

Planning Consultation Response
Initial Planning Application
 Environment Section – Climate Change

Application Reference:	71867		
Site:	Land bound to the north by Brightley Brook, Pilsworth Fisheries, Pilsworth Road & Heywood Distribution Park; to the west by Whittle Brook; to the east by Birch Industrial Park & fields; and to the south by the M62 corridor.		
Proposed Development:	Application for outline planning permission (all matters reserved) for a national-scale employment development, comprising Storage & Distribution (Use Class B8) and Industrial (Use Classes B2, E(g)(ii) and E(g)(iii)) uses (including, but not limited to, Logistics, Manufacturing Processes and Data Centres), with supporting ancillary uses including Hotel (Use Class C1), Commercial & Business & Service (Uses Class E(a - g)), Education (Use Class F1(a)), Local Community (Use Class F2(a - c) uses, Sui Generis uses (in accordance with the Uses Schedule), and associated demolition works, landscaping, drainage, ecological enhancements, highway works, cycleway and footpath linkages and other ancillary infrastructure.		
To:	Helen Leach	From:	
Our Reference:	CL969.230625.CC1	Date:	23 June 2025

Recommendations

It should be noted that the submitted information does not distinguish between the districts of Bury and Rochdale. Recommendations made are for land located within the area of Bury Council, however informal discussions have been had with Rochdale MBC regarding the overall approach to climate change assessment.

Should this application be approved, subsequent detailed applications are anticipated. Further assessments and details are recommended and warranted. As such for each Reserved Matters Application it is recommended that conditions for the following assessments/information to be submitted are attached to the approval:

- GMCA Energy and Carbon Proforma as set out by the [GMCA Net Zero Guidance](#).
- Detailed Energy use intensity (EUI).
- Overheating Analysis.
- Post construction and occupancy evaluation of energy usage.
- Detailed calculations of energy demand, on-site energy generation, and subsequent carbon emissions.
- Whole Lifecycle Carbon Assessment (WLCA) of buildings.

Reason: To build sustainable and resilient places in accordance with paragraphs 161 – 166

of the National Planning Policy Framework (December 2024) and Places for Everyone Policy JP-S2 (Carbon and Energy) and JP-S3 (Heat and Energy Networks).

Assessment / Comments	
Information Reviewed	• Sustainability, Energy and Carbon Statement, Turley Sustainability and ESG, dated April 2025. • Environmental Statement, Chapter 18, Turley Sustainability and ESG (undated) • Environmental Statement – Volume 3 (Environmental Management Plan), Turley (EIA), dated April 2025.
Background	
Proposal	• Outline application covering a major part of the JPA1.1 Northern Gateway Allocation Site. • The plots for the whole of the Northern Gateway JPA 1.1 allocation area are shown on the EIA Assessment Plan: Uses. This application does not comprise the full extent of the Northern Gateway JPA 1.1 allocation area. The area of the application is shown in the Parameters Plan 1: Uses ; Bury land falls within plots B and D • Approval sought for up to 600,000 sqm of new employment floorspace and up to 5,000 sqm of supporting uses on 209.8 ha of land within the districts of Bury and Rochdale. • The Proposed Scheme comprises a national scale employment development, including logistics, warehousing, industrial and manufacturing uses, with a range of other supporting uses and associated demolition works, landscaping, drainage, ecological enhancements, highway works, cycleway and footpath linkages and other infrastructure. • It is anticipated that the site has the potential to take approximately 20 years to be delivered.
Policies	Bury Council have declared a climate emergency and set a target to be carbon neutral by 2038 alongside all Greater Manchester districts. A Climate Action Strategy and a Climate Action Plan have been devised to reduce emissions, promote sustainability, improve air quality as well as the health and wellbeing of Bury's communities. The draft Bury Local Plan sets out the Council's proactive approach to climate change in policy LP-CC1. Places for Everyone (PfE), adopted in March 2024 aims to be at the forefront of action on climate change, creating places more resilient to climate change with an overarching goal of sustainable development. Policy JP-S2 sets out measures to achieve a carbon neutral Greater

	Manchester no later than 2038 including the provision of an energy statement to support development proposals. It is expected that new developments, unless it can be demonstrated that it is not practicable or financially viable will be net zero carbon. Policy JP-S3 details measures to support heat and energy networks. The Greater Manchester Combined Authority has published Net Zero Design Guidance which includes submission guidance for these two key policies.
Energy	
Assessment	• The scheme aims to minimise energy demand by a “fabric first” approach. • A GMCA Energy and Carbon Proforma has been completed. It is stated that the <i>Applicant has acknowledged these targets and will strive to meet them where feasible and viable.</i> • Proposed measures are indicative at this stage and will be confirmed at detailed stage. • Predicted regulated and unregulated energy demand has been modelled for the whole scheme based on outline assumptions. • A review of renewable energy technologies was presented. Column mounted turbines and the use of hydroelectric power were discounted. Solar PV systems were noted to be well suited to the scheme. • Due to the low thermal demand of B2 and B8 use class buildings and the continued projected decarbonisation of the UK power grid the assessment concluded it wasn't sufficient to support the delivery of a heat network.
Mitigation	• Windows will be sized and orientated to balance heat gain, heat loss and internal daylight in occupied spaces. Design measures will include orientation of offices to avoid significant south facing glazing and brise soleil over windows which may be at risk of excessive solar gain. • Detailed Energy and Carbon Proforma to be submitted at each reserved matters application (RMA). • Compliance with the Future Building Standards (or equivalent future legislation) is proposed as a minimum. This is expected to achieve 75-80% reduction in carbon emissions beyond Part L 2013. • It is anticipated that mechanical ventilation with heat recovery will be used in offices. • Lighting control to minimise energy usage. • Detailed Energy use intensity (EUI) will be calculated at each RMA. • Further consideration to the feasibility of roof mounted turbines will be given at detailed design. • Local and communal air source heat pumps are to be considered in the design.

	- Passive cooling measures are proposed to be incorporated into the design of the masterplan and individual buildings to reduce cooling demand and the risk of overheating. Appropriate overheating analysis is to be carried out at RMAs. - Post construction and occupancy evaluation of energy usage is proposed to be completed for a sample of buildings in each phase (subject to occupant agreement).
Net Zero Carbon	
Assessment	- The assessment sets out how carbon emissions are to be addressed as part of a “whole lifecycle” approach. - The UKGBC Net Zero Carbon Buildings Framework approach to zero carbon operational energy is to be followed. - The measures set out under Energy should meet these principles. - Incorporating 22,500m² or 4,500kWp solar PV would supply over 90% of the proposed scheme’s estimated regulated energy demand and associated carbon emissions. As such to deliver net zero in operation, solar PV would need to be increased by 350kWp or approximately 1,750m² (depending on efficiencies and performance). - With regards construction carbon emissions, consideration will be given to top impacts such as ready-mix concrete, steel frames and emissions associated with construction activities.
Mitigation	- To demonstrate compliance with policy JP-S2, detailed calculations of energy demand, on-site energy generation, and subsequent carbon emissions will be completed for each RMA. - Measures will be explored at design stage to reduce carbon emissions at infrastructure and building level such as balancing cut and fill, material efficiency and procuring materials locally. - Travel Plan measures have been proposed including - Electric Vehicle (EV) charging points throughout the site, with capacity for larger vehicles such as HGVs. - A Whole Lifecycle Carbon Assessment (WLCA) of buildings will be undertaken for each RMA, This will include a separate carbon assessment of the infrastructure associated with the enabling works.
Climate Resilience	
Assessment	- Climate change projections for Greater Manchester by 2080 were considered. - Technical assessments have been submitted for Flooding and Drainage.
Mitigation	Passive measures to be incorporated to reduce the risks of overheating. This includes extensive green and blue infrastructure

	to reduce the urban heat island effect. • Sustainable Drainage Systems (SuDS) are a key aspect of the wider blue and green infrastructure network of the scheme. • The Applicant has committed to achieving a BREEAM 'Excellent' rating for each building at the Proposed Development where viable.
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