



Paul Butler Associates

Planning, Development & Heritage Consultants

08 October 2024

Joss Simpson
The Planning Service
Bury Council
3 Knowsley Place
Bury
BL9 0EJ

Our ref: 23.1958

Dear Joss,

Location: 17 Belle Vue Terrace, Bury, BL9 0SY
Application 71156: Response to invalid letter

On behalf of our client, Mr Zvi Portnoy, this letter has been prepared to respond to the additional information requested in order to validate the above planning application (invalid letter dated 20 September 2024).

Please find the additional information tabled below as per the numbering on the invalid letter:

1. See attached updated floor plans with numbering amended.
 2. Change to description is agreed.
 3. Places for Everyone review:
- **JP-S2: Carbon and Energy: Please refer to the submitted energy statement.**

Provide an energy statement to set out how the proposal complies with Policy JP-S2.

Response: Policy JP-S2 states that aims for carbon neutrality by 2038 will be supported through a range of measures including promoting the retrofitting of existing buildings with measures to improve energy efficiency and generate renewable and low carbon energy, heating and cooling, amongst other measures.

Development proposals should set out how this has been achieved in an energy statement in accordance with the energy hierarchy, which in order of importance seeks to: i. Minimise energy demand; ii. Maximise energy efficiency; iii. Use renewable energy; iv. Use low carbon energy; and v. Utilise other energy sources.

No operational development is required to facilitate the proposals. The development involves the conversion of the existing building from a 6 person HMO to a 9 person HMO. Three vacant rooms within the existing property will be used to provide the additional bedrooms. However, during the renovation of the existing property to bring it into use as a 6 bed HMO, measures to reduce energy demand and maximise the energy efficiency of the property have been implemented through thermal insulation which was installed to comply with Part L of the Building Regulations:

- All Roof Voids - 300mm mineral wool insulation quilt installed

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- Existing external walls – 100mm “Dritherm” mineral wool cavity batts within the internal 100mm cavity
- Existing external basement walls - lined with min 67.5mm Kingspan “Kooltherm” K18 insulated dry lining board.
- Existing Sloping ceilings and dormer walls - 100mm Kingspan “Kooltherm” K107 rigid insulation board fitted between rafters with 42.5mm “Kooltherm” insulated plasterboard applied to the rafters

Points ii, iv, and v of the energy hierarchy were also considered during the renovation. The following measures were considered but discounted for the reasons set out below:

- The gas boiler has been removed and the house has been upgraded to all electric power and electric radiators installed. An air source heat was considered however this would have been at significant additional cost and out of budget for the renovation.
- Solar Photovoltaic panels were discounted as the pitched roof of the property faced North and had 1no. velux window. The rear south west facing is an existing flat roof dormer and the possible array would have had to be mounted on a metal framework higher than the ridge line of the property and therefore would have been visually unsightly. The cost of installation would have been around £15,000 + vat and therefore cost prohibitive .
- Biomass was discounted as there is no area to store fuel.

- **JP-H3: Type, Size and Design of New Housing:**

All dwellings must:

- Comply with the nationally described space standards (NDSS);
- and be built to the accessible and adaptable standard in Part M4(2) of BR unless specific site conditions make this impracticable.
- Please complete the attached space standard table.

Response: The NDSS apply to new dwellings. NDSS do not set a stand for a nine person house, therefore the NDSS cannot be applied to this development. This application is for conversion to a Sui Generis HMO which is subject to space standards set out in the ‘Houses in Multiple Occupation Licensing conditions’ document. Nonetheless the space standard table has been completed where possible.

- **JP-H4: Density of New Housing Requirements:**

Provide a statement confirming the density is appropriate to the location.

Response: Policy JP-H4 states that new housing development should be delivered at a density appropriate to the location, reflecting the relative accessibility of the site by walking, cycling and public transport and the need to achieve efficient use of land and high-quality design.

Policy JP-H4 sets out minimum densities for new housing developments. In town centre locations, a minimum of 120 dwellings per hectare should be achieved. This application is for the conversion of a 6 bed HMO to a 9 bed HMO, therefore the density standard is not applicable to this development. Nonetheless, the proposals comply with the general principles of the policy; Paragraph 7.8 of PfE states that there is a strong focus in this Plan on directing new housing

towards previously-developed sites within the existing urban area. This will help to address existing dereliction and poorly used sites, as well as reducing the need to release greenfield and Green Belt land for development. Paragraph 7.11 stresses that it will be important to make the most of existing housing stock. The proposals will result in a more efficient use of an existing house which is located in a highly sustainable and accessible town centre location.

If you require any further information in order to determine the application, please do not hesitate to get in touch.

Yours sincerely

A handwritten signature in black ink that reads "Lynsay Ewart". The script is cursive and fluid.

Lynsay Ewart BSc (Hons), MSc, MRTPI

Principal Planner