



GK11-let-04

23rd April 2024

Bury MBC,
Development Control
3 Knowsley Place
Duke Street
Bury,
BL9 0EJ

Dear Sir,

**Change of Use of vacant land to accommodate 2 no. static caravans for a temporary period of time on land to the south of Brick House Farm, Castle Road, Bury, BL9 8QS
Planning Reference 70658.**

Following the submission of a planning application for the above, additional information has been requested of which this document provides comments regarding your Places for Everyone Joint Development Plan Document.

Policy JP-S2: Carbon and Energy:

The aim of the Places for Everyone Development Plan Document is to develop a carbon neutral Greater Manchester by 2038, which in order of importance seeks to:

- Minimise energy demand.
- Maximise energy efficiency.
- Use renewable energy.
- Use low carbon energy.
- Utilise other energy sources.

Stated within this plan, as an interim measure, development should be consistent with the 2022 Part L Building Regulations.

Our proposal is to position 2 ‘off the shelf’ static caravans on the site, which are not permanent structures and are not required to comply with the Building Regulations (AD Part L Volume 2, Section 0, para 0.11b states that temporary buildings with a total planned time use of two years or less are exempt from energy efficiency requirements).

As the static caravans are to be proprietary modules for temporary living accommodation, little or no thought will have been directed PFE at this time, nor is this a requirement.

There is no requirement for any carbon emissions to be offset, at this time.

A contribution to any carbon offset fund is therefore inappropriate.

Policy JP-C2: Digital Connectivity:

This planning policy required all new development to have full fibre premises connections unless unviable, such that internet connections will be operational and immediately accessible to network providers when occupiers move into new properties.

Unfortunately in rural areas where there is limited access to affordable digital connections and with this temporary and remote location, a new connection to the static caravans is unviable.

This policy will however be fully embraced in the construction of the permanent dwelling to be erected on the adjacent plot 1.

Let me know if you need anything further.

Yours sincerely,

Gary Dearden