

Examination of the Places for Everyone (PfE) Joint DPD

IN11: Matters, Issues and Questions relating to Green Belt additions

Introductory note in respect of principle of Green Belt additions

1. Please also see paragraphs 1-3 or our Matter 25 statement (Green Belt additions in Bolton).

Matter 26: Green Belt additions – Bury

Issue 26.8. GBA10 Crow Lumb Wood

Q26.8. Are there exceptional circumstances to justify adding 13.7 ha of land north of Crow Lumb Wood to the Green Belt? In particular:

- a) What are the major changes in circumstances since the existing Green Belt boundary was defined in this location that make the adoption of this exceptional measure necessary?
- b) Is Ramsbottom an “historic town” as referred to in NPPF 138?
- c) Would including the site in the Green Belt prevent the effective use of the land for recreational activities?
- d) Why would national policy and local plan policies relating to heritage assets, green infrastructure, open space and countryside not be adequate including having regard to topography and flood risk constraints?

1. No.
2. Exceptional circumstances to justify a proposed addition to the Green Belt (GB) have not been “fully evidenced and justified” as required by NPPF140. As the plan within document 07.01.11¹ clearly shows the site is within the built-up area of Ramsbottom. Peel considers that the justification put forward for addition of this land to the GB is flawed for the reasons set out in its representations².

Q26.8a)

3. There are no material changes in circumstances which justify adding this site to the GB and none are identified within the PfE’s evidence base.
4. On the contrary, and as the Green Belt Topic Paper (07.01.25[Appendix 1]) confirms, compelling exceptional circumstances justify the **removal** of land from the GB to meet development needs. To illustrate: in the time since this land was excluded from the GB in 1984³ housing needs in Bury have almost trebled from c.266⁴ to the current Local Housing Need of 734⁵ homes per year.

¹ 56th page of PDF (no internal pagination)

² Regulation 19 Representations, Paper 3, Table 8.4 (GMCA Consultation Portal Comment ID PfE5116)

³ The Greater Manchester Green Belt Local Plan, Greater Manchester Council (1984)

⁴ The Greater Manchester Strategic Planning Framework (Department of Environment; 1989) set a minimum increasing in the housing stock of Bury of 4,000 dwellings between 1986 and 2001; an average of 266 per annum

⁵ Standard method requirement plus 20% buffer

5. The Green Belt Topic Paper (07.01.25[Appendix 3 pages 13/14]) provides no evidence of any change of circumstances affecting the site that justifies addition of the land to the GB. It states the addition of the site to the GB is “*an opportunity to give the land greater protection*”. Affording “*greater protection*” is not an exceptional circumstance on a correct interpretation of NPPF140. That is merely a statement of the effect of the policy, *after* designation.
6. Given the significant need for more homes, the land should be retained outside the Green Belt in order that any potential it has to contribute to meeting those or other needs can be objectively assessed including through a future local plan.

Q26.8b)

7. No.
8. In order to be regarded as a “historic town” for the purposes of GB policy a settlement must be of particular and specific historic quality. While Ramsbottom has historic interest, it does not meet this requirement.
9. Ramsbottom is identified as a historic town in the Stage 2 Green Belt Additions Assessment (07.01.11). This parcel is identified as being “*theoretically visible from the historic settlement*” (07.01.11[Appendix A:58th page of PDF]) and making a “*strong*” contribution to preserving the setting and special character of historic towns⁶.
10. These assessments are not based on any robust analysis and as explained further in Peel’s earlier representations⁷ are highly subjective. There is no analysis of the town’s special character; its setting; or the extent to which the setting contributes to its character. LUC’s conclusion appears to be based entirely on the adjacency of the site and the Ramsbottom Conservation Area, the special interest and setting of which is protected by other local and national policies.

Q26.8c)

11. No.
12. The inclusion of the land within the GB would have no impact on any current or future recreational activity on the site but may constrain proposals for built development.

Q26.8d)

13. Existing national and local plan policies provide a robust framework for controlling future development of the site. The Green Belt Topic Paper (07.01.25 [Appendix 3]) mentions that several policies apply to the site and provide appropriate protection of certain features of the site. In particular, part of the site is an SBI, and the site is currently identified in the Bury UDP as a Special Landscape Area (UDP Policy EN9/1) and is also subject to the Wildlife Links and Corridor designation (UDP Policy EN6/4). It is proposed to be designated as part of a “River Valley” under Policy JP-G 3. Criterion 1 of Policy JP-G 3 seeks to retain the “open character” of

⁶ 07.01.11 Stage 2 Green Belt Additions Assessment, LUC, 2020, Table 1

⁷ Regulation 19 Representations, Paper 2, paragraphs 9.88-9.89 (GMCA Consultation Portal Comment ID: PFE5167)

the river valleys. These policies would apply appropriate protection of valued features of the site while not precluding it making a sustainable contribution to meeting development needs.

Modification requested

14. Delete Green Belt addition GBA10 from Appendix B (Picture B2, Page 410), (Table B1, Page 411) and (Picture B12).

Word count 767/1,000

Issue 26.9. GBA11 Nuttall West, Ramsbottom

Q26.9. Are there exceptional circumstances to justify adding 0.4 ha of land north of Nuttall West, Ramsbottom to the Green Belt? In particular:

- a) What are the major changes in circumstances since the existing Green Belt boundary was defined in this location that make the adoption of this exceptional measure necessary?
- b) Why would national policy and local plan policies relating to green infrastructure, open space and countryside not be adequate?

- 15. No.
- 16. Exceptional circumstances to justify a proposed addition to the GB have not been “fully evidenced and justified” as required by NPPF140. As the plan within document 07.01.11⁸ shows the site is within the built-up area of Ramsbottom. Peel considers that the justification put forward for addition of this land to the GB is flawed for the reasons set out in its representations⁹.
- 17. The following additional points are made in respect of each of the specific parts of Q26.9.

Q26.9a)

- 18. There are no material changes in circumstances to justify adding this site to the GB and none are identified within the PFE’s evidence base.
- 19. On the contrary, and as the Green Belt Topic Paper (07.01.25[Appendix 1]) confirms, compelling exceptional circumstances justify the **removal** of land from the GB to meet development needs. To illustrate: in the time since this land was excluded from the GB in 1984¹⁰ housing needs in Bury have almost trebled from c.266¹¹ to the current Local Housing Need of 734¹² homes per year.
- 20. The Green Belt Topic Paper (07.01.25[Appendix 3] pages 14/15) provides no evidence of any change of circumstances affecting the site that warrants GB protection. It states the addition of the site to the GB is “an opportunity to give the land greater protection”. Affording “greater protection” is not an exceptional circumstance on a correct interpretation of NPPF140. That is merely a statement of the effect of the policy, *after* designation.
- 21. Given the significant need for more homes the land should be retained outside the Green Belt in order that any potential it has to contribute to meeting those needs can be objectively assessed including through a future local plan.

⁸ 60th page of PDF (no internal pagination)

⁹ Regulation 19 Representations, Paper 3, Table 8.6 (GMCA Consultation Portal Comment ID: PFE5116)

¹⁰ The Greater Manchester Green Belt Local Plan, Greater Manchester Council (1984)

¹¹ The Greater Manchester Strategic Planning Framework (Department of Environment; 1989) set a minimum increasing in the housing stock of Bury of 4,000 dwellings between 1986 and 2001; an average of 266 per annum

¹² Standard method requirement plus 20% buffer

Q26.9b)

22. Existing national and local plan policies provide a robust framework for controlling future development of the site. The Green Belt Topic Paper (07.01.25 [Appendix 3]) mentions that several policies apply to the site and provide appropriate protection of certain feature of the site. In particular, the site is an SBI and is currently identified in the Bury UDP as Special Landscape Area (UDP Policy EN9/1), Wildlife Links and Corridor (UDP Policy EN6/4) and for Protected Recreation Provision (UCP Policy RT1/1). These policies would apply appropriate protection valued features of the site while not precluding it making a sustainable contribution to meeting development needs.

Modification requested

23. Delete Green Belt addition GBA11 from PfE Appendix B (Picture B2, Page 410), (Table B1, Page 411) and Picture B13.

Word count 482/1,000

Issue 26.11. GBA13 Nuttall East, Ramsbottom

Q26.11. Are there exceptional circumstances to justify adding 1.0 ha of land at Nuttall East, Ramsbottom to the Green Belt? In particular:

- a) What are the major changes in circumstances since the existing Green Belt boundary was defined in this location that make the adoption of this exceptional measure necessary?
- b) The extent to which it fulfils the purposes of the Green Belt having regard to the strength of the existing green belt boundary.
- c) Why would national policy and local plan policies relating to green infrastructure, open space and countryside not be adequate?

24. No.

25. Exceptional circumstances to justify a proposed addition to the GB have not been “fully evidenced and justified” as required by NPPF140. Peel considers that the justification put forward for addition of this land to the GB is flawed for the reasons set out in its representations¹³.

Q26.11a)

26. There are no material changes in circumstances to justify adding this site to the GB and none are identified within PFE’s evidence base.

27. On the contrary, and as the Green Belt Topic Paper (07.01.25[Appendix 1]) confirms, compelling exceptional circumstances justify the *removal* of land from the GB to meet development needs. To illustrate: in the time since this land was excluded from the GB in 1984¹⁴ housing needs in Bury have almost trebled from c.266¹⁵ to the current Local Housing Need of 734¹⁶ homes per year.

28. The Green Belt Topic Paper (07.01.25 [Appendix 3 pages 17/18]) provides no evidence of any change of circumstances for the site that warrants GB protection. It states the addition of the site to the GB is “*an opportunity to give the land greater protection*”. Affording “greater protection” is not an exceptional circumstance on a correct interpretation of NPPF140. That is merely a statement of the effect of the policy, *after* designation.

29. Given the significant need for more homes, the land should be retained outside the Green Belt in order that any potential it has to contribute to meeting those needs can be objectively assessed including through a future local plan.

¹³ Regulation 19 Representations, Paper 3, Table 8.8 (GMCA Consultation Portal Comment ID: PFE5116)

¹⁴ The Greater Manchester Green Belt Local Plan, Greater Manchester Council (1984)

¹⁵ The Greater Manchester Strategic Planning Framework (Department of Environment; 1989) set a minimum increasing in the housing stock of Bury of 4,000 dwellings between 1986 and 2001; an average of 266 per annum

¹⁶ Standard method requirement plus 20% buffer

Q26.11b)

30. The existing GB boundary, as set by the 1984 Green Belt Local Plan, is currently marked by the edge of dense woodland, which slopes steeply downwards away from the site, and the existing settlement area to the west. These are readily recognisable boundaries, defined by physical features that are likely to be permanent.
31. The Stage 2 Green Belt Study (07.01.11 [page 69]) indicates that the site makes a strong contribution to GB purpose 1 (check the unrestricted sprawl of large built-up areas), a weak contribution to purpose 2 (prevent neighbouring towns from merging), a moderate contribution to purpose 3 (assist in safeguarding the countryside from encroachment) and no contribution to purpose 4 (preserving the setting and special character of historic towns).
32. Peel disagrees with the findings of the Green Belt Study and considers that the site performs weakly against the purposes of the GB¹⁷. In particular, as a result of the existing strong defensible GB boundaries and the site's topographical features, the site is visually and physically separate from the countryside areas to the south. These features would prevent the existing built-up area from further sprawl and encroachment of the built-up area into the countryside. Given its small size, the site plays no purpose in preventing Ramsbottom from merging with Bury due to the large expanse of GB beyond the site.

Q26.11c)

33. Existing national and local plan policies provide a robust framework for controlling future development of the site. The Green Belt Topic Paper (07.01.25 [Appendix 3]) mentions that several policies apply to the site and provide appropriate protection of certain feature of the site. In particular, the site is an SBI and is currently identified in the Bury UDP as Special Landscape Area (UDP Policy EN9/1), Wildlife Links and Corridor (UDP Policy EN6/4) and for Protected Recreation Provision (UCP Policy RT1/1). These policies would apply appropriate protection valued features of the site while not precluding it making a sustainable contribution to meeting development needs.

Modification requested

34. Delete Green Belt addition GBA13 from Appendix B (Picture B2, Page 410), (Table B1, Page 411) and (Picture B15).

Word count 680/1,000

¹⁷ Regulation 19 Representations, Paper 3, Table 8.5 (GMCA Consultation Portal Comment ID XXX)

Issue 26.13. GBA15 Broad Hey Wood North

Q26.13. Are there exceptional circumstances to justify adding 9.1 ha of land at Broad Hey Wood North to the Green Belt? In particular:

- a) What are the major changes in circumstances since the existing Green Belt boundary was defined in this location that make the adoption of this exceptional measure necessary?
- b) Is Ramsbottom an “historic town” as referred to in NPPF 138?
- c) Why would national policy and local plan policies relating to heritage assets, ancient woodland, green infrastructure, open space and countryside not be adequate?

35. No.
36. Exceptional circumstances to justify a proposed addition to the GB have not been “fully evidenced and justified” as required by NPPF140. As the plan within document 07.01.11¹⁸ shows the site is within the built-up area of Ramsbottom. Peel considers that the justification put forward for addition of this land to the GB is flawed for the reasons set out in its representations¹⁹.

Q26.13a)

37. There are no material changes in circumstances to justify adding this site to the GB and none are identified within PFE’s evidence base.
38. On the contrary, and as the Green Belt Topic Paper (07.01.25[Appendix 1]) confirms, compelling exceptional circumstances justify the *removal* of land from the GB to meet development needs. To illustrate: in the time since this land was excluded from the GB in 1984²⁰ housing needs in Bury have almost trebled from c.266²¹ to the current Local Housing Need of 734²² homes per year.
39. The Green Belt Topic Paper (07.01.25 [Appendix 3 pages 20-22]) provides no evidence of any change of circumstances for the site that warrants GB protection. It states the addition of the site to the GB is “an opportunity to give the land greater protection”. Affording “greater protection” is not an exceptional circumstance on a correct interpretation of NPPF140. That is merely a statement of the effect of the policy, *after* designation.
40. Given the significant need for more homes the land should be retained outside the GB in order that any potential it has to contribute to meeting those needs can be objectively assessed including through a future local plan.

Q26.13b)

41. No. See response to Q26.8b) above.

¹⁸ 76th page of PDF (no internal pagination)

¹⁹ Regulation 19 Representations, Paper 3, Table 8.10 (GMCA Consultation Portal Comment ID: PFE5116)

²⁰ The Greater Manchester Green Belt Local Plan, Greater Manchester Council (1984)

²¹ The Greater Manchester Strategic Planning Framework (Department of Environment; 1989) set a minimum increasing in the housing stock of Bury of 4,000 dwellings between 1986 and 2001; an average of 266 per annum

²² Standard method requirement plus 20% buffer

Q26.13c)

42. Existing national and local plan policies provide a robust framework for controlling future development of the site. The Green Belt Topic Paper (07.01.25 [Appendix 3]) mentions that several policies apply to the site and provide appropriate protection of certain feature of the site. In particular, the site is an SBI and is currently identified in the Bury UDP for Protected Recreation Provision (UCP Policy RT1/1). These policies would apply appropriate protection valued features of the site while not precluding it making a sustainable contribution to meeting development needs. It is proposed to be designated as part of a “River Valley” under Policy JP-G 3. Criterion 1 of Policy JP-G 3 seeks to retain the “open character” of the river valleys. These policies would apply appropriate protection valued features of the site while not precluding it making a sustainable contribution to meeting development needs.

Modification requested

43. Delete Green Belt addition GBA15 from Appendix B (Picture B17, Page 410), (Table B1, Page 411) and (Picture B17).

Word count 511/1,000