

PLANNING STATEMENT

FORMER BARCLAYS BANK, 26 SILVER STREET, BURY, BL9 0DH.

RE: FULL PLANNING AND LISTED BUILDING APPLICATION FOR
CHANGE OF USE AND INTERNAL ALTERATIONS TO FORM 9 APARTMENTS.
ALTERATIONS INCLUDE WORKS TO THE REAR OF THE BUILDING TO PROVIDE
BIN/CYCLE STORAGE; REPLACEMENT OF EXISTING TIMBER FRAMED WINDOWS;
MEZZANINE FLOORS AND ROOF LIGHTS

Prepared by Jay Everett BSC Hons MRTPI Director,
Addison Planning Consultants Ltd on behalf of
Property Investment Complete Ltd

28th August 2026



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REFERENCE DOCUMENTS

S4 - APP A - BURY COUNCIL 5 YEAR SUPPLY STATEMENT NOV 2025

QUALIFICATIONS AND EXPERIENCE

- 1.1 My name is Jay Everett, and I have been a Chartered Member of the Royal Town Planning Institute since 1993. I hold a degree in Town and Regional Planning, and I am Managing Director of Addison Planning Consultants Ltd.
- 1.2 I have 35 years of experience of working in the field of town planning, including 12 years in local government working in both planning policy and development control and 23 years acting for landowners, developers, occupiers, and investors throughout the North of England. My involvement in the property market involves the preparation of complex planning applications, strategic promotion of land and property through the local planning policy system and acting as expert witness at planning appeals.
- 1.3 My Statement deals with the planning policy context relating to the site and specifically the history of the application site, why the proposed residential scheme has been developed and the planning policy context for the proposals. I then consider the planning case for the scheme.
- 1.4 **Chapters 2 to 4** introduce the proposal. Chapter 3 describes the site and its environs, and the planning history. Chapter 4 examines the planning policy context for the consideration of the proposals.
- 1.5 **Chapter 5** of my Statement examines the planning case for the proposed scheme.
- 1.6 **Chapter 6** summarises the principal conclusions from Chapters 5.

INTRODUCTION & BACKGROUND INFORMATION

- 2.1 This Statement has been prepared on behalf of Property Investment Complete Ltd owners and prospective developers of the Former Barclays Bank, 26 Silver Street, Bury, BL9 0DH.
- 2.2 The site comprises the former Barclays Bank situated on the west side of Silver Street at its junction with Bank Street. The building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest. The property is a Grade II Listed Building recorded on the NHLE (list entry number SD8029110708) and was added to the statutory list in 1981.
- 2.3 The property has been vacant for a considerable time. The previous use ceased operation in circa 2010, and the building has since remained unused. The current vacancy and lack of maintenance have led to the onset of deterioration of the fabric of the building.
- 2.4 Planning and Listed Building Applications for the conversion of the building to nine apartments were submitted to Bury Council (The Council) in May 2024. The Applications (referenced 70803 and 70804) were refused permission under delegated authority on the 22nd of October 2025. The stated nine Reasons for Refusal on the full application reference 70803 were:

"1 The proposal would result in the loss of significant features of a Grade II Listed Building to the detriment of its appearance, character and historic interest, principally within the former banking hall. The proposal would not bring the Listed Building back into a use that would be compatible with its conservation and the harm to the Listed Building is considered to be less than substantial harm. The applicant has failed to demonstrate a clear and convincing justification or balancing of identified public benefit against the harm identified. The proposal would therefore conflict with the following policies of the Development Plan: EN2/3 Listed Buildings, JP-P2 – Heritage and Chapter 16 -Conserving and enhancing the historic environment of the National Planning Policy Framework.

2 The proposed windows, by reason of the introduction of blanking panels, are detrimental to the character and special architectural interest of this, the adjacent listed buildings and would fail to preserve the Bury Town Centre Conservation Area. The proposal would therefore conflict with the following policies of the Development Plan: EN2/3 Listed Buildings, JP-P2 - Heritage, EN2/1 - Character of Conservation Areas, EN2/2 - Conservation Area Control and Chapter 16 -Conserving and enhancing the historic environment of the National Planning Policy Framework.

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3 Insufficient information has been submitted with the application to enable the Local Planning Authority to fully determine the effect of the proposal upon the appearance, character and historic interest of a Grade II Listed Building. The information provided does not allow for the Local Planning Authority to carry out its statutory duty, specifically in having special regard to the desirability of preserving the building and any features of architectural or historic interest which it possesses. The proposal would therefore conflict with the following policies of the Development Plan: EN2/3 Listed Buildings, JP-P2 - Heritage and Chapter 16 -Conserving and enhancing the historic environment of the National Planning Policy Framework.

4 The applicant has failed to demonstrate that they would be able to provide adequate noise mitigation within the proposed development without detriment to a Grade II Listed Building and the Conservation Area within which the site is located, which would be seriously detrimental to the residential amenities of future occupiers by reason of the noise. The proposed development therefore conflicts with the following policies of the Development Plan: EN1/2 - Townscape and Built Design, EN7/2 - Noise Pollution,JP-P1: Sustainable Places EN2/3 Listed Buildings, JP-P2 - Heritage, EN2/1 - Character of Conservation Areas, EN2/2 - Conservation Area Control and Chapter 16 -Conserving and enhancing the historic environment of the National Planning Policy Framework.

5 The location of the bedroom window for Unit 05 would result in an unacceptable reduction in the level of privacy currently enjoyed by the occupiers of No. 24 Silver Street by reason of the sub-standard distances between habitable windows and the shared boundary and between existing windows at No. 24 Silver Street. The proposed development therefore conflicts with Development Plan Policies H1/2 - Further Housing Development, EN1/2 - Townscape and Built Design, H2/4 - Conversions, and Supplementary Planning Document 6: Alterations and Extensions to Residential Properties.

6 The proposed dwellings would fail to meet Nationally Described Space Standards (NDSS) for in built storage for units 6, 7, 8 and 9. The proposal would therefore fail to comply with Places for Everyone Joint Development Plan Policy JP-H3: Type, Size and Design of New Housing.

7 The proposed development by virtue of the insertion of rooflights to serve bedrooms within Units 06, 07 and 08 would provide poor, inadequate and sub-standard living conditions for future occupiers by virtue of very limited natural light and restricted and poor outlook and ventilation. The proposed development therefore conflicts with Development Plan Policies H1/2 - Further Housing Development, EN1/2 - Townscape and Built Design, H2/4 - Conversions, and Supplementary

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Planning Document 6: Alterations and Extensions to Residential Properties.

8 The application and submitted plans and supporting statements contain insufficient information to enable the Local Planning Authority to assess whether the proposal would maximise reductions in carbon emissions, as required by Policy JP-S2 - Carbon and Energy of the Places for Everyone Joint Development Plan.

9 The application and submitted plans and supporting statements contain insufficient information to demonstrate that the proposal would comprise high quality digital infrastructure, as required by Policy JP-C2 - Digital Connectivity of the Places for Everyone Joint Development Plan”.

- 2.5 The Decision Notice relating to the Listed Building Application reference 70804 sets out three Reasons for Refusal. These replicate Reasons for Refusal numbers 1 to 3 of the full Planning Application reference 70804.
- 2.6 This revised application addresses each of the stated nine reasons for refusal. The Statement explains how the revisions, together with additional information, specifically address each Reason for Refusal.
- 2.7 This revised Planning Application therefore presents a comprehensive update to the original May 2024 submissions and provides evidence to show that the proposals fully accord with national and Development Plan policies.

THE PROPOSAL

- 2.8 The proposed development relates to the adaptive conversion of the building to form 9 no. one and two-bedroom apartments. The proposed redevelopment of the site comprises the following elements:
- The outbuildings to the rear, formerly bank vaults and servicing spaces, will be adapted to provide bin/recycling store and cycle storage space with access to Bank Street via an existing passage to the west side of the Bank Chambers building.
 - Proposed external works are relatively minor and will include the installation of new ventilation grill covers to the Silver Street and Bank Street elevations (a detail sheet provides a number of cast iron design options for these covers – Code L6 Architecture drawing number 23-062-SK218). Rooflights will be installed to the west, south and east facing roof pitches set below the parapet wall. The existing modern (20th century) timber windows will be replaced throughout with new multi-light top and side hung casement windows (Code L6 Architecture drawing number 23-062-211). Material and glazing detail to be confirmed. Blanking panels to the windows are no longer proposed.

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- Internally, the ground floor space will be sub-divided to provide 4 no. apartments (previously 3 no. units were proposed). The works will include the removal of a later side stair and lift shaft to the northern section of the building, installation of a new stair and lift and installation of a new mezzanine floor within the former banking hall space to the south side of the building.
 - The proposed works to the banking hall space have been revised to provide for 2 no. duplex apartments formed by a vertical sub-division of the space. The mezzanine floor will be set back from the Bank Street and Silver Street frontages to allow parts of the original full height space to the hall to be retained. Internal sub-division of bedroom and stairwell spaces to the new mezzanine level will adopt a pod design to avoid obscuring the decorative ceiling.
 - The first-floor space, including first floor mezzanine, will be sub-divided to form 5 no. apartments with original structural divisions walls retained and later partitions removed. New stud-walling will be introduced to define the new apartment spaces. New straight flight stairs will be installed, predominantly breaking through the later first floor mezzanine within the northern section of the building.
 - Sections of masonry walling will be removed in a number of areas to accommodate the new stairs to the central, rear, of the building and to provide new door openings into the apartment spaces. A number of existing openings will also be blocked off. Sections of the existing ceiling at ground and mezzanine levels will be removed to allow for the insertion of the new lift shaft and stairs to split level apartments.
 - Cycle and bin storage will be accommodated within the outbuildings to the west, rear, of the building within an existing passage link retained.
- 2.9 A Design and Access Statement (together with detailed plans) have been prepared which show how a sensitively designed proposal will be delivered that respects the character, appearance, and special qualities of the building.
- 2.10 The submitted Planning and Listed Building Applications for the Application Scheme comprise the following list of drawings and documents.
- S1a: APC Covering Ltr to BC 28-08-2026
- S1b: Planning-Listed Building App Form 28-08-2026.
- S1c: 23-062-200 Site Location Plan - A4

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S2: Drawings

23-062-201-Plans As Existing-A1

23-062-202-Elevations As Existing-A1

23-062-203-Sections As Existing-A1

23-062-210-Plans As Proposed-A1

23-062-211-Elevations and Window Details As Proposed-A1

23-062-212-Sections As Proposed-A1

23-062-215-General Construction Details

23-062-216-Ground Floor Mezzanine Plans Details -A1

23-062-SK218-Ventilation Grilles Details

ENV12976 - 26 Silver Street DESIGN MHVR (Rev B)

S3: Design and Access Statement 28-08-2026

S4: Planning Statement 28-08-2026

S5: Built Heritage Statement 26-040-A 03-07-2026

S6: Noise Impact Assessment DC4652-NR1v2 – 19-07-2026

S7: Drainage Strategy 24272-DR-C-0100 P1

S8: Structural Investigation Report LD-24-251 09-09-2024

S9a: Financial Viability Assessment – Roberts and Roberts

S9b: Cost Plan by PEAK PM-74 - 23-07-2026

S9c: Marketing Report by Pearson Ferrier 11-02-2026

S10: Policy JP-C2 - Digital Connectivity Assessment

S11: Energy Statement

- 2.11 The following section of this Statement therefore sets out a description of the site and its surroundings and its Planning History.

SITE DESCRIPTION AND PLANNING HISTORY

SITE LOCATION

- 3.1 The property is within the Metropolitan Borough of Bury and is in a central location in Bury town centre. The site is situated on Silver Street at its junction with Bank Street. The plan below shows the location of the site in context with its surroundings.



- 3.2 To the south of the property are The Library Gardens. To the southeast is the Gallipoli Garden. Silver Street itself has a mixed of commercial and residential properties.
- 3.3 The aerial photograph below shows the Application Site relative to its surroundings.



SITE DESCRIPTION AND PLANNING HISTORY

SITE CONTEXT

- 3.4 The site lies within Bury Town Centre Conservation Area. The map extract below shows the site relative to the Conservation Area (yellow shading) and the Core Shopping Area (light blue shading) which lies to the north of the property.



- 3.5 The property is a Grade II Listed Building recorded on the NHLE (list entry number SD8029110708) and was added to the statutory list in 1981. The Listing description states:

“1868, by Blackwell and Son and Booth, of Manchester and Bury. Enriched classical style. A substantial corner building of two storeys. Ashlar, with moulded plinth and rusticated bands across ground floor and cornice (on brackets alternation with medallions) across upper floor. Five large windows, the upper ones having shaped hoods on brackets and enriched pseudo-balcony fronts. The middle bay projects slightly; on ground floor it has large arched entry with horizontal ribbing to angled intrados and grotesque head as keystone; on first floor it has paired pilasters supporting segmental pediment enclosing sculpture. Side sections of front are framed by pilasters. Parapet with sections of balustrading; chimneys with bracketed cornices surmount it. 4-bay return front to Bank Street is similar. Recessed quadrant corner. INTERIOR has highly enriched plasterwork. Built for Bury Banking Co, founded (as Grundy and Wood) before 1836. Upper floor formerly used as Bury Council Chamber and offices.”

- 3.6 Adjoining to the west, on a cross plan fronting onto Bank Street, is the Grade II Listed Bank Chambers building (1067279) which was

SITE DESCRIPTION AND PLANNING HISTORY

originally an annex to the bank. Added to the list in 1985 the building has the following description:

"1868: by Blackwell and Son and Booth, of Manchester and Bury, being an annexe to the abutting Barclays Bank. Red brick with stone dressings. 3 storeys. 3 windows, arched and with sill band on top storey. The rest tall, and with cornices above, but with wooden transmullioned glazing. Rusticated bands terminating in quoins. Cornice and blocking course."

- 3.7 Section 3.05 of the submitted Built Heritage Statement identifies heritage assets in proximity to the application site. There are five Listed Buildings/structure in proximity to the Application site. These are shown on the plan below (annotated with blue pins) and include the following buildings:

2-8, BANK STREET: Heritage Category: Listed Building Grade: II
List Entry Number: 1356790

War Memorial to the Lancashire Fusiliers, Gallipoli Gardens: Heritage Category: Listed Building Grade: II*
List Entry Number: 1250814

Bury School of Arts and Crafts, Broad Street
Grade II Listed Building List Entry Number: 1250802

PLANNING HISTORY

- 3.8 The following Planning History has been derived from the Council's Public Access database – a full Land Search has not been undertaken and there may therefore be other older planning applications relating to the site.
- 3.9 Ref. No: 43075: DISABLED ACCESS RAMP TO FRONT OF BUILDING | Status: Withdrawn
- 3.10 Ref. No: 43077: LISTED BUILDING CONSENT - DISABLED ACCESS RAMP TO FRONT ENTRANCE. LOWERING OF ENTRANCE DOOR AND | Status: Withdrawn
- 3.11 Ref. No: 43831: INTERNAL AND EXTERNAL ACCESS RAMP AND RELOCATION OF ATM'S (RESUBMISSION) | Status: Approved February 2005.
- 3.12 Ref. No: 43832: LISTED BUILDING CONSENT - ACCESS RAMP (INTERNAL & EXTERNAL) AND RELOCATION OF ATM'S IN RESPECT OF | Status: Approved February 2005.

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- 3.13 Ref. No: 43932: INSTALLATION OF 7 NO. AIR CONDITIONING SYSTEMS, 7 NO. CONDENSING UNITS TO BE LOCATED ON THE REAR | Status: Approved March 2005.
- 3.14 Ref. No: 43933: LISTED BUILDING CONSENT - INSTALLATION OF 7 NO. AIR CONDITIONING UNITS, 7 NO. CONDENSING UNITS TO | Status: Approved March 2005
- 3.15 Ref. No: 53396: Change of use from (Class A2 Bank) to A3 (Restaurants and Cafes) and A4 (Drinking Establishments) | Status: Approved January 2011. This Permission does not appear to have been implemented and lapsed in January 2014.
- 3.16 Ref. No: 53530: Listed Building Consent - Re-paint all window frames, front door (and frame) and hand railings on | Status: Approved February 2011.
- 3.17 Ref. No: 57636: Change of use of ground floor and part of first floor to restaurant (Class C3); Subdivision of building to form offices at ground, first and second floors (Class B1); New entrances formed on Bank Street and Silver Street; Internal alterations | Status: Approved July 2014. This Permission does not appear to have been implemented and lapsed in July 2017.
- 3.18 Ref. No: 57645: Listed building consent for change of use of ground floor and part of first floor to restaurant (Class C3); Subdivision of building to form offices at ground, first and second floors (Class B1); New entrances formed on Bank Street and Silver Street; Internal alterations | Status: Approved July 2014. This Permission does not appear to have been implemented and lapsed in July 2017.
- 3.19 Planning and Listed Building Applications for the conversion of the building to nine apartments were submitted to Bury Council (The Council) in May 2024. The Applications (referenced 70803 and 70804) were refused permission under delegated authority on the 22nd of October 2025.

PLANNING POLICY CONTEXT

- 4.1 The following paragraphs set out a description of relevant adopted Development Plan.

THE DEVELOPMENT PLAN

- 4.2 The Town and Country Planning Act 1990 (the '1990' Act, as amended) and the Planning and Compulsory Purchase Act 2004 (the '2004 Act') establish the legislative basis for town planning in England and Wales. Together the Acts establish a 'plan led' system which requires Local Planning Authorities to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.
- 4.3 Statutory duties relating to proposals affecting listed buildings and conservation areas are contained in the Planning (Listed Buildings and Conservation Areas) Act 1990. The relevant statutory duty relating to development affecting a listed building is contained in Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. This makes it a statutory duty for a local planning authority, in considering whether to grant listed building consent or planning permission for development which affects a listed building or its setting, to *"have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"*.

NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

- 4.4 As well as having regard to the relevant legislation, the application proposal must be assessed in the context of prevailing heritage policy. National heritage policy is set out the National Planning Policy Framework (NPPF), published on 17 August 2026. The 2026 Framework replaces the previous December 2024 Framework and introduces a revised structure comprising national decision-making policies alongside policies for plan-making.
- 4.5 The policies of the Framework refer to the concept of a heritage asset, which is defined as a building, monument, site, place, area, or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority.
- 4.6 The policies of the Framework place an emphasis on significance, which is defined as the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic, or historic. Significance derives

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not only from a heritage asset's physical presence, but also from its setting.

- 4.7 The NPPF defines the setting of a heritage asset as the surroundings in which it is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance, or may be neutral.
- 4.8 Several policies set out in the Framework are of direct relevance to the consideration of the proposed development of the conversion of the subject premises.
- 4.9 Where a development proposal would result in harm to the significance of a designated heritage asset, Policy HE6 of the Framework requires the effect on the asset to be carefully assessed and the conservation of the designated heritage asset to be given substantial weight. Any harm to, or loss of significance of, a designated heritage asset requires clear and convincing justification. The Framework also recognises the positive contribution that suitable development can make through the reuse and enhancement of heritage assets.
- 4.10 Policy HE7 indicates that the effect of an application on the significance of a non-designated heritage asset should be considered in determining the application. A balanced judgement should be taken having regard to the scale of any harm or loss and the significance of the heritage asset.
- 4.11 Public benefits include heritage benefits and may include sustaining or enhancing the significance of a heritage asset, reducing risks to the asset, securing its long-term conservation and bringing an underused or vacant heritage asset back into an appropriate use.
- 4.12 In any assessment, it is also important to have regard to the contribution made to the significance of a heritage asset by its setting and the contribution it may make to the significance of other assets.
- 4.13 The relevant national policies of the 2026 Framework include Policies S3 and S4 relating to sustainable development and development within settlements; Policy DP3 relating to good design; the relevant transport policies; policies relating to climate change and flood risk; and Policies HE4, HE5 and HE6 relating to the conservation and assessment of heritage assets and proposals affecting designated heritage assets.

THE DEVELOPMENT PLAN

- 4.14 The Bury Unitary Development Plan (UDP) acts as a guide for the future development or protection of land in the Borough and together

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with other adopted Development Plan Documents its policies and proposals form the basis for the Council's decisions on planning applications. The current Bury UDP was adopted by the Council on 29th August 1997 (and is therefore significantly out of date).

- 4.15 The Joint Places for Everyone (PfE) Development Plan Document was adopted by Bury Council with effect from 21 March 2024 and supersedes some of the UDP policies, as set out in PfE Appendix A Table A.2.
- 4.16 The recently adopted PfE Plan was jointly prepared by nine Greater Manchester districts, including Bury. This plan establishes the strategic planning framework within which the nine districts will prepare Local Plans. Some of major strategic decisions relating to Bury's future growth and development have already been made through the PfE Plan. 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.
- 4.17 Bury's Local Plan will provide a more detailed set of locally specific planning policies to complement PfE. Given that both PfE and the Local Plan will be key parts of Bury's development plan, there is clearly a need for consistency between the two. In particular, the Local Plan will need to incorporate and reflect the levels of growth and the strategic policy approach set out in PfE.

Unitary Development Plan and Policies

- 4.18 The following policies, as far as they are consistent with the NPPF, may be relevant to the consideration of the application proposal:
 - H1/2 Further Housing Development
 - H2/1 The Form of New Residential Development
 - H2/2 The Layout of New Residential Development
 - H2/4 Conversions (referenced in the Reasons for Refusal)
 - ENV7/2 Noise Pollution
 - EN1/2 Townscape and Built Design (referenced in the Reasons for Refusal)
 - EN2/1 Conservation and Listed Buildings
 - EN2/2 Conservation Area Control
 - EN2/3 Listed Buildings
 - HT2/4 Car Parking and New Development. NB the premises have no curtilage land or space to provide parking. The assessment shows that

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the site is however in a highly sustainable location where onsite parking is not required.

JP-P1 Sustainable Places

JP-P2 Heritage

JP-S2 Carbon and Energy

JP-H3 Type, Size and Design of New Housing

JP-C5 Streets For All

JP-C6 Walking and Cycling

JP-C2 Digital Connectivity

- 4.19 The following chapter of my Statement therefore examines the case for planning within this Development Plan, SPDs, planning position papers and planning policy context which includes the NPPF (August 2026) and NPPG.

ASSESSMENT OF PLANNING CASE

- 5.1 I have structured my Statement to assess each of the nine stated Reasons for Refusal in relation to the previous Planning and Listed Building Applications for the conversion of the building to nine apartments (referenced 70803 and 70804) which were refused permission under delegated authority on the 22nd of October 2025.

Reason for Refusal nos1 and 3

- 5.2 These state:

"1 The proposal would result in the loss of significant features of a Grade II Listed Building to the detriment of its appearance, character and historic interest, principally within the former banking hall. The proposal would not bring the Listed Building back into a use that would be compatible with its conservation and the harm to the Listed Building is considered to be less than substantial harm. The applicant has failed to demonstrate a clear and convincing justification or balancing of identified public benefit against the harm identified. The proposal would therefore conflict with the following policies of the Development Plan: EN2/3 Listed Buildings, JP-P2 – Heritage and Chapter 16 -Conserving and enhancing the historic environment of the National Planning Policy Framework".

"3 Insufficient information has been submitted with the application to enable the Local Planning Authority to fully determine the effect of the proposal upon the appearance, character and historic interest of a Grade II Listed Building. The information provided does not allow for the Local Planning Authority to carry out its statutory duty, specifically in having special regard to the desirability of preserving the building and any features of architectural or historic interest which it possesses. The proposal would therefore conflict with the following policies of the Development Plan: EN2/3 Listed Buildings, JP-P2 - Heritage and Chapter 16 -Conserving and enhancing the historic environment of the National Planning Policy Framework".

- 5.3 In addition to the updated plans further evidence has been provided with the application to address these reasons for refusal. This includes an updated Heritage Impact Assessment that considers a soft strip of some internal fabric to reveal (and allow an assessment of) any historical fabric; along with an assessment of the revised plans on the historic fabric. This is included with the application submissions reference: **S5** - Built Heritage Statement 26-040-A 03-07-2026.
- 5.4 Evidence is provided in relation to the attempts at marketing the property for alternative uses by Peirson Ferrier who have acted as agents for the vendors since August 2023. This is included with the submissions reference: **S9c** - Marketing Report by Pearson Ferrier 11-02-2026.

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- 5.5 Finally, the viability of the scheme has been thoroughly tested to provide evidence that the proposed residential scheme for 9 apartments represents the optimum viable use of the building. This evidence includes a sensitivity test of converting the former Banking Hall to just one unit (this reducing the overall number to 8 apartments) as a variation that would further minimise impact on the spatial qualities of the hall. The viability Assessment has been informed by a detailed assessment of the costs of the works by an independent quantity surveyor to ensure a key assumption (build cost) in the appraisal is robust. This evidence is included with the submissions reference:
S9a: Viability Assessment by Roberts Roberts
S9b: Cost Plan by PEAK PM-74 - 23-07-2026
- 5.6 Having regard to the heritage reasons for refusal of the previous planning and listed building consent applications, the revised scheme has minimised potential impacts upon the historic fabric, particularly the internal space within the former Banking Hall, as far as is possible. Additional information has been provided indicating the methodology for the installation of new division walling and floors and indicates that this can be introduced whilst minimising intervention into significant retained decorative features. The recession of the new mezzanine floor will maintain the legibility, in part, of the original Banking Hall space and the use of a 'pod' design will allow most of the decorative ceiling to be retained without alteration or masking.
- 5.7 Where interventions are necessary, such as the vertical subdivision of the Banking Hall, this has been carefully designed to be fully reversible. Where further soft strip investigations have revealed partial remnant of decorative features, the design shows how these will be encapsulated and preserved. The revised plans therefore demonstrate a clear conservation led approach.
- 5.8 Policy HE6 of the 2026 Framework provides the relevant national policy framework for assessing proposals affecting designated heritage assets. The policy gives substantial weight to the conservation of designated heritage assets and requires any harm to their significance to be justified. At the same time, the Framework adopts a more positive approach towards the sustainable reuse of heritage assets and recognises the contribution that suitable development can make to bringing underused buildings back into use.
- 5.9 In this case, the proposed development provides a sustainable and viable means of bringing a long-term vacant Grade II Listed Building back into active use. The proposal will secure investment in the repair, refurbishment and continued maintenance of the building whilst retaining and revealing significant historic fabric wherever practicable.

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The current condition and prolonged vacancy of the building demonstrate the importance of securing an appropriate and deliverable future use.

- 5.10 The evidence submitted with the application demonstrates that the proposed residential conversion represents a viable means of securing that future use, whilst the revised design has reduced the impact on the significance of the building as far as practicable.

Viability

- 5.11 An Economic Feasibility Report (Roberts & Roberts. 2026) has been prepared and is included with the application submissions. The Report explores the alternative options that have been considered for the property including the Council Officer's preferred solution for the Banking Hall (for the space to be utilised for just one apartment with bedroom pods located on the ground floor to preserve the openness of the Banking Hall space).
- 5.12 The Council Officer's preferred option reduces the total number of apartments in the building from nine to eight, thus reducing the overall revenue that can be achieved whilst the build costs do not change dramatically.
- 5.13 The viability assessment has been informed by a Build Cost Schedule prepared by an independent Quantity Surveyor providing an accurate and evidential basis for the assessment.
- 5.14 The Report advises that the proposed residential re-use is the optimum viable use of the building and that the 9 no. units proposed are the minimum required to achieve a positive return on cost for the developers. In contrast, the evidence shows the reduction in unit numbers to 8 apartments would reduce the return on cost to an unviable level.
- 5.15 Whilst the levels of profit are still marginal at just 9% (for the proposed nine-unit scheme), the evidence shows that the proposed application submission represents the best chance of securing the regeneration of the building. Continued vacancy is clearly not sustainable and will only result in the further deterioration of the building.
- 5.16 The accompanying Economic Viability Assessment therefore demonstrates that residential conversion of the building to nine apartments represents the optimum viable use of the listed building. Alternative commercial uses have been explored but have not proven

ASSESSMENT OF PLANNING CASE

deliverable, reflecting prolonged vacancy since 2010 and changing market conditions within Bury Town Centre.

- 5.17 The appraisal demonstrates that the proposed level of development is the minimum necessary to fund the extensive repair, refurbishment and ongoing maintenance of the listed building. A reduced number of apartments would not generate sufficient value to support the significant costs associated with restoring the heritage asset.
- 5.18 The proposed scheme therefore represents a viable and sustainable adaptive reuse of the listed building which secures its long-term conservation and brings a long-term vacant heritage asset back into active use, consistent with the positive approach to the reuse of heritage assets established by Policy HE6 of the 2026 Framework.

Reason for Refusal no2

- 5.19 This states:
"2 The proposed windows, by reason of the introduction of blanking panels, are detrimental to the character and special architectural interest of this, the adjacent listed buildings and would fail to preserve the Bury Town Centre Conservation Area. The proposal would therefore conflict with the following policies of the Development Plan: EN2/3 Listed Buildings, JP-P2 - Heritage, EN2/1 - Character of Conservation Areas, EN2/2 - Conservation Area Control and Chapter 16 -Conserving and enhancing the historic environment of the National Planning Policy Framework".
- 5.20 The revised plans have removed this element of the previous proposal; that is the revised plans do not propose or require blanking panels to be inserted across any of the windows. Reason for Refusal No2 has therefore been addressed.

Reason for Refusal no4

- 5.21 This states:
"4 The applicant has failed to demonstrate that they would be able to provide adequate noise mitigation within the proposed development without detriment to a Grade II Listed Building and the Conservation Area within which the site is located, which would be seriously detrimental to the residential amenities of future occupiers by reason of the noise. The proposed development therefore conflicts with the following policies of the Development Plan: EN1/2 - Townscape and Built Design, EN7/2 - Noise Pollution, JP-P1: Sustainable Places EN2/3 Listed Buildings, JP-P2 - Heritage, EN2/1 - Character of Conservation Areas, EN2/2 - Conservation Area Control and Chapter 16 -Conserving and enhancing the historic environment of the National Planning Policy Framework".

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- 5.22 PfE Policy JP-P1 aims to create a liveable city region and requires developments to provide comfortable and inviting indoor and outdoor environments offering a high level of amenity that minimises exposure to pollution. UDP Policy EN7/2 - Noise Pollution that restricts development that would lead to an unacceptable noise nuisance to nearby occupiers and/or amenity users.
- 5.23 In relation to noise (reason for refusal no4), the Local Planning Authority identified concerns regarding the demonstration and implementation of the proposed acoustic mitigation measures within the constraints of the Grade II Listed Building and Conservation Area.
- 5.24 The original submitted Noise Impact Assessment (NIA) assessed the existing acoustic environment, identified the site as being subject to elevated noise levels and established the mitigation requirements necessary to achieve suitable internal residential noise conditions. The NIA considered both external noise sources and noise from neighbouring premises, including the lawful nightclub use at No. 24 Silver Street. It identified that appropriate internal noise levels could be achieved using enhanced glazing and an alternative ventilation strategy to allow windows to remain closed during periods of elevated noise.
- 5.25 The Local Planning Authority's subsequent assessment raised concerns regarding the level of detail provided to demonstrate how the identified acoustic mitigation measures would be incorporated into the revised building design, particularly in relation to the interaction between window alterations, ventilation requirements and the heritage significance of the Listed Building. These concerns were considered alongside the wider heritage matters associated with the proposed façade alterations, including the treatment of window openings and the introduction of blanking panels.
- 5.26 The revised proposals have subsequently been prepared following the refusal, with amendments to the layout and external treatment of the building. This updated NIA has therefore been prepared to review the revised scheme and confirm the acoustic performance requirements for the glazing and ventilation strategy.
- 5.27 An updated NIA has been prepared and is included with the application submission (reference: **S6** - Noise Impact Assessment DC4652-NR1v2 - 19-07-2026) and defines the acoustic criteria required to achieve suitable internal conditions, including the required glazing performance and the provision of mechanical ventilation with heat recovery (MVHR).
- 5.28 The updated NIA concludes that:

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“Based on the noise risk assessment matrix detailed in Figure 1 of the ProPG, taking account of the measured noise levels and the context of the site, it is considered that this site is subject to noise that generates a high risk of an adverse effect.

A high risk suggests that there is an increased risk that the development may be refused on noise ground. As such, consideration should be given to how noise affects the site and any future developments. The development should take account of that noise risk in the form of a detailed Acoustic Development Statement which reflects good acoustic design principles in the layout of dwellings and the use of space, confirming that adverse impacts will be mitigated and minimised.

For a site considered to be of high risk, it is not expected that noise should be a barrier to the development following the incorporation of the recommendations made above.

The assessment shows that, following the incorporation of the alternative glazing and ventilation strategy, internal noise levels within habitable rooms are predicted to be compliant with the requirements of BS 8233:2014.

It is therefore considered that the calculated internal noise levels are below the LOAEL set for this project

As such, these levels are considered to be acceptable and meet the requirements of the NPPF and the Noise Policy Statement for England”.

- 5.29 The proposed mitigation measures have been incorporated into the scheme details including the specification of the proposed window design and the inclusion of a MHVR system. The Reason for Refusal has therefore been comprehensively addressed and the revised application accords with policies of the Development Plan: EN1/2 - Townscape and Built Design, EN7/2 - Noise Pollution, JP-P1: Sustainable Places EN2/3.

Reason for Refusal no5

- 5.30 This states:
“5 The location of the bedroom window for Unit 05 would result in an unacceptable reduction in the level of privacy currently enjoyed by the occupiers of No. 24 Silver Street by reason of the sub-standard distances between habitable windows and the shared boundary and between existing windows at No. 24 Silver Street. The proposed development therefore conflicts with Development Plan Policies H1/2 - Further Housing Development, EN1/2 - Townscape and Built Design, H2/4 -

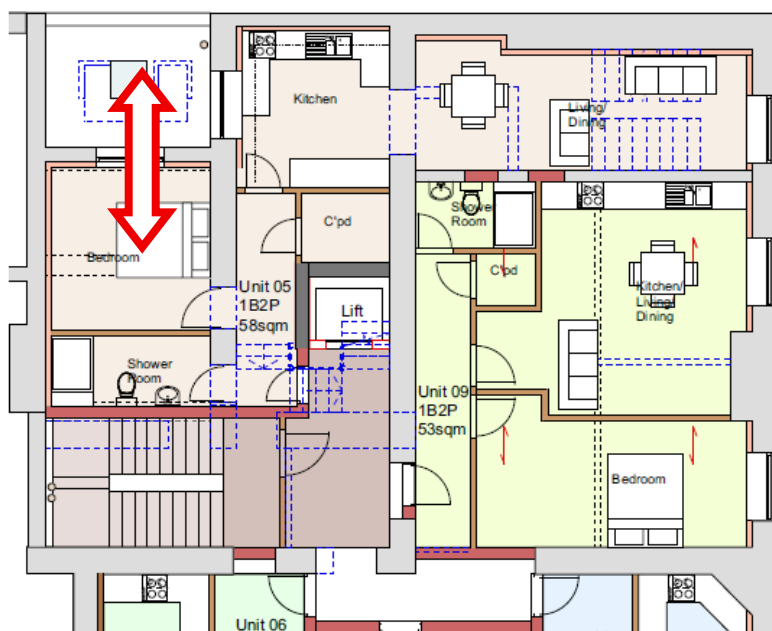
ASSESSMENT OF PLANNING CASE

Conversions, and Supplementary Planning Document 6: Alterations and Extensions to Residential Properties”.

- 5.31 The Officer Report for Planning Refusal 70803/FUL (Appendix A) sets out the reasoning behind this Reason for Refusal as follows:

“A new window, within the existing fabric of the building is proposed to be introduced to serve the bedroom for unit 5. This window would be sited approximately 2.95 metres from the shared boundary with No. 24 Silver Street and whilst not detailed on an extended site plan showing the neighbouring properties it and would appear to face a courtyard area for this property. This distance is below the 7 metres required by SPD 6 and as such the bedroom window would rely on views over land outside of the applicant's ownership contrary to guidance. This window would also face towards existing windows within the side elevation of No.24 and it does not appear that a separation distance of 20 metres can be provided”.

- 5.32 The proposed layout plan submitted for the previous Application 70803/FUL showed a proposed bedroom to Unit 5 as per the extract from the submitted plan reference 23-062-SK110-Plans As Prop-Option2 - 06-10-2025 below. The bedroom window in question to Unit 5 is highlighted:



- 5.33 The drone photograph below shows the relationship between the elevation where the bedroom to unit 5 was previously shown and the windows (which are blanked) in the elevation opposite (and which relate to the former nightclub use).

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- 5.34 The plans have been revised to address this relationship to this courtyard. At the ground floor mezzanine level, no windows are proposed in the northern elevation facing the courtyard. A proposed office room to Unit 3 has a proposed skylight situated in the room (where the existing extraction stack is situated) to provide natural daylight to this space.
- 5.35 At first floor level no windows are proposed in the northern elevation facing the courtyard. The northern elevation remains as existing. A proposed home office to Unit 9 has a proposed skylight situated in the room to provide natural daylight to this space.
- 5.36 The revised plans do not therefore raise any issues in relation to separation distances between proposed windows in the northern elevation and existing windows facing the northern elevation in no 24 Silver Street. This reason for refusal is therefore comprehensively addressed in the revised plan submissions.

Reason for Refusal no6

- 5.37 This states:

“6 The proposed dwellings would fail to meet Nationally Described Space Standards (NDSS) for in built storage for units 6, 7, 8 and 9. The proposal would therefore fail to comply with Places for Everyone Joint Development Plan Policy JP-H3: Type, Size and Design of New Housing”.

- 5.38 PfE Policy JP-H3 states that all new dwelling must:

“1. Comply with the nationally described space standards (NDSS); and

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2. Be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations unless specific site conditions make this impracticable".

- 5.39 The Officer Report for Planning Refusal 70803/FUL (Appendix A) sets out the reasoning behind this Reason for Refusal at Page 13. The Officer analysis concluded that four of the proposed nine units (units 6, 7, 8 and 9) did not meet the NDSS. The revised plans included with this Application have been amended to ensure each unit now complies with the NDSS standards.
- 5.40 **Unit 1** (in former banking hall with mezzanine bedrooms)- 2 bed, 4-person unit @ 90 square metres exceeds the minimum GIA standard of 79 square metres. Bedroom floor area of approximately 17 square metres, and 3.7 metres in width exceeds the double occupancy bedroom standards. Built in storage cupboards are proposed in both bedrooms ensuring the minimum 2 square metres meets required standards is met.
- 5.41 **Unit 2** - 2 bed, 4-person unit. Two storeys (mezzanine). At 85 square metres exceeds the minimum GIA standard of 79 square metres. Both bedrooms meet minimum floor areas and widths for double occupancy. Built in storage cupboards are proposed in both bedrooms ensuring the minimum 2 square metres meets required standards is met.
- 5.42 **Unit 3** - 1 bed, 2-person unit. Two storeys (mezzanine). At 100 square metres exceeds the minimum GIA standard of 58 square metres. The proposed double bedroom meets minimum floor areas and widths for double occupancy. In built in storage is included meeting the storage standards.
- 5.43 **Unit 4** - 1 bed, 1-person unit. Two storeys (mezzanine). At 52 square metres exceeds the minimum GIA standard of 39 square metres. The proposed double bedroom meets minimum floor areas and widths for double occupancy. In built in storage is included meeting the storage standards.
- 5.44 **Unit 5** - 1 bed, 2-person unit. Single storey. At 58 square metres including bedroom mezzanine meets the minimum GIA standard of 58 square metres. Bedroom floor area and width would meet minimum standards for double occupancy. In built storage from the hallway exceeds minimum standards.
- 5.45 **Unit 6** - 1 bed, 2-person unit. Single storey. At 58 square metres including bedroom mezzanine meets the minimum GIA standard of 58 square metres. Bedroom floor area and width would meet minimum

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- standards for double occupancy. In built storage from the hallway exceeds minimum standards.
- 5.46 **Unit 7** - 1 bed, 2-person unit. Single storey. At 58 square metres including bedroom mezzanine meets the minimum GIA standard of 58 square metres. Bedroom floor area and width would meet minimum standards for double occupancy. In built storage from the hallway exceeds minimum standards.
- 5.47 **Unit 8** - 2 bed, 3-person unit. Two storeys (mezzanine). At 78 square metres exceeds the minimum GIA standard of 70 square metres. In terms of sections and overall head heights. Bedroom 1 would comply with double occupancy standards. Bedroom 2 would comply with single occupancy standards.
- 5.48 **Unit 9** - 1 bed, 2-person unit. Single storey. At 96 square metres exceeds the minimum GIA standard of 58 square metres. Bedroom meets minimum standards for area and width. In built storage shown in bedroom.
- 5.49 The revised proposals therefore meet or exceed the NDDS standards.

Reason for Refusal no7

- 5.50 This states:
"7 The proposed development by virtue of the insertion of rooflights to serve bedrooms within Units 06, 07 and 08 would provide poor, inadequate and sub-standard living conditions for future occupiers by virtue of very limited natural light and restricted and poor outlook and ventilation. The proposed development therefore conflicts with Development Plan Policies H1/2 - Further Housing Development, EN1/2 - Townscape and Built Design, H2/4 - Conversions, and Supplementary Planning Document 6: Alterations and Extensions to Residential Properties".
- 5.51 The Officer Report for Planning Refusal 70803/FUL (Appendix A) sets out the reasoning behind this Reason for Refusal as follows:
"The habitable bedrooms for units 6, 7 and 8 would be served only by rooflights and would have no outlook. This proposed layout would lead to a poor amenity for the future occupiers"
- 5.52 The proposed layout plan submitted for the previous Application 70803/FUL showed the proposed first floor mezzanine with bedrooms only served by Velux/roof light windows.
- 5.53 The revised plans with this application have substantially revised the floorplans. At the first-floor mezzanine level the bedrooms to Units 8

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and 9 face existing windows in the eastern elevation with a conservation rooflight also proposed to each unit. Both are therefore well served in terms of natural light and ventilation.

- 5.54 Similarly, unit 4 faces an existing window in the eastern elevation and is set back from an existing window in the southern elevation, with a conservation rooflight also proposed to this unit. Units 5 and 6 bedrooms are also set back from the existing windows in the southern elevation with rooflights above.
- 5.55 All upper floor units in the revised plans are therefore well served in terms of natural light and ventilation. Ensuring the proposals do not conflict with Development Plan Policies H1/2 - Further Housing Development, EN1/2 - Townscape and Built Design, H2/4 - Conversions, or the Supplementary Planning Document 6: Alterations and Extensions to Residential Properties”.

Reason for Refusal no8

- 5.56 This states:
“The application and submitted plans and supporting statements contain insufficient information to enable the Local Planning Authority to assess whether the proposal would maximise reductions in carbon emissions, as required by Policy JP-S2 -Carbon and Energy of the Places for Everyone Joint Development Plan”.
- 5.57 JP-S2 - Carbon & Energy sets out the steps required to achieve net zero carbon emissions. This policy has been supplemented by guidance produced by the combined Authority *“Submission guidance for Places for Everyone policies JP-S2 and JP-S3”.*
- 5.58 The extent of potential energy efficient measures to be incorporated into an existing building is also limited by its Listed status and requirement to ensure impact on the fabric of the building is minimised.
- 5.59 Efforts have however been made to maximise the energy efficiency of the building arising from the proposed conversion. These details are capture in the Energy Statement submitted with the application that sets out the steps that have been incorporated.

Reason for Refusal no9

- 5.60 This states:
“9 The application and submitted plans and supporting statements contain insufficient information to demonstrate that the proposal would comprise high-quality digital infrastructure, as required by Policy JP-C2 - Digital Connectivity of the Places for Everyone Joint Development Plan”.

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- 5.61 This Reason for Refusal of Planning Application 70803/FUL references Policy JP-C2 - Digital Connectivity (see page 218 of **CD3**) which supports the provision of affordable, high quality, digital infrastructure.
- 5.62 It is notable that the Policy is phrased as a 'permissive' policy with criterion 2 indicating that the Council will support applications where measures include provision for "...full fibre to premises connections". The policy supports the provision of free, secure, high-speed public wi-fi connections, particularly in the most frequented areas.
- 5.63 The Reason for Refusal was imposed because the Council considered that the applicant has not demonstrated how they would meet the requirements of this policy, even though such details could have been the subject of a reasonable planning condition.
- 5.64 Notwithstanding, a Policy JP-C2 - Digital Connectivity Assessment has been prepared and is included with the application submission under reference S10. This shows that suitable digital connectivity is available and can be included as part of the detailed construction specification for the residential apartments.
- 5.65 This revised application therefore addresses and accords with Policy JP-C2 - Digital Connectivity.
- 5.66 The preceding sections of this report show that the reasons for refusal in relation to the previously proposed scheme of 9 units have been comprehensively addressed in this revised application.
- 5.67 I then assess any other planning issues and make my conclusions.

PRINCIPLE OF DEVELOPMENT

Development Of Residential Dwellings

- 5.68 The August 2026 NPPF establishes a clear presumption in favour of sustainable development. Policy S3 directs decision-makers to apply Policy S4 when considering development proposals within settlements. Policy S4 states that development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by adverse effects when assessed against the national decision-making policies. The application site is previously developed land within the established urban area of Bury and therefore falls within the circumstances to which Policy S4 applies.
- 5.69 Policy S3 sets out the presumption in favour of sustainable development.

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“1. Decisions on development proposals should apply a presumption in favour of sustainable development. This means:

- a. Policy S4 in this Framework should be applied when considering development proposals within settlements;*
- b. Outside settlements, policy S5 should be applied; and*
- c. In all locations, development proposals that accord with both an up-to-date development plan and the decision-making policies in this Framework should be approved without delay.*

2. Where a development proposal falls partly within and partly outside a settlement, policies S4 and S5 should be applied to the relevant parts which are inside or outside of the settlement boundary (as appropriate), before coming to an overall view on the proposal”.

- 5.70 Policy S4 applies to the principle of development within settlements and states:

“1. Development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework.

2. In applying policy S4, the circumstances in which the benefits of approving development are likely to be substantially outweighed by adverse effects include (but are not restricted to) situations where the development proposal would:

- a. Have a substantial adverse impact in relation to:*
 - i. The allocation or safeguarding of land or buildings for particular uses in the development plan, unless there is no reasonable prospect of an application coming forward for the allocated use, or there is evidence that the safeguarding is no longer appropriate; or*
 - ii. The application of the policies in this Framework for existing recreational land and facilities (HC7), Local Green Space (HC8), areas of particular importance for biodiversity and geodiversity (N6), Protected Landscapes (N4) and development within residential curtilages (L2(1)(d)).*
- b. Involve the whole or partial loss of undeveloped land which is used for a cemetery or burial ground; or for water storage and/or flood risk management (unless suitable compensatory provision is made that does not increase the risk of flooding either on or off-site); or*
- c. Fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances”.*

- 5.71 The proposal relates to an existing building (previously developed land) within the existing urban area and does not engage the circumstances identified in Policy S4(2)(a) to (c) that would indicate that the benefits of development are likely to be substantially outweighed by adverse effects. The starting point is therefore that the proposal should be approved unless the benefits of doing so would be substantially outweighed by adverse effects when assessed against the national decision-making policies.

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5.72 In this regard, other relevant policies in the framework include policies HO7 and L2.

5.73 Policy HO7: Meeting the need for homes states:

“1. In applying the policies in this Framework, substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community, as identified through needs assessments prepared for the area of the local planning authority and other relevant evidence. This includes, but is not limited to, homes needed for different groups assessed under policy HO1”.

5.74 Places for Everyone (PfE) is part of Bury’s statutory development plan and provides the strategic planning framework for Greater Manchester, including the strategic distribution of housing growth. Bury’s adopted and emerging planning policy framework seeks to maximise the reuse of previously developed land and support the delivery of new homes in sustainable urban locations. The proposal is consistent with these objectives by bringing a vacant and previously developed site back into productive residential use.

5.75 Current Bury Council evidence demonstrates continuing housing need (reference. S4 - App A - Bury Council 5 Year Supply Statement Nov 2025). This sets out at paragraph 4.2 that the 5-year land supply calculation in November 2025 was 4.1 years. Paragraph 3.8 also indicates that the 2023 published Housing Delivery Test (HDT) equates to 64%.

5.76 The provision of nine additional apartments will therefore make a modest but positive contribution to meeting identified local accommodation needs. In accordance with Policy HO7 of the NPPF, substantial weight should be given to the benefits of providing homes which contribute towards evidenced accommodation needs.

5.77 Policy HO7 therefore attributes substantial weight to the benefits that accrue from this proposal for nine apartments on previously developed land in a sustainable location.

5.78 Policy L2: Making effective use of land states that *“Substantial weight should be given to the benefits where a development proposal would achieve one or more of the following:”*

“b. Making better use of vacant and underutilised land and buildings (such as: by bringing back into residential use empty homes and other suitable buildings; converting space above shops; redeveloping underutilised retail and business sites; and building on or above service yards, lockups, car parks and other transport infrastructure which are no longer required).”

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- 5.79 The proposal is for the redevelopment of an existing building (previously developed site) where the existing structure is vacant and substantially deteriorated. Bringing the site back into productive use will remove a long-term vacant building, improve the appearance and function of the site and make efficient use of land within the urban area. These benefits weigh in favour of the proposal and are consistent with the national objective of making effective use of land.
- 5.80 Policy TR3: Locating development in sustainable locations: the policy sets out that proposals should reflect the several principles, considering the vision for the site, the type of development and its location. The policy therefore sets out guiding principles, as opposed to proscribing proposals that could be deemed to be inaccessible.
- 5.81 The NPPF promotes the effective use of land in meeting the need for homes, making as much use as possible of previously developed land, promoting and supporting the development of under-utilised land and buildings. This is reiterated PfE policy JP-S1. The site is not subject to a protective designation within either the Local Plan or PfE.
- 5.82 The site is sustainably located in terms of access to facilities to meet most of the everyday needs of residents, being located within Bury centre and within walking distance of a good range of public transport options. In this context, the site is sustainably located and appropriate for residential development.
- 5.83 The delivery of nine dwellings on the application site will provide a small windfall contribution to housing delivery. The contribution should therefore be afforded positive weight, alongside the substantial weight directed by Policy HO7 to the provision of homes which meet evidenced accommodation needs.

Economic Benefits

- 5.84 The 2026 Framework places significant emphasis on supporting economic growth and ensuring that the planning system supports sustainable development and the efficient use of land. The proposed redevelopment will generate construction expenditure, support employment during the works and return a prominent vacant town centre building to active use.
- 5.85 The development will result in a significant level of construction spend. The resulting occupation of the units will also have consequent positive economic benefits on the local economy. The proposal is therefore afforded significant material weight in support of it by the NPPF.

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Transport Effects

- 5.86 The NPPF seeks to ensure that development proposals support sustainable transport, prioritise walking, cycling and public transport where appropriate, and take account of the accessibility and connectivity of development.
- 5.87 In this case the site is constrained by its tight curtilage and there is no scope to provide onsite parking. The site is however in a highly sustainable location in proximity to the main town centre bus terminus and a short walking range of services and facilities. In relation to cycle storage the proposal includes a communal store at the ground floor level. The proposal therefore makes effective use of a highly accessible town-centre location whilst incorporating cycle storage and avoiding the introduction of unnecessary car parking.
- 5.88 Given the last use of the premises as a Bank the level of traffic that would be generated by nine dwellings would be negligible in comparison.
- 5.89 As such it is highly unlikely to have any material or significant residual impact on traffic or road safety and so accords with the relevant national transport policies, including Policy TR6 concerning the assessment of transport impacts.
- 5.90 Regarding parking and servicing details, the proposal is to convert a listed building that has no curtilage land – there are no proposals for parking. The submitted layout plan shows the proposed servicing arrangement regarding the location and routing of bin and cycle stores. The proposals therefore make adequate provision for bin and cycle stores.

Housing Mix

- 5.91 The proposals will deliver nine new apartments with the following mix proposed:
- Three two-bedroom apartments
 - Six one-bedroom apartments
- 5.92 Policy JP-H3 sets out in strategic terms an objective for housing to meet locally expressed needs in terms of the type, size, and tenures to meet the needs of the borough's communities.
- 5.93 The proposed housing mix reflects the local needs for one and two-bedroom apartments and is of an appropriate type for a town centre location.

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- 5.94 Regarding affordable housing requirements, the application proposal is under the threshold set out in UDP policy where affordable housing would be required.

Design Quality

- 5.95 The 2026 Framework places a strong emphasis on achieving well-designed places and making effective use of land. Policy DP3 establishes national design principles for development proposals, including the requirement to respond appropriately to context and create high-quality places.
- 5.96 Development Plan policies of relevance include saved UDP policies H2/1 The Form of New Residential Development, H2/2 The Layout of New Residential Development, H2/4 Conversions and EN1/2 Townscape and Built Design.
- 5.97 The proposal seeks to convert an existing building of architectural merit. The proposal has been designed to respect the character of the existing building, with limited external alterations proposed. The interior will be reconfigured to create well designed units that acknowledge the sites Grade II listed status and location within the Conservation Area.
- 5.98 The sensitive treatment will retain and reveal significant elements of the original character of the building whilst limiting intervention into the historic fabric wherever practicable. The proposal clearly accords with the principles set out in the UDP design related policies.

Residential Amenity

- 5.99 Saved UDP Policy H2/4 relates to proposals for the conversion of buildings into two or more self-contained units and sets out criteria to ensure proposals protect the amenities of nearby residents and the occupants of the proposed units.
- 5.100 In this case, the proposed conversion will not have any effect on the amenity of neighbouring property or the general character of the area.

Drainage and Flood Risk

- 5.101 The NPPF requires local planning authorities to take a proactive approach to mitigating and adapting to climate change, including through the efficient use of existing buildings, energy efficiency, appropriate adaptation measures and the management of flood risk.

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- 5.102 In this case, the building is existing and already connected to the existing drainage system and there are no opportunities to change the existing arrangements. A drainage strategy is included with the submissions (reference: S7 - Drainage Strategy 24272-DR-C-0100 P1) to demonstrate the available connections.
- 5.103 As a conversion of an existing building the proposals will not increase the risk of flooding either on or off site and the site can be adequately drained of both surface and foul water.

Ecology

- 5.104 The premises have no curtilage land and there are therefore no opportunities to introduce hard or soft landscaping. The biodiversity of the premises meets the 'de-minis' exemption in relation to Biodiversity Net Gain requirements.

Heritage

- 5.105 As set out in the policy context section of my report a proportional assessment of the value of the heritage asset is required. In this case, a specialist assessment has been undertaken by a heritage consultant. A Built Heritage Statement is included with the application submissions with reference: S5 - Built Heritage Statement.
- 5.106 That document and the planning policy context section of my report set out the concept of weighting different degrees of effect on heritage significance in accordance with Policies HE4, HE5 and HE6 of the 2026 Framework.
- 5.107 Policy HE5 requires the effects of development on heritage assets to be assessed, including whether development would have a positive effect, no effect, harm or result in total loss of significance. Policy HE6 provides the decision-making framework for designated heritage assets and requires substantial weight to be given to their conservation.
- 5.108 The specialist assessment undertaken (ref: S5 - Built Heritage Statement 03-07-2023) undertakes a thorough analysis of the special characteristics of the building and assess the impact of the proposed development. It concludes:

“Overall, it is considered that the proposed sub-division and loss of the original spatial character of principal hall spaces, most notably the ground floor banking hall, will give rise to harm to the significance of the listed building. The principal facades of the building will be retained and the potential replacement of existing windows, subject to detailing, may

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secure an element of enhancement. The harm identified to the listed building, 26 Silver Street, is considered to be less than substantial. No impacts upon the significance of other designated or non-designated heritage assets will arise. In accordance with Framework guidance this harm should require clear and convincing justification demonstrating that the proposals represent the optimum viable use for securing the refurbishment and re-use of the building.”

- 5.109 I concur with the conclusions of the heritage specialist. The building is slipping into poor condition. The proposed use will cause a degree of harm to the significance of the designated heritage asset, as identified in the Built Heritage Statement.
- 5.110 Policy HE6 of the 2026 NPPF requires substantial weight to be given to the conservation of designated heritage assets and requires any harm to their significance to be clearly and convincingly justified.
- 5.111 In this case, the justification for the intervention arises from the need to secure a sustainable and deliverable future for a long-term vacant Grade II Listed Building. The revised scheme has reduced intervention in significant historic fabric and provides a viable mechanism for bringing the building back into active use whilst securing its repair and ongoing maintenance.
- 5.112 The building has been vacant since 2010. The Planning history shows attempts have been made to secure alternative uses but alternative proposals have never been implemented. In the interim period, the internal condition of the building has deteriorated and requires comprehensive regeneration and refurbishment.
- 5.113 The proposed development provides a deliverable mechanism for securing the building's long-term future. It will bring a prominent vacant listed building back into active use, secure investment in its repair and maintenance, retain significant historic fabric and support the regeneration of Bury Town Centre.
- 5.114 When these benefits are considered alongside the carefully controlled nature of the proposed interventions, the proposal represents a sustainable and appropriate reuse of the heritage asset and accords with the positive approach to heritage-led regeneration established by Policies HE4–HE6 of the 2026 Framework.

SUMMARY AND CONCLUSIONS

- 6.1 This Planning Statement demonstrates that the revised proposals have been comprehensively amended following the refusal of the previous applications (Refs. 70803 and 70804). The revised scheme has been informed by the Council's reasons for refusal together with further technical assessment, detailed design revisions and additional supporting information.
- 6.2 The proposal seeks to secure the long-term future of a vacant Grade II Listed Building through its sensitive conversion to nine high-quality residential apartments. The scheme retains the building's principal architectural features, limits intervention to the historic fabric wherever practicable and provides an economically viable solution capable of funding the comprehensive repair and ongoing maintenance of the building.
- 6.3 The application is supported by a comprehensive suite of technical documents including a Built Heritage Statement, Noise Impact Assessment, Energy Statement, Digital Connectivity Assessment, Structural Investigation, Drainage Strategy and Economic Viability Assessment. Together these demonstrate that each of the previous reasons for refusal has been fully addressed.
- 6.4 The proposal represents an appropriate and sustainable re-use of a long-term vacant Grade II Listed Building within Bury Town Centre. The scheme accords with the overarching objectives of the 2026 National Planning Policy Framework, the Places for Everyone Joint Development Plan and the relevant saved policies of the Bury Unitary Development Plan by securing a viable and sustainable future use for an important heritage asset whilst delivering much-needed housing in a highly sustainable location.
- 6.5 The revised design has significantly reduced impacts upon the historic fabric of the building, removed previously identified harmful elements, improved internal layouts, ensured compliance with nationally described space standards, resolved overlooking concerns, incorporated appropriate acoustic mitigation and demonstrated compliance with the Council's requirements relating to energy efficiency and digital connectivity.
- 6.6 The proposal will deliver substantial public benefits, including:
- securing the long-term conservation of a vacant Grade II Listed Building;
 - preventing further deterioration of a designated heritage asset;
 - bringing a prominent vacant town centre building back into active use;
 - delivering nine new dwellings in a sustainable town centre location;

SUMMARY AND CONCLUSIONS

- supporting the vitality and regeneration of Bury Town Centre;
- generating economic investment and construction employment; and
- making efficient use of previously developed land without placing pressure on greenfield sites.
- safeguarding the significance of a designated heritage asset for future generations.

6.7 Whilst the specialist heritage assessment identifies a limited level of harm to the significance of the designated heritage asset arising from the subdivision of part of the former banking hall, that harm is clearly justified by the need to secure a viable and sustainable future for the long-term vacant listed building. Policy HE6 of the 2026 National Planning Policy Framework requires substantial weight to be given to the conservation of designated heritage assets and requires any harm to be justified. In this case, the evidence demonstrates that the proposed interventions have been carefully designed to minimise harm whilst securing substantial heritage, economic, social and environmental benefits, including the repair, reuse and continued maintenance of the listed building.

6.8 The evidence submitted with this application demonstrates that the scheme fully addresses the Council's previous concerns and complies with the relevant provisions of the Development Plan when read as a whole. There are no material planning considerations that indicate permission should be withheld. For the reasons set out within this Planning Statement and the accompanying technical evidence, it is respectfully submitted that the proposal accords with the Development Plan when read as a whole and that there are no material considerations which indicate that planning permission or listed building consent should be withheld. Accordingly, both applications should be approved without delay in accordance with the Development Plan and the relevant national decision-making policies of the 2026 National Planning Policy Framework.



Signature:

Date: 28th August 2026.....

JAY EVERETT BSc HONS, MRTPI