remain subject to continued collaborative work.

3.93 **The Environment Agency's** representations resulted in a substantial revision of Policy LP-W1 on flood risk and water management, as well as a proposed amendment to Policy LP-BE6 to strengthen the integration of natural assets.

3.94 **Natural England's** comments informed changes to the vision, the pollution policy and the consideration of biodiversity and nature recovery.

3.95 **Historic England's** comments led to specific amendments to heritage policies, while the representations of other infrastructure providers were considered in the context of the relevant policies and the wider development plan.

Other key changes to the draft Local Plan unrelated to representations

Implementation, monitoring and review

3.96 There has been a number of key changes to the implementation, monitoring and review chapter with the Introduction of a comprehensive Monitoring Framework (Table 4) with links each strategic objective to indicators and targets.

Treatment of saved Unitary Development Plan policies

3.97 This is an entirely new chapter which sets out, policy by policy, which UDP policies are either being replaced by Local Plan policies or are not being carried forward into the Local Plan.

4. Publication Local Plan (Regulation 19)

4.1 Representations were invited on the Publication version of the Local Plan and its supporting evidence under Regulation 19 over an eight-week period running from 17 July to 11 September 2026.

4.2 The following sets out the Council's consultation methods employed for the draft Local Plan.

Inspection of material

4.3 All relevant material was made available for inspection electronically via the Council's planning policy pages of the web site at www.bury.gov.uk/burylocalplan.

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4.7 We contact those on the database throughout the process of preparing planning policy documents so that everyone had the opportunity to influence policies and proposals as they emerge.

4.8 Depending on the contact's specified preference, the Council sent letters or emails to all database contacts (see Appendix 4).

Social media

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4.11 This was reported in the Bury Times.

Posters

4.12 The Council produced additional publicity material to advertise the invitation for representations on the Publication Local Plan in the form of posters (see Appendix 6) which were placed on town centre notice boards, in the Mill Gate shopping centre, in Ramsbottom Civic Centre, at Bury and Radcliffe Markets, at leisure centres and in notice boards within thirteen of the biggest parks across the Borough.

Summary of responses received on the Publication Local Plan

4.13 As stated above, the Council invited representations on the Publication Local Plan over an eight-week period, ending on 11 September 2026. In response the Council received a total of 103 representations from 100 individuals and organisations.

4.14 Appendix 7 to this Consultation Statement sets out a summary of the main issues raised at the Regulation 19 stage and the Council's initial, high level response to each of these issues.

5. Next steps - submission and examination

5.1 Once all the relevant material is collated, the Council will be in a position to formally submit the Local Plan, Policies Map, relevant supporting evidence and all representations received during the Regulation 19 stage, to the Secretary of State for Housing, Communities and Local Government for

independent examination under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

5.2 As stated previously, as the Local Plan is being prepared under the 'legacy' system, it is imperative that the Plan is submitted by no later than 31 December 2026.

5.3 Following submission to the Secretary of State, the Local Plan will be examined by an independent Planning Inspector(s) appointed by the Secretary of State. The purpose of the examination is to determine whether the Plan has been prepared in accordance with the relevant legal and procedural requirements and whether it is sound, having regard to the National Planning Policy Framework.

5.4 The examination will consider the representations received during the Publication consultation, together with the Council's evidence base and supporting documentation.

5.5 The Inspector will identify the matters and issues to be examined and may hold public hearing sessions to consider these in detail, with the Council, representors and other participants invited to contribute as appropriate.

5.6 During the examination, the Inspector may identify matters requiring clarification or further evidence and, where necessary, invite the Council to propose modifications to address any concerns. Any proposed modifications would need to be considered in accordance with the applicable examination procedures, including consultation where required. The Inspector will ultimately determine whether the Plan can be found sound, subject to any necessary modifications.

5.7 Following the examination, the Inspector will issue a report setting out their conclusions and recommendations. If the Plan is found sound (or could be found sound subject to modification) and the Council resolves to adopt it, the Local Plan will become part of the statutory development plan for the borough, providing part of the policy framework for determining planning applications and guiding future development.

Appendix 1 – Draft Local Plan consultation letter/email

Bury Council

BUSINESS, GROWTH AND INFRASTRUCTURE

«Title» «Forename» «Surname»
«Company_GroupName»
«Address1»
«Address2»
«Address3»
«Address4»
«Address5»

14 March 2025

Dear Sir/Madam

CONSULTATION ON THE DRAFT BURY LOCAL PLAN

We are contacting you as you have previously expressed an interest in local planning matters and your details are included on our consultation database.

Following the adoption of the Places for Everyone Joint Plan (PfE) on 21 March 2024, the Council is now moving forward with a new Local Plan for Bury.

We are now seeking views on the draft Local Plan over an eight-week period **commencing on 17 March and ending at 23:59 on 12 May 2025**.

What is the Bury Local Plan?

The Local Plan sets out a long-term framework to manage future growth and development in the Borough up to 2042.

Together with the adopted Places for Everyone Joint Plan, Bury's new Local Plan will form a key part of Bury's overall development plan and the policies within them will be used as the basis for determining future planning applications.

PfE establishes the strategic planning framework within which the nine participating districts will prepare their own Local Plans. Some of the major strategic decisions relating to Bury's future growth and development have already been made through PfE. For example, it identifies future needs for housing and employment floorspace, allocates strategic sites to help meet these needs and identifies a revised Green Belt boundary.

Bury's Local Plan will provide a more detailed set of locally specific planning policies. Once adopted, the new Local Plan will replace the saved policies in the current Unitary Development Plan.

How can I view the draft Local Plan and make comments?

All relevant documentation can be found at www.bury.gov.uk/localplan. You can view the documents electronically at Bury Town Hall reception between the hours of 8.45am and 5.00pm (Monday-Friday)

Bury Council, Town Hall, Knowsley Street, Bury, Greater Manchester, BL9 0SW

and at local libraries and the Tottington Centre during their normal opening hours (see www.bury.gov.uk/libraries and www.tottingtoncentre.co.uk/ for details).

In order to give us a clear and accurate picture of your views, you are requested to make your representation on an official comment form which you will be able to access via the Council's web site at www.bury.gov.uk/localplan. In doing so, we will be able to establish your definitive views and can give your representation full consideration before using these to inform the progression to the Publication Local Plan.

Alternatively, you can download a comment form from the above web site and email it to planning.policy@bury.gov.uk or return it by post to:

Strategic Planning and Infrastructure
Business, Growth and Infrastructure
3 Knowsley Place
Duke Street
Bury
BL9 0EJ

It should be noted that consultation on the Local Plan is not an opportunity to object to sites that have already been allocated through the Places for Everyone Joint Plan. Places for Everyone (and the sites allocated within it) was adopted by each of the nine participating districts in March 2024. As such, the sites allocated at the Northern Gateway (JPA1.1 and JPA1.2); Elton Reservoir (JPA7); Seedfield (JPA8) and Walshaw (JPA9) are no longer designated as Green Belt and the principle of development on these sites has been established.

What are the next steps?

We will give thorough consideration to all relevant comments submitted in response to consultation on the draft Local Plan and, where necessary, we will feed these comments into the next Publication version of the Plan.

Can I change how I'm contacted or unsubscribe?

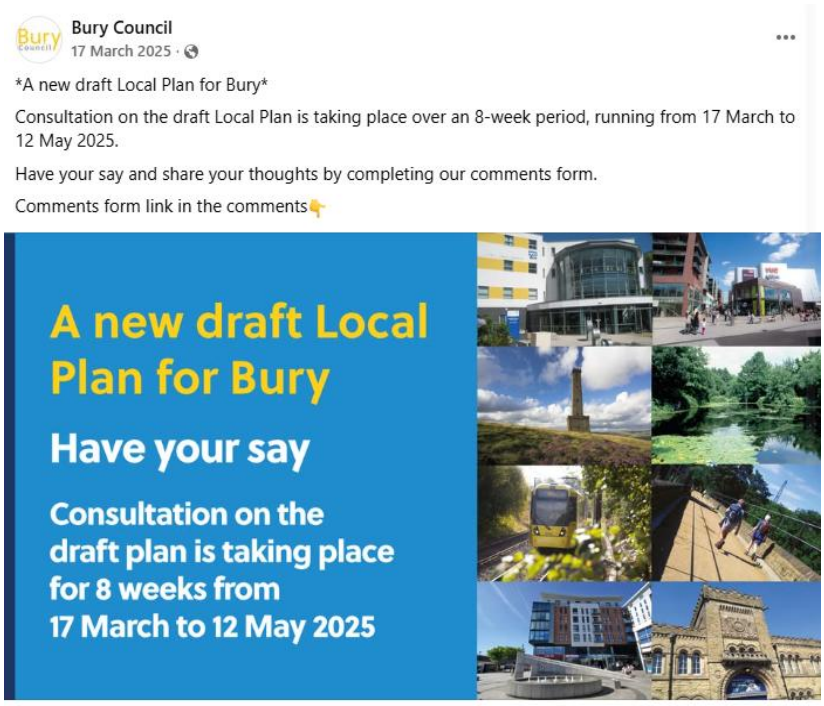
We are contacting you by mail because we do not have a record of an email address for you. If you have access to email and wish to be kept informed of future stages of the Local Plan, please help the Council to save money by emailing us at planning.policy@bury.gov.uk and we will keep you informed of future stages by email.

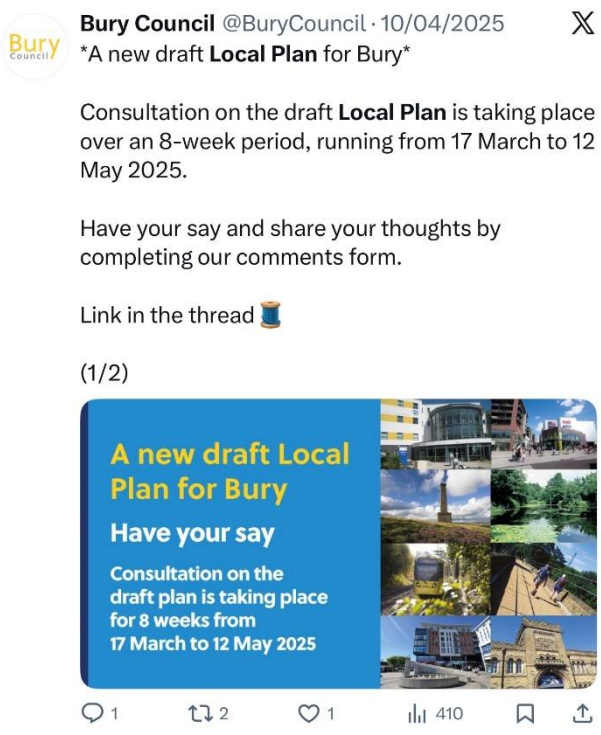
Alternatively, if you no longer wish to be contacted about planning policy matters, you can unsubscribe from the service at any time by emailing your details to planning.policy@bury.gov.uk or calling 0161 253 7800.

Yours sincerely,

Strategic Planning and Infrastructure Team

Appendix 2 – Examples social media posts for draft Local Plan







Bury Council @BuryCouncil · 26/02/2025

Bury Council is drawing up a new **Local Plan** which will help to determine the shape of the borough for decades to come. mynewsdesk.com/uk/bury-counci...



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Appendix 3 – Poster for draft Local Plan



Appendix 4 – Publication Local Plan consultation letter/email

Bury Council

PLACE DIRECTORATE

«Title» «Forename» «Surname»
«Company_GroupName»
«Address1»
«Address2»
«Address3»
«Address4»
«Address5»

16 July 2026

Dear Sir/Madam

CONSULTATION ON THE PUBLICATION BURY LOCAL PLAN

We are contacting you as you have previously expressed an interest in local planning matters and your details are included on our consultation database.

Following the adoption of the Places for Everyone Joint Plan (PfE) on 21 March 2024, the Council is now moving forward with a new Local Plan for Bury.

Under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, we are now seeking views on the Publication Local Plan over an eight-week period **commencing on 17 July and ending at 23:59 on 11 September 2026**.

What is the Bury Local Plan?

The Local Plan sets out a long-term framework to manage future growth and development in the Borough up to 2043.

Together with the adopted Places for Everyone Joint Plan, Bury's new Local Plan will form a key part of Bury's overall development plan and the policies within them will be used as the basis for determining future planning applications.

PfE establishes the strategic planning framework within which the nine participating districts will prepare their own Local Plans. Some of the major strategic decisions relating to Bury's future growth and development have already been made through PfE. For example, it identifies future needs for housing and employment floorspace, allocates strategic sites to help meet these needs and identifies a revised Green Belt boundary.

Bury's Local Plan will provide a more detailed set of locally specific planning policies. Once adopted, the new Local Plan will replace the saved policies in the current Unitary Development Plan.

How can I view the draft Local Plan and make comments?

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Bury Council, Town Hall, Knowsley Street, Bury, Greater Manchester, BL9 0SW

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In order to give us a clear and accurate picture of your views, you are requested to make your representation on an official comment form which you will be able to access via the Council's web site at www.bury.gov.uk/burylocalplan. In doing so, we will be able to establish your definitive views and can give your representation full consideration before using these to inform the progression to the Publication Local Plan.

You can download a comment form from the above web site and email it to planning.policy@bury.gov.uk or return it by post to:

Strategic Planning and Infrastructure
Place Directorate
3 Knowsley Place
Duke Street
Bury
BL9 0EJ

What are the next steps?

Following consultation on the Publication Local Plan and Council approval, we intend to submit the Plan, supporting documents and all representations made to this consultation to the Secretary of State. A Planning Inspector will then be appointed to oversee an examination of the Plan.

Can I change how I'm contacted or unsubscribe?

We are contacting you by mail because we do not have a record of an email address for you. If you have access to email and wish to be kept informed of future stages of the Local Plan, please help the Council to save money by emailing us at planning.policy@bury.gov.uk and we will keep you informed of future stages by email.

Alternatively, if you no longer wish to be contacted about planning policy matters, you can unsubscribe from the service at any time by emailing your details to planning.policy@bury.gov.uk or calling 0161 253 7800.

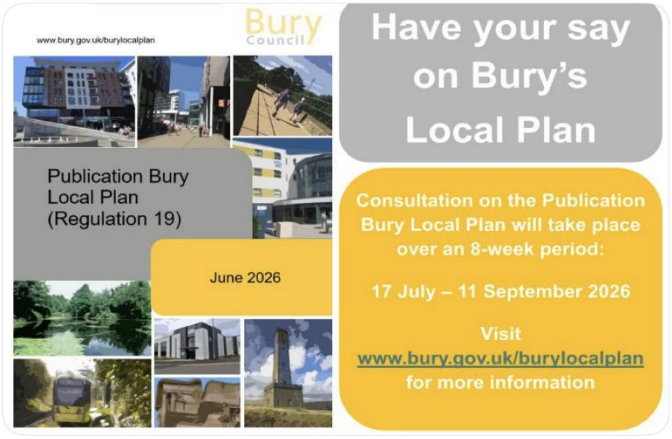
Yours sincerely,

Strategic Planning and Infrastructure Team

Appendix 5 – Examples social media posts for Publication Local Plan

Bury Council @BuryCouncil · 1h

Bury Council has reached another milestone to help shape the future of all our six towns & communities. The Local Plan will guide how communities grow, develop & thrive. Consultation on the Publication version of the Local Plan takes place until 11 Sept - link in thread

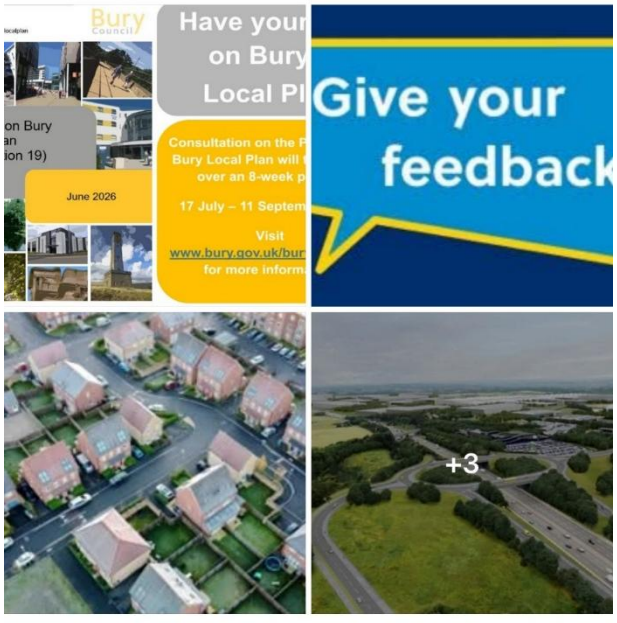


1 203

Bury Council
43m ·

Have your say on the latest version of Bury's new Local Plan.

Consultation on the Publication version of the Lo... See more



1

Bury Council @BuryCouncil · 46m

Have your say on the latest version of Bury's new Local Plan.

Consultation on the Publication version of the Local Plan is taking place over an 8-week period, running from 17 July to 11 September.

Share your thoughts by completing our comments form. Show more



1 1 137

Appendix 6 – Poster for Publication Local Plan



Appendix 7 – Summary of the key issues raised at the Regulation 19 stage

Issue Raised	Council Response
Context for the Local Plan	
The Council has applied the wrong version of the National Planning Policy Framework (NPPF) and should review the Plan against the correct policy context before submission. Concerns were also raised about the implications of the August 2026 NPPF and National Decision-Making Policies (NDMPs).	The Local Plan explains at paragraphs 2.5–2.7 that it is being prepared under the transitional arrangements in paragraphs 234(c) and 235 of the December 2024 NPPF because it delivers housing and other development requirements in the adopted Places for Everyone Joint Plan. The Plan is therefore to be examined against the December 2023 NPPF. The Council has nevertheless had regard to relevant provisions of the August 2026 NPPF where appropriate, without displacing the applicable transitional arrangements. The Inspector will determine the applicable policy framework and soundness at examination.
Additional local layer of policy should be incorporated within Figure 1, which includes adopted "Supplementary Planning Documents" that have been prepared for allocated PfE Plan sites.	Figure 1 illustrates the principal stages in preparing the Local Plan rather than providing an exhaustive list of all planning guidance. Adopted Supplementary Planning Documents (including Development Frameworks for PfE allocations) are material considerations and provide further guidance for implementing the adopted development plan, but they do not form part of the statutory development plan. Their omission from the process diagram does not diminish their status or relevance.
The SDS should be recognised within Figure 2 of the Policy Hierarchy presented in the Regulation 19 Local Plan.	The Local Plan is prepared within the existing statutory planning framework. Paragraphs 2.10–2.19 explain the role of PfE and the relationship between the adopted development plan documents. The

Issue Raised	Council Response
	proposed Spatial Development Strategy (SDS) is not an adopted component of the development plan at this stage and its status and relationship to the Local Plan will depend on the relevant legislation and progress of its preparation. Figure 2 appropriately depicts the current policy hierarchy.
The Strategy	
Amend the vision & Objective 3 to refer all sites and not just PDL sites and the PfE Strategic Sites.	The Vision and Objective 3 should be read alongside the Spatial Strategy and the policies throughout the Plan. The strategy seeks to make effective use of previously developed land and support delivery of the strategic sites already allocated through PfE, while applying policies to development proposals across the Borough. It is not intended to suggest that development on other land is inappropriate. Such proposals would remain subject to the relevant development plan policies and national policy.
Greater recognition of advanced manufacturing, logistics, digital technologies, artificial intelligence and innovation-led industries within the Vision and Strategic Objectives.	The Local Plan supports economic growth, regeneration, employment opportunities and investment, including through Policies LP-E1 to LP-E4 and the strategic context established by PfE. The Northern Gateway allocation provides a major opportunity for employment growth. The Plan is intended to provide a durable land use policy framework rather than prescribe particular technologies or sectors, which may evolve over the plan period.

Issue Raised	Council Response
Call for explicit recognition of Bury West as a strategic growth and infrastructure area within the Local Plan. This would support a coordinated infrastructure-led approach centred on: • Strategic link road. • New Metrolink stop. • Delivery of Elton Reservoir and Walshaw allocations.	The strategic growth locations and infrastructure commitments relevant to Bury West are established principally through Places for Everyone, including the Elton Reservoir and Walshaw allocations and the associated strategic policy framework.
Suggestions were made to strengthen Objectives 15 and 16 by introducing measurable outcomes and clearer commitments to flood risk reduction, water quality improvement, sustainable drainage and water efficiency.	The Plan includes dedicated policies on flood risk and water management (LP-W1), sustainable drainage (LP-W2) and water resources (LP-W3), alongside policies for green infrastructure and developer contributions. These policies establish requirements for proposals to assess and manage flood risk, incorporate appropriate drainage and protect water resources. Detailed outcomes and mitigation will depend on site-specific evidence and the relevant infrastructure providers. It would not be appropriate to prescribe identical measurable targets for every development.
HBF argued that energy efficiency requirements should align with nationally recognised standards, including the Future Homes Standard.	The Local Plan has been prepared under the applicable NPPF transitional arrangements and should be read alongside national building regulations and standards as they apply when development is undertaken. Policy LP-BE6 promotes high-quality, sustainable design and addresses energy and environmental performance within the scope of planning policy. The

Issue Raised	Council Response
	Council does not consider it necessary to duplicate or pre-empt national technical standards, which may change during the plan period.
Residents raised concerns about the compatibility of Green Belt and greenfield development with the Council's climate and biodiversity commitments. Particular concerns focused on wildlife habitats, biodiversity net gain, flood risk, drainage, loss of green space and the cumulative impacts of development at Simister/Bowlee.	The Local Plan seeks to balance the delivery of housing and economic growth with protection and enhancement of the natural environment. Policies LP-GI1 to LP-GI7 address green infrastructure, biodiversity, biodiversity net gain, the nature recovery network, wildlife-friendly features, trees and soils; Policies LP-W1 and LP-W2 address flood risk and drainage. Strategic allocations were established through the adopted PfE Plan and are not being reallocated through this Local Plan. The effects of individual proposals must be assessed against the applicable policies and environmental requirements, including cumulative effects where relevant.
Respondents highlighted the importance of linking growth to infrastructure delivery, particularly transport improvements, drainage, utilities and community facilities.	Infrastructure delivery is an integral part of the Plan. Policy LP-DM1 requires development to provide or contribute towards the infrastructure, facilities and services needed to mitigate its impacts and support sustainable growth. The Infrastructure Delivery Plan identifies key requirements and provides a framework for continued engagement with infrastructure providers. The Infrastructure Delivery Plan is a 'living' document and will be updated as requirements, funding and delivery information develop.
Broad Distribution of Development - Support was expressed for considering previously developed land first, while some	The Spatial Strategy reflects the adopted PfE framework and seeks to make effective use of previously developed land and town centres while

Issue Raised	Council Response
respondents suggested that "grey belt" and other sustainable Green Belt sites may be required in future.	supporting the strategic allocations already established through PfE. The Council has assessed potential sites through the plan-making process and its Site Suggestions Background Paper. The Plan does not allocate additional Green Belt sites because the Council considers the identified supply sufficient to meet the adopted housing requirement. Applications on Green Belt or grey belt land will be assessed under the applicable national and development plan policies.
Residents raised concerns about public confidence in decision-making, perception of predetermined outcomes, impacts on existing communities and the long-term consequences of major development proposals.	The Local Plan has been prepared through the statutory plan-making process, including consultation at Regulation 18 and Regulation 19 Publication stages, and is supported by an evidence base and an Integrated Assessment. Representations are being recorded and will be submitted for independent examination, where an Inspector will assess legal compliance and soundness. The Council recognises the importance of public confidence and will continue to explain the Plan's evidence, policy choices and delivery arrangements through the examination process.
Policies Map - The Draft Policy Map does not presently identify the PfE allocations.	The Policies Map should be read with the Local Plan and the adopted Places for Everyone Joint Plan. PfE allocations are established by that adopted plan and are not allocations made by this Local Plan. The introductory text at paragraphs 1.17–1.19 explains that the principle of development on the PfE strategic sites has already been established and that comments on those allocations cannot be determined through this Local Plan process.

Issue Raised	Council Response
Policies Map - Green infrastructure and recreation designations overlap with land identified for development PfE Allocations.	The presence of a PfE allocation does not remove the need to address biodiversity, open space, recreation, drainage and other relevant constraints through the allocation framework and subsequent applications.
Meeting our Housing Needs	
Plan period should be extended beyond 2043, typically to 2045, to provide greater flexibility, meet national policy expectations for long-term planning, and account for potential delays in examination and adoption.	Paragraph 22 of NPPF (December 2023) states that strategic policies should look ahead over a minimum 15-year period from adoption. Subject to the outcomes and timescale of the Examination, the Council anticipates that the plan will be adopted prior to April 2028, and would therefore look ahead over a minimum of 15 years from adoption. It is therefore not considered necessary to extend to plan period.
The housing requirement is based on outdated Places for Everyone figures rather than more recent Local Housing Need calculations. The housing requirement should be increased, and the latest LHN figures used when extending the plan period beyond 2039.	The housing requirement for Bury has been established through the Places for Everyone Joint Development Plan (adopted on 21 March 2024), which sets a requirement for an average of 452 homes per year (with stepped targets set out in Policy JP-H1) from 2022-2039. As set out in PfE paragraph 1.56 and footnote 2, in the event that a local plan looks beyond 2039, the minimum requirement figures set out in Policy JP-H1 should be used to inform local plan targets, with the annual average figure 2022-2039 to be treated as a minimum requirement for each year after 2039. As a result, for a Local Plan period to 2043, the Bury

Issue Raised	Council Response
	Local Plan will need to identify a sufficient supply of sites to accommodate an average of 452 homes per year from 2039-2043. Sufficient housing land has been identified to meet the PfE housing requirement (including meeting the annual average over the period from 2039-2043 which is beyond the PfE plan period). In accordance with the Regulation 8(4) of the Town and Country Planning (Local Planning) (England) Regulations 2012 the policies contained in a local plan must be consistent with the adopted development plan. The Bury Local Plan is not intended to supersede any of the PfE policies, which are considered to be up-to-date. In line with the transitional arrangements set out in paragraphs 234c and 235 of NPPF December 2024, it is appropriate to use the PfE housing requirement for the Bury Local Plan.
Requests that the new Local Plan makes it expressly clear that the annual target to deliver 452 new houses per year will be treated as a minimum.	PfE Policy JP-H1 expressly states that the delivery rates set out in PfE Table 7.2 are a minimum. It is not considered necessary to replicate this statement in the Local Plan.
The Council will be unable to demonstrate a 5 year supply of deliverable housing land upon adoption of the Local Plan. The Plan relies too heavily on strategic allocations, brownfield sites and town centre developments, and does not provide	The Council has identified sufficient land to meet the housing requirement over the plan period.

Issue Raised	Council Response
sufficient flexibility, resilience or housing land supply to meet future needs. A broader range of housing sites, including smaller and medium-sized deliverable sites, should be allocated to reduce reliance on a limited number of large strategic allocations and support the maintenance of a five-year housing land supply. Call for additional housing allocations and contingency measures to address potential under-delivery.	Table 3 of the Regulation 19 Local Plan provides a breakdown of the housing land supply and demonstrates that there is an 18.6% flexibility allowance, which will ensure the housing requirement can be met. Overall, 72% of the identified supply (8,199 dwellings) is through housing completions, sites under construction and with planning permission and PfE allocations. Of the remaining units, 2,135 are on other identified sites within town centres (for which masterplans have been produced, and the majority of which are in Council ownership); 570 are on other sites outside town centres and 342 are through a small sites windfall allowance. The SHLAA includes a range of site sizes, and details are provided in the Housing Topic Paper (June 2025) which demonstrate that 17% of the supply is on sites of one hectare or less and 16% is on sites of 1 – 5 hectares. The Council is working to bring forward identified sites (including Council owned sites) that will contribute to demonstrating a five-year supply from adoption. The housing land supply will be updated to reflect the latest position.
A policy framework for bringing forward additional sustainable sites where necessary is required and there should be an early review of the Local Plan to address future housing pressures.	The Council has identified sufficient land to meet the housing requirement over the plan period.

Issue Raised	Council Response
	Table 3 of the Regulation 19 Local Plan provides a breakdown of the housing land supply and demonstrates that there is an 18.6% flexibility allowance, which will ensure the housing requirement can be met. Policy LP-H2 sets out the Council's approach to windfall housing development.
Additional sites submitted for allocation: • Grundy Fold Farm • Starling Road • Pole Lane • Park Lane Farm. • Swan Lodge • Long Lane • Longsight Road/Wood Road Lane • Holcombe Road • Touch Road/Springside Road • Land west of Walshaw • South of Bury New Road, Radcliffe • Brandlesholme Lane, Greenmount • Ripon Hall Avenue, Ramsbottom • Nuttall Lane, Ramsbottom • Land to the East of Walmersley Road	The Local Plan does not allocate the additional sites listed because the Council considers that the housing requirement can be met by the identified supply. Additional Green Belt release is not considered necessary to deliver the adopted PfE requirement. The suitability of any individual proposal remains subject to the development plan and national policy.

Issue Raised	Council Response
Concern that Policy LP-H2 could unintentionally support unplanned grey belt housing development that undermines the delivery of strategic sites and infrastructure.	Applications for development within the Green Belt will be determined in accordance with national planning policies set out in NPPF.
Whilst it is understood that the Bury Local Plan will be examined against NPPF2023, given the significance of grey belt land in the context of Bury not being able to demonstrate a five year supply of deliverable housing sites, it is considered important that the Plan addresses the implications of grey belt for decision-making.	Applications for development within the Green Belt including those on Grey Belt land will be determined in accordance with national planning policies set out in NPPF. It is not necessary for the Local Plan to duplicate these policies. NPPF (December 2023) paragraph 16 states that plans should avoid unnecessary duplication of policies, including those with the Framework. NPPF (2026) Policy PM6(1)(c) also states that plan should not duplicate national decision-making policies.
Affordable housing requirements, particularly the proposed 50% provision on Green Belt sites, is inconsistent with national policy, may be unviable and could affect housing delivery. However, there is broad support for increasing affordable housing provision, reflecting evidence of substantial affordable housing need across the borough.	NPPF (December 2023) paragraph 63 expects planning policies to reflect the need for affordable housing. The Council's Housing Need and Demand Assessment identifies a high level of need for affordable housing (an annual imbalance of 1,017 over the next 10 years), which, whilst this cannot be met by planning policies alone, justifies the need for robust affordable housing policies. The affordable housing policy has been tested through the Local Plan Viability Assessment (LPVA), which concludes that the majority of development planned in the Bury Local Plan is viable.

Issue Raised	Council Response
	The requirement for 50% affordable housing on sites of 10 or more dwellings in the Green Belt (subject to viability where appropriate), is considered to be consistent with NPPF 2026 Policy HO5. Whilst the Bury Local Plan is being prepared in accordance with transitional arrangements, it is considered appropriate to have regard to the 2026 NPPF policy. The Golden Rules set out in Policy GB8 will be applicable for decision making purposes. The Council is not reliant on development coming forward within the Green Belt to meet its housing need. Nevertheless, the LPVA incorporates testing of Green Belt typologies with a 50% affordable housing requirement, and finds that development is viable with adjustments to return, land value, other s106 requirements and in some circumstances an increase in value. If development is to be brought forward on Green Belt sites through planning applications, it is considered appropriate to seek to maximise the land value capture for the public benefit.
Affordable housing policies should place greater emphasis on viability considerations, particularly where strategic sites face significant infrastructure costs. Opposition to overly prescriptive affordable housing tenure splits and supports site-by-site assessment based on viability and changing housing needs.	The affordable housing policy has been tested through the Local Plan Viability Assessment (LPVA), which concludes that the majority of development planned in the Bury Local Plan is viable. There is considered to be sufficient flexibility within Policy JP-H4 to take account of viability and allow for an alternative tenure mix where appropriate.

Issue Raised	Council Response
	The PfE Strategic Allocations have already been subject to a viability assessment and an Examination process that found the PfE plan sound. As set out in the LPVA, for Bury's two cross-boundary strategic PfE sites (JPA1.1 and JPA1.2) the approach to affordable housing was left to the Bury Local Plan to determine. These sites have therefore been considered within the Bury Local Plan Viability Assessment, with JPA1.1 relying on generic typology testing, and JPA1.2 tested separately.
Reference NPPF 2026 circumstances where viability assessments can justify non-policy-compliant affordable housing contributions.	Viability assessments will be considered in accordance with NPPF. It is not necessary for the Local Plan to duplicate these policies. NPPF (December 2023) paragraph 16 states that plans should avoid unnecessary duplication of policies, including those with the Framework. NPPF (2026) Policy PM6(1)(c) also states that plan should not duplicate national decision-making policies.
Remove or limit overage arrangements and instead allow proportionate viability reviews at key development phases if necessary. Replace the requirement for a full open-book appraisal with a viability assessment prepared in accordance with national policy.	Planning Practice Guidance on viability states that a plan should set out circumstances where review mechanisms may be appropriate, and they are a tool to strengthen local planning authorities' ability to seek compliance with relevant policies over the lifetime of the project. The proposed overage approach is considered to be a reasonable and proportionate approach. Proposed modification noted. The Council considers it important to ensure that where a viability appraisal is provided as part of a planning

Issue Raised	Council Response
	application, sufficient detailed information is provided to allow clear interpretation and interrogation of it.
Support for a varied housing mix but seek greater flexibility to account for market conditions, local demand, site-specific circumstances and viability considerations.	Policy LP-H3 is considered to provide sufficient flexibility to take account of site-specific circumstances, whilst also seeking to ensure that an appropriate mix of dwellings will be delivered over the plan period to address the housing needs of the local community.
Calls for clearer explanations of affordable, social housing and housing for older people definitions and guidance on what constitutes a suitable location for older persons accommodation.	The Local Plan Appendix 3: Glossary includes a definition of affordable housing, with reference to the NPPF definition (which is not replicated as it may be subject to change). There is no set definition within Policy LP-H5 of housing for older people, as it can take a broad range of forms to meet needs. Criterion e and f of Policy LP-H5 expect residential accommodation specifically targeted at older and disabled people to be well-integrated with the wider neighbourhood and offer easy access to community facilities, local services and public transport.
Query regarding why affordable housing requirements differ between town centres and other locations and concern that the Council should do more to address affordability issues in the north of the Borough.	The Local Plan Viability Assessment (LPVA) provides the justification for different affordable housing requirements between town centres and other locations, based on development viability. Policy LP-H4 seeks to increase the availability of affordable homes and is applicable Boroughwide.

Issue Raised	Council Response
Concerns are raised over requirements for accessible and adaptable housing, with requests for stronger evidence and viability testing to justify the proposed standards.	The requirement for all new dwellings to be built to the M4(2) standard is established through adopted PfE Policy JP-H3, which has been subject to examination and found to be sound. The requirement for 4% of all home on sites of 50 of more dwellings to be built to 'wheelchair user' standard in Part M4(3) of the Building Regulations is based on evidence from the Housing Need and Demand Assessment. The cost of meeting M4(2) and M4(3) standards is included in the Local Plan Viability Assessment.
No mention has been made about the support/care provision at the proposed extra care housing schemes. Additionally, no mention has been made that supported accommodation is often time limited.	These are not considered to be matters for the Local Plan. The Council is preparing a Local Supported Housing Strategy. This sits outside the planning system.
The proposed requirement for self-build plots on larger developments received considerable objection, with respondents questioning evidence of demand and highlighting potential impacts on site delivery.	The Bury Local Plan Housing Topic Paper (June 2026) paragraphs 4.87-4.98 provide evidence of demand for custom and self build plots, and it is anticipated that additional entries will be added to the self-build register over the plan period. The Council has a legal duty to have regard to the self-build and custom housebuilding register in preparing planning policies, and NPPF (December 2023) paragraph 63 includes people wishing to commission or build their own homes as a specific group that should be reflected in planning policies.

Issue Raised	Council Response
	The requirement set out in Policy LP-H7 for 5% of dwelling to be provided as self-build plots on sites of 200 or more dwellings where practicable is considered to be a reasonable and proportionate approach to meeting this need. Policy LP-H7 is considered to provide sufficient flexibility to take account of evidence of local need, the nature of the development proposed and the viability of the development. Where plots are required at the point of planning approval there is sufficient flexibility for them to revert to market housing after a 6-month period of marketing where it can be demonstrated that there is no demand.
Concern that housing targets focus on the number of homes delivered rather than the types of home needed. A clearer mix of housing requirements on PfE allocations is required.	Policy LP-H3 seeks to ensure that an appropriate mix of dwellings will be delivered over the plan period to address the housing needs of the local community. The PfE Strategic Allocations have already been subject to an Examination process that found the PfE plan sound, and are subject to PfE Policy requirements, as well as adopted Development Frameworks. An overly prescriptive approach to housing mix is not considered appropriate, as needs can change over the plan period.
HMO policies are too vague and difficult to apply consistently. A register of HMOs is required.	Policy LP-H11 is considered to provide an appropriate policy basis for the determination of planning applications for HMOs. The need for a register of HMOs is not a matter for the Local Plan.

Issue Raised	Council Response
Infrastructure providers highlighted the need for transport, water and wastewater infrastructure planning to align with the full scale of proposed housing growth.	Policy LP-DM1 requires development to provide, or contribute towards, the infrastructure, facilities and services necessary to mitigate its impacts and to support sustainable growth. The Infrastructure Delivery Plan (IDP) published alongside the Bury Local Plan provides a framework for ongoing engagement with infrastructure providers. The IDP is a 'living' document, recognising that infrastructure requirements will change over time and will be updated as things change.
Topic Paper 2: Housing – should: • Reflect the delivery characteristics and viability challenges of large strategic sites. • Maintain flexibility in housing mix requirements rather than imposing prescriptive targets. • Allow strategic allocations such as JPA1.2 to deliver a greater proportion of family housing where appropriate. • Reconsider the proposed affordable housing tenure split and assess requirements on a site-by-site basis rather than applying fixed percentages over the whole plan period.	The policies within the Local Plan are considered to be offer sufficient flexibility whilst also seeking to ensure that developments contribute towards meeting identified local housing needs.

Issue Raised	Council Response
Delivering Economic Growth	
Support for the Local Plan's objective of promoting economic growth, investment and business expansion.	Noted.
Absence of clear employment floorspace requirements following the removal of the previous quantitative employment policy, with requests for greater clarity around future employment growth assumptions.	The Local Plan's approach to employment is set out in Policies LP-E1 to LP-E4 and should be read alongside the adopted PfE Plan, which establishes the strategic employment growth framework and identifies strategic employment locations, including the Northern Gateway.
Infrastructure providers highlighted the importance of aligning employment growth with supporting infrastructure, including water, wastewater, energy and transport networks, and stressed the need for early engagement to address potential capacity constraints and delivery timescales.	The Infrastructure Delivery Plan identifies key infrastructure requirements and supports ongoing engagement with relevant providers. Capacity, connection requirements and delivery timescales will be considered with providers as proposals are brought forward. The IDP is a living document and is not intended to be a fixed schedule of every utility project.
National Highways sought stronger policy requirements for assessing the transport impacts of employment development, particularly the cumulative effects of industrial and warehousing growth on the strategic road network.	Transport impacts are addressed through the Plan's transport policies, including LP-TR1 and LP-TR5, and through the strategic transport policies in PfE, including JP-C4 and JP-C8. Employment proposals must be supported by appropriate transport evidence and mitigation, including consideration of cumulative impacts on the highway network where relevant. The Council will continue to engage with National Highways and other highway authorities to ensure that detailed assessment is

Issue Raised	Council Response
	appropriately undertaken in relation to the scale, location and effects of individual proposals.
Some respondents requested greater flexibility within Employment Generating Areas, arguing that a wider range of commercial and employment-generating uses should be supported, including broader Class E uses.	Policy LP-E3 safeguards Employment Generating Areas for employment-generating uses and provides a framework for considering proposals in those locations. The Council recognises the need for flexibility as business models and employment uses evolve but considers that an unrestricted expansion to all Class E uses could undermine the purpose of safeguarding land for employment and industrial activity. Proposals will be assessed against the policy, the characteristics of the area and the need to retain an appropriate supply of employment land.
Supporting our Centres	
Overall support was expressed for the Local Plan's approach to supporting and strengthening town, district and local centres, including measures to maintain vitality, encourage investment and promote active uses within centres.	Noted.
Concern raised that proposed retail impact assessment thresholds may be overly restrictive and are not adequately supported by evidence.	The Bury Town Centres study provides the evidence to support Policy LP-TC2: Managing the location and scale of main town centre uses.

Issue Raised	Council Response
The threshold for impact assessment should be measured in net retail floorspace or sales area.	Policy LP-TC2 sets thresholds for impact assessments to ensure that proposals for main town centre uses outside defined centres are assessed proportionately and that the vitality and viability of existing centres are protected. The threshold is intended to relate to the scale of the proposed development as defined in the policy and supporting evidence, rather than being restricted to net retail sales area alone. The Bury Town Centres Study provides the evidence underpinning the policy approach; the Council does not consider the proposed change necessary to achieve the policy's objectives.
Northern Gateway Development Vehicle requested greater clarity regarding the application of town centre policies within the Northern Gateway allocation, particularly in relation to sequential testing and retail impact assessments for main town centre uses.	The Northern Gateway is an allocation in the adopted PfE Plan. Its policy framework and the adopted Development Framework should be read alongside the Local Plan's town centre policies. Policy LP-TC2 applies to proposals for main town centre uses in accordance with national policy, including sequential and impact tests where applicable. The Local Plan does not alter the principle of the PfE allocation - the application of these tests to a particular proposal will depend on its nature, scale, location and the relevant policy requirements.
Support was expressed for policies that seek to protect and enhance the character, appearance and function of shopping frontages and centres, particularly where heritage assets and conservation areas may be affected. Historic England welcomed these provisions.	Noted.

Issue Raised	Council Response
Creating Healthy and Successful Communities	
Objections were raised to Policy LP-CM1 (New Development and Social Value), with developers and industry bodies arguing that the requirement for a Social Value Strategy on all major developments would place an unnecessary additional burden on applicant, is not adequately justified by evidence or national policy and is not sufficiently precise in explaining how compliance with the policy will be assessed or demonstrated.	Policy LP-CM1 seeks to ensure that major development contributes positively to local social value and community outcomes. The Council considers that the requirement for a Social Value Strategy provides a proportionate means of explaining how a proposal will respond to local priorities and maximise benefits, complementing rather than replacing other planning obligations. The policy should be applied in a manner proportionate to the scale and nature of development, with the strategy demonstrating relevant commitments and outcomes. The Council considers the policy supports the Plan's wider objective of delivering healthy and successful communities.
Concerns were raised regarding requirements for health infrastructure contributions from developments of 200 or more homes, with respondents seeking greater clarity on thresholds, evidence, delivery mechanisms and compliance with Community Infrastructure Levy regulations.	The Council will continue to collaborate with the GM Integrated Care Partnership and the Bury Locality and Integrated Care Board to determine the health care requirements associated with new development and to ensure that appropriate provision is provided.
Policy LP-CM3 (Education Provision in New Housing) generated concern over the approach to education contributions, with respondents seeking greater clarity on pupil yield calculations, funding requirements, school capacity evidence and where school expansions or new schools will be required. Request for the policy to ensure that the trigger point for any education	Additional guidance on the Council's approach to education contributions can found with Supplementary Planning Document 17 (SPD17)- Developer Contributions for Education. SPD17 supports PfE Policy JP-P5: Education, Skills and Knowledge.

Issue Raised	Council Response
contribution coincides with an appropriate point in the development project that does not create any viability issues that may prevent delivery of the scheme and should be based on a roof tax.	
Policy LP-CM4 (Community Facilities) could be strengthened to offer adequate protection to public houses and other community facilities. Local plans need to identify the assets deserving protection and install robust policies which target protection for traditional public houses which should include marketing, viability and potential.	Policy LP-CM4 seeks to protect community facilities where their loss would harm the social, recreational or cultural needs of the community. The policy provides a framework for considering the effects of a proposed loss and the availability of alternatives. The Council considers that the policy can be applied to public houses where they perform a community function; a separate list of every facility is not necessary for the policy to operate. Evidence of marketing, viability and the prospect of continued community use can be considered where relevant to an application.
Topic Paper 6 - Requests for greater clarity on the funding, delivery mechanisms and timescales for community facilities, social infrastructure and regeneration projects.	The Local Plan is supported by the Infrastructure Delivery Plan, which identifies key infrastructure needs associated with planned growth and provides a framework for engagement with delivery partners. Policy LP-DM1 establishes the policy basis for securing necessary infrastructure through development. The IDP is not intended to be a comprehensive implementation programme with confirmed funding and delivery dates for every project, as these matters depend on partner decisions, funding and development phasing. It will be updated as information becomes available.

Issue Raised	Council Response
Topic Paper 6 - Concerns raised by residents about pressures on health services and the need for healthcare infrastructure to be delivered alongside new development.	The Council will continue to collaborate with the GM Integrated Care Partnership and the Bury Locality and Integrated Care Board to determine the health care requirements associated with new development and to ensure that appropriate provision is provided.
Promoting Sustainable Transport	
Consultation responses generally support the Local Plan's ambition to promote sustainable transport, increase walking, wheeling, cycling and public transport use, and reduce reliance on private vehicles.	Noted.
Concern regarding transport evidence underpinning major site allocations, particularly whether sufficient assessment has been undertaken of cumulative transport impacts and whether necessary mitigation measures can be delivered alongside development.	The Local Plan does not include site allocations. The need for transport evidence underpinning major site allocations will be considered in line with the relevant allocations policies. As major site allocations are brought forward through planning applications supporting transport assessment will need to be submitted which consider the cumulative highway and transport impacts of the sites and set out the necessary mitigation measures which will be delivered alongside any future development.
Stronger recognition of cumulative impacts on the strategic and local highway network, with calls for greater engagement with	The purpose and role of the Bury Local Plan is to support delivery of PfE in Bury. Providing more detailed non-strategic 'development management' policies that support the strategic policies in PfE, whilst ensuring that

Issue Raised	Council Response
National Highways and clearer consideration of future transport scenarios.	together they reflect, and support delivery of, the Council's priorities and regeneration ambitions. The evidence presented along with the transport evidence submitted during the examination into PfE is considered an appropriate amount of information for a Local Plan that is proposing no site allocations. PfE also includes Policy JP C4: The Strategic Road Network, and Policy JP-C8: Transport Requirements of New Development. The Council will continue to engage with National Highways.
Concerns were raised regarding the balance of transport investment across the borough, with some respondents arguing that northern parts of the borough require greater public transport improvements and connectivity enhancements.	The Bury Local Plan and the Bury Local Transport Strategy acknowledge that some of the key local issues associated with accessibility in the Borough relate to capacity and quality of public transport and its supporting infrastructure particularly in the north of the Borough. Policy LP-TR1 promotes sustainable transport across the Borough and seeks to encourage the improvement of public transport services to the Borough's less accessible locations.
Topic Paper 7 – Transport - Concerns about congestion, limited public transport connectivity, air quality impacts and road capacity, particularly in relation to Northern Gateway, Walshaw and Elton Reservoir.	The Local Plan does not include site allocations. These issues will be considered in line with the relevant allocation policies.

Issue Raised	Council Response
Conserving our Built Environment and Achieving High-Quality Design	
Consultation responses were broadly supportive of the Local Plan's objectives to conserve the historic environment and promote high-quality, sustainable and design-led development across the borough.	Noted. The Council welcomes support for the Plan's approach to conserving the historic environment and promoting high-quality design. Policies LP-BE1 to LP-BE6 establish the relevant framework for protecting heritage assets and securing well-designed development.
Flexibility on archaeological protection policies to allow planning benefits to be weighed against any heritage impacts in line with national policy was requested.	Policy LP-BE4 requires archaeological features to be considered in determining development proposals, with the level of assessment and any mitigation proportionate to the significance of the asset and the potential impact. The policy should be read alongside national policy, which requires the significance of heritage assets and the effect of proposals to be assessed and weighed in the decision-making process. The Council does not consider that archaeological protection should be weakened through a blanket flexibility provision. Decisions will depend on the evidence and significance of the asset in each case.
Traditional Architecture- specifically authentic style Design Codes must be at the forefront on strong economic, ecological and environmental grounds.	Policy LP-BE6 seeks high-quality design that responds positively to local character and distinctiveness. The Council supports the use of design guidance and codes where these are grounded in an understanding of local character, including the Borough's varied townscape and architectural heritage. The policy does not require a single architectural style across Bury but, rather, it seeks context-sensitive design that is durable, attractive and appropriate to its setting.

Issue Raised	Council Response
Some inconsistencies between Policies LP-BE1, LP-BE2, LP-BE3, LP-BE4, LP-BE5 and the NPPF 2026.	The policies should be read as a coherent local framework alongside the applicable NPPF and national heritage policy. The Local Plan is subject to the transitional arrangements set out in Chapter 2 and will be examined against the applicable version of the NPPF. The Council considers that Policies LP-BE1 to LP-BE5 provide locally specific protection for conservation areas, listed buildings, scheduled monuments, archaeological features and non-designated heritage assets, while retaining the need to assess significance and the effects of proposals in accordance with national policy.
Policy LP-BE6 (Design and Layout of New Development) attracted the majority of representations. While respondents generally supported the ambition to achieve high-quality design, many developers argued that some requirements are overly prescriptive and require greater flexibility.	Policy LP-BE6 sets design expectations intended to secure high-quality, context-responsive development and to avoid poor design becoming established over the Plan period. The policy should be applied proportionately, taking account of the scale, nature and context of the proposal and the feasibility of individual measures. The Council considers that a clear policy framework is necessary to deliver its design objectives and that the policy provides appropriate flexibility through its criteria and supporting text.
Developers and industry bodies requested that references to solar energy generation be aligned with the Government's Future Homes Standard to avoid duplication of national requirements.	The Local Plan should be read alongside applicable national building regulations and standards, including any Future Homes Standard in force when development is undertaken. Policy LP-BE6 addresses the planning aspects of sustainable design and energy generation. It is not intended to duplicate technical requirements that are properly addressed through

Issue Raised	Council Response
	building regulations. The Council considers that the policy's locally specific design objectives remain relevant alongside national standards.
Concerns were raised that requirements for green roofs, green walls and other urban greening measures could be interpreted as mandatory for all developments. Respondents sought clarification that such measures should be applied where appropriate and feasible.	Policy LP-BE6 promotes urban greening and sustainable design in a manner that responds to the development's context. The policy should not be interpreted as requiring every listed measure on every site regardless of feasibility. The appropriate response will depend on site conditions, design, viability and the opportunities available. The Council considers that retaining these measures in the policy helps ensure that opportunities for climate resilience, biodiversity and amenity are properly considered.
Significant concern was expressed regarding the proposed design review process, with respondents seeking greater clarity on when reviews would be required, how "sensitive development" would be defined and how reviews would operate without delaying development delivery.	The design review process is intended to support design quality for appropriate proposals, particularly those with greater sensitivity or significance. The need for review should be proportionate to the nature, scale and context of the development and should be identified early enough to inform the design process. It is not intended to create an unnecessary delay or substitute for the planning application process. The Council considers that review provides a useful mechanism for improving proposals where appropriate.
Infrastructure providers highlighted the importance of incorporating sustainable drainage, water management,	The Local Plan addresses these matters through Policy LP-BE6, green infrastructure policies LP-GI1 to LP-GI7, water policies LP-W1 and LP-W2, and developer contributions policy LP-DM1. These policies require relevant considerations to be addressed through the design and

Issue Raised	Council Response
biodiversity enhancement and utility infrastructure considerations at the earliest stages of site design.	assessment of proposals. Early engagement with infrastructure providers and proportionate site-specific evidence will help identify constraints and mitigation before designs are finalised.
Clarification as to whether Policy LP-BE9 is intended to provide a policy basis for the control and improvement of existing advertisements, as well as regulating new or proposed advertisements.	Policy LP-BE9 provides the policy framework for assessing advertisements and their effects on amenity and public safety, including proposals to display, alter or replace advertisements. Existing advertisements may also be subject to control under the relevant advertisement regulations and other applicable powers. The policy is not a substitute for those statutory controls, but its criteria provide the local planning context for proposals requiring consent.
Conserving and Enhancing our Green Infrastructure	
There is broad support for the Local Plan's overall objective of protecting and enhancing green infrastructure, biodiversity, woodland, trees and ecological networks across the borough.	Noted. The Council welcomes support for the Plan's objectives to protect and enhance green infrastructure, biodiversity, woodland, trees and ecological networks. Policies LP-GI1 to LP-GI7 provide the framework for these objectives.
Many respondents support Policy LP-GI1 (Green Infrastructure), although several developers seek greater flexibility to ensure the policy does not unnecessarily constrain housing and employment development, particularly on sites within or adjacent to Green	Policy LP-GI1 recognises the multiple functions of green infrastructure and seeks to protect and enhance its contribution to biodiversity, landscape, recreation, flood management and connectivity. The policy is not intended to prevent all development within or near green infrastructure. It requires proposals to demonstrate that relevant functions are safeguarded and opportunities for enhancement are taken.

Issue Raised	Council Response
Belt, strategic allocations and identified green infrastructure networks.	PfE allocations remain governed by their adopted strategic policy framework, and proposals will be assessed against the applicable policies.
Suggest that Criterion (c) of LP-GI1 is flawed and should be removed because it applies a Green Belt-style test that focuses on openness and urban sprawl rather than ecological, recreational, landscape or flood management functions. This could provide an unjustified route for development that avoids proper assessment of impacts on green infrastructure. In addition, suggestion that the policy is unclear whether criteria (a)-(d) operate individually or cumulatively. If only one criterion must be met, criterion (c) could allow inappropriate development to proceed despite significant harm to green infrastructure. Criterion (e) lacks adequate biodiversity protection as it focuses on network integrity, connectivity and multifunctionality without requiring biodiversity value to be maintained. This could allow recreational or access improvements to outweigh ecological harm. Evidence within Topic Paper 9: Green Infrastructure identifies the need to minimise impacts on biodiversity and references key Green Infrastructure Standards, but these standards have not been incorporated into LP-GI1 or related policies.	The Council considers that Policy LP-GI1 provides a necessary framework for safeguarding green infrastructure's multifunctional role. Criterion (c) addresses the relationship between green infrastructure and the wider spatial structure of the Borough. It does not replace assessment of the other policy criteria or the need to comply with relevant biodiversity, open space, landscape and flood risk policies. The criteria should be read together and in the context of the policy as a whole. The Council considers that the policy, supported by Topic Paper 9 and the wider green infrastructure evidence, provides an appropriate basis for decision-making and does not consider removal of criterion (c) justified.

Issue Raised	Council Response
Concern that biodiversity policies do not clearly explain how priority habitats and protected species will be safeguarded. Recommends inclusion of the biodiversity mitigation hierarchy within policies. Suggests providing maps of priority habitats and links to relevant ecological data sources.	Policies LP-GI2 to LP-GI7 address biodiversity and geodiversity assets, biodiversity net gain, the Local Nature Recovery Network, wildlife-friendly features, trees and soils. Proposals must be informed by appropriate ecological evidence and comply with relevant statutory protections for protected species and habitats. The mitigation hierarchy is reflected in the policy framework and national requirements and should be applied when assessing impacts.
Policy LP-GI2 should be amended to fully reflect national policy protections for SSSIs and irreplaceable habitats, and include stronger requirements to support the recovery of priority species.	Policy LP-GI2 protects biodiversity and geodiversity assets, including designated sites and irreplaceable habitats, and should be read alongside national policy and statutory protections for SSSIs and protected species. The policy framework also supports biodiversity recovery through LP-GI3 and LP-GI4. The Council considers that these provisions provide a coherent approach to protecting important assets while allowing proposals to be assessed on the evidence, significance of the features and the applicable national policy tests.
Concerns were raised regarding the balance between protecting biodiversity assets and accommodating development needs, with some developers arguing that policies should provide greater scope for mitigation and compensation where impacts on ecological assets cannot be fully avoided.	The Plan applies a mitigation hierarchy and seeks to avoid harm to biodiversity assets before considering mitigation and, where appropriate, compensation. The scope for mitigation depends on the asset affected and the relevant statutory and policy protections. Compensation is not an automatic substitute for avoiding harm, particularly in relation to irreplaceable habitats. The Council considers that the policies

Issue Raised	Council Response
	appropriately balance development needs with the need to conserve and enhance biodiversity.
There is no evidential justification for the blanket 50 m buffer required by LP-GI2 for irreplaceable habitats.	The buffer requirement is intended as a precautionary measure to protect irreplaceable habitats from direct and indirect effects of development, including disturbance and changes to hydrology and habitat condition. The appropriate protection needed will depend on the habitat and the potential impacts, but a clear buffer provides certainty and encourages early consideration of constraints. The Council considers the requirement justified by the importance of avoiding harm to irreplaceable habitats. Site-specific evidence will inform how the policy applies to individual proposals.
Biodiversity Net Gain policies received broad support in principle; however, developers and industry bodies argued that parts of the policy duplicate national legislation and guidance and could create unnecessary complexity or additional viability burdens.	Policy LP-GI3 is intended to operate alongside, and not replace or duplicate, the statutory biodiversity net gain regime. It provides local policy context for securing appropriate gains and supporting the Borough's ecological network, while national legislation and guidance continue to apply. The Council considers that local policy is needed to ensure biodiversity outcomes are considered in the context of Bury's priorities and that any viability or delivery issues can be assessed through the applicable policy and application process.
Policy LP-G3 does not follow the biodiversity mitigation hierarchy and irreplaceable habitats are not adequately addressed.	Policy LP-GI3 should be read alongside Policy LP-GI2 and national requirements, including the mitigation hierarchy and protections for irreplaceable habitats. The policy's purpose is to secure biodiversity net

Issue Raised	Council Response
	gain where required and appropriate. It does not remove the need first to avoid and minimise adverse effects or to comply with the separate protections that apply to designated sites and irreplaceable habitats. The Council considers the combined policy framework provides this protection.
Policy LP-GI4 should be strengthened by introducing stronger safeguards against harm to the Local Nature Recovery Network and by prioritising Biodiversity Net Gain delivery within LNRS opportunity areas. The policy should make a stronger link between Biodiversity Net Gain (BNG) delivery and the Local Nature Recovery Network by prioritising off-site BNG within LNRS opportunity areas wherever possible.	Policy LP-GI4 seeks to protect and strengthen the Local Nature Recovery Network and improve ecological connectivity. Policy LP-GI3 supports biodiversity net gain, and delivery within locally identified nature recovery priorities can contribute to these aims where suitable and feasible. The Council considers that a rigid requirement to deliver all off-site gains within designated opportunity areas could restrict effective delivery where suitable sites, landowner agreement or ecological benefits are not available. The policies should encourage outcomes that are ecologically appropriate and consistent with the statutory BNG framework.
Policies requiring wildlife-friendly features, such as bird and bat bricks and hedgehog highways, attracted objections from housebuilders who considered the requirements overly prescriptive and requested a more flexible, site-specific approach informed by ecological evidence.	Policy LP-GI5 seeks to incorporate wildlife-friendly features into development where appropriate, supporting biodiversity and helping nature recovery in built-up areas. The policy should be applied with regard to the nature and scale of the proposal, ecological evidence and relevant technical constraints. The Council considers that these features can provide cumulative benefits and that retaining a local policy expectation is justified, while allowing the details to respond to site-specific circumstances.

Issue Raised	Council Response
The minimum provision should be bird bricks and bat boxes , not either/or. The swift brick motion clearly advocated for swift bricks in all new developments, it was passed unanimously over two years ago and should not be watered down as your current wording does.	Policy LP-GI5 establishes a policy approach to wildlife-friendly features, including bird and bat features, with the precise measures informed by the proposal and relevant ecological circumstances. The Council recognises the value of swift bricks and other nesting features but considers that a policy should allow appropriate design responses rather than mandate the same combination of features on every development irrespective of context. The policy is intended to secure meaningful wildlife benefits while allowing proportionate, evidence-led implementation.
Policy LP-GI5 should be strengthened by clarifying species-related exemptions, adopting measurable lighting standards, and requiring on-site habitat creation and restoration to support nature recovery.	Policy LP-GI5 supports wildlife-friendly design and should be applied with reference to ecological evidence and relevant species protections. Lighting impacts, habitat creation and restoration can be addressed through the policy and other relevant development plan requirements, including LP-GI1 to LP-GI4. The Council considers that site-specific assessment is the appropriate means of determining suitable measures and that fixed technical standards in the Local Plan could become outdated or fail to reflect local conditions.
Tree, woodland and hedgerow policies generated significant comment, with strong support for protecting existing trees and ancient woodland, but concerns from developers that proposed replacement tree ratios and valuation requirements may be overly	Policy LP-GI6 seeks to protect and enhance trees, woodland and hedgerows and requires proposals to consider their value and the effects of development. Replacement planting and tree valuation requirements are intended to reflect the loss of established natural assets and the time needed for replacement planting to provide equivalent benefits. The Council considers these requirements justified by the environmental,

Issue Raised	Council Response
onerous, insufficiently evidenced and potentially harmful to development viability.	amenity and climate benefits of trees, while the scale and detail of provision should be proportionate to the impacts and site circumstances.
Policy LP-GI6 should be strengthened to better protect hedgerows that function as wildlife corridors and to ensure alignment with Biodiversity Net Gain requirements for linear habitat.	Policy LP-GI6 protects trees, woodland and hedgerows, including their contribution to landscape and ecological connectivity. Hedgerows that function as wildlife corridors should be assessed as part of the site's ecological network and relevant biodiversity net gain requirements. The Council considers the existing policy framework provides an appropriate basis for this assessment and that proposals must demonstrate how impacts will be avoided, mitigated or, where appropriate, compensated.
Policy LP-GI7 should provide significantly stronger protection for peat soils, align with the irreplaceable habitat protections in LP-GI2, and provide stronger evidence before concluding that peat at Unsworth Moss cannot be restored.	Policy LP-GI7 recognises the importance of soils, including peat, for biodiversity, carbon storage, water management and landscape. It should be read alongside Policy LP-GI2 where habitats meet the definition of irreplaceable habitat and alongside the relevant evidence on Unsworth Moss. The Council considers that policy decisions should be based on the available ecological and soil evidence and that the Local Plan appropriately seeks to protect soil resources and avoid unacceptable impacts.

Issue Raised	Council Response
Improving Access to Quality Open Space, Sport and Recreation	
Consultation responses were broadly supportive of the Local Plan's objective to protect, enhance and improve access to open space, sport and recreation facilities across the borough.	Noted.
Concern that the Plan does not adequately demonstrate equitable access to green space across the Borough.	The Local Plan is supported by the Open Space Assessment, which considers provision and accessibility across the Borough and informs Policies LP-OS1 and LP-OS2. The policies seek to protect existing open space and ensure that new development contributes to appropriate provision. The Council recognises that accessibility and quality vary between places and the evidence base provides a borough-wide basis for identifying needs and applying the policies to proposals.
Objects to any aspect of the Bury Local Plan that could enable the development or loss of Milton Road Fields/Milton Road Open Space (Milton Meadows) in Radcliffe, arguing that the Plan lacks sufficient evidence and policy justification to support such an outcome.	The Local Plan identifies the site at Milton Road as protected open space, sport and recreation and green infrastructure. As such, any proposals on the site would be subject to relevant policies and the provisions of the National Planning Policy Framework.
Request for stronger evidence on accessibility, tree cover, environmental quality and community access to nature.	The Open Space Assessment considers open space quantity, quality and accessibility and informs the Plan's approach to protecting and improving provision. Tree cover, environmental quality and access to nature are also addressed through the green infrastructure and tree policies. The Council considers the evidence proportionate to the Local Plan's role and that

Issue Raised	Council Response
	site-specific deficiencies and opportunities can be considered through development proposals and relevant strategies.
Concerns that open space requirements should avoid duplication of obligations and should allow strategic, site-wide approaches to provision where developments are delivered in phases or through multiple planning applications. Dual use of school sports facilities should be taken into account.	Policies LP-OS1 and LP-OS2 seek to protect existing provision and ensure that development contributes to the open space needs it generates. The Council supports coordinated, site-wide provision where it delivers accessible and usable facilities and avoids unnecessary duplication, subject to appropriate arrangements for delivery, management and long-term maintenance. Dual-use school facilities may contribute where their availability, accessibility and suitability for community use are secured. They should not be assumed to replace public provision without evidence.
Policy LP-OS1 should explicitly recognise and safeguard the ecological connectivity functions of open spaces when determining whether land is surplus to requirements.	Policy LP-OS1 protects open space having regard to its value and function. Ecological connectivity is an important green infrastructure function and is also addressed through Policies LP-GI1 to LP-GI4. The policies should be read together so that an assessment of whether open space is surplus to requirements takes account of its relevant recreational, environmental and ecological functions. The Council does not consider a separate amendment necessary to achieve this integrated approach.
Policy LP-OS2 should be strengthened by embedding Green Infrastructure Standards and ensuring recreational demand from	Policy LP-OS2 is informed by the Open Space Assessment and sets requirements for provision associated with new housing. Green infrastructure standards and ecological considerations are addressed

Issue Raised	Council Response
new development does not adversely affect sensitive habitats and ecological assets.	through the Plan's green infrastructure policies. The Council considers that the combined framework provides a proportionate basis for securing accessible open space while protecting sensitive habitats. Site-specific requirements should reflect the scale and location of development and the evidence of need.
Requests for the designation of land at Oak Avenue, Holcombe Brook/Ramsbottom as Local Green Space, citing its recreational, community, wellbeing and biodiversity value.	The Local Plan has considered the evidence and representations relating to open space, but designation as Local Green Space is subject to the national policy tests and must be justified through the plan-making process. The Council does not consider that a request in a representation alone establishes that the land at Oak Avenue meets those tests. The site's recreational, community and biodiversity value can be considered under the existing open space and green infrastructure policies and through any appropriate future plan-making process.
Topic Paper 10: Open Space, Sport and Recreation - clarification as to whether alternative forms of community food-growing provision can contribute towards the allotment requirement where these provide an equivalent community function and are demonstrated to respond more appropriately to the character and constraints of a strategic development.	Policy LP-OS2 and the supporting Open Space Assessment set out the approach to provision, including allotments and food-growing opportunities. The Council recognises that alternative community food-growing provision may offer benefits, but it must be shown to provide an appropriate and accessible function for the intended community and to meet the relevant identified need. The policy should not be interpreted as allowing an alternative to be counted automatically without evidence of its suitability, availability and long-term management.

Issue Raised	Council Response
Managing Water and Flood Risk	
Consultation responses broadly support the Local Plan's approach to managing flood risk, water resources and sustainable drainage, recognising the importance of climate resilience and integrated water management. Developers questioned policy wording requiring compliance with consultee advice and references to external guidance documents within policy.	Noted. Policy LLP-W1 requires applicants to have regard to recognised technical guidance and standards when preparing development proposals. These provide flexibility and allow schemes to respond to evolving best practice.
Environment Agency broadly supported the chapter but requested amendments to strengthen the focus on reducing flood risk, rather than solely managing existing risk. It recommends requiring development to be safe over its lifetime, deliver flood risk reduction where practical, and provide clearer guidance on compensatory flood storage and finished floor levels.	Policy LP-W1 seeks to direct development away from areas at highest risk of flooding and ensure development is safe throughout its lifetime. It is considered that the policy, read alongside national policy and the Strategic Flood Risk Assessment, provides an effective framework for managing flood risk and climate change impacts.
Seeks clearer requirements for site-specific flood risk assessments, argues that major developments should be supported by up-to-date site surveys that consider climate change impacts and effects on neighbouring properties.	The requirements and scope for site-specific flood risk assessment (FRAs) are set out in the NPPF and NPPG. The Environment Agency review FRAs to check they are satisfactory, including that flood risk is not increased elsewhere.

Issue Raised	Council Response
Concerns were raised about previous developments contributing to increased flooding elsewhere.	
GMEU highlighted the cross-boundary nature of flooding and suggested stronger recognition of impacts on neighbouring authorities such as Manchester and Salford.	The plan has been prepared in consultation with neighbouring authorities and relevant risk management authorities and is supported by the Strategic Flood Risk Assessment, which considers catchment-wide flood risk issues.
Several responses relate to the requirement for new residential development to meet the optional Building Regulations water efficiency standard of 110 litres per person per day.	Approach is based on most recent evidence available which highlights water pressures in the North West.
There was general support for the use of Sustainable Drainage Systems (SuDS), although some developers sought greater flexibility by requiring developments to have regard to drainage guidance rather than demonstrate strict compliance.	Policy LP-W2 is considered to provide sufficient flexibility to take account of site-specific circumstances, whilst also seeking to ensure that development proposals incorporate SuDS schemes in line with the national requirements and standards.
The Environment Agency supports Policy LP-W2 but recommends stronger references to integration with the natural environment, ensuring SuDS schemes do not adversely affect river processes or ecological systems.	Policy LP-W2 seeks to ensure that sustainable drainage systems deliver multiple benefits, including flood risk management, water quality improvements, biodiversity enhancement and climate resilience.

Issue Raised	Council Response
United Utilities recommends a stronger policy requirement that development demonstrates no unacceptable adverse impact on the water environment.	Policy LP-W3 promotes a catchment-based approach and seeks to avoid adverse impacts on water resources while delivering environmental improvements where opportunities arise.
United Utilities requested the reinstatement of a dedicated policy to protect public water supply catchments and manage development within sensitive drinking water catchment areas.	Development proposals on land identified as a public water catchment area can have an impact on water supply resources. The Plan already requires development to protect and enhance the water environment and applicants will be expected to engage with the statutory water undertaker where development may affect public water supply catchment land. The Environment Agency has a statutory role in protecting water environments.
Topic Paper 12 – Water and Flood Risk - Concern about sewer capacity, flooding risks and the effectiveness of sustainable drainage systems, particularly in relation to the Walshaw allocation.	The Walshaw Development Framework highlights that development within the Walshaw allocation provides the opportunity to consider whether the site can improve flood and drainage in the wider area. All planning applications will need to be accompanied by a Flood Risk and Drainage Assessment and Strategy, in accordance with PfE Policy JP-S4. In terms of drainage, Chapter 7 of the Development Framework specifies that relevant planning applications will need to be accompanied by a flood risk and drainage assessment and strategy which includes and approach to drain impermeable areas via an adoptable surface water drainage network, attenuated into strategic

Issue Raised	Council Response
	basins, controlled and discharged at greenfield discharge rates to existing watercourses.
Topic Paper 12 – Water and Flood Risk - Recommends updates to reflect the latest national sustainable drainage standards are included.	Policy LP-W2 should be read alongside the latest applicable national sustainable drainage standards and guidance. The Council will take account of relevant updates as development proposals are assessed and as supporting guidance evolves. The Local Plan provides the overarching policy framework but avoids the need to reproduce technical guidance in the policy text given that detailed technical standards may change over time.
Development Management	
Developers and landowners raised concerns that cumulative policy requirements, planning obligations and infrastructure costs could undermine development viability and delivery, particularly on strategic and complex sites. Respondents requested greater flexibility and stronger recognition of viability considerations.	A Local Viability Assessment has been produced in accordance with national guidance to support the Regulation 19 Local Plan, and concludes that the overall development planning for in the new Local Plan is considered to be viable. There is considered to be sufficient flexibility to take account of viability where appropriate, including specific references within affordable housing policy LP-H4, the M4(3) requirement in LP-H5, custom and self-build policy LP-H7, and developer contributions Policy LP-DM1.
Several representations sought stronger monitoring of housing delivery, infrastructure provision, transport impacts, biodiversity outcomes, brownfield development and cumulative	The Local Plan includes a monitoring framework in Table 4 and identifies indicators for assessing implementation and outcomes. Housing delivery, infrastructure, transport, biodiversity and environmental matters are

Issue Raised	Council Response
environmental effects, together with clearer links between identified issues and corrective action.	addressed through the relevant policies and evidence base. Monitoring information will help the Council understand whether the Plan's objectives are being achieved and inform future review where necessary. The Council considers that the framework is proportionate to the Plan's role and does not need to prescribe a separate corrective action for every possible monitoring outcome.
Integrated Appraisal	
The Integrated Assessment does not adequately recognise the sustainability benefits of allocating Swan Lodge for development.	The Integrated Assessment assesses the reasonable alternatives considered through plan preparation. It is not intended to assess an unselected site as though it were an allocation. The Council therefore does not consider the omission of a preferred assessment outcome for Swan Lodge undermines the Plan.
Request a technical amendment to the assessment process relating to the consideration of "in-combination" effects with other plans and projects.	The Integrated Assessment and the Habitats Regulations Assessment consider the potential effects of the Plan in accordance with the applicable assessment requirements. The Council will ensure that the assessment and its conclusions are read alongside the relevant plans and projects and that in-combination effects are addressed where required.
Advised that assessments of likely significant effects should be undertaken before the Appropriate Assessment stage when considering cumulative impacts.	The Council recognises that the Habitats Regulations Assessment process requires screening for likely significant effects and, where necessary, an Appropriate Assessment before a plan can be adopted.

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	The Integrated Assessment and HRA should be read together and in accordance with the applicable regulations and guidance.
Other Evidence Base Documents	
Strategic Flood Risk Assessment - The Environment Agency supports the use of a Level 1 Strategic Flood Risk Assessment (SFRA), given that the Local Plan does not propose additional allocations beyond those in Places for Everyone. However, it identifies errors in the SFRA mapping, particularly relating to the representation of Main Rivers such as Whittle Brook, Brightley Brook, and sections of the River Irwell. The Agency recommends correcting these mapping issues before or after examination to ensure the evidence base remains robust. Elton Reservoir is not included in the Appendix E and should be added.	The Council notes the Environment Agency's support for the use of a Level 1 Strategic Flood Risk Assessment (SFRA), reflecting the Local Plan's reliance on the strategic allocations already identified in the adopted Places for Everyone Plan and the absence of additional allocations. The Council will review the suggested mapping errors in relation to Main Rivers, including Whittle Brook, Brightley Brook and sections of the River Irwell, and will, where necessary, make corrections to ensure the SFRA accurately reflects the relevant watercourses. Appendix E relates to sites that have not been allocated. Elton Reservoir was considered through the Places for Everyone Strategic Flood Risk Assessment.
Open Space Assessment - Greater flexibility around allotment requirements, particularly at Elton Reservoir, so that alternative food-growing opportunities can contribute towards requirements.	The Open Space Assessment informs Policy LP-OS2 and the approach to allotment provision. The Council recognises that alternative food-growing opportunities may be appropriate in some circumstances, but they must provide a demonstrable equivalent community benefit and be accessible, deliverable and capable of long-term management. The

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	policy should not be interpreted as permitting a reduction in provision without evidence that the identified need will be met.
Viability – Peel, the Northern Gateway Development Vehicle and Taylor Wimpey submitted reps on the Bury Local Plan Viability Assessment prepared by Three Dragons.	The Local Plan Viability Assessment has been prepared by Three Dragons in accordance with national guidance. It tests the Plan's policy requirements against development typologies and considers the cumulative effect of policy costs on viability. The Council has considered the representations received on that evidence and will provide the assessment and relevant responses as part of the examination material. The Council considers that the assessment supports the conclusion that the majority of planned development is viable, while recognising that site-specific viability may need to be considered where the relevant policies allow.
Local Plan Site Suggestions Background Paper - The Site Suggestions Background Paper concludes that further Green Belt release is not required to meet housing needs. Peel disagrees, arguing that: • Housing delivery should be increased. • The borough lacks a five-year housing supply. • Grey Belt sites may now be considered suitable under national policy. • Allocating additional sites would be more effective than relying on windfall development.	The housing supply in Table 3 of the Local Plan is considered sufficient to meet the adopted PfE housing requirement over the Plan period. PfE establishes Bury's strategic housing requirement and the strategic allocations and the Local Plan is required to be consistent with the adopted development plan. The Council therefore does not consider further Green Belt release justified at this stage. National policy on Green Belt and grey belt will continue to apply to individual planning applications.

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Housing Land Supply - Peel emphasises the strategic importance of the Elton Reservoir allocation. Peel argues that several discounted housing sites should remain under consideration and are capable of contributing to future housing delivery if additional land is required, including: • Land north-east of Nuttall Lane. • Broadhey Playing Fields, Ripon Hall Avenue. • Land off Brandlesholme Road, Greenmount. Query regarding the accuracy of some housing completion figures. Justification for the small sites windfall allowance used in housing supply calculations and querying why only small sites are included.	Elton Reservoir has been allocated through PfE and is included within the housing land supply. The 2025 SHLAA which forms the basis of Table 3 of the Regulation 19 Local Plan includes 2,420 homes at Elton within the Bury Local Plan period to 2043, and a further 1,080 beyond 2043. The trajectory will be reviewed as part of the usual annual SHLAA update process. The Council has identified sufficient land to meet the housing requirement over the plan period and does not seek to allocate additional sites. Table 3 of the Regulation 19 Local Plan provides a breakdown of the housing land supply and demonstrates that there is an 18.6% flexibility allowance, which will ensure the housing requirement can be met. Housing completions are monitored on an annual basis based on a range of data sources, including site visits where necessary. The justification for the small sites windfall allowance is set out in the Strategic Housing Land Availability (SHLAA) Summary Report and is based on past delivery rates on sites of <5 units. No large windfall allowance is included because, whilst it is likely that larger sites will become available over the plan period due to unforeseen circumstances, larger sites are easier to identify than small sites and many are therefore already included within the land supply. NPPF (December 2023) requires there to be compelling evidence that windfall sites will provide a reliable source of supply. There is insufficient evidence to demonstrate what an

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	appropriate allowance for larger sites would be or certainty over whether past trends are likely to continue.
Infrastructure Delivery Plan - Improvements made to the 2026 Infrastructure Delivery Plan are welcomed but considers it insufficiently detailed. Request an Infrastructure Delivery Schedule identifying: • Specific projects. • Costs. • Funding sources. • Delivery organisations. • Development phasing. Argued that there is currently no clear mechanism explaining: • How infrastructure costs will be apportioned. • How strategic infrastructure will be funded upfront. • How later developments will reimburse earlier infrastructure providers. Particular emphasis is placed on ensuring developments benefiting from infrastructure delivered through Elton Reservoir make fair and proportionate contributions.	Noted. The Infrastructure Delivery Plan (IDP) published alongside the Bury Local Plan provides a framework for ongoing engagement with infrastructure providers. Whilst the IDP seeks to identify the key infrastructure required to deliver the Local Plan, it does not capture every project being planned by the Council nor is it intended to provide a prescribed implementation plan for the provision of infrastructure with confirmed funding and delivery timetables. It will be a 'living' document, recognising that infrastructure requirements will change over time as new or improved infrastructure is provided. However, an updated Infrastructure Delivery Plan including an infrastructure Delivery Schedule will be submitted with the Regulation 20 Local Plan.

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National Highways broadly supports the transport evidence underpinning the Northern Gateway allocation. It supports the proposed transport strategy but stresses that successful delivery depends on: • Infrastructure being delivered on time. • Appropriate funding arrangements. • Effective mitigation of impacts on the Strategic Road Network (SRN). National Highways highlights the need for continued assessment of: • M62 Junction 19. • M66 Junctions 2 and 3. • Simister Island. • Wider North-East Growth Corridor impacts. It notes there is currently no commitment for future motorway improvements to be funded through national road investment programmes.	Noted. Strategic Allocations in PfE have their own policies which provide policy requirements. As the Northern Gateway allocation is brought forward through planning applications supporting transport assessments will need to be submitted which would consider the cumulative highway and transport impacts of the site including impacts on the SRN.
Consultation Statement	
National Highways is not specifically named within the Consultation Statement and there is no explicit explanation of	The Statement of Common Ground prepared to support the Local Plan demonstrates how through the preparation of the Plan we have co-

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how any representations from National Highways or other strategic transport bodies have influenced the Plan. Whilst the document refers to highways infrastructure, infrastructure providers and the need for a robust evidence base, discussion of strategic highway impacts remains relatively high level.	operated with our neighbouring authorities and other relevant public bodies including National Highways and Transport for Greater Manchester on strategic priorities, including those that cross boundaries.
Topic Papers	
Topic Paper 11 – Greenbelt - Updated Green Belt evidence including a grey belt assessment and stronger contingency planning for future development needs.	The Local Plan does not allocate additional Green Belt sites because the Council considers the housing requirement can be met through the identified supply and the strategic sites already allocated in PfE. The Local Plan is prepared under the applicable transitional arrangements and is not intended to pre-empt future strategic plan-making or duplicate national Green Belt policy. The application of grey belt policy to individual proposals remains a matter for decision-making under the applicable national policy.
Other Comments	
Concerns were raised regarding the accessibility of the consultation process, consultation timing during summer holidays, lack of awareness of consultation opportunities and perceptions that public input has limited influence on outcomes. The Plan was described as overly complex and difficult for the public to understand.	The Council has sought to provide a proportionate and accessible programme of engagement on the Development Frameworks within a defined statutory timeframe. Consultation has been undertaken in a structured and professional format and in accordance with relevant Regulations and its Statement of Community Involvement

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Questions were raised about the role of developers and landowners in preparing development frameworks, with concerns over maintaining Council independence and public confidence in decision-making.	The Council worked with land promoters and developers in setting the vision and spatial principles for the PfE development frameworks (Elton Reservoir, Walshaw and Simister Bowlee), how the development will come forward and how it will comply with the development plan for Bury. The Development Frameworks supplement policies within PfE and are not relevant to the Local Plan.
Calls were made for clearer evidence bases, more transparent decision-making and stronger monitoring mechanisms to ensure delivery of planned outcomes.	The Local Plan is supported by an evidence base, an Integrated Assessment, an Infrastructure Delivery Plan and a monitoring framework in Table 4 of the Local Plan. These documents provide transparency on the rationale for the Plan and a means of monitoring its implementation. Policy LP-DM1 and the relevant topic policies establish requirements for infrastructure, transport, environmental protection and development impacts. The Council considers these mechanisms proportionate and will review the Plan in light of monitoring and changing circumstances as appropriate.
Community groups and residents questioned the justification for Green Belt release, seeking stronger evidence that brownfield opportunities have been exhausted first.	The Local Plan promotes effective use of previously developed land and makes provision for the strategic sites allocated through PfE. The Council considers the identified supply sufficient to meet the adopted housing requirement and does not consider further Green Belt release necessary. The adopted PfE Plan has already established the strategic allocations and revised Green Belt boundary.

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Concerns were raised about biodiversity protection, ecological evidence, climate change impacts, flood risk and protection of valued open spaces, particularly around Elton Reservoir and other local sites.	The Local Plan includes policies to protect and enhance green infrastructure and biodiversity (LP-GI1 to LP-GI7), manage flood risk and drainage (LP-W1 and LP-W2), protect open space (LP-OS1 and LP-OS2) and address pollution. The Plan is supported by an Integrated Assessment and relevant environmental evidence. The PfE allocations were established through the adopted strategic plan and are not reallocated through this Local Plan. Site-specific impacts, mitigation and infrastructure requirements will need to be addressed through the relevant allocation framework and planning applications.
Objections highlighted the need for updated environmental assessments and stronger ecological safeguards.	The Local Plan is supported by an Integrated Assessment, including sustainability, health and equality assessment components as well as a Habitats Regulations Assessment, together with topic-specific evidence. These assessments have informed the Plan's strategy and policies. The Council considers the evidence proportionate to a Local Plan that does not make new site allocations and relies on the adopted PfE strategic allocations. Where individual proposals come forward, they will be subject to the environmental assessment and ecological requirements applicable to them.
Detailed objection to the PfE allocation JPA1.2 Simister Bowlee and request for updated evidence to support the allocation.	The Simister-Bowlee site was taken out of the Green Belt and allocated for residential development through Places for Everyone (PfE). A suite of evidence which supported the allocation was examined by independent Planning Inspectors prior to the adoption of the PfE Plan.

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	The Simister Bowlee Development Framework was adopted on the 30th June 2026. The evidence supporting the Development Framework was proportionate to this stage of the development process (i.e. bridging the gap between the allocation in PfE and planning applications. Further, more detailed evidence will be submitted with all planning applications within the site to ensure that the proposals reflect the latest position.

Bury
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