



Development Plans Unit  
Strategic Planning and Economic Development  
Department for Resources and Regulation  
3 Knowsley Place  
Duke Street  
Bury BL9 0EJ

28th September 2017

Dear Sirs,

### **Re: Bury Local Plan – Key Issues and Policy Framework**

Further to the publication of the Bury Local Plan – Key Issues and Policy Framework, we submit our response.

#### **Key Consultation Question 1**

[Do you feel that the proposed Vision for the Borough is an appropriate reflection of how the Borough should be by 2035?](#)

We feel that this, although sounding very good, is not really specific and is worded in such a way as to make it difficult to disagree with it. One of the key phrases is 'sustainable growth'. This should include wording stating that the growth will be managed in such a way as to enhance and improve the lives of the existing residents. Bury MBC's first duty is to the current residents of the Borough and this should always be at the forefront of all decision making. Also, why is the plan looking ahead to 2035 when the NPPF says "preferably a 15 year time horizon?"

#### **Key Consultation Question 2 Housing**

[Are there any other key issues relating to housing that you feel the Local Plan should be seeking to address and do you think that the proposed scope and direction of Local Plan policies is appropriate?](#)

Bury MBC appears to have accepted the GMSF without question. As the elected representative of the existing residents of the Borough it should be acting on behalf of the existing residents in 1) Ensuring there is sufficient housing for existing residents before considering housing people who do not as yet live in the Borough. 2) Questioning the numbers of houses deemed by the GMSF to be required for these future possible residents.

It should also be analysing the household size forecasts, which appear to be very low. The large number of proposed new homes would not enhance the quality of life for the current population of the Borough. In fact it would be detrimental in many ways, including increasing congestion, leading to a further deterioration in air quality. The loss of green spaces and trees would exacerbate this.



Bury MBC's duty is to represent and act for the residents of the Borough in a robust manner. This should come before anything else. The phrase 'encouraging the re-use of vacant land and derelict buildings' should be re-worded as 'Ensuring the re-use of vacant land and derelict buildings at all times before allowing development on any Green Belt or Open Spaces'.

### **Key Consultation Question 3 Economy and Employment**

Are there any other key issues relating to the economy and employment that you feel the Local Plan should be seeking to address and do you think that the proposed scope and direction of Local Plan policies is appropriate?

We feel that increasing and improving employment prospects for the current population of Bury should be the first priority and that brownfield sites can and should be utilised before any consideration is given to using prime Greenbelt land. Whilst attracting jobs and workers to the area is important for growth there is a limit to the amount of people who can live and work here and how much growth Bury can absorb as well as how much growth the existing residents want. Bury is a small town not a city. The infrastructure cannot cope with a huge influx of new residents and businesses. Given the geography of the town, congestion would reach dangerous levels. Also, if we are seeking to grow heritage and tourism as a source of income and employment then building on the Greenbelt is going to detract from the attractiveness of the area as a destination and thus adversely impact tourism

### **Key Consultation Question 4 Town Centres and Main Town Centre Uses**

Are there any other key issues relating to town centres and main town centre uses that you feel the Local Plan should be seeking to address and do you think that the proposed scope and direction of Local Plan policies is appropriate?

Broadly we agree. The identification of Radcliffe and Prestwich town centres as having significant problems is to be welcomed but there is little in there to show how Bury MBC plans to address these two specific areas.

### **Key Consultation Question 5 Health and Wellbeing**

Are there any other key issues relating to health and wellbeing that you feel the Local Plan should be seeking to address and do you think that the proposed scope and direction of Local Plan policies is appropriate?

The vision correctly states that new development places pressure on existing recreational facilities. It also acknowledges poor air quality in parts of the Borough. The loss of swathes of Green Belt and open spaces would exacerbate this situation and be detrimental to the health and wellbeing of existing residents, who should be Bury MBC's first priority. Although encouraging/promoting active travel is a laudable aim, not



everybody is able to cycle or walk to their destination for a variety of reasons. The proposal to control the number of fast food takeaways is good but why have they been allowed to proliferate? Bury Planning has obviously passed these applications in the first place.

## **Key Consultation Question 6 Flood Risk**

Are there any other issues relating to flood risk that you feel the Local Plan should be seeking to address and do you think that the proposed scope and direction of the Local Plan policies is appropriate?

The local plan should include an independent viable risk assessment in relation to the increased risk of flooding in areas “currently at risk” and include new areas of “at risk” following any proposed development. The assessment should include any impact upon at risk areas where developments are likely to take place up stream and in water collection areas outside of the borough.

## **Key Consultation Question 7 Energy and Physical Infrastructure**

Are there any other issues relating to energy and physical infrastructure that you feel the plan should be seeking to address and do you think that the proposed scope and direction of the Local Plan policies is appropriate?

Post Brexit changes within the UK will presumably exclude the Borough’s requirement to adhere to European legislation in relation to waste management and so with the increase in population expected a viable waste management plan will be essential, particularly when current budgets are being constrained and reviewed downwards. Demand for waste services can only increase and the local plan should provide at least outline details, particularly if landfill sites are increasingly considered inappropriate.

Fracking - as an area of significant coal mining and alongside the evidence from the US about the negative impact of fracking, we feel that Bury MBC should avoid all attempts to introduce fracking in the Borough until irrefutable evidence is obtained that no negative consequences will be experienced by the residents and habitats in Bury.

Sewage - it is acknowledged in the local plan information that sewage systems in areas of the borough are already at capacity. For this reason, further development should be refused until such time as this issue is appropriately addressed.

The GMSF states that carbon reducing measures such as 'increase the area of habitats that sequester and store carbon including through a more than doubling of tree cover...' Amongst other measures will assist in producing a 60% reduction in emissions by 2035. Further development in the borough would contradict this.

Digital technology - we have concerns about minimising barriers to implementation eg using blanket way leave agreements to speed up access and giving providers early sight of new development sites so they can be included in investment plans. These concerns are based on the opportunity for investors to 'wag the dog' and put the local authority in difficult situations/planning appeals, which would be costly to finance and may result in unnecessary development.



## Key Consultation Question 8 Natural Environment

Are there any other key issues relating to the natural environment that you feel the Local Plan should be seeking to address and do you think that the proposed scope and direction of Local Plan objectives is appropriate?

We note a requirement to protect, enhance and restore water bodies. We find this hard to reconcile with the proposed development of 3500 houses around Elton Reservoir. This could not be an enhancement of the reservoir in any way. It would admittedly still be there but the natural environment around it would be gone, along with wildlife habitats and the recreational facilities it provides. We also note the phrase designating key assets and ensuring that new development does not have an adverse impact on the natural environment. Again this is hard to reconcile with some of the proposed developments. Has consideration been given to the damage that will be caused to the environment around Walshaw Brook with the Bolholt Lodge and Elton Brook with Parkers Lodges?

Also the 1250 dwellings proposed for Dow Lane and Walshaw. Dow Lane Park is a much used recreational facility and hosts a myriad of wildlife. The development proposed for Walshaw would destroy the tranquil village feel in that part of Walshaw. Indeed the view of Walshaw with the church spire surrounded by pastureland is iconic.

The proposed Northern Gateway development, if carried out in its entirety would blend a number of towns into a huge urban sprawl and result in a large loss of Green Belt land. The residents of these towns would suffer from the increased traffic and pollution and the loss of separate identities for the towns. Whilst we appreciate the employment benefits it would bring, we feel it would discourage developers and businesses from using brownfield sites, which is supposed to be the first option. If this development was scaled down somewhat leaving more green spaces and keeping the towns' boundaries, it may be easier to gain the hearts and minds of the local population.

References to Green Infrastructure – it should be made clear that Green Infrastructure is not the same as Green Belt or green space. Whilst Green Infrastructure is all well and good it is not a substitute for Green Belt land.

## Key Consultation Question 9

Are there any other issues relating to open land that you feel the Local Plan should be seeking to address and do you think the proposed scope and direction of the Local Plan policies is appropriate?

We do not agree with the Key Issues.

GMSF identifying the Green Belt boundary, with Bury MBC capitulating to everything. As previously stated, the Council is elected by the people of Bury to put their best interests at the heart of all decisions. Many people who live in Bury like the town for its green



spaces and may not want to have them reduced in order to house vast numbers of people.

Removing other protected open land designations. This could lead to wholesale development of any piece of previously undeveloped land and ultimately more loss of Green Belt.

The River Valleys and West Pennine Moors are in need of a review. Ambiguous – what does this actually mean?

### **Key Consultation Question 10 The Built Environment**

Are there any other key issues relating to the built environment that you feel the Local Plan should be seeking to address and do you think that the proposed scope and direction of Local Plan objectives is appropriate?

The issue of heritage seem to be addressed in relation to the built environment.

### **Key Consultation Question 11 Transport**

Are there any other key issues relating to transport that you feel the Local Plan should be seeking to address and do you think that the proposed scope and direction of Local Plan objectives is appropriate?

Yes – the addition of another 12700 dwellings and the resultant massive increase in road users travelling in and out of the Borough, as well around the Borough has not been mentioned. If the Borough is struggling to cope with traffic now, what will it be like by 2035? If council leaders believe everyone will be walking or cycling to their destination, they are being naïve. Improvements to public transport will help, as will park and ride schemes and shuttle buses but they will not solve the problem. Also the mention of low emission and ultra-low emission vehicles suggests that Bury council officials believe that most residents of the Borough can afford these vehicles. Until such time as these vehicles become more affordable we will have to live with increased pollution due to traffic being at a standstill at peak times.

In addition how does Bury MBC expect the new businesses it is hoping to attract to the area to deal with the congestion? Again, it is naïve to assume that businesses will not be reliant on road transport, so this will also increase traffic in a Borough with roads that are stretched to capacity at busy times.

### **Key Consultation Question 12 Community Facilities**

Are there any other key issues relating to the community facilities that you feel the Local Plan should be seeking to address and do you think that the proposed scope and direction of Local Plan objectives is appropriate?

The key issues seem to have been identified but there is very little detail. Public services are struggling to cope now with the present population and there would need to be massive extra investment to deal with an influx of (say) 25000 people (according to



GMSF figures). It is difficult to imagine smaller developers funding this investment, so it would end up being only the large developers who want to build large-scale developments who would be able to afford it. These large-scale developments are what damage the nature and identity of small towns. (Not to mention the destruction of the environment.)

## **Appendix 1 The Roles of the GMSF and Bury Local Plan**

### Comments

Bury MBC should resist robustly any allocation of Green Belt land in the Borough by GMSF in order to retain the Borough's unique green areas for existing residents and future generations.

Bury MBC should consider carefully the type of housing required. As well as the obvious need for starter homes and family homes other ways could be found to free up existing family homes in the Borough. These could become available if there was a policy of building a number of suitable and affordable retirement properties in the right areas, enabling older people who may want to downsize or move to more manageable properties to do so. Many older people are still living in family homes for want of being able to find a suitable retirement property without moving too far from their home town. The net result of this would be a better use of available land as many of the existing family homes in the Borough have large areas of garden etc, whereas retirement properties tend to have a smaller footprint.

Bury MBC should always put the needs and concerns of Bury's current residents before any other considerations. That is what we elected them to do.

Yours Faithfully

Chris Russell (Mr)  
Chair Bury Folk

&

James Mason (Mr)  
Secretary Bury Folk