

FOCUS
TOWN PLANNING

Former Spurr House site

Planning Statement

On behalf of

Watson

August 2025

Table of Contents

1. Executive Summary	1
2. Introduction	2
3. Site and Surroundings	5
4. The Proposal	6
5. Relevant Planning Policy	8
National Planning Policy Framework	8
National Planning Practice Guidance	11
Places for Everyone	11
Bury Unitary Development Plan	12
Supplementary Planning Documents	13
Five Year Housing Land Supply Statement (2025)	14
Housing Delivery Test Action Plan (2019)	14
Emerging Planning Policy	15
6. Affordable Housing Statement	16
7. Open Space/Recreation Statement	19
8. Statement of Community Involvement	20
Pre application with Bury Council	20
Public Consultation	20
9. Key Planning Considerations	21
Principle of development	21
Housing need	21
Design	22
Other material considerations	23
10. Conclusion	36

Appendices

Appendix 1: Site Location Plan

Appendix 2: Proposed Site Plan

Appendix 3: Consultation Map

Appendix 4: Consultation Letter

1. Executive Summary

1.1. This Planning Statement has been prepared by Focus Town Planning in support of a full planning application by Watson. It sets out the planning justification and rationale for the proposed development. The proposal is for:

1.2. It is proposed that the properties will be for:

‘Demolition of existing buildings, erection of two blocks comprising 60 apartments, 62 car parking spaces, relocated site access and associated infrastructure and landscaping’.

1.3. The proposal comprises 60 high-quality apartments across two blocks and seeks to deliver much-needed affordable housing in a highly sustainable and accessible location. The scheme includes a mix of 1-bed and 2-bed affordable homes, addressing a well-evidenced and growing need within the borough.

1.4. The site is previously developed and well connected to existing services, amenities, and sustainable transport options. The development makes efficient use of brownfield land and will significantly enhance the character and appearance of the site and surrounding area.

1.5. The application is supported by a comprehensive package of technical reports, which confirm that the proposal is acceptable in terms of design, highways, drainage, ecology, noise, and other planning considerations.

1.6. There are many benefits arising from the development including addressing the pressing need for more affordable homes and regenerating previously developed land as part of a sustainable development. This carries significant weight in favour of granting approval.

1.7. The proposal will deliver the following:

- Delivering affordable homes, to help meet a pressing local and national need;
- Regenerating and making best use of previously developed land;
- Energy efficient homes, with an EPC B rating, with cheaper running costs for residents;
- EV charging provision for every car parking space; and
- Private amenity space for local residents.

1.8. The proposed development aligns with national and local planning policy and represents a highly sustainable, policy-compliant, and deliverable scheme that will provide meaningful social value by addressing acute affordable housing need in Bury.

2. Introduction

2.1. Focus Town Planning has been instructed by Watson to prepare this supporting Planning Statement to accompany a planning application for the redevelopment of Spurr House on Pole Lane in bury for residential development, comprising 60 apartments, which will be managed by a housing association for a range of affordable housing tenures, such as affordable rent and shared ownership.

2.2. The application is submitted in full and proposes

‘Demolition of existing buildings, site clearance works including removal of areas of hardstanding and the erection of two blocks of apartments, comprising 60 residential units, relocation of existing site access, associated landscaping’

2.3. This Statement has been prepared to assist the Council in their determination of the planning application. It serves several purposes in this respect. Firstly, it provides a detailed description of the application proposals. Secondly, it provides a comprehensive overview of the planning policy context applicable to the site. Thirdly, it considers the land use policy issues raised by the redevelopment of the site. Finally, it provides an assessment of the detailed planning issues raised by the development proposals.

2.4. The Statement also provides a section as a Statement of Community Involvement and an Affordable Housing Statement.

2.5. The application is supported by the following plans and technical documents:

- Application forms and certificates;
- Covering letter prepared by Focus Town Planning;
- Planning Statement prepared by Focus Town Planning dated August 2025;
- Design and Access Statement prepared by TADW dated August 2025;
- Proposed Ground Floor Plan GA (drawing ref: 241352-TADW-00-00-DR-A-0050-P-7);
- Proposed First Floor Plan GA (drawing ref: 241352-TADW-00-00-DR-A-0051-P-6);
- Proposed Second Floor Plan GA (drawing ref: 241352-TADW-00-00-DR-A-0052-P-6);
- Proposed Third Floor – Roof Plan GA (drawing ref: 241352-TADW-00-00-DR-A-0053-P-6);
- Proposed Roof Plan GA - Block B (drawing ref: 241352-TADW-00-00-DR-A-0054-P-5);
- Location Plan (drawing ref: 241352-TADW-00-00-DR-A-0001-P-2);
- Existing Site Plan (drawing ref: 241352-TADW-00-00-DR-A-0002-P-4);
- Proposed Site Plan (drawing ref: 241352-TADW-00-00-DR-A-0010-P-9);
- Proposed Site Plan Showing Roof Plans (drawing ref: 241352-TADW-00-00-DR-A-0011-P-5);

- Proposed Elevations Block A (drawing ref: 241352-TADW-00-00-DR-A-0060-P-8);
- Proposed Elevations Block B Sheet 1 (drawing ref: 241352-TADW-00-00-DR-A-0065-P-8);
- Proposed Elevations Block B Sheet 2 (drawing ref: 241352-TADW-00-00-DR-A-0066-P-8);
- Proposed Site Section and Street Scene Elevation (drawing ref: 241352-TADW-00-00-DR-A-0067-P-6);
- Design Sections (drawing ref: 241352-TADW-00-00-DR-A-0070-P-1);
- Fire Plan Block A – Ground and First Floor (drawing ref: 241352-TADW-00-00-DR-A-0080-P-1);
- Fire Plan Block A – Second Floor and Roof (drawing ref: 241352-TADW-00-00-DR-A-0081-P-1);
- Fire Plan Block B – Ground and First Floor (drawing ref: 241352-TADW-00-00-DR-A-0082-P-1);
- Fire Plan Block B – Second and Third Floor (drawing ref: 241352-TADW-00-00-DR-A-0083-P-1);
- Fire Plan Block B – Roof Plan (drawing ref: 241352-TADW-00-00-DR-A-0084-P-1);
- Material Schedule (drawing ref: P-2);
- Topographical Survey prepared by SurveyEng Ltd;
- Utilities Survey prepared by SurveyEng Ltd;
- Transport Statement prepared by SCP Transport dated July 2025;
- Travel Plan prepared by SCP Transport dated July 2025;
- Access Service Plan prepared by SCP Transport;
- Swept Path Analysis prepared by SCP Transport (drawing ref: SCP/240887/ATR02);
- Air Quality Assessment prepared by Cundalls dated November 2024;
- Noise Impact Assessment prepared by Cundalls dated December 2024;
- Phase 1 Geo Environmental Appraisal prepared by Brownfield Solutions Ltd dated August 2022;
- Phase 2 Geo Environmental Appraisal prepared by Brownfield Solutions Ltd dated November 2022;
- Refurbishment and Demolition Asbestos Survey prepared by Reddish Vale Insulations Ltd dated April 2022;
- Reinspection Asbestos Survey prepared by Reddish Vale Insulations Ltd dated March 2023;
- Remedial Strategy prepared by Brownfield Solutions Ltd dated September 2024;
- Dust Management Report prepared by Cundalls dated November 2024;
- Flood Risk Assessment prepared by Elluc dated August 2025;
- Preliminary Ecological Appraisal, Preliminary Roost Assessment and Biodiversity Net Gain Assessment prepared by Thomson Environmental Consultants dated January 2023;
- Preliminary Roost Assessment and Ground level Tree Assessment prepared by Thomson Environmental Consultants dated November 2024;

- Biodiversity Net Gain Report prepared by Thomson Environmental Consultants dated August 2025
- BNG metric prepared by Thomson Environmental Consultants dated August 2025;
- Arboricultural Impact Assessment prepared by Thompson Environmental Consultants dated October 2024;
- Landscape Management Plan prepared by Trevor Bridge Associates
- Hard and Soft Landscaping Plans prepared by Trevor Bridge Associates
- External Works Layout (drawing ref: 24104-C-140-(C))
- Site Clearance and Demolition Plan (drawing ref: 24104-C-199-(C))
- Road Construction Details (drawing ref: 24104-C-300-(A))
- S278 Layout Plan (drawing ref: 24104-C-500-(F))
- Vehicle Tracking (private car) (drawing ref: 24104-C-701-(B))
- Concept Drainage Layout (drawing ref: 24104-C-1000-(D))
- Highways Dilapidation Survey prepared by DAM Consultants;
- Storm Sewer Design prepared by Elluc Projects Limited;
- Statement of Community Involvement (Within Planning Statement)
- Amenity/Recreation Space report (Within Planning Statement)
- Crime Impact Statement prepared by GMAU dated July 2025
- Density Statement (within Design and Access Statement)
- Nationally Designed Space Standards Table (within Design and Access Statement)
- Digital Connectivity Statement prepared by Watson
- S106 Pro Forma

2.6. The Statement demonstrates that the redevelopment of this previously developed site, within the urban area, very much accords with national planning policy and should be approved.

3. Site and Surroundings

- 3.1. The proposed development site is located on Pole Lane in Unsworth. It currently comprises a vacant single storey building, constructed in circa 1980 and previously operated as a care home. Vehicular and pedestrian access is taken via Pole Lane. The site area is approximately 0.67Ha. A site location plan is included at **Appendix 1**. Site photographs can be found within the accompanying Design and Access Statement.
- 3.2. There is an area to the front of the existing building for car parking, with informal landscaping and a mixture of trees. There are no Tree Preservation Orders or Listed Buildings, nor is the site located within a conservation area. The site is within Flood Zone 1.
- 3.3. The site is located within a predominantly residential area, with Unsworth Cricket and Tennis Club located to the south, residential development to the north and west, with Unsworth Academy to the east. It is predominantly flat.
- 3.4. The site is unallocated on the Proposals Map accompanying the Bury Unitary Development Plan.
- 3.5. As set out in the Design and Access Statement, the site was previously occupied by a single storey building which was used up until recently as a care home.

Planning History

- 3.6. The site has a limited planning history available online.
- 3.7. Most recently, planning permission was granted in June 2023 for the change of use from residential home (Class C2) to a pupil referral unit (Class F1) and single storey extensions. This consent has not been implemented.

4. The Proposal

4.1. The application is submitted in full. It proposes to redevelop the site to provide 2 blocks of apartments, providing 60, one and two bedroom apartments, along with associated car parking and landscaping. The proposed site layout plan is included at Appendix 2. The properties will be available for a range of affordable tenures, such as affordable rent or shared ownership.

4.2. The application proposes:

‘Demolition of existing buildings, site clearance works including removal of areas of hardstanding and the erection of two blocks of apartments, comprising 60 residential units, relocation of existing site access, associated landscaping’

4.3. The site is currently occupied by a disused former care home, with dense vegetation and established trees along the site boundaries to varying degrees. It is proposed that all the existing structures on site be demolished, and the site cleared of existing low lying vegetation. 16 trees will also be removed to accommodate the proposed development.

4.4. The development is arranged in two ‘L’-shaped blocks (Blocks A and B), positioned to create a loose courtyard arrangement that promotes natural surveillance and amenity space between the buildings. Block A is 3 storeys in height, with the 4-storey Block B set to the rear.

4.5. The buildings are designed in a contemporary architectural style using a carefully curated palette of materials that complement the character of Pole Lane, including high-quality multi-red facing bricks with contrasting plinths and detailing.

4.6. Vehicular access will be taken from Pole Lane, at the south-west corner of the site, allowing safe ingress/egress with visibility splays agreed in consultation with the Local Highway Authority. 63 car parking spaces are proposed (including 3 visitor bays), alongside 70 cycle storage spaces, and all designated parking bays are equipped with electric vehicle charging infrastructure.

4.7. The layout retains and enhances a significant proportion of mature trees and boundary vegetation, particularly on the north, east, and south edges, with additional landscaping to strengthen the ecological buffer with the adjacent cricket club and Green Belt to the south-east. The south-east corner of the site is retained as open landscaped space due to ecological sensitivity, topographical changes, and ball-strike risk from the cricket club.

- 4.8. All apartments meet the Nationally Described Space Standards (NDSS). The scheme also complies with Building Regulations Part M, with 72% of dwellings achieving M4(2) standard, and the remainder designed for inclusive access at ground level.
- 4.9. The development includes a strong commitment to sustainability and energy efficiency, incorporating:
- High thermal performance construction
 - MVHR systems and Air Source Heat Pump hot water cylinders
 - Solar PV on flat roofs
 - Low-energy lighting
 - Secure cycle parking and EV charging
- 4.10. The scheme includes for the provision of general and recyclable waste storage, with two external bin stores located to the north and south of the site.

5. Relevant Planning Policy

- 5.1. This section summarises the key planning policies in the local development plan, and relevant guidance in the NPPF that is applicable to the proposal.
- 5.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The statutory Development Plan for Bury comprises:
 - Joint Places for Everyone (PfE) (March 2024)
 - Bury Unitary Development Plan (UDP) (August 1997)
 - Greater Manchester Minerals Plan
 - The Greater Manchester Joint Waste DPD (2012).
- 5.3. Other policies, strategies and evidence base documents are also material and relevant, including the draft Bury Local Plan, Supplementary Planning Documents as well as other documents which form the evidence base to the Local Development Framework, particularly in relation to housing land supply.

National Planning Policy Framework

- 5.4. National planning policy guidance is set out within the NPPF (December 2024), which is supplemented by the National Planning Policy Guidance.
- 5.5. The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 8), through the three overarching objectives of economic, social and environmental sustainability.
- 5.6. At the heart of the NPPF is the presumption in favour of sustainable development through plan making and decision taking. Paragraph 11 explains that for decision taking, this means that proposals that accord with an update to date development plan should be approved without delay.
- 5.7. Importantly, paragraph 11d states that where there are no development plan policies or the policies which are the most important for determining the application are out of date, this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well designed places and providing affordable homes, individually or in combination.

- 5.8. Section 4 relates to design making and requires local planning authorities to approach decisions on proposed development in a positive and creative way, working proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area.
- 5.9. Paragraph 40 suggests early engagement having potential to improve the efficiency and effectiveness of the planning system and improved outcomes for the community. Paragraph 41 also suggest engaging with the local community ahead of a planning submission.
- 5.10. Section 5 focuses on delivering a sufficient supply of homes. Paragraph 61 states that to support the Government's objective of significantly boosting the supply of homes, it is vital that the sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed.
- 5.11. Paragraph 62 stresses that in establishing housing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.
- 5.12. Section 8 relates to promoting healthy and safe communities. Paragraph 96 states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction. Are safe and accessible so that crime and disorder, and the fear of crime do not undermine the quality of life or community cohesion. And, enable and support healthy lives through both promoting good health and preventing ill health – through such things as layouts that encourage walking and cycling, access to green infrastructure, sports facilities and local shops.
- 5.13. Section 9 considers promoting sustainable transport. Paragraph 110 sets out that significant development should be focused in areas that are sustainable through limiting the need to travel and by offering a choice of transport modes.
- 5.14. Paragraph 116 states that developments should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 5.15. Section 11 relates to making effective use of land in meeting the need for homes and other uses. Paragraph 124 sets out that planning policies and decisions should '*give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs*'. It also states at paragraph 125(d) decisions should promote and support the development of under-utilised land and buildings.
- 5.16. Paragraph 129 states that in achieving appropriate densities, planning policies and decisions should support development that made efficient use of land taking into account, *inter alia*, the identified need for different types of housing and other forms of development and local market conditions and viability.

- 5.17. Section 12 places weight on achieving well designed places, with an emphasis on the creation of high quality, beautiful and sustainable buildings and places being fundamental at paragraph 131.
- 5.18. Paragraph 135 ensures that developments *'function well and add to the overall quality of the area, not just in the short term but over the lifetime of the development'* and *'optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development'*.
- 5.19. Trees are considered at Paragraph 136 to make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change and opportunities are taken to incorporate new trees into developments.
- 5.20. Section 14 highlights the importance of supporting the reduction of emissions and encouraging the use of renewable and low carbon energy. Specifically, Paragraph 164 asks that new development should be planned in a way that avoids increased vulnerability to the impacts arising from climate change and can help reduce greenhouse gas emissions through its location and design.
- 5.21. Paragraph 166 requires local planning authorities in determining applications to expect development to comply with any new development policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant that isn't feasible or viable as well as taking into consideration landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 5.22. In relation to flood risk, paragraph 170 sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).
- 5.23. Paragraph 181 requires planning applications to be supported by a site-specific flood risk assessment and local planning authorities should ensure that flood risk is not increased elsewhere.
- 5.24. Section 15 seeks to conserve and enhance the natural environment. Paragraph 187 states that planning decisions should contribute to and enhance the natural and local environment through protecting and enhancing landscape, sites of biodiversity or geological value and soils (a), minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features that support priority of threatened species such as swifts, bats and hedgehogs (d), preventing new and existing development from contributing to, being put at unacceptable risk from or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability (e) as well as remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

- 5.25. Paragraph 193 sets out the principles for local planning authorities for determining applications in respect of biodiversity.
- 5.26. Ground conditions and pollution are considered within Paragraphs 196 to 201 in respect of noise, air and ground pollution and ensuring that new development is appropriate for its location having consideration to the potential sensitivities of the site or wider area to impacts that could arise from the development.

National Planning Practice Guidance

- 5.27. The Government produces planning practice guidance to support the NPPF. Of relevance to this proposal are:
- Biodiversity net gain
 - Effective use of land
 - Housing supply and delivery
 - Renewable and low carbon energy.
- 5.28. For Biodiversity Net Gain (BNG), the NPPG states that this is to be delivered in line with the Environment Act 2021. From 12 February 2024, most developments must achieve a minimum 10% net gain in biodiversity, measured using the Defra Biodiversity Metric, and maintained for at least 30 years.
- 5.29. BNG should follow the mitigation hierarchy: avoid, minimise, restore, then compensate. It can be delivered on-site, off-site, or via statutory credits, subject to BNG trading rules. A Biodiversity Gain Plan must be submitted and approved before development begins.
- 5.30. The NPPG reinforces that BNG must be integrated into the design process and secured through planning conditions or legal agreements. It must not be used to justify otherwise unacceptable ecological harm.
- 5.31. In relation to the supply of housing, the guidance states that where local authorities do not have an adopted plan which is less than 5 years old that identifies a five year supply of specific deliverable sites at the time of examination, then they are required to update annually a supply of specific developable sites to provide either a minimum five years' worth of housing, or a minimum of four years' worth of housing in certain circumstances.
- 5.32. Where a local authority cannot demonstrate a five year housing land supply, including any appropriate buffer, the presumption in favour of sustainable development will apply, in accordance with Paragraph 11d of the NPPF.

Places for Everyone

- 5.33. The Joint Places for Everyone Development Plan Document was adopted by nine Greater Manchester local authorities, including Bury in March 2024. It identifies future needs for

housing and employment floorspace, allocates strategy sites to help meet these needs and identifies a revised Green Belt boundary.

- 5.34. In terms of housing, the PfE identifies strategic housing allocations to meet Bury's future housing targets. There is a need to identify additional housing sites through the development plan, albeit limited with a focus on previously development brownfield sites within the existing urban area.
- 5.35. As a result, some of the retained policies within the Unitary Development Plan (UDP) were superseded.
- 5.36. The policies within PfE of relevance to this proposal are detailed below.
- 5.37. Policy JP-H1 sets a requirement for an average of 452 homes per year over the plan period, with stepped targets starting from a minimum housing target of 246 homes per year from 2022-2025 (increasing in future years of the plan).
- 5.38. Policy JP-H2 seeks to significantly increase the supply of new housing.
- 5.39. JP-H3 seeks to provide an appropriate mix of dwelling types and sizes.
- 5.40. Policy JP-H4 requires new housing developments to 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 the efficient use of land and high-quality design. It also sets a minimum density to be considered.
- 5.41. Policy H4 relates to affordable housing and sets a minimum target of 20% across most areas, with a mix of affordable housing tenures, preferring on site delivery.

Bury Unitary Development Plan

- 5.42. The Unitary Development Plan was adopted in August 1997. In 2007, the Council had to decide which policies to save until such time that a new Local Plan was adopted. The Secretary of Statement agreed that all policies should be retained apart from policy OL7/1.
- 5.43. Following adoption of PfE, many of the saved policies have been superseded, of relevance to this development policies relating to housing land provision (H1), housing environment and design (H2), housing need and new development (H4) and new development (HT4).
- 5.44. The general strategic direction of the UDP is to revitalise the sub regional economy, promoting urban regeneration, delivering new dwellings, ensuring Green Belt, open land and environmental quality and focusing shopping facilities within existing town centres, with a maintained transport system.

Supplementary Planning Documents

SPD 1: Open Space, Sport and Recreation Provision in New Housing Development (2015)

- 5.45. This SPD gives detailed guidance on the Council's approach to the provision and enhancement of open space, sport and recreation facilities as part of new housing developments.
- 5.46. It provides advice on developer contributions towards the provision, enhancement and maintenance of open spaces in Bury.
- 5.47. Saved UDP Policy RT2/2 requires all proposal for new housing of 10 units or more to make provision for the recreational needs of the prospective residents. Smaller developments may by negotiation provide a one-off payment to the Council via a Section 106 agreement for the upgrading of an existing public open space or implementation of an outstanding recreation allocation in the nearby area.

SPD3: Planning Out Crime in New Development (2001)

- 5.48. SPD3 provides advice on measures which can be incorporated into the design of new developments to reduce the fear of crime and lessen future opportunities for crime in Bury.
- 5.49. Measures include natural surveillance, designing for safety of people and the security of property and using defensible space.
- 5.50. For residential development, where appropriate, developing a mixture of housing types of any one site where possible and consider the grouping of houses. Providing definitive boundary treatments, avoiding landscaping that creates hiding places or obscures the house frontage.
- 5.51. It also advises on providing overlooked pedestrian routes, avoiding communal car parking where possible or make provision to incorporate security measures, ensuring rear gardens adjoin one another, with controlled access to the rear of properties from a frontage with a strong lockable gate, and avoiding deck access landings to properties.

SPD11: Parking Standards in Bury (2007)

- 5.52. The SPD expands upon the parking policies with the UDP and has 4 objectives:
 - a. To ensure the level of car parking associated with development is appropriate, in order to support a reduction in reliance upon the private car
 - b. To set specific standards for residential development in areas of high accessibility
 - c. To encourage an integrated approach to specific land uses and transport networks by improving physical and social links between them

- d. To ensure that parking facilities are inclusive and cater for end users in a safe and non threatening way.

5.53. Table 2 sets out the parking standards in Bury. It requires 4 bed dwelling houses to provide 3 spaces per unit.

SPD16: Design and layout of New Development (2008)

5.54. This SPD sets out a series of principles for good design and process through which this can be achieved in relation to specific types of development, including housing. It seeks to ensure a high standard of design for all development across the borough.

SPD17: Developer Contributions for Education (2024)

5.55. This SPD sets out the Council's approach to seeking developer contributions towards education. It was adopted in September 2024 and supports Policy JP-P5: Education, Skills and Knowledge of the adopted Places for Everyone Plan.

5.56. It will seek contributions where a new housing development will create an unacceptable impact on pupil places within schools, to ensure adequate provision of education infrastructure. Contributions will be sought for residential developments of 10 dwellings or above and only where there is a projected shortfall of primary and/or secondary places in the local area.

Five Year Housing Land Supply Statement (2025)

5.57. Bury Council published their most recent housing land supply statement in March 2025. Within it, the Council consider that primarily due to the adoption of Places for Everyone, which includes a number of large strategic, Green Belt sites that they can currently demonstrate a five year housing land supply.

5.58. As at April 2024, the Council considered that they had 5.8 year supply.

Housing Delivery Test Action Plan (2019)

5.59. The Council published their Housing Delivery Test Action Plan in February 2019. Bury has been consistently underdelivering against their housing targets for over 10 years.

5.60. Within national Government's most recent Housing Delivery Test (2023), Bury had delivered 798 dwellings out of a requirement of 1237 over the previous 3 years, equating to 64% of their requirement.

Emerging Planning Policy

Bury Local Plan

- 5.61. Following the adoption of PfE, Bury MBC are now preparing a new Local Plan to replace the existing saved policies of the Bury UDP. The Local Plan will provide a more detailed set of locally specific planning policies to complement the PfE.
- 5.62. There are no published timescales for the new Local Plan, however the Council is currently undertaking a call for sites exercise, with a request to focus on brownfield previously development sites within existing urban area.

6. Affordable Housing Statement

- 6.1. The proposal consists of a full planning application for 60 apartments at the former Spurr House site on Pole Lane.

Relevant planning policy

- 6.2. The relevant planning policies relating to affordable housing are set out within the Bury UDP, at Policy H4/1. It states that:

“The Council will encourage the provision of affordable housing through negotiation, partnership agreements and the identification of land suitable for such purposes. There will be a particular emphasis given towards encouraging the development of affordable housing as an integral part of large housing developments.”

- 6.3. The Council’s SPD5 relates to affordable housing provision within new residential development. SPD5 serves as supplementary planning guidance to Policy H4/1 of the Bury Unitary Development Plan. It provides detailed instructions on how affordable housing should be negotiated, designed, and delivered through new residential planning applications. This guidance includes technical advice intended for both developers and planning officers.
- 6.4. The threshold within the SPD for delivering affordable housing is 25 dwellings or more or sites over 1 hectare. A provision of 25% affordable housing is required.
- 6.5. The Council produced its First Homes Policy Position Statement (“FHPPS”) in December 2021. Page 4 of the FHPPS states that:

*“Once a minimum of 25% of the affordable units as First Homes has been accounted for, the Written Ministerial Statement states that social rent should be delivered in the same percentage as set out in the local plan. The remainder of the affordable housing tenures should be delivered in line with the proportions set out in the development plan.
In Bury, the affordable housing policies do not set specific requirements for proportions of different tenures, therefore the tenure of the remaining 75% of affordable units is open for negotiation. We have been delivering a similar discounted sale product for a number of years, the main difference being that the properties are discounted by 25% and are not restricted to first time buyers. It is anticipated that First Homes will replace a proportion of these properties.”*

- 6.6. Within Places for Everyone, there is a drive to see 20% of all housing delivered across the Greater Manchester boroughs as affordable, with a mix of tenures and provided on site within housing developments.

- 6.7. The NPPF states at Paragraph 63 that the size, type and tenure of housing should be assessed and reflected in planning policies. This should include but is not limited to affordable housing (including social rent).
- 6.8. Paragraph 64 goes on to state that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required. Annex 2 of the Framework provides the definition of what constitute affordable housing. This includes social rent, other affordable housing for rent, discounted market sales housing and other affordable routes to home ownership such as shared ownership.

Past delivery

- 6.9. Bury Council provided an update on their past delivery in their Bury Five Year Supply of Deliverable housing Land dated March 2025. Whilst it provides an overall update on their delivery of housing in general, it does not provide a breakdown for affordable housing that has been delivered, against their housing requirements.
- 6.10. Based on review of available information on the council's website, there appears to be persistent under delivery of affordable housing.
- 6.11. According to the 2019 Strategic Housing Market Assessment (SHMA), there is a requirement for 263 net additional affordable dwellings per annum across the borough. However, between 2017/18 and 2021/22, the Council delivered only 184 affordable homes in total—an average of just 37 per year. This equates to a significant shortfall of 1,131 dwellings over the five-year period, or an annual average deficit of 226 affordable homes.
- 6.12. More recent evidence from the 2020 Housing Needs and Demand Assessment (HNDA) identifies an even higher annual requirement of 448 affordable homes between 2020/21 and 2036/37. Between 2020 and 2022, the Council fell short by 795 dwellings—equivalent to an annual deficit of 398 homes. These figures demonstrate that affordable housing delivery is not keeping pace with the level of need and that the gap between supply and demand is widening.
- 6.13. This persistent under delivery highlights a critical shortfall in affordable housing provision within the borough. In this context, proposals that significantly boost affordable housing supply should be given substantial positive weight in the planning balance.

Assessment

- 6.14. The development is for 100% affordable housing. It comprises a mix of one and two bedroom apartments, split over two blocks. The apartments will be available for a range of affordable tenures, such as affordable rent or shared ownership.
- 6.15. The properties will be retained by a Registered Provider.

- 6.16. The provision of affordable housing, and the properties remaining as affordable in perpetuity can be secured via a planning condition. This is the preferred method due to funding constraints with Homes England if the affordable housing is secured through a S106 Agreement.
- 6.17. The provision of such a significant contribution, which exceeds the local and regional requirements towards affordable housing and the persistent under delivery of affordable housing is a material consideration which weighs heavily in favour of the application.

7. Open Space/Recreation Statement

- 7.1. This application proposes 60 affordable homes at Spurr House on Pole Lane. The development triggers the requirement under UDP Policy RT2/2 and the Council's Open Space SPD to provide 4,800 m² of informal on site open space. This is consistent with 80 m² of open space per dwelling, including 6 m² for children's play.
- 7.2. Bury's 2015 Greenspace Audit and Strategy, which informs the Council's Open Space SPD, indicates that all typologies of open space provision across the Borough are currently deficient in terms of quantity, quality, and accessibility.
- 7.3. For this area of Bury, it is identified that there is a deficit in open space provision, as detailed in the table below.

Typology	Local Provision	Surplus/Deficit
Parks and gardens	None within 480m	Deficit
Natural/semi natural	Hollins Vale, Burrs Country Park	Deficit against accessibility standard
Amenity Greenspace	Informal open space provided on site	Deficit
Play and Youth Facilities	No LEAP/NEAP within 480m	Deficit
Outdoor Sports Pitches	Unsworth Cricket Club to south	Likely adequate but quality uncertain

- 7.4. Whilst it is recognised by the applicant that there is a deficit of open space provision within the local area, based on the delivery of 100% affordable housing scheme, the applicant does not intend to provide any financial contribution towards open space.

8. Statement of Community Involvement

- 8.1. This section details the consultation that was carried out by the applicant ahead of submitting the application.
- 8.2. The Government encourages applicants to engage with local stakeholders to help inform proposals as set out at paragraph 41 of the NPPF, this includes engaging with the local community.

Pre application with Bury Council

- 8.3. A formal pre application submission was made in October 2024. An online meeting was held with development control officers and highway officers in November 2024. The meeting was held to discuss the proposed approach to the redevelopment of the site, the principle of residential development and the realignment of the site access. A written response from the Council was received on 14 November 2024.

Public Consultation

- 8.4. The local community was informed of the proposed residential development via a letter drop in January 2025. This included a copy of the proposed site layout plan and CGI images.
- 8.5. 160 letters were sent to existing properties on surrounding streets. A map of the properties consulted can be found at Appendix 3. A copy of the letter can be found at Appendix 4.
- 8.6. Residents were invited to provide comments on the application via email. Nine responses were received from residents. Of the Nine responses, 1 was an outright objection, 1 broadly supported the redevelopment of the site but would prefer detached properties and 7 raised concerns regarding highway impact, the proposed tenure of the development and whether the apartments would be able to look directly into existing properties.

9. Key Planning Considerations

- 9.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 9.2. The revised NPPF along with the NPPG and other supplementary and emerging policies are material considerations relevant to the determination of this application.

Principle of development

- 9.3. The site is unallocated brownfield site within the Unitary Development Plan, within an urban area and not within the Green Belt. As such, in accordance with the NPPF, there is a presumption in favour of development.
- 9.4. Section 11 of the NPPF makes clear that substantial weight should be given to using suitable brownfield land within settlements for homes and other identified needs. The redevelopment of this site, to deliver much needed family homes should be supported.
- 9.5. The site is occupied by a vacant building. It is in a poor condition and is unsuitable for retention and conversion to an alternate use. Therefore, the proposed redevelopment is the most viable opportunity as well as being wholly compatible with the surrounding land uses.
- 9.6. The principle of residential development on the site is therefore considered to be acceptable and would comply with the NPPF, Places for Everyone and current UDP policies.

Housing need

- 9.7. There is a national housing crisis. Insufficient levels of housing have been provided over many years which has led to an overall lack of supply, particularly so in Bury. The Government's clear and long held objective is to 'significantly boost the supply of homes', with the objective of delivering 300,000 new homes per year. There is a continued emphasis on the reuse of brownfield land.
- 9.8. Bury Council's most recent published position, as of March 2025, claims a 5.8-year deliverable housing land supply. This is based on the stepped housing requirement set out in the adopted *Places for Everyone* (PfE) Joint Development Plan (March 2024) and supported by the Council's Strategic Housing Land Availability Assessment (SHLAA) and Five-Year Supply Statement, with a base date of 1 April 2024.
- 9.9. However, delivery rates for affordable housing in Bury lag significantly behind the identified need as set out in the Affordable Housing Statement. The contribution of 60 units towards the council's annual affordable housing target of 448 (as set out in the HNDA, 2020) would

represent 13% of the annual requirement. This should be given great weight in the determination of this application.

Design

- 9.10. The planning application is supported by a comprehensive Design and Access Statement (DAS). This forms an integral part of the submission and should be read in conjunction with the submitted plans and other supporting information.
- 9.11. The DAS describes the development proposals and provides important information about the scheme, and particularly the design solution adopted. It includes commentary on the layout of the site, the scale and massing of the development and the appearance of the apartment blocks.
- 9.12. The DAS explains how the development has been designed to be inclusive to all and minimise the opportunities for crime and disorder, and reduce the fear of crime.
- 9.13. In designing the scheme, the applicant has been mindful of the National Design Guidance, Nationally Described Space Standards and local design policies. Pre application discussions have taken place with officers at Bury Council and amendments have been made to incorporate the comments received.
- 9.14. All apartments comply with the Nationally Designed Space Standards for a one and two bedroom apartment. The scheme also complies with Building Regulations Part M, with 72% of dwellings achieving M4(2) standard, and the remainder designed for inclusive access at ground level.
- 9.15. The proposed layout of the site seeks to maximise the density of the development on site to ensure an efficient use of previously developed land, whilst also ensuring sufficient space is provided for on site parking provision, landscaping and amenity for residents. Thereby according with Bury UDP Policy H1/2 Further Housing Development
- 9.16. In terms of the scale and massing of the proposed apartment blocks, Block A is 3 storeys and Block B is 4 storey in height. Careful consideration has been taken to ensure the position of the building does not result in overlooking or overshadowing on neighbouring properties.
- 9.17. The proposed design and materials are reflective of the local area whilst also providing a contemporary design, to ensure that it integrates well into the surrounding area, in accordance with Policy EN1/2.
- 9.18. It therefore meets the objectives set out in Paragraphs 8, 119, 120, 130, 152, 153 and 154 of the NPPF in making effective use of previously developed land, supports housing delivery, enhances biodiversity, and promotes sustainable transport, as well as meeting core sustainability principles.

Other material considerations

Ecology

- 9.19. A Preliminary Ecological Appraisal (PEA) was undertaken by Thomson Environmental Consultants in 2022 to assess the baseline ecological value of the Former Spurr House site. This report has been supplemented with additional bat survey undertaken between 2022 and 2025. This approach was agreed with Suzanne Wymont at the Greater Manchester Ecology Unit prior to the submission of the application.
- 9.20. The site comprises a mix of modified grassland, scattered trees, scrub, and sealed surfaces, with areas of lowland mixed deciduous woodland offering moderate ecological interest. The survey identified no protected or priority species or habitats on-site, although the woodland and scrub areas may support common amphibians, nesting birds, and invertebrates.
- 9.21. Separate bat surveys confirmed that one building and three trees have potential roosting features, though no active roosts were found (as summarised in the bat section of this statement).
- 9.22. The PEA recommended a series of mitigation and enhancement measures, including retention of boundary trees where possible, sensitive lighting design to protect nocturnal species, and the installation of bird and bat boxes.
- 9.23. Clearance works will be scheduled to avoid the nesting bird season, and additional pollinator-friendly planting will be integrated into the site layout to improve biodiversity value post-development.
- 9.24. In accordance with the Environment Act 2021, a Biodiversity Net Gain (BNG) Assessment was also undertaken in 2025, using the latest Defra Biodiversity Metric.
- 9.25. The baseline biodiversity value of the site was assessed at 3.73 habitat units. Following development, the site is expected to deliver 3.58 habitat units, representing a 3.94% net loss. However, there will be a gain of 1.18 hedgerow units, as no hedgerows currently exist on site.
- 9.26. To address the shortfall and comply with BNG trading rules, the applicant proposes off-site compensation equivalent to 0.53 habitat units. This will be delivered via creation of medium distinctiveness scrub and lowland mixed deciduous woodland, in line with ecological priorities.
- 9.27. A Biodiversity Gain Plan will be submitted post-permission, supported by a 30-year Habitat Management and Monitoring Plan, as required under the Environment Act. The proposed mitigation hierarchy and net gain strategy are consistent with the principles set out in paragraph 178 and 180 of the NPPF, which require development to enhance biodiversity and avoid significant ecological harm.

9.28. The approach also satisfies Policy EN6/3 of the Bury Unitary Development Plan, which seeks to conserve and enhance features of ecological value and promote appropriate ecological mitigation. Furthermore, the proposals align with Policy JP-G 9 of the Places for Everyone Joint Development Plan, which requires all major development to deliver measurable net gains in biodiversity and support nature recovery.

Bats

9.29. Three detailed ecological assessments were undertaken by Thomson Environmental Consultants between 2022 and 2025 to assess the bat roosting potential at the Former Spurr House site:

- i. Preliminary Roost Assessment (PRA) and Ground-Level Tree Assessment (GLTA) (Nov 2024, Ref: WAT005-001-002),
- ii. Bat Hibernation Survey (Apr 2025, Ref: WAT005-001-005),
- iii. Aerial Inspection Report (Apr 2025, Ref: WAT005-001-009).

9.30. The initial PRA found that Building 1 (B1) had moderate roost potential, later upgraded to high potential following changes to the roof structure and increased loft cavity accessibility. Building 2 (B2) had low potential but was subsequently demolished. Trees T1, T2, and T7 were identified as having features suitable for roosting bats (PRFs) under updated Bat Conservation Trust (BCT) guidelines (2023), with others assessed as low or negligible risk.

9.31. To address these findings, hibernation surveys were conducted from November 2024 to March 2025 using five static bat detectors and internal inspections. No bats or evidence of roosting were detected. Therefore, it was concluded that demolition of B1 poses no risk of disturbing bats, provided works commence before May 2025. If delayed beyond that date, updated dusk/dawn emergence surveys will be required per BCT guidance.

9.32. Given that the buildings are unlikely to be demolished until the end of 2025, early 2026, additional bat surveys are due to be undertaken.

9.33. For trees with potential roost features:

- T3, although low risk, is to be felled and will require a licensed bat ecologist to undertake a pre-felling inspection and apply soft felling methods.
- T1, T2, and T7 will undergo aerial inspection. No roosts have been confirmed to date.

9.34. Ecological enhancement measures, including installation of bat boxes, and minimising light pollution, are recommended and will be secured through an Ecological Enhancement Plan. Best-practice construction methods will also mitigate noise and dust during works.

- 9.35. The approach taken complies with paragraphs 179 and 180 of the NPPF, which require development to avoid significant harm to biodiversity, and to secure measurable net gains where possible. No roosts were found, and mitigation is proportionate. Enhancement through bat boxes aligns with biodiversity net gain principles.
- 9.36. The assessment followed current BCT guidance, and the staged survey methodology reflects the PPG's emphasis on using proportionate ecological information to inform decision-making.
- 9.37. The proposals accord with Policy EN6/3 (Features of Ecological Value), which seeks to protect habitats used by legally protected species such as bats. No roosts will be lost, and the inclusion of new roosting features (bat boxes) enhances ecological value.
- 9.38. The development aligns with Policy JP-G 9 (A Net Enhancement of Biodiversity and Geodiversity) by avoiding harm to protected species, applying a precautionary approach, and integrating biodiversity enhancement into the site design.

Trees

- 9.39. An Arboricultural Impact Assessment was prepared by Thomson Environmental Consultants (October 2024) to support the proposed redevelopment of the Former Spurr House site in Bury.
- 9.40. The survey identified a total of 25 individual trees, 4 groups, and 2 hedgerows. Tree quality was categorised using BS5837:2012, with 11 trees and 1 group classified as moderate quality (Category B), and the remainder identified as low (Category C) or poor quality (Category U) specimens.
- 9.41. The development proposal will necessitate the removal of 10 individual trees, one group (G2), and one hedgerow (H1). Most of the trees to be removed are Category C, with only two moderate-quality trees (T1 and T8) being lost. The removals are required primarily to accommodate access, parking, and reconfiguration of the built footprint. Importantly, the retained trees—particularly higher-value trees along the boundaries—can be protected in accordance with BS5837:2012 standards through the implementation of protective fencing, construction exclusion zones, and appropriate working methods during demolition and construction.
- 9.42. The AIA includes an outline Arboricultural Method Statement and Tree Protection Plan, both of which will be finalised and secured via condition.
- 9.43. Proposed mitigation includes compensatory planting as part of the landscape scheme, with species selection and placement intended to deliver long-term amenity, biodiversity, and green infrastructure benefits.

- 9.44. The proposed approach aligns with Paragraph 131 of the NPPF, which recognises the value of trees and supports their retention wherever possible. The scheme retains the majority of higher-quality trees, and where removals are necessary, it includes compensatory planting and protection measures for retained trees, consistent with paragraph 180(c), which seeks to avoid significant loss of irreplaceable or valued habitat.
- 9.45. The scheme respects the UDP's objectives to retain trees of value and integrate tree cover into development. The majority of higher-quality trees are retained, and the loss of moderate and low value specimens is mitigated through replacement planting. Tree protection and careful construction practices support compliance with Policy EN8.
- 9.46. The development supports PfE Policy JP-G 9 by seeking to retain boundary vegetation, provide compensatory planting, and embed green infrastructure into the site layout. The landscape-led approach and attention to tree protection during construction demonstrate a commitment to environmental quality and biodiversity resilience in line with PfE priorities.

Crime

- 9.47. A Crime Impact Statement (CIS) was prepared by Greater Manchester Police Design for Security to assess the proposed redevelopment of Spurr House into 60 residential apartments. The report evaluates the scheme using the principles of Crime Prevention Through Environmental Design (CPTED) and confirms that, subject to minor design modifications, the scheme will be robust in mitigating crime risks and fostering a safe and secure residential environment. The Design and Access Statement sets out why some of the proposed amendments cannot be accommodated.
- 9.48. The existing site was identified as vulnerable due to low fencing, overgrown vegetation, and lack of surveillance—factors commonly associated with derelict sites that attract nuisance and criminal activity. However, the proposed redevelopment would significantly enhance safety and natural surveillance by introducing well-overlooked, active residential frontage.
- 9.49. Paragraphs 92(b) and 130(f) of the NPPF require planning decisions to promote safe and inclusive places that reduce opportunities for crime and support healthy communities. The proposals fully align with these principles through the application of CPTED, the adoption of Secured by Design standards, and the creation of well-overlooked public spaces, thereby helping to design out crime.
- 9.50. The development is consistent with UDP Policy EN1/2 (Townscape and Built Design), which promotes design that reduces opportunities for crime. It also complies with Policy EN1/5 (Crime Prevention), which encourages schemes to incorporate features that deter crime, including secure boundaries, natural surveillance, and defensible space—all of which are central to the proposed scheme.
- 9.51. The proposal supports Policy JP-P 1 (Safe Places) of PfE by integrating secure design, access control, and active surveillance into the scheme. It also complements JP-S 4

(Resilient Places) by fostering long-term community resilience through good design and effective maintenance strategies that prevent deterioration and anti-social behaviour.

Transport and parking

- 9.52. The Transport Statement, prepared by SCP and dated July 2025, supports the proposed residential redevelopment of the Former Spurr House site on Pole Lane, Unsworth. The proposal includes the demolition of the existing care facility and the construction of 60 residential apartments, with 39 car parking spaces, including disabled and EV charging bays, along with covered cycle storage.
- 9.53. The site will be accessed via the existing vehicular entrance on Pole Lane, which meets design standards for visibility and geometry. The internal layout is designed to accommodate refuse vehicles and emergency services. The surrounding area is well connected by foot, cycle, and public transport, with nearby access to bus stops and Besses o' th' Barn Metrolink Station (less than 1.3km walking distance).
- 9.54. The location supports sustainable travel, being within walking and cycling distance of schools, shops, health services, and employment. The site benefits from access to three frequent bus services along Hollins Lane, and pedestrian links will be improved with dropped kerbs and tactile paving.
- 9.55. Using TRICS data, the report forecasts a net increase of just 3 additional two-way vehicle trips in the AM peak and 3 in the PM peak, compared with the extant use of the site. The impact of this modest increase is considered negligible, particularly given existing traffic levels on Pole Lane and the surrounding highway network.
- 9.56. A total of 39 parking spaces are proposed, supported by cycle storage and good access to public transport. This provision is deemed appropriate given the sustainable location and the expected demographic of residents.
- 9.57. Bin stores and servicing areas are located to allow direct access for refuse vehicles, confirmed via swept path analysis.
- 9.58. A review of recorded accident data for the past five years indicates no identifiable safety trends or accident clusters in the vicinity of the site. The proposed access and surrounding network are considered safe and suitable for the proposed development.
- 9.59. The submitted Transport Statement confirms that the proposed development is accessible, safe, and sustainably located. The scheme makes efficient use of previously developed land and integrates with existing travel networks while promoting sustainable transport choices.
- 9.60. The development aligns with NPPF Paragraphs 110 and 112, which promote safe and sustainable transport systems and require that development does not have an unacceptable impact on highway safety. The minimal additional traffic and strong emphasis on walking,

cycling, and public transport ensure full compliance. As set out in Paragraph 111, no severe residual cumulative impacts on the road network have been identified.

- 9.61. The proposal accords with UDP Policy HT2/4 (Car Parking and New Development) and HT4 (New Development), which support development in sustainable locations where highway safety is maintained, and travel demand is managed. The provision of cycle storage, EV charging, and access to public transport all contribute to policy alignment.
- 9.62. The development supports PfE Policy JP-C 7 (Transport Requirements of New Development), which encourages active travel, public transport use, and low car dependency. The scheme also contributes to Policy JP-P 1 (Sustainable Places) by integrating travel infrastructure that supports a low-carbon, accessible neighbourhood.

Flood Risk and Drainage

- 9.63. A Flood Risk Assessment has been prepared by Elluc (July 2025) in support of the application. It confirms the site lies within Flood Zone 1 and is suitable for residential use, with low risk from all sources of flooding.
- 9.64. The FRA also confirms low risk from surface water, groundwater, and reservoir flooding.
- 9.65. The FRA proposes a sustainable drainage strategy (SuDS) to manage surface water runoff from the site. Key features include:
- Attenuation storage via underground cellular storage or oversized pipes.
 - Flow control to restrict discharge to 5.0 l/s, in line with greenfield runoff rates.
 - Final discharge to the existing public sewer network, subject to United Utilities approval.
 - Consideration for future climate change impacts with allowance for 40% increase in rainfall intensity.
- 9.66. The topography of the site naturally drains from the northern boundary toward the south. The layout and drainage system are designed to safely manage runoff, with no risk to adjacent properties or on-site users.
- 9.67. A future SuDS maintenance regime is recommended and will be secured through condition or management plan, ensuring long-term performance of drainage infrastructure.
- 9.68. The development complies with NPPF paragraphs 159–169, which require new development to be appropriately located in relation to flood risk and to manage surface water sustainably. The proposed SuDS approach and site location in Flood Zone 1 fully satisfy national policy, and the development avoids placing future users at risk.
- 9.69. The proposal aligns with Policy EN5/1 (New Development and Flood Risk) and EN5/2 (Unsworth Moss), ensuring development avoids contributing to increased flood risk. The sustainable drainage solution and low site vulnerability support compliance with the plan's flood protection objectives.

9.70. The drainage and flood strategy supports Policy JP-S 4 (Resilient Places) and JP-S 6 (Clean Air and Water) by improving resilience to climate change, reducing runoff, and avoiding harm to water infrastructure. The SuDS-led design also contributes to environmental sustainability and climate adaptation goals in the plan.

Ground conditions

- 9.71. A comprehensive suite of site investigation reports including a Phase I and II Geo-Environmental Assessment (Brownfield Solutions, 2022) and a Remedial Strategy (Rev A, September 2024) have been undertaken to assess contamination, ground stability, and suitability for residential development.
- 9.72. The investigations confirmed elevated concentrations of lead and arsenic within the made ground, posing a potential risk to human health. However, no significant risks were identified to controlled waters, and ground gas levels were found to be low, classifying the site as Characterisation Score 1 (CS1), which does not require gas protection measures.
- 9.73. A detailed Remedial Strategy has been proposed and will be implemented to mitigate contamination risks. This includes:
- A 450 mm validated clean cover system in all soft landscaping areas, underlain by a hard dig layer or geotextile membrane.
 - Verification of imported soils and site-won materials through sampling and chemical testing.
 - Waste soils, classified largely as hazardous, will be managed under an approved Materials Management Plan.
 - Hardstanding areas will act as barriers to prevent contamination pathways.
 - All remedial works will be verified and reported as part of the final validation process to satisfy planning conditions.
- 9.74. Strip foundations and suspended floor slabs are considered suitable, with bearing capacities confirmed via in-situ testing. However, SuDS infiltration techniques (e.g., soakaways) are not feasible due to site conditions.
- 9.75. The remediation strategy supports Paragraphs 183–188 of the NPPF, which require developments to ensure land is suitable for use, particularly where a site is affected by contamination. The proposals include appropriate investigation, risk assessment, mitigation, and verification, in full alignment with these requirements.
- 9.76. The works comply with Policy EN7/5 (Waste Management Facilities) and EN7/3 (Groundwater Protection) by ensuring contamination is addressed without risk to environmental receptors. The approach also meets EN1/2 (Townscape and Built Design) by facilitating safe redevelopment of previously developed land.

9.77. The strategy aligns with Policy JP-S 4 (Resilient Places) and JP-P 6 (Development and Infrastructure) by delivering sustainable remediation on a brownfield site and mitigating risks associated with land contamination. The use of verification procedures also supports the long-term environmental resilience goals of PfE.

Asbestos

9.78. A full refurbishment and demolition asbestos survey was undertaken at Spurr House, by Reddish Vale Insulations Ltd on behalf of Gardiner & Theobald LLP. The survey, conducted on 4-5 April 2022 in accordance with HSG264 guidance, aimed to locate and assess asbestos-containing materials (ACMs) across the building in preparation for demolition and redevelopment.

9.79. The site, a former residential care home built in the 1960s, was found to contain multiple forms of ACMs, including:

- Asbestos insulating board (AIB) in corridors and beneath windows;
- Asbestos thermoplastic floor tiles and bitumen adhesives widely across staff rooms, bedrooms, corridors, and bathrooms;
- Asbestos bitumen adhesive beneath floor coverings in most blocks;
- Asbestos mastic in the external garage;
- Asbestos reinforced composite in toilet cisterns;
- Asbestos textile rope in electrical meter boxes.

9.80. Many ACMs were identified beneath floor coverings and in concealed locations, necessitating intrusive inspection. A total of 40 samples were taken and analysed by a UKAS-accredited laboratory, confirming the widespread presence of asbestos-containing materials, primarily Chrysotile and Amosite.

9.81. The report recommends complete removal of ACMs prior to any refurbishment or demolition in line with the Control of Asbestos Regulations 2012. It also advises the use of HSE-licensed asbestos removal contractors, sealing of affected areas, and labelling of materials in situ until removal.

9.82. Paragraph 183 of the NPPF requires that planning decisions ensure sites are suitable for their proposed use, taking into account ground conditions and contamination risks. The asbestos survey demonstrates proactive due diligence and supports safe redevelopment, meeting this requirement.

9.83. The asbestos risk has been fully characterised, and remedial recommendations are in place, satisfying the NPPF's objectives on safe and suitable development.

9.84. Policy EN1/2 (Hazardous Installations) and EN7/2 (Pollution Control) are relevant. While these policies typically address external sources of risk, the presence and proper

management of ACMs align with the UDP's emphasis on environmental safety and human health. The proposed actions conform with the UDP's broader environmental objectives.

- 9.85. Policy JP-S6 (Health and Wellbeing) and Policy JP-P1 (Pollution Control) call for developments to avoid unacceptable risks to health, including from land contamination and hazardous materials.
- 9.86. By undertaking a thorough asbestos assessment and committing to the full removal of ACMs by qualified professionals, the development aligns with PfE's strategic objective to support clean, healthy environments.

Services and Utilities

- 9.87. The existing electrical, gas and water services will be shut off and disconnected prior to the demolition of the building. This application is accompanied by a utility survey which identifies the locations of the relevant cables and pipes that will need to be disconnected.

Noise

- 9.88. A Noise Impact Assessment was prepared by Cundall (November 2024) in support of the proposed residential redevelopment of the Former Spurr House site. The assessment evaluates the acoustic environment for future residents and the impact of the development on existing noise-sensitive receptors.
- 9.89. Noise surveys were conducted at three positions around the site over multiple 24-hour periods. The dominant noise source was identified as road traffic along Pole Lane and Hollins Lane. Sound levels were found to be highest at the site boundaries near these roads, with measured LAeq levels between 51-61 dB during daytime and 45-54 dB at night, typical for suburban locations.
- 9.90. BS8233:2014 and WHO guidelines were used to assess acceptable internal noise levels. Modelling shows that the proposed building layout, orientation, and facade design will ensure that:
- Internal noise levels can be met in habitable rooms with standard double glazing and trickle ventilation in most areas;
 - In some facades exposed to higher noise levels, enhanced glazing and acoustically attenuated ventilators will be required.
- 9.91. For outdoor amenity areas (e.g. balconies and gardens), noise levels are predicted to remain below 55 dB LAeq,16hr, in line with external guidance for residential use.
- 9.92. Construction-related noise and vibration impacts are expected to be temporary and controllable through standard good practice measures, such as limiting working hours, use of low-noise equipment, and a Construction Environmental Management Plan (CEMP).

- 9.93. The site is considered suitable for residential development from a noise perspective, provided that the recommended mitigation measures are incorporated into the detailed design and implemented through planning condition or building regulations.
- 9.94. The assessment complies with NPPF paragraph 185, which requires planning decisions to ensure new development is appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution, including noise. The scheme ensures internal and external environments meet acceptable acoustic standards and mitigates impacts on future residents.
- 9.95. The proposals are compliant with Policy EN7/2 (Pollution Control) and EN1/2 (Townscape and Built Design). The development has been designed with acoustic mitigation built in and avoids creating unacceptable living conditions, in line with the UDP's intent to manage environmental impacts.
- 9.96. The development supports PfE Policy JP-S 6 (Clean Air and Safe Development) by ensuring that future residents are protected from adverse noise impacts. The design-led approach to acoustic performance reflects PfE's emphasis on healthy, high-quality living environments, contributing to long-term residential amenity.

Air Quality

- 9.97. An Air Quality Assessment has been prepared by Cundall (November 2024) in support of the proposed residential redevelopment. The assessment has considered both the construction and operational phases of the development and has been undertaken in accordance with Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) guidance, with the scope agreed in consultation with Bury Council's Environmental Health team (see Appendix B of the report).
- 9.98. The site is not located within an Air Quality Management Area (AQMA), although the nearest AQMA boundary (Bury AQMA covering the M66) lies approximately 120 metres east of the site. The assessment confirms that existing pollutant levels (NO_2 , PM_{10} , $\text{PM}_{2.5}$) in the study area are within national air quality objectives (Tables 4-2 and 4-3), and exceedances are unlikely based on current and projected background data (Section 4.1.1). The report concludes that future site users will not be exposed to pollutant concentrations above objective thresholds, with estimated annual mean NO_2 levels at the site expected to be lower than at comparable roadside locations such as BU3ANO/BU3BNO/BU3CNO, where recorded concentrations in 2023 were between 18.8–19.7 $\mu\text{g}/\text{m}^3$ (Section 4.1.1.2).
- 9.99. Construction phase activities present a medium risk of dust impacts without mitigation, particularly from demolition and construction activities (Section 5.1). However, with the implementation of an appropriate Air Quality Dust Management Plan (AQDMP) and best practice controls as detailed in Appendix G, the report concludes that construction impacts would not be significant. Mitigation includes site management, dust suppression, wheel washing, and minimising drop heights for materials (Section 6.1).

- 9.100. Regarding the operational phase, the development is not anticipated to cause an increase in traffic movements exceeding EPUK/IAQM thresholds (i.e. <500 LDV AADT and <100 HDV AADT), and therefore no further traffic-based dispersion modelling was required (Section 3.4.2). Additionally, the proposed development will use electric heating and cooling, with no reliance on gas or diesel combustion plant, meaning no associated emissions from point sources (Section 3.4.1).
- 9.101. The report concludes that the proposed development would have no significant adverse effects on local air quality, complies with all relevant UK Air Quality Objectives, and that there are no air quality constraints to its delivery (Executive Summary, p. ii and Conclusion, Section 8.0).
- 9.102. The proposals therefore accord with Saved Policy EN7/1 of the Bury Unitary Development Plan, which seeks to resist development resulting in unacceptable levels of atmospheric pollution; and Policy JP-S 6 of the adopted Places for Everyone Joint Development Plan, which requires development to protect and improve air quality, especially in proximity to AQMAs and vulnerable receptors.
- 9.103. The proposed development is not expected to result in any exceedance of air quality standards and incorporates appropriate mitigation to minimise construction-related impacts. The scheme therefore complies with both local and strategic policy objectives for sustainable development and environmental protection.

Dust

- 9.104. A Dust Management Plan prepared by Cundall (November 2024) has been submitted in support of the application. The document provides a comprehensive and site-specific framework for mitigating construction dust emissions throughout the demolition and build phases of the project.
- 9.105. The assessment identifies the risk of dust impact as "medium" for human health and "low to medium" for dust soiling, based on the proximity of existing sensitive residential receptors (within 20-50 metres of the site boundary) and the scale of the proposed works (Section 3.2, Table 3). No high-risk receptors such as schools or hospitals were identified within the immediate surroundings. The document applies risk assessment principles in line with the Institute of Air Quality Management (IAQM) Guidance on the Assessment of Dust from Demolition and Construction (2014).
- 9.106. The plan sets out a range of robust and proportionate site control measures to be implemented during all relevant construction phases. These include water-based dust suppression, covering of stockpiles, minimising drop heights, and installing wheel-wash facilities to reduce dust from vehicle movements (Section 4.0). In addition, speed limits for site vehicles, clear site access points, and monitoring procedures are specified to further reduce emissions and ensure ongoing compliance (Sections 4.1-4.5).

- 9.107. Site management responsibilities are also clearly defined, including the appointment of a Dust Control Lead tasked with implementing controls, carrying out regular inspections (particularly during dry and windy conditions), and maintaining a log of any dust-related complaints (Section 4.6). This approach aligns with best-practice expectations and will be adaptable through the construction programme should site conditions or regulatory requirements change.
- 9.108. The mitigation proposed is proportionate to the assessed level of risk and ensures that the development will not result in significant adverse impacts from construction dust. As such, the proposals are considered to be compliant with Saved Policy EN7/1 of the Bury Unitary Development Plan, which resists development likely to generate unacceptable levels of atmospheric pollution; and Policy JP-S 6 of the adopted Places for Everyone Joint Development Plan, which supports development that reduces air pollution and protects public health, particularly during the construction of new housing.
- 9.109. In conclusion, the Dust Management Plan provides a clear framework for managing and minimising dust impacts and contributes to the delivery of a sustainable, policy-compliant development. It is recommended that the measures outlined in the plan be secured via a planning condition or incorporated into a wider Construction Environmental Management Plan (CEMP).

Energy

- 9.110. An Energy Statement has been prepared to support the proposed development. The scheme is designed to comply with the Greater Manchester Places for Everyone Plan and the national energy hierarchy by prioritising energy efficiency and low-carbon technologies.
- 9.111. Measures include high-performance building fabric, air source heat pump water heaters, LED lighting with automated controls, and extract-only ventilation with heat recovery where required.
- 9.112. The strategy aims to achieve EPC ratings of B for all units and deliver a 60% reduction in hot water energy demand and associated carbon emissions compared to conventional systems.
- 9.113. While the site does not currently propose photovoltaic panels or connection to a district energy network, it is being future-proofed for potential integration.
- 9.114. The scheme also incorporates electric vehicle charging and has been assessed for overheating risk in line with Approved Document O.
- 9.115. The proposed development therefore aligns with the energy and sustainability objectives set out in the Places for Everyone Joint Development Plan, incorporating measures that prioritise energy efficiency, reduce carbon emissions, and future-proof the scheme in line with Policy JP-S2.

Amenity and Recreation Space

- 9.116. The scheme delivers private amenity space to ground floor residents, as well as balconies to residents on the upper floors and additional amenity space within the boundary of the property.
- 9.117. It is acknowledged that there is a deficit of formal open space/play provision within the vicinity of the site. However, given the substantial contribution of 100% affordable housing on site, this should be weighed in favour against the lack of financial contribution towards additional open space provision.

Digital connectivity

- 9.118. The proposed redevelopment of the Former Spurr House site includes the delivery of high-performance gigabit-capable broadband infrastructure to serve all 62 residential apartments. As outlined in the Digital Connectivity Statement prepared by Watson Homes, the scheme will provide full fibre-to-the-premises (FTTP) connections via Openreach and additional gigabit-capable services through Virgin Media, where available.
- 9.119. Each dwelling will benefit from:
- Dedicated full-fibre connections, enabling access to broadband packages of up to 1 Gbps upload and download speeds;
 - Pre-installed internal Cat 6 cabling and connection hardware (ONT and Virgin ITB points), ensuring seamless internal distribution of high-speed internet;
 - No resident set-up costs, as all infrastructure is to be installed prior to occupation.
- 9.120. The network design is future-proofed through the use of dedicated ducting, and Watson Homes will coordinate all necessary wayleaves and provider agreements to ensure robust and legally compliant delivery under the Electronic Communications Code.
- 9.121. This infrastructure will enable residents to access a wide choice of internet service providers, offering affordability, competition, and reliable service performance-aligning with the national push toward inclusive digital access and smart-ready development.
- 9.122. The scheme supports NPPF Paragraph 114, which encourages planning decisions that enable the expansion of electronic communications networks, including next generation mobile technology and full fibre broadband. The provision of gigabit-ready infrastructure at the point of build is fully consistent with national objectives for digital infrastructure and future-proofing.
- 9.123. The development fully complies with Policy JP-C 2 (Digital Connectivity), which requires all new development to be served by full-fibre gigabit-capable infrastructure from the outset. The inclusion of both Openreach FTTP and Virgin Media cabling ensures a high level of choice and resilience, and the use of Cat 6 internal wiring and ducting supports the delivery of future digital upgrades without disruption.

10. Conclusion

- 10.1. This application seeks full planning permission for the redevelopment of the Spurr House site to deliver 60 high-quality, 100% affordable apartments in a sustainable and accessible location. The proposals represent the efficient reuse of previously developed land, bringing forward a deliverable scheme that responds directly to Bury's acute and worsening affordable housing need.
- 10.2. The development has been carefully designed to align with national, regional, and local planning policy objectives. It supports the aims of the NPPF by significantly boosting the supply of affordable housing, making effective use of brownfield land, and delivering a well-designed, sustainable development that promotes social inclusion.
- 10.3. At the regional level, the scheme accords with the Places for Everyone Joint Development Plan, including Policy JP-H4 (Affordable Housing) and Policy JP-S2 (Sustainable and Resilient Places). It contributes to the ambition of achieving carbon neutrality across Greater Manchester by 2028, incorporating a robust package of sustainability measures in line with the energy hierarchy.
- 10.4. Locally, the proposals support the overarching objectives of Bury's development strategy by providing homes in a location well served by existing infrastructure, services, and public transport. Technical assessments confirm there are no unacceptable impacts in relation to highways, drainage, ecology, noise, or design.
- 10.5. In light of the substantial planning benefits of the scheme, particularly the delivery of 60 much-needed affordable homes, the proposal represents sustainable development and should be approved without delay in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the presumption in favour of sustainable development set out in paragraph 11 of the NPPF.

Appendix 1



01	Location Plan
0001	Scale 1:1250 @ A4

General Notes
01: Dimensions must not be scaled from this drawing. If in doubt, please ask.
02: All dimensions are in millimetres unless noted otherwise.
03: All dimensions should be verified on site before proceeding with the work.
04: TADW Architects shall be notified in writing of any discrepancies.
05: © TADW Limited (UK) 2015

Legend

P2	Site edged red shown and highway access work areas incl. Area updated	28.01.25	AM	MH
P1	Issued for comment	22.11.24	AM	MH
Issue	Description	Date	Drawn	Checked

Drawing Status
P - Planning | T - Tender | C - Construction | R - As Record

For Approval



Six St Petersgate Stockport Cheshire SK1 1HD
Ph 0161 477 6158 Fx 0161 480 8342 mail@tadw.co.uk www.tadw.co.uk

Client Watson Homes

Job Pole Lane Bury

Title Location Plan

Scale 1:1250 @ A4

Note - Prints from PDF files may not be to scale, check accuracy against scale

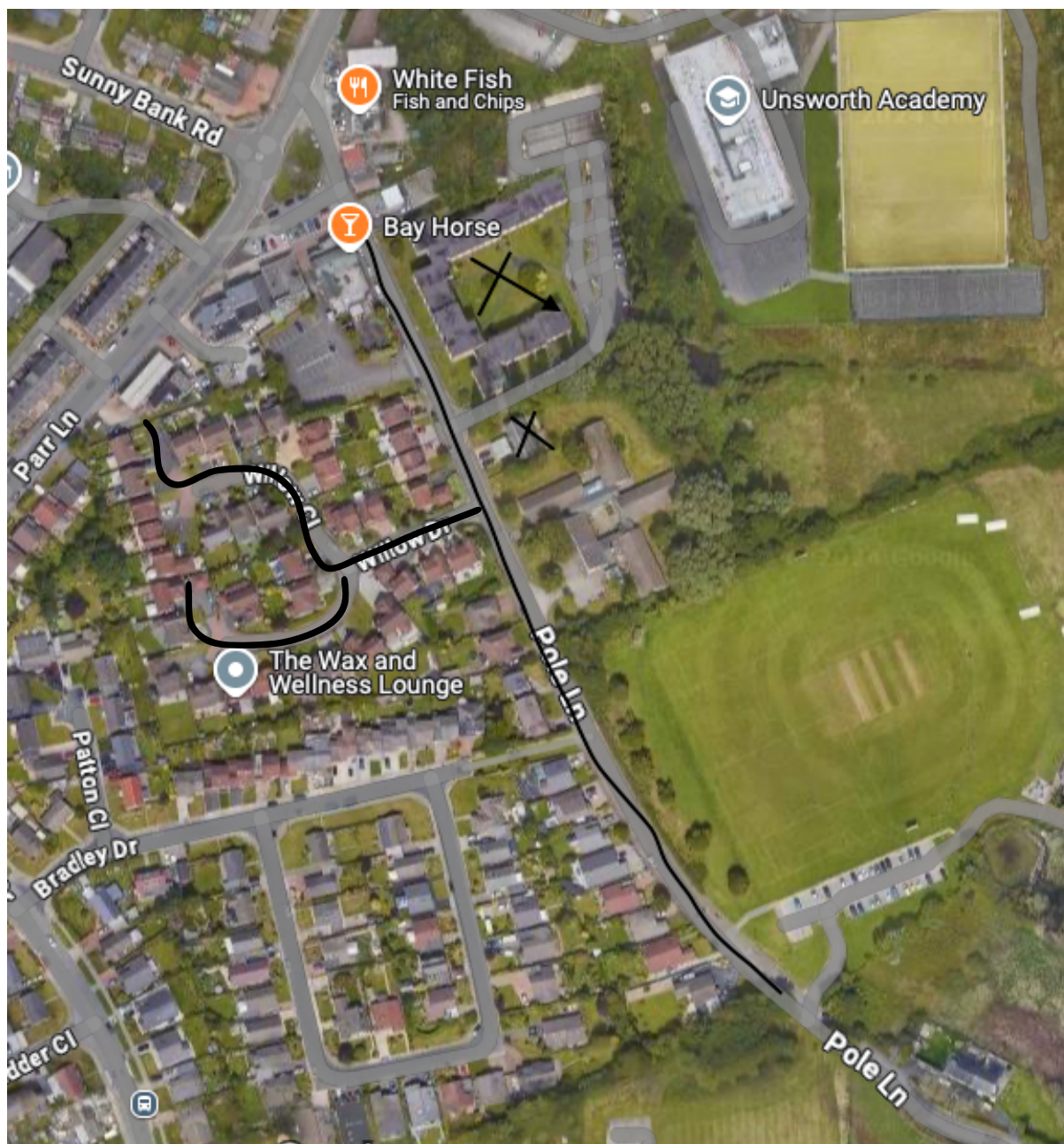
10m	20m	40m	60m
1:1250			

Job No.	Originator	Ph.	Level	View	Role	Dwg	Status	Rev.
241352-TADW-	00-	XX-	DR-	A-	0001-	P-	2	

Appendix 2



Appendix 3



Appendix 4



«Address_1» «Address_2»
«address_3»
«Address_4»
«Address_5»
«Postcode»

17 January 2025

Dear Resident

REDEVELOPMENT OF LAND AT SPURR HOUSE, POLE LANE, BURY

We write to advise you of our intention to submit a full planning application for the redevelopment of the former Spurr House care home.

The care home closed in 2021 and since then, the building has been lying empty.

The proposal would deliver 60 residential homes, over two blocks of apartments. The development includes the relocation of the site access further south on Pole Lane, 63 parking spaces and associated landscaping. The layout has been carefully considered to ensure sufficient separation distances from existing residential properties and to enable the retention of as many trees as possible. We enclose a copy of the site layout with this letter.

Block A will be three storeys and Block B will be part three, part four storey. The buildings will be finished in red brick, with grey brick accents and a flat roof. The apartments will have balconies, with ground floor apartments provided with an external patio area.

The apartments will be for a range of affordable tenures such as shared ownership or rent to buy, and will be delivered with one of our affordable housing partners.

The site is located within the settlement boundary and is previously developed. National planning policy encourages the redevelopment of brownfield sites, such as this one.

Should you have any comments regarding the scheme that you wish to share, we would welcome your thoughts via email to hello@focustownplanning.co.uk.

Yours faithfully

Watson



FOCUS

TOWN PLANNING

Focus Town Planning Limited

Company registration: 15537251

Egerton House, Towers Business Park, Wilmslow Road, Didsbury, M20 2DX