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1 Introduction

Overview

- 1.1 To help explain the Greater Manchester Spatial Framework (GMSF), a series of Topic Papers has been prepared to set out the reasons for the policies in the draft GMSF.
- **1.2** Each Topic Paper summarises and cross-references:
 - The relevant evidence and explains how this has informed the draft GMSF;
 - The 2016 consultation comments that are relevant to the topic.
 - The recommendations of the Integrated Assessment, that seeks to ensure the GMSF is sustainable and promotes equality.
- **1.3** The Topic Papers explain how the draft GMSF policies and allocations have been derived based on the evidence, consultation comments and Integrated Assessment.
- 1.4 The Greater Manchester Combined Authority has chosen to prepare Topic Papers to be transparent in how the GMSF has been prepared and to provide a more understandable summary of the background technical information.

What is the GMSF?

- 1.5 The GMSF is a joint plan of all ten local authorities in Greater Manchester, providing a spatial interpretation of the Greater Manchester Strategy which will set out how Greater Manchester should develop over the next two decades up to the year 2037. It will:
 - Identify the amount of new development that will come forward across the 10 districts, in terms of housing, offices, and industry and warehousing, and the main areas in which this will be focused.
 - Ensure we have an appropriate supply of land to meet this need.
 - Protect the important environmental assets across the conurbation.
 - Allocate sites for employment and housing outside of the urban area.
 - Support the delivery of key infrastructure, such as transport and utilities.
 - Define a new Green Belt boundary for Greater Manchester.

2 Policy context

National Planning Policy Framework

2.1 The latest NPPF was published in July 2018. Paragraph 11 tells us that plans should apply a presumption in favour of sustainable development and sets out that a plan's strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless certain criteria are met.

- **2.2** Chapter 13 covers 'Protecting Green Belt land'. Paragraph 134 sets out the five purposes of Green Belt:
 - To check the unrestricted sprawl of large built-up areas;
 - To prevent neighbouring towns merging into one another;
 - To assist in safeguarding the countryside from encroachment;
 - To preserve the setting and special character of historic towns;
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- **2.3** With respect to taking a decision to alter Green Belt boundaries already established, Paragraph 136 tells us that:
 - Boundaries should only be altered where exceptional circumstances are fully evidenced and justified, with a view to their intended permanence in the long term and so they can endure beyond the plan period. Detailed amendments may be made through non-strategic policies including neighbourhood plans (Paragraph 136).
 - Before concluding that exceptional circumstances exist to justify changes, other
 reasonable options for meeting identified needs should have been examined fully
 including making full use of suitable brownfield sites, optimising the density of
 development and having regard to discussions with neighbouring authorities about
 whether they accommodate some of the identified need (Paragraph 137).
 - Other factors should be taken into account such as the need to promote sustainable patterns of development and the consequences for sustainable development of diverting development inside or outside of the Green Belt boundary (Paragraph 138).
- 2.4 Once concluded that it is necessary to release Green Belt, Paragraph 138 tells us plans should give first consideration to land which has been previously-developed and/or is well-served by public transport and should also set out ways in which release can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.
- 2.5 When defining Green Belt boundaries, Paragraph 139 gives us six measures to satisfy including the need to ensure land is not included for which it is unnecessary to keep permanently open and the requirement to use boundaries that use physical features that are readily recognisable and likely to be permanent.
- 2.6 Once boundaries have been defined, Paragraph 141 notes that local authorities should plan positively to enhance a Green Belt's beneficial use and includes examples such as providing opportunities access or for visual amenity and biodiversity.
- **2.7** Elsewhere in the NPPF, Green Belt is referred to within Chapter 5 'Delivering a sufficient supply of homes'. Paragraph 72 tells us that:

- The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns.
- There are a number of caveats such as the need to be well-located, supported by the necessary infrastructure and facilities, where there are opportunities presented by planned investment and an area's economic potential and scope for net environmental gains.
- In selecting locations, it should be considered whether it is appropriate to establish Green Belt around or adjoining developments of significant size.

3 Summary of evidence

Greater Manchester Green Belt Assessment (2016)

- 3.1 LUC produced a report in July 2016 which included an assessment of the Green Belt within Greater Manchester. The overall aim of the study is to provide an objective, evidence-based and independent assessment of how the Greater Manchester Green Belt contributes to the five purposes of Green Belt, as set out in Paragraph 134 of the NPPF (see policy context).
- 3.2 It includes an assessment against the purposes of:
 - The individual 'parcels' and broad strategic areas that make up the existing Green Belt;
 - Potential additional areas of land that currently lie outside the Green Belt, to help understand whether they could be added to the Green Belt.
- 3.3 The report clarifies that a Green Belt Assessment is not a Green Belt Review which looks at the need for areas to be removed or added to the Green Belt and requires an Assessment to inform judgements to be made on the amount and location of land to be added or removed. The section 'Further work required' at the end of this paper acknowledges that this work is yet to be completed and provides more detail.
- 3.4 The parcels were rated against five policy ratings of 'Strong', 'Moderate', 'Weak', 'No Contribution' and 'Not Applicable'. Purpose 1 (checking the unrestricted sprawl of large built-up areas) was split into 2 categories of 1a (Evidence of existing urban sprawl) and 1b (Protection of open land from potential for urban sprawl). A decision was made to discount Purpose 5 (assisting urban regeneration by encouraging the recycling of derelict and other open land) from the assessment as it was judged to be difficult to distinguish the extent to which each parcel delivers against the purpose and the results would be unreliable.
- 3.5 The report also assesses the performance of sites that are currently not in the Green Belt against the purposes to ascertain whether they are suitable for inclusion within the Green Belt. This exercise was later expanded to look at more sites in 2018 (see below).

- 3.6 The parcel ratings are presented in the report on a district-by-district basis with supporting justifications and maps provided in the appendices. It was found that all parcels in the Greater Manchester Green Belt meet at least one purpose. The report concludes that the Green Belt plays an important role in:
 - Restricting unplanned development due to the complex urban form of Greater Manchester resulting from its historical development and growth of a series of industrial towns:
 - Ensuring that cities, towns and smaller settlements retain their identity by preventing further coalescence, particularly the narrow corridors of open land that separate one town from the next;
 - Maintaining the openness of the countryside around and within the conurbation providing an important landscape, recreational and ecological resource;
 - Protecting the setting and character of towns and cities that grew during the Industrial Revolution which, whilst not always recognised as being of historic importance, represent an important era in British history. In many places the Green Belt helps to protect the setting of the historic cores despite continued growth in the 20th and 21st centuries.

Greater Manchester Assessment of Proposed Additions (2018)

- 3.7 LUC were commissioned to followed up the July 2016 report with an additional assessment in 2018 of a further set of potential additions to the Green Belt. The 2016 report examined the performance of 58 areas of land not currently in the Green Belt, and this follow-up report used the same assessment methodology to consider another 32 areas of land against the purposes in the NPPF.
- 3.8 The section on 'Minimising the release of Green Belt' sets this out in more detail and Appendix 1 details the results of the assessments for each proposed addition, whether from 2016 or 2018.

4 Summary of consultation

2016 Consultation comments on Policy GM13

- 4.1 A large proportion of the comments received in response to public consultation on the 2016 Draft GMSF were in relation to proposals for release of Green Belt land for development, the majority of these being in opposition.
- 4.2 The issues raised were broad in scope and ranged from an in-principle objection to loss of Green Belt and concern that there are conflicts with current Green Belt policy to specific comments on proposed additions to the Green Belt and suggested amendments to the wording of Policy GM13.
- **4.3** These comments are summarised below according to the issue raised.

Objection to the principle of Green Belt loss

4.4 There should be no net loss of Green Belt as the decision cannot be reversed. The proposals conflict with existing national planning policy and proposed draft policy GM13 and would result in a disproportionate scale of release in some areas and this is at odds with the permanence the designation of Green Belt is supposed to represent. The population forecasts cannot be relied upon. The process has been developer-led.

Other alternatives should be considered first

- **4.5** Vacant and derelict brownfield sites should be prioritised and the proportion of the land supply that is brownfield needs to be increased up to 80-90%. More should be done to remove obstacles that prevent brownfield sites coming forward.
- 4.6 Greenfield land in peripheral locations is not the answer, growth is required to support city centres. Better use should be made of existing land and property i.e. multiple occupancy, exploring higher densities. There are large numbers of empty properties in inner urban areas that can be used. Land with planning permission should be built out first.

Contrary to Government policy / legislation

4.7 Exceptional circumstances do not exist, housing growth and increased economic activity are not sufficient reasons alone. The proposals are contrary to NPPF Green Belt policy, recent Government announcements and Ministerial Statements on protecting Green Belt, and the approach is in breach of UK and EU Habitat Directives.

Conflicts with purposes of Green Belt

- 4.8 The proposals will encourage sprawl and result in no separation between urban areas, therefore being contrary to Green Belt purposes of checking unrestricted urban sprawl of built-up areas, preventing neighbouring towns from merging and safeguarding the countryside from encroachment.
- 4.9 More detail is required in respect of quantifying and describing the areas to be lost, and ensuring the resultant pockets of land are not fragmented and vulnerable to development pressure. The remaining Green Belt should be protected and enhanced.

In support of Policy GM13

4.10 Support from the development industry for Green Belt release, particularly housebuilders, who believe that the GMSF is the right mechanism to do this. Exceptional circumstances exist to release Green Belt to meet needs that will arise to up to 2035 and beyond. Family housing is lacking in areas where people wish to live and there is land available to meet the shortfall with existing infrastructure in place.

- **4.11** Some support and recognition of the approach of releasing a relatively small number of larger sites which can complement the infrastructure and facilities required, as opposed to incremental development of smaller sites, as this provides for a simpler plan-led system. The GMSF allows for planned release of sites as opposed to planning by appeal.
- 4.12 Loss of Green Belt is better than the alternative which is use of land in national parks and city parks. If release is necessary, proposals should be sensitive to the need to retain what is valuable about Green Belt, ensuring development does not cause wider harm to openness.

Suggested amendments to Policy GM13

- **4.13** The following references are incorrect or require further work:
 - The 8.2% net reduction in Green Belt relates to GM whereas the Green Belt extends to non-GM areas and so this figure overplays the proportion to be lost.
 - Figure 16.2 does not show the proposed deletion at OA12.
- 4.14 The policy should include reference to the exceptions contained within Paragraph 89/90 of the NPPF, safeguarded land, the potential for Green Belt release to enhance existing supply and address adjacent brownfield sites which may be difficult to bring forward on their own. A separate policy should also be prepared covering smaller sites in the Green Belt that could aid delivery in the short term to introduce more flexibility. The policy should be supported by a schedule of mapping of the land to be lost, outlining its existing use and significance.
- **4.15** In regard to Green Belt boundaries, this should include locations adjacent motorways to protect residents from adverse effects of vehicle pollution. The proposed allocations should include retained corridors of Green Belt that link with adjacent areas to ensure continuity.
- **4.16** Clarification is required on the following:
 - GMCA's commitment to Green Belt protection given the significant proposed releases;
 - Whether proposed alterations to Green Belt will need to be ratified or supplemented by alterations in Local Plans within districts;
 - What alternative approaches have been considered such as smaller sites on the edge of settlements.

Proposed additions to the Green Belt

4.17 There were many comments in support of West Salford Greenway from residents and Councillors as it was viewed that the site is integral to the community, it prevents urban sprawl, is a vital green lung and provides protection/preserves the setting of adjacent

historical areas of importance. The site is subject to a full Public Inquiry and landowners Peel Holdings object as it is unjustified, parts of the site can meet housing needs and there is local evidence that links to the Green Belt are tenuous.

- 4.18 The proposed addition at Standish attracted support from local residents who view this as being crucial in the face of considerable development pressure in the area. Recreational facilities for prospective residents would be protected and the proposal would allow for a more defensible boundary. Morris Homes object due to a perceived lack of explanation or justification and because it does not take into account local housing needs or the value of the countryside being protected. Standish is not proposed for Green Belt release and so it is not clear how this compensates residents affected by releases in other areas within the district.
- **4.19** Roch Valley was supported as a Green Belt addition as it will help to protect and maintain a network of habitats.

Other general comments

4.20 Farming activities should continue to take priority in Green Belt. Planning policies for farming should promote diversification opportunities that help support productive farm businesses.

Specific comments from individuals and organisations not already raised

- **4.21** Councillor Western noted that the allocations identified have significant potential as areas capable of delivering much needed housing and substantial economic growth. The Tameside Green Party criticised the focus on a small number of large releases and queried how they 'maximise sustainability'.
- **4.22** The following interest groups raised objections to the policy:
 - The Campaign to Protect Rural England: More ambitious targets for protection and enhancement are required, priorities should be to save existing and create new Green Belt. A strategy for the positive use of Green Belt is required, there is scope for providing for informal recreation close to the conurbation.
 - Friends of the Earth: Failure to consider reasonable alternatives and there is a lack of robust evidence. New development should be in locations that reduce greenhouse emissions.
 - Forestry Commission: Quality not quantity approach required to ensure Green Belt is managed effectively in the long-term.
 - National Farmers Union: Loss of productive farmland undermines the contribution that GM can make to its own food security, flood risk and recreation. Some land loss may be appropriate where economically viable.
 - Manchester Climate Change Agency: Proposals are inconsistent with policy objectives and commitments in other GM policy documents.

- 4.23 In respect of comments from local authorities, High Peak Borough Council were concerned that the proposed scale and distribution of growth and proposed release of land from Green Belt is premature as the GMSF should be informed by a comprehensive Green Belt Review. Such a review is important as High Peak share Green Belt with Stockport and Tameside Councils.
- 4.24 The general consensus from the development industry is that the principle of Green Belt release to meet needs was supported, and that exceptional circumstances exist, however the amount of land that needs to be released has been substantially under-estimated. Safeguarded land should be identified to aid deliverability, a minimum requirement would be to provide a similar amount of safeguarded land as that which is to be released in the plan period, as at Cheshire East. The Home Builders Federation argued that without additional releases the amount of new development that could be planned would be low and would lead to significant over-reliance on neighbouring authorities to meet unmet needs which are not in a position to do so.

2016 consultation comments on the Green Belt Assessment

Criticism of the methodology

4.25 The parcels are too large and this overlooks the importance and contribution of smaller sites, giving misrepresentative and inaccurate conclusions. The assessment could go further and assess whether one purpose is more important than another and does not offer further details on how scores have been determined. Land currently safeguarded has not been assessed through a systematic or independent process. The definition of sprawl is not considered to be justified and is there is a conflict between it and the fact that areas adjacent to the urban area may present the most sustainable options for development. The 5th purpose of assisting in urban regeneration by encouraging the recycling of derelict and other urban land should not have been discounted, as analysis could have been provided at Borough level or more detailed levels of the extent of available and suitable brownfield sites in the area. Committed road schemes and associated development such as the Manchester Airport Relief Road will change the ratings of some parcels and these should be reviewed.

Conflict between evidence and proposed allocations

4.26 The assessment against purposes suggests that some parcels should not be developed and concerns are raised that the Draft GMSF appears to have proposed their release without sufficient regard to this evidence. Further discussion or assessments would be welcomed that properly outline how the allocations can be developed without causing harm to the Green Belt. Development on parcels scoring as strong sets a precedent for further consideration of other parcels for development in future.

Comments on proposed allocations and Call for Sites

4.27 Some comments received on the proposed allocations at OA20 Woodford and NG3 Junction 21 M62 with reference to the assessment conclusions. Other comments received on proposed allocations at OA2 Elton Reservoir, OA24 Sidebottom Fold and NG1A & B Northern Gateway with no reference to the assessment. Objections lodged on a range of Call for Sites suggestions also received citing the assessment against purposes.

Administrative comments on report

4.28 Comments highlighting spelling errors within the appendices relating to settlements and inconsistencies such as references to locations that are not relevant to the parcel in question. Concern that this calls into question the accuracy of the wider GMSF.

How outputs from the assessment should be used

4.29 Some suggestions that selected Green Belt parcels should be considered further for development as the land is unused or has a limited contribution to make towards purposes. Other comments stated that no parcels should be developed whether it is land subject to a proposed allocation or land not within a proposed allocation. Parcels with strong ratings should be retained unless there are overriding reasons for not doing so e.g. no land in vicinity with lower rating. Other comments suggested that revisions to the boundary should be made based on the results and that parcels should be developed for appropriate Green Belt uses rather than be unused.

How the assessment can be progressed by further evidence

- 4.30 A Green Belt Review has not been undertaken and this is required to justify the site selection process and demonstrate the GMSF has been positively prepared in accordance with the NPPF. The review should be independent, should focus on the proposed allocations and Call for Sites suggestions, and should assess the appropriateness of removing and adding land to the Green Belt including their boundaries against the purposes prior to a test of suitability and deliverability. This will ensure enough land is released to meet identified needs.
- 4.31 A comprehensive assessment of non-Green Belt land is required to determine whether it might justify inclusion within the Green Belt, with subsequent decisions on sites then informed by other planning issues in a logical and transparent process.
- **4.32** An assessment of value of Green Belt land is essential to understand which parts can be developed without detriment to the overall benefit of retaining Green Belt.

Wider issues of releasing Green Belt to meet needs

4.33 Concern about Green Belt land adjacent proposed allocations as there is a need to prevent further urban sprawl and over-development on land forming important green gaps between existing communities and potential communities.

4.34 Where Green Belt includes recreational land uses alongside industrial and commercial uses that can be protected through other policies under Paragraph 74 of the NPPF, these should be critically examined to assess whether their designation of Green Belt withstands detailed scrutiny, as their retention is contrary to the purpose of recycling derelict land and creates pressure for ad hoc release of Green Belt outside the area and planning by appeal.

Specific comments from organisations not already raised

- **4.35** The following expressed support for the assessment:
 - Chorley Council: Welcomes the assessment and, where appropriate, the redesignation of boundaries. No changes in Bolton and Wigan currently affect the district.
 - High Peak Borough Council: The assessment is based on a robust methodology and welcome the specific references to the role the Green Belt has in separating settlements in Stockport and Tameside from settlements in the High Peak.
- **4.36** The following raised issues with the assessment:
 - The Campaign to Protect Rural England: We have not previously been engaged in this assessment and methodology and view it would have been more transparent and beneficial for stakeholders to have been consulted on its robustness.
 - Poynton Town Council: Fails to reach overall conclusions on the extent to which each parcel has value, therefore it is limited as an aid to site selection. Suggestion that the Cheshire East Green Belt Assessment's grading system and consideration of impact on adjoining areas should be followed.
- 4.37 The development industry and landowners generally welcome the assessment as a critical evidence base document. However, some respondents disagreed with the assessment ratings on parcels where land interests are being promoted and put forward their own assessments. Persimmon and Morris Homes find the failure to consider land requirements beyond the plan period as being contrary to Paragraph 85 of the NPPF and states that it will be necessary to identify new safeguarded land to ensure boundaries do not need to be reviewed again by 2035. Districts that have a poor delivery record must maintain a reservoir of developable land where substantial safeguarded land is to be lost.

5 Summary of IA

5.1 The table below shows the IA objectives, in relation to Policy GM13 from the 2016 Draft, where an issue has been identified that requires policy mitigation or input together with recommendations.

IA Objective	Summary against overall objective	IA Recommendation
11: Conserve and enhance biodiversity, green infrastructure and geodiversity assets.	The policy states that GI will be enhanced and functions will be encouraged which includes providing high quality green spaces as well as associated social benefits. Cumulative effects – Increased development may decrease and negatively impact on the biodiversity assets that are present.	Policy should stress the value of multifunctional green infrastructure, recognising the economic and social value sites can deliver. Larger, strategic sites should contribute to creation of new multifunctional green infrastructure within the sites themselves, but also
16: Conserve, and/or enhance landscape, townscape, heritage assets and their setting and the character of GM.	Neutral against objective. Assessment criteria anticipated with some uncertainty about degree of change. Individual areas may be altered through release of GB but will depend on site and nature of scheme.	Detailed appraisal of openness and GB boundaries.

6 GMSF Strategy, Policies and Allocations

- 6.1 This chapter of the topic paper follows the following structure in outlining the approach that has underpinned Policy GM-G11 'The Greater Manchester Green Belt':
 - A short background to the Greater Manchester Green Belt;
 - Our approach and how it responds to key issues to emerge from consultation and integrated assessment in 2016;
 - The land supply position and the identified shortfall;
 - Consideration of the alternatives to using Green Belt;
 - How our approach meets the national presumption in favour of sustainable development;
 - Our case for exceptional circumstances;
 - Our approach to minimising the release of Green Belt including proposed additions to the Green Belt;
 - Our approach regarding safeguarded land;
 - A short section on the relationship of GM-G11 with Local Plans.

Background

- 6.2 The Greater Manchester Green Belt has not been reviewed at the sub-regional scale for over 30 years since the former Greater Manchester Council set out to rationalise and bring consistency to the task of establishing a boundary. The Greater Manchester Structure Plan was adopted after approval by Secretary of State in March 1981 and was superseded by a later version in 1986.
- 6.3 The main themes of the Structure Plan were around urban concentration and redirecting development to the inner core, although it included Policies OL1 to OL3 which complemented these efforts to regenerate urban areas. Policy OL1 set out the extent of the Green Belt describing the general areas it would cover but noted that precise boundaries would be determined in Local Plans. Policy OL2 listed the uses that would be appropriate and Policy OL3 set out the approach for settlements within the Green Belt. A schematic, strategic Green Belt was included in the diagram and is shown at Figure 1 (marked as green triangles).

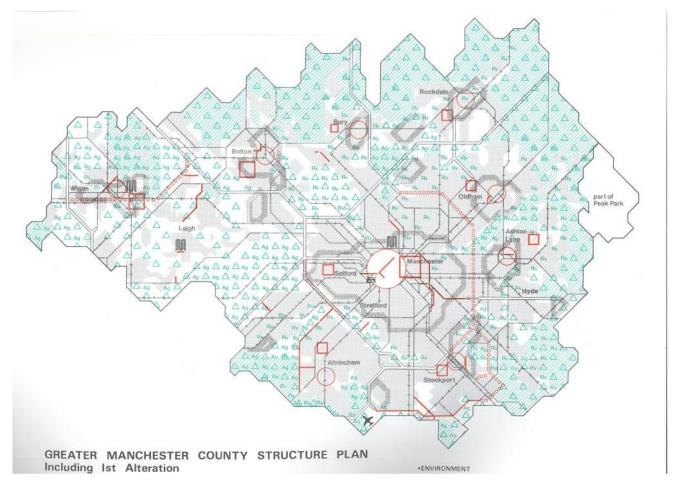


Figure 6.1 GM Structure Plan key diagram



Figure 6.2 GM Structure Plan key

- Green Belt Local Plan in the form of a written statement and a 1:10,000 scale proposals map which defined precise boundaries on an ordnance survey map base. The supporting explanatory material to the statement set the detailed criteria used in defining the boundaries and noted that the prime purpose was to protect 'vital yet vulnerable breaks' between urban areas to ensure built-up areas do not merge and that the areas of Green Belt land are contiguous with larger expanses of similar character in neighbouring counties. Recognisable physical features were followed where possible and decisions were made on the edges of the Green Belt such as the inclusion of parks, playing fields, sports grounds, allotments and ribbon development 'with Green Belt qualities'. Exclusions covered house gardens, primary school buildings and churchyards.
- 6.5 The Greater Manchester Green Belt Local Plan was adopted in January 1984 after a Public Inquiry. A full assessment of the Green Belt areas in Greater Manchester has not been undertaken since. The Written Statement advised local authorities that amendments to the approved GM Green Belt could be made via District Local Plans. Alterations of a significant nature have been made in 7 out of the 10 districts and these changes, proposing both additions and removals, and these are set out at Table 2.2 of the Greater Manchester Green Belt Assessment (2016).
- 6.6 The current extent of the Green Belt is considered later in this section under 'Minimising the release of Green Belt'.

Responding to public consultation and Integrated Assessment

6.7 More than 27,000 responses were received on the 2016 Draft and, generally, the single largest issue was in relation to the proposed loss of Green Belt. In terms of the thematic chapters i.e. Chapters 4-27 which did not involve the strategy, key locations or specific proposed allocations, the Green Belt policy attracted almost 40% of the comments.

- **6.8** The breadth of issues raised are covered above, although in broad terms, the overriding concerns expressed from the vast majority of respondents in relation to Policy GM13 and supporting evidence was that:
 - The loss of Green Belt land is unnecessary, disproportionate and unjustified, is contrary to national Green Belt policies and will result in unsustainable patterns of development that negatively affect other objectives of the plan e.g. protection and enhancement of ecology, provision of adequate infrastructure in support of development.
 - Exceptional circumstances do not exist to alter the boundaries of the Green Belt;
 - Green Belt loss is a last resort and should be minimised, prioritising other alternatives within the urban area e.g. previously-developed land and increase in densities, highlighting that the regeneration of urban areas would be undermined if not;
 - In respect of the development industry, that the housing target is too low and therefore further Green Belt land should be released and safeguarded land identified, the supply including smaller sites as the proposed releases are large and may not be deliverable over the plan period;
 - The proposed allocations conflict with the findings of the Green Belt Assessment;
 - A Green Belt Review should be undertaken that establishes its value and demonstrates that the proposed development can be accommodated without causing harm to the wider Green Belt.
- **6.9** There was also some positive feedback from respondents, citing that:
 - Meeting objectively assessed needs by releasing Green Belt is necessary and that exceptional circumstances exist. The GMSF is the appropriate mechanism to achieve this:
 - The approach of releasing a relatively small number of larger sites is supported as these have significant potential to support economic growth and are capable of supporting the range of infrastructure and facilities required, as opposed to widespread incremental development of smaller sites;
 - The Green Belt Assessment is a necessary and critical part of the evidence base.
- 6.10 The IA of the 2016 Draft did not identify any significant impacts in relation to Policy GM13. In terms of the recommendations, it is judged that the revised policy covers that set out for Objective 11 and that the detail required to meet Objective 18 will be available at the Publication stage.

6.11 The spatial strategy, revised GMSF Policy GM-G11, supporting evidence and the approach set out in this topic paper respond to the above points.

6.12 Our approach will:

- Maintain an extensive area of Green Belt, helping to protect the character and environment of Greater Manchester;
- Seek considerable improvements in public access, so that it provides a greater public benefit for all residents;
- Make a small net reduction in the total size of the Green Belt, so that the overall scale
 of growth can be accommodated and to provide the carefully targeted investment
 required to address poor economic performance in some parts of Greater Manchester;
- Phase the release of sites from the Green Belt so that new homes and employment floorspace are accompanied by the necessary supporting infrastructure, and to avoid it displacing potential investment from previously-development sites in existing urban areas.
- Some areas of land in other locations will be incorporated into the Green Belt, to ensure that their open character is protected.

Land supply position and shortfall

- 6.13 The Local Housing Need (LHN) for Greater Manchester is 201,077 units and a total of 189,283 units has been identified in the existing baseline supply. This leaves a shortfall of 11,794 units against the LHN. In addition it is necessary to allow flexibility and choice in housing delivery and this results in a greater shortfall than 11,794 units. There is therefore a need to consider land which is currently protected open land/ safeguarded land or Green Belt.
- 6.14 The need for industry and warehousing land in Greater Manchester is 4,220,000 sqm and the baseline supply is 2,627,492 sqm, leaving a shortfall of 1,592,508 sqm. The need for office space is 2,460,000 sqm and the existing baseline supply is 2,806,705 sqm. There is a significant shortfall of land for industry and warehousing, and whilst there is a small oversupply of office space. However, as with housing, it is necessary to provide sufficient flexibility against the overall need for industry and warehousing and offices. Consequently, protected open land/safeguarded land or Green Belt must be considered to meet the identified employment land need in Greater Manchester.

Exhausting the alternatives to using Green Belt

- 6.15 National policy makes explicit the steps that local authorities must follow to examine fully all other reasonable options for meeting their identified needs for development before they conclude that exceptional circumstances exist to justify altering Green Belt boundaries. These steps are as follows:
 - Making as much use as possible of suitable brownfield sites and underutilised land;
 - Optimising densities in town and city centres and other locations well served by public transport;
 - Discussions with neighbouring authorities about whether they could accommodate some of the identified need.
- 6.16 The first two steps above are considered together under 'Maximising the land supply in the urban area'. The third step is covered under 'Accommodating needs outside of Greater Manchester'. The remainder of the section then turns to other alternative sources that were considered, sets out the spatial options that were explored for meeting needs, before concluding that Green Belt is required to make up the shortfall.

Maximising the land supply in the urban area

- 6.17 It was recognised from consultation feedback that there was a consensus that more could be done to unlock the potential of previously-developed land across the conurbation whether it be vacant, derelict or stalled with extant planning permission.
- 6.18 The spatial strategy of the GMSF places a strong focus on the efficient use of land resources and highlights the contribution that an increase in densities at town centres and other accessible locations can make, such as in the Core Growth Area. The maximisation of previously-developed land can address dereliction, help to target investment and reduce the amount of greenfield land required. However, this is tempered by the conclusion that such an approach will still not be enough to satisfy the scale and distribution of development required to meet the needs of Greater Manchester.
- 6.19 As referred to in the land supply statements for housing and employment, since the 2016 draft consultation, all districts have undertaken a comprehensive and co-ordinated piece of work as part of a GM land supply officer group to search for potential housing sites in order to maximise the amount of brownfield development and minimise the need for Green Belt release. Brownfield Registers were published in December 2017, the full land supply was published in March 2018 and an updated land supply position is published in the Housing and Employment topic papers.
- **6.20** The sources of potential additional yields that were explored include:
 - Extant planning permissions;
 - Allocations:
 - Lapsed planning permissions;
 - Developer proposals;

- Main town centres;
- Sites in close proximity to public transport nodes, such as train stations and Metrolink stops;
- Existing employment allocations;
- Unimplemented employment permissions;
- Poorly performing employment areas, for example as identified in an employment land review;
- Mill buildings identified in the Greater Manchester Mills survey;
- Existing safeguarded land;
- Existing protected open land;
- Other greenfield land around the edge of the urban area, informed by the latest open space assessment where available;
- Council-owned land:
- Sites already assessed through the SHLAA that are considered to not be deliverable due to policy non-compliance but would be preferable to using Green Belt.
- **6.21** Figure 11.1 within the GMSF shows land identified within the existing urban area for housing, offices, industry and warehousing through the land availability assessments of each district. This includes the identification of suitable brownfield sites and where appropriate, the optimisation of density ratios.
- **6.22** The Housing topic paper identifies that, of the baseline housing land supply that is not windfalls or that which includes a loss allowance, 134,269 units is on brownfield sites, equating to 74%. Greenfield land accounts for 13% of supply, the remainder made up of mixed sites.
- **6.23** The Employment topic paper finds that 88% of the baseline office floorspace and 66% of the baseline industry and warehousing floorspace is on brownfield sites. For greenfield sites, offices and industry/warehousing account for 11% and 30% respectively.
- **6.24** Within the plan period, 87% of housing, 95% of offices and 50% of industrial and warehousing is within the urban area. As such, it is clear that there is insufficient land on brownfield sites to accommodate the needs for housing and employment.
- **6.25** Looking ahead, and as referenced in the Housing topic paper, there is also significant potential for additional sites to come forward for housing that have not specifically been included in the supply and which will provide a degree of flexibility in future years. Two such sources of this additional supply are:
 - GMCA are negotiating a Housing Package with Central Government which includes a £50 million land fund to bring forward brownfield sites and will offer improved flexibility in managing a separate £300 million Housing Investment Loan Fund.
 - Town Centre Challenge: Where it is possible to assess their deliverable housing potential, town centre sites have been identified within Strategic Housing Land Availability Assessments and included within the baseline housing land supply. The Town Centre Challenge initiative launched by the Mayor and GMCA in November

- 2017 seeks to regenerate town centres across Greater Manchester by identifying the ambition for and barriers to delivering change within them and will aid in supporting the delivery of higher density mixed and affordable housing, helping to create viable housing markets.
- One Public Estate: This programme is exploring whether various public sector organisation estates could be better shared or co-located in order to free up land for housing development. Such opportunities were not previously part of the baseline supply but could contribute to housing delivery over the plan period and provide additional flexibility. Funded by the Local Government Association and Cabinet Office, the GMCA have piloted the One Public Estate programme in Stockport and are in the process of extending it out to all districts.

Accommodating needs outside of Greater Manchester

- **6.26** This section addresses the third requirement of national policy on Green Belts in respect of exploring alternatives to Green Belt.
- **6.27** GMCA have previously made the commitment in the 2014 Objectively Assessed Needs consultation that all of GM's needs would be met within the identified GM Functional Economic Area which is the current administrative boundary. There are currently no unmet needs for housing or employment in GM.
- 6.28 The Greater Manchester Statement of Common Ground notes correspondence with and issues raised by authorities that adjoin Greater Manchester's boundaries, both in response to the 1st Draft GMSF in 2016 and also in preparing the Revised Draft GMSF. It confirms that none of our strategic partners are presently in a position to accommodate any of GM's objectively assessed housing and employment needs. In particular, it is noted that this would not be appropriate as it would require them to release parts of their own Green Belt and would be likely to lead to less sustainable commuting patterns.

Making up the shortfall

- **6.29** To help meet the housing and employment land shortfall, a site selection methodology has been devised which is informed by the revised draft GMSF objectives. The Site Selection topic paper sets out the approach in more detail.
- 6.30 Stage one of the assessment relates to land which is outside of the existing urban area but which is not in the Green Belt, including protected open land and safeguarded land. Seven of the ten districts have identified this resource, which is considered to be sequentially preferable to Green Belt, in their previous Local Plans, although the rationale behind their inclusion differs between districts. As such, the Site selection topic paper lists the protected open land and safeguarded land that were considered appropriate for allocation. Some of these sites have been proposed as additions to the Green Belt (see 'Minimising the release of Green Belt' and Appendix 1).
- **6.31** Even with the inclusion of POL/safeguarded land there remains a shortfall against the identified need for both housing and employment.

Spatial Options

6.32 The GMSF Spatial Options paper considers a range of options for meeting the local housing needs and objectively-assessed needs for employment, in order to address the requirements of national planning practice guidance in relation to assessing reasonable alternatives. The options have been subject to Integrated Assessment and are shown below with a commentary on what this involves and what impact this has on Green Belt:

Option	Approach	Commentary
1 - Business as usual	Projects forward existing development trends.	No Green Belt release. Would not meet needs for housing or employment.
2 - Urban max	Deliver housing growth in urban area with increased densities.	No Green Belt release. Would meet local housing needs but this would result in overdevelopment of sites and would increase pressure on infrastructure and green spaces.
		Would meet employment needs but not of a range to meet market demands and would not address to need to increase competitiveness in the northern districts.
3 - Transit city	Optimises development in the most sustainable locations around existing	Requires Green Belt release. Would not meet local housing needs and would increase pressure on green spaces.
	transport hubs and town centres.	Would result in a greater choice of employment locations. The focus on existing assets however would mean that a limited contribution is made to warehousing and distribution which require motorway access, and to the need to redistribute growth to the north.
4 - Boost northern competitiveness	Focus development in the northern districts of Wigan, Bolton, Bury, Rochdale, Oldham and Tameside.	Requires Green Belt release. Would meet needs for housing and employment but would lead to an uneven distribution of growth, disadvantaging areas of Greater Manchester.
5 - Sustain southern competitiveness	Focus development in the southern districts of Salford, Trafford, Manchester and Stockport. Takes advantage of global assets such as Manchester Airport.	

Option	Approach	Commentary
6 - Hybrid option	Combination of options 3, 4 and 5.	Requires Green Belt release. Meets local housing needs and employment needs.
		It optimises the housing land supply ensuring all opportunities to increase densities and identify additional sites have been explored. Development is concentrated in the most sustainable locations near to town centres and/or transport hubs. It takes advantage of existing and planned global assets, delivers inclusive growth across Greater Manchester and seeks opportunities to boost the competitiveness of the northern areas.

Table 6.1

- **6.33** The IA found the hybrid option to be the most appropriate and it incorporates elements of three of the spatial options drawing out specific elements which combined meet the overarching GMSF vision and strategic objectives, as well as meeting development needs.
- 6.34 Green Belt release is therefore required if Greater Manchester is to meet its housing and employment needs and is to realise the ambitions of the spatial strategy. As such, stage 2 to 4 of the Site Selection topic paper give consideration to sites in the Green Belt and assess Call for Sites suggestions to arrive at areas of search for allocations.

Meeting the presumption in favour of sustainable development

- **6.35** The previous section outlines that we have addressed Paragraph 11 of the NPPF in respect of positively seeking opportunities to meet our development needs. The Housing and Employment topic papers demonstrate that the draft GMSF meets objectively assessed needs for housing and employment and incorporates sufficient flexibility against this target.
- 6.36 The footnote to Paragraph 11 (no. 7) lists Green Belt as a designation that could provide a strong reason for restricting the overall scale, type or distribution of development in the GMSF. Whilst it is acknowledged that there are some adverse impacts on the Green Belt in accommodating these development needs, it is viewed that the benefits are not significantly and demonstrably outweighed by these impacts, when assessed against the NPPF as a whole.
- **6.37** In detailing our approach, this paper sets out below:
 - The benefits of Green Belt release as part of a case for exceptional circumstances;
 - Our approach to mitigate any adverse impacts through:

- Minimising the release of Green Belt, including the through the identification of land to be added to the Green Belt;
- Securing beneficial use for retained Green Belt.

The case for exceptional circumstances

- **6.38** Paragraph 136 of the NPPF requires that Green Belt boundaries should only be altered where exceptional circumstances are evidenced and fully justified. This section sets out the case for exceptional circumstances with regard to the proposed release of Green Belt and additions to the Green Belt.
- 6.39 It is considered that the necessity of realising the spatial strategy of the GMSF, as informed by the positive long-term outcomes of the Greater Manchester Strategy, amounts to exceptional circumstances which justify altering the boundaries of the Green Belt. The following elements combine to strengthen this case further:
 - Land within the proposed 2019 Green Belt meets at least one purpose of including land within Green Belts as specified in national policy.
 - The local housing needs (formerly known as objectively assessed needs for housing)
 cannot be met by the baseline housing supply, and therefore additional sites within
 the Green Belt are required to deliver the inclusive growth, choice of housing, and
 flexibility of supply that the strategy demands;
 - The objectively assessed needs for employment cannot be met by the baseline employment supply if a flexibility of choice is to be realised, and the only opportunities to increase Greater Manchester's GVA for the economy and address economic disparities are located within the Green Belt;
 - The selected strategic locations and allocations in the Green Belt are well served by public transport, take advantage of key assets, maximise economic opportunities which have significant capacity to deliver transformational change, deliver inclusive growth, support town centres and have a significant impact on their regeneration, deliver long-term sustainable travel options and enable significant wider community benefits:
 - There is insufficient land that is not in the urban area or in the Green Belt (protected open land/safeguarded land) to meet local housing needs;
 - Retained Green Belt within some proposed allocations provide opportunities for beneficial use including green infrastructure and net environmental gain.
 - Land has been added to the Green Belt where its designation is necessary to keep
 it permanently open, where enhancements to beneficial use can be made and where
 development would be harmful to the sustainable delivery of the spatial strategy.

6.40 Each of the above reasons are taken in turn and expanded further below, with signposting to other topic papers and evidence where this is appropriate.

The spatial strategy

- 6.41 The Greater Manchester Strategy and the Northern Powerhouse have pioneering visions which provide the context for the GMSF and its spatial approach. The breadth of their ambition and the expectations they place on GM require the spatial strategy to respond in respect of its targets for growth and this in turn impacts on the land needed for this growth.
- **6.42** The topic papers on housing and employment collectively make the case that the objectively assessed needs of Greater Manchester cannot be met by the the baseline land supply and therefore Green Belt land is required to meet the shortfall.
- **6.43** 4 of the 10 priorities in the GMS have spatial dimensions and supporting them are key ambitions which frame our strategy. The relevant GMS priorities and ambitions are set out below together with links to the objectives that are set out in Chapter 3 of the revised draft GMSF.

Priority in Greater Manchester Strategy	GMS Ambition	GMSF Objective
Priority 4 - A thriving and productive economy in all parts of Greater Manchester	 'Greater Manchester will be at the heart of a thriving Northern Powerhouse'. 'We will have the right employment sites and premises, in the right locations to support economic growth in all parts of Greater Manchester'. 	Objective 3 - Create a thriving and productive economy in all parts of Greater Manchester (ensuring a diverse range of employment sites and premises, an increase in net additional floorspace and the development of high value clusters). Objective 4 - Maximise the potential arising from our national and international assets (including by ensuring infrastructure supports growth in the strategic locations). Objective 5 - Reduce inequalities and improve prosperity (including by promoting inclusive growth, prioritising development in well-connected locations and

Priority in Greater Manchester Strategy	GMS Ambition	GMSF Objective
		strengthening the competitiveness of north Greater Manchester).
Priority 5 - World-class connectivity that keeps Greater Manchester moving	'Greater Manchester will have world-class connections that support long-term, sustainable economic growth and access to opportunity for all'.	Objective 6 - Promote the efficient movement of people and goods (via enhancing and expanding our existing transport network and enabling active travel)
Priority 6 - Safe, decent and affordable housing:	'All parts of Greater Manchester will be neighbourhoods of choice, with good quality affordable homes in safe and attractive neighbourhoods, well served by public transport, so that the people that live in them are connected to jobs and opportunity and have access to excellent local amenities, green spaces and a high quality cultural and leisure offer'.	Objective 1 - Meet our housing need (via a focus in the urban area, core growth area, town centres and public transport hubs). Objective 2 - Create neighbourhoods of choice (including through prioritising the use of previously developed land). Objective 9 - Ensure access to critical physical and social infrastructure (supporting communities and businesses and new development providing access to or provision of)
Priority 7 - A green city region and a high quality culture and leisure offer for all:	'Ensure that Greater Manchester offers a vibrant, stimulating environment for people to live, work, study and play, supported by a world-class cultural and leisure offer'.	Objective 7 - Promote climate resilience, reduce carbon emissions and make Greater Manchester a carbon neutral city region (including by promoting sustainable patterns of development that minimise the need to travel).

Priority in Greater Manchester Strategy	GMS Ambition	GMSF Objective
		Objective 8 - Improve the quality of our natural environment and access to green spaces (including by enhancing biodiversity, geodiversity and green infrastructure).

Table 6.2 Links between Greater Manchester Strategy and Plan Objectives

- **6.44** As such, the key aspects of our strategy that are ambitious in nature and clearly support a case for altering the boundaries of the Green Belt are as follows:
 - The need to make the most of key locations and assets in Greater Manchester, including the Core Growth Area and Manchester Airport, that set it apart from other places, to help improve prosperity, support economic growth and boost international competitiveness;
 - Responding to the disparities in growth between the north and south and tackling areas of severe deprivation by boosting significantly the competitiveness of north Greater Manchester, enabling more balanced and inclusive growth overall.

All parts of the proposed Green Belt satisfy at least one purpose

- 6.45 The evidence in the Green Belt Assessment in 2016 and the Assessment of Proposed Additions in 2018 finds that all parcels in the proposed 2019 Green Belt, including proposed additions, meet at least one of the five purposes of including land within the Green Belt as set out in NPPF Paragraph 134.
- **6.46** As noted in these reports, national policy does not require all the purposes of Green Belt to be met simultaneously and a strong rating against any purpose on its own could be sufficient on its own to indicate an important contribution.

Meeting housing needs

- **6.47** The Housing topic paper makes the case that the baseline supply for housing does not contain enough land to meet local housing needs and outlines that efforts to optimise supply have not been sufficient in meeting the shortfall. The amount of new housing is driven by demographic changes and the proposed scale of economic growth.
- 6.48 The NPPF requires a number of alternatives to be explored, and it has been demonstrated above that a maximisation of opportunities on previously-developed land and underutilised land, at accessible locations and discussions with neighbouring authorities in regard to assistance also fall short.

6.49 The Spatial Options paper finds a hybrid growth option to be the most appropriate approach in terms of ensuring balanced and inclusive growth and the required flexibility and choice that meets GMSF objectives. Such an option will require the release of Green Belt.

Meeting employment needs

- 6.50 The Employment topic paper notes that the baseline supply for offices and industry/warehousing is not sufficient to meet the total supply requirement if we are to seek a flexibility of choice. Objective 3 of the revised draft GMSF seeks a thriving and productive economy in all parts of Greater Manchester, and together with the prioritisation of brownfield land, requires that we ensure a diverse range of employment sites and premises. Objective 4 and 5 require development to make the most of existing assets and the competitiveness of north Greater Manchester is strengthened.
- 6.51 Greater Manchester is well-placed to take advantage of new economic opportunities due to its size and diversity and if realised this can increase the prosperity of local residents by making a full contribution to rebalancing the national economy. The existing baseline supply for employment does not offer these opportunities and a proportion of existing floorspace is of poor quality or is not of the right type. There is a need to provide flexibility of choice to the supply to ensure its continuation after the plan period and that occupier and developer needs are met. Patterns of growth also need to be balanced and inclusive, becoming less southward focused, so it can correct current disparities. This can only be achieved with the release of Green Belt.

Strategic locations and allocations in the Green Belt

- 6.52 The strategy's emphasis on a rebalancing of growth to increase the competitiveness of the north and deliver large-scale economic opportunities also allows for the creation of new, sizeable sustainable communities with supporting infrastructure. National planning policy at Paragraph 72 of the NPPF recognises the potential this can have for the supply of large numbers of new homes, provided they are well located and designed and provide access to services, the opportunities for planned investment in infrastructure and scope for net environmental gains.
- 6.53 Policy GMStrat-6 on Northern Areas seeks to boost economic opportunities and diversify housing provision by the selective release of Green Belt. The scale of development planned at strategic locations are transformational in nature as they have the potential to deliver significant benefits over a wider area. Interventions such as the rapid transit corridors will connect existing communities with planned new communities via provision of high quality housing developments and help to address extensive deprivation and relatively low levels of growth. In turn, such development and interventions will increase the attractiveness of the north help to increase business creation and local economic activity.

- 6.54 The direction of the Greater Manchester Strategy to form 'neighbourhoods of choice' feeds into Policy GM-E1 on Sustainable Places which requires new developments to contribute to successful places with a clear identity rather than functioning in isolation, to help Greater Manchester become one of the most liveable city-regions in the world.
- **6.55** The Site selection topic paper has identified the most sustainable locations by assessing potential sites against the following criteria to ensure that the proposed allocations meet the objectives in the revised draft GMSF:
 - <u>Criterion 1</u> Land which has been previously developed and/or land which is well served by public transport;
 - <u>Criterion 2</u> Land that is able to take advantage of the key assets and opportunities that genuinely distinguish Greater Manchester from its competitors;
 - <u>Criterion 3</u> Land that can maximise existing economic opportunities which have significant capacity to deliver transformational change and / or boost the competitiveness and connectivity of Greater Manchester and genuinely deliver inclusive growth;
 - Criterion 4 Land within 800 metres of a main town centre boundary or 800 metres from the other town centres' centroids;
 - <u>Criterion 5</u> Land which would have a direct significant impact on delivering urban regeneration;
 - <u>Criterion 6</u> Land where transport investment (by the developer) and the creation of significant new demand (through appropriate development densities), would support the delivery of long-term viable sustainable travel options and deliver significant wider community benefits;
 - <u>Criterion 7</u> Land that would deliver significant local benefits by addressing a major local problem/issue.

Lack of housing potential between the urban area and Green Belt

- 6.56 The Green Belt Assessment from 2016 notes that the conurbation of Greater Manchester has a complex urban form and that the Green Belt plays an important role in ensuring individual cities, towns and settlements retain their identity. It also refers to the Inspector's Report on the 1984 Greater Manchester Green Belt Local Plan which draws attention to the tightly defined boundaries that were originally drawn around the edge of the built-up areas to prevent merging and to act as a restraint in redirecting development towards the urban core.
- 6.57 Local Plans in Greater Manchester and the former Regional Spatial Strategy for the North West continued a policy of urban concentration for a number of years and therefore the success of this approach has led to pressure for development on protected open land and safeguarded land on the fringes of the urban area. This topic paper and the housing topic paper has demonstrated that this resource is therefore insufficient to meet local housing needs in reaching the conclusion that Green Belt release is required.

Providing opportunities for beneficial use within Green Belt

- 6.58 Policy GM-G11 notes that the GMSF will capitalise on opportunities from development to enhance green infrastructure functions that deliver environmental and social benefits for residents and provide high quality green spaces to support economic growth. This supports national policy which requires local authorities to plan positively to enhance beneficial use within the Green Belt.
- **6.59** Some of the proposed allocations retain Green Belt within them and therefore offer such an opportunity to make substantial improvements to environmental quality and public access.
- **6.60** The evidence base papers on landscape character and sensitivity, natural capital and accessible natural greenspace underpin this approach.

Additions to the Green Belt

6.61 To help minimise the release of Green Belt, land has been identified outside of the Green Belt which is judged to be suitable as an addition to the Green Belt. In arriving at this conclusion, Appendix 1 of this paper and supporting evidence in Green Belt assessments in 2016 and 2018 demonstrate that all proposed areas meet at least one purpose of including land within Green Belts, that they meet national policy requirements and that their increased protection under Green Belt would be justified. Some additions also offer opportunities for beneficial use such as green infrastructure and increased public access.

Minimising the release of Green Belt

- **6.62** As the Summary of Consultation in this paper has set out, the feedback from the overwhelming majority of respondents at public consultation in 2016 related to Green Belt release. Many indicated that the proposed loss of 8.2% was disproportionately large, should be a last resort and must be minimised as much as possible.
- 6.63 Mayor Andy Burnham committed to overseeing a rewrite of the GMSF which, alongside a brownfield-first approach and a prioritisation of town centres for housing, included a drive to protect the existing Green Belt as far as possible. As such, the loss of Green Belt has been cut by over half in the revised draft GMSF.
- 6.64 The following sections draw comparisons between the existing Green Belt, the Green Belt proposed in 2016 and the Green Belt proposed in 2019, and also introduces our proposed additions to the Green Belt which have helped to minimise the impact of release further.

Existing Green Belt

6.65 The Greater Manchester Green Belt is <u>59,358.11 hectares</u> in size and this covers <u>46.7%</u> of the total area of Greater Manchester.

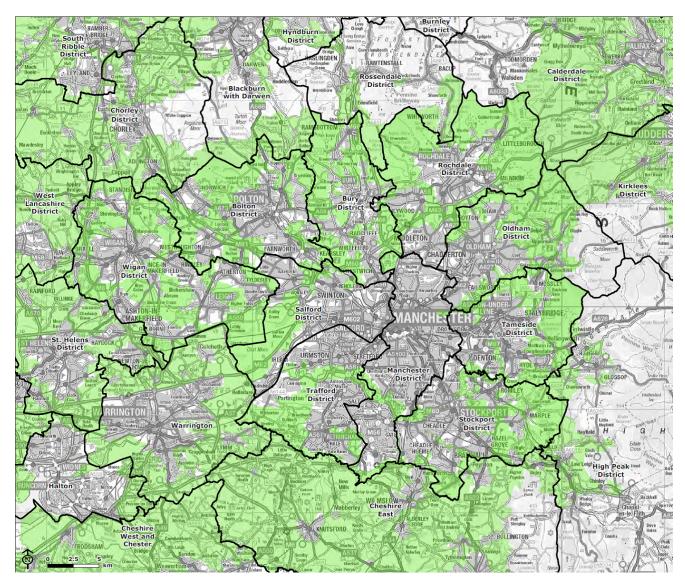


Figure 6.3 Existing GM Green Belt

Green Belt 2016

- **6.66** The 2016 Draft proposed that, following releases of Green Belt to meet objectively-assessed needs, the revised Green Belt would be <u>54,480.47 hectares</u> in size, covering <u>42.8%</u> of Greater Manchester.
- **6.67** Compared to the existing Green Belt, this represented a net reduction of 4,878 hectares, or a fall of <u>8.2%</u>.

The proposed approach: Green Belt 2019

6.68 The proposed Green Belt is now <u>56,938.66 hectares</u> in size, covering <u>44.8% of Greater</u> Manchester.

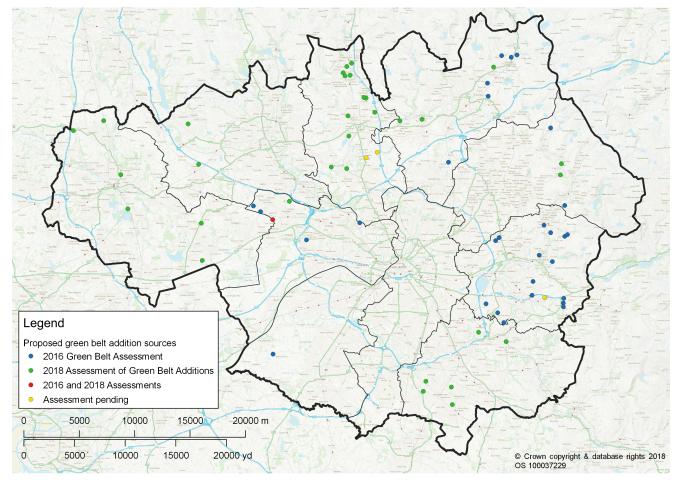
- **6.69** Compared to the existing Green Belt, this represents a net reduction of 2,419 hectares which is a fall of <u>4.1%</u>. Therefore, when comparing this with the proposed loss in 2016, the net change in Green Belt has been reduced by <u>2,459 hectares</u>, or <u>50%</u>.
- **6.70** The following table illustrates this comparison further, on a Greater Manchester and district level.

Area	Size of district (Ha.)	Size of existing Green Belt (Ha.)	Proportion of area in existing Green Belt (%)	Size of 2016 Green Belt (Ha.)	Proportion of area in 2016 Green Belt (%)	Size of 2019 Green Belt (Ha.)	Proportion of area in 2019 Green Belt (%)	Net change between 2016 and 2019 (%)
Bolton	13,937.30	7,204.03	51.7	6,922.35	49.7	7,062.07	2.03	49.6
Bury	9,916.29	5,903.56	59.5	4,697.04	47.4	5,191.62	52.4	41.0
Manchester	11,531.02	1,276.32	11.1	1,230.10	10.7	1,220.21	10.6	-21.4
Oldham	14,192.32	6,234.07	43.9	5,799,74	40.9	5,891.54	41.5	21.1
Rochdale	15,765.48	9,892.89	62.8	9,168.39	58.2	9,433.98	8'69	36.7
Salford	9,691.06	3,361.71	34.7	3,071.70	31.7	3,391.17	35.0	110.2
Stockport	12,567.56	5,840.07	46.5	5,317.55	42.3	5,721.30	45.5	77.3
Tameside	10,285.21	5,056.87	49.2	4,634.70	45.1	4,982.90	48.4	82.5
Trafford	10,573.55	3,974.98	37.6	3,522.99	33.3	3,622.59	34.3	22.0
Wigan	18,760.89	10,613.59	9.95	10,115.92	53.9	10,421.27	2.53	61.4
Greater Manchester	127,220.67	59,358.11	46.7	54,480.47	42.8	56,938.66	44.8	50.4

Table 6.3 Comparison of change in size and proportion of Green Belt

Additions to the Green Belt

- 6.71 The review of Greater Manchester's Green Belt as part of the GMSF also enables us to consider whether there are any opportunities to increase the overall extent of Green Belt by adding land that is currently outside of it. Doing so acknowledges the 4% loss required to meet housing and employment needs and helps to minimise and compensate for the impact caused.
- **6.72** The policy context of this topic paper has outlined that LUC were commissioned to carry out a Green Belt Assessment in 2016, which identified 58 potential additions, and also a follow-up exercise in 2018 which has identified a further 32 sites.
- **6.73** Under both exercises, LUC used a methodology to assess each of the proposed sites against the purposes of the Green Belt. Section 2 on Policy context sets this out in more detail.
- **6.74** It is proposed to take forward 65 additions to the Green Belt and this represents a <u>total</u> of 960.5 hectares. Plans of each of the proposed Green Belt additions can be found in Appendix A of the revised draft GMSF.
- **6.75** Appendix 1 of this topic paper sets out details of each proposed addition to be taken forward together with details of:
 - The source of the proposed addition according to how the site has been assessed in the evidence base and its reference number in that document;
 - An independent assessment of how the site performs against the purposes of Green Belt;
 - Justifications from districts as to why the site has been selected, having regard to national planning policy in the NPPF under Paragraph 139.



Picture 6.1

- **6.76** The source has been itemised in Appendix 1 as follows:
 - A. 2016 Green Belt Assessment marked as blue in map above.
 - B. 2018 Assessment of Proposed Additions to the Green Belt marked green.
 - C. Assessment pending 2019 marked yellow.
- 6.77 Three of the proposed additions are referenced as Category C and will only be carried forward if considered suitable by an independent assessment against the purposes of the Green Belt.

Safeguarded Land

6.78 National policy indicates that, where necessary, local authorities should identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. Consultation responses to the 2016 draft highlighted that safeguarded land will be required to aid deliverability.

6.79 Other than land provided alongside allocations with site-specific requirements, the revised draft GMSF does not include any significant proposals for safeguarded land at this stage. It is considered that sufficient land has been identified beyond the plan period for both housing and employment needs and that opportunities in the urban area will continue to play a key role in meeting supply needs.

Local Plans

6.80 Although no sites are being identified in the GMSF for housing in Bolton, in 2018 Bolton Council resolved to approve a planning application for a golf course to host the Ryder Cup at Hulton Park, together with associated leisure development and 1,036 houses. The Secretary of State for Housing, Communities and Local Government has called in the application for his determination. The application site is in the Green Belt and the revised draft GMSF does not change this status. If following consideration by the Secretary of State for Housing, Communities and Local Government, the planning application is approved and the Ryder Cup is awarded, then consideration will need to be given to removing the proposed housing areas from the Green Belt. Therefore, although Bolton Council has indicated its strong support for the principle of the planned proposal, until there is certainty about the planning approval and the award of the Ryder Cup, then the whole site will remain in the Green Belt.

Appendix A Assessment and justification of Green Belt additions

The table below lists the 65 proposed additions to the Green Belt with details of their location, the findings of the assessment against the purposes of Green Belt, the source of this assessment and justifications for their inclusion.

yainst Why should it be Is Green Belt kept permanently necessary to open? naintain openess?	It is necessary to	to conserve the	character of affording the Westhoughton as a highest level of	town with open land	centre, especially in	the light of the long certainty to those term potential for wishing to see the	of	other open land permanently	oughton.	It is necessary to	to conserve the	character of affording the Horwich as a town highest level of		with a setting of	with a setting of rising open land especially in the	with a setting of rising open land especially in the light of the proposed	with a setting of rising open land especially in the light of the proposed development of
ssment aga purposes	Strong	Moderate	Moderate	Moderate	Moderate					Strong	Moderate	Strong		Moderate	Moderat Strong	Moderat	Moderat Strong
Assessment against purposes	1 a	1b	2	3	4					1a	1b	2	۲	o _			
Source (Previous ref no.)	В									В					•		
District	Bolton									Bolton							
Site area (Ha.)	23.99									41.19				_			
Address	Ditchers Farm									/ qnl	Knowles rarm						
Ref	_									7							

Why should it be Is Green Belt kept permanently necessary to open?	urban land of within the built up area of the town.		, laigely	ownership. Corridor, Special Much of it is Landscape Area.	undevelopable due Other constraints:		It is expected that	the site will	continue to be	protected as part	of the GI network	in the Local Plan.	Current Green	Belt and	proposed site are	both part of	continuous	wooded river	valley that has no	acitoración a colo
	urb the the	<u>=</u> 0) := 	M M	unc	; :														
Assessment against purposes		Moderate	Moderate	N/C	Moderate	Strong)													
Assessi		1a	1b	2	3	4														
Source (Previous ref no.)		В																		
District		Bury																		
Site area (Ha.)		9.09																		
Address		Broad Hey Wood																		
Ref		က																		

Is Green Belt necessary to maintain openness?	Development pressure on fringes of site to north and west under current River Valley designation	Current	designations: OPOL, Protected	Recreation.	Other constraints: SBI (part covering	woodland to north).	OPOL sites will not be carried forward in Local Plan. Not all of the site contains a wide range of ecosystem services and so emerging Bury GI
Why should it be kept permanently open?		Open land, largely	in public ownersnip. In recreational use.	Large tree cover.			
Assessment against purposes		a Strong	Strong	N/C	Strong	N/C	
Source A: (Previous ref no.)		1a	1b	7	က	4	
District		Bury					
Site area (Ha.)		8.10					
Address		Chesham					
Ref		4					

Is Green Belt necessary to maintain openness?	Review likely to conclude parts of the site will not form part of the GI network in Local Plan. Would lead to a more defensible boundary.	Current	designation: Kiver Valley, Special	Landscape Area. Other constraints:	Grade B and C	It is expected that the site will continue to be protected as part of the GI network in the Local Plan. Offers greater protection than River Valley or GI designation and
Why should it be kept permanently open?		Partly in	recreational use Open land, largely	in private ownership Excellent contiguity	with wider Green Belt, separated only	by a path from wider park. Little development potential for most part due to challenging topography and flood risk. Northern end of site subject to village green inquiry in
Assessment against purposes		Strong	Moderate	N/C	Moderate	Strong
Asses		1 a	1b	2	3	4
Source (Previous ref no.)		В	,		,	
District		Bury				
Site area (Ha.)		13.70				
Address		Crow Lumb Wood				
Ref		5				

Ref	Address	Site area (Ha.)	District	Source (Previous ref no.)	Assessm	Assessment against purposes	Why should it be kept permanently open?	Is Green Belt necessary to maintain openness?
	Hollins Brow	2.25	Bury	O	This proposed addition will only carried forward if considered suitab an independent assessment agai the purposes of t Green Belt.	This proposed addition will only be carried forward if considered suitable by an independent assessment against the purposes of the Green Belt.	Open land, in private ownership. Undevelopable due to topography and flood risk constraints.	Current designations: River Valley, Wildlife Corridor. Uses strong defensible boundary of River Roch to west and so Hollins Lane need not interrupt what is continuous wider area of open land.
1	Hollybank Street,	1.21	Bury	В	1a	Strong	Open land, in public	Current
	Kadciiiie				1b	Moderate	ownersnip. Undevelopable due	designations: OPOL, Wildlife
					2	N/C	to ecological and access constraints.	Links and Corridor.
				•	<u>-</u> د	Moderate		Other constraints:
				•	4	N/C		SBI.
								The whole site is identified as an SBI but this is not

Is Green Belt necessary to maintain openness?	considered to be a designation which would maintain openness and provide permanence. Boundary makes more sense tight up to urban area.	Current	designations. River Valley,	Wildlife Corridor.	Other constraints: Grade C SBI.	It is expected that the site will continue to be protected as part of the GI network in the Local Plan. Some of the site is identified as an SBI but this is not
Why should it be kept permanently open?		Open land, in mixed	public/private ownership.	In recreational use		
Assessment against purposes		Moderate	Moderate	Weak	Modrate	N/C
Source As (Previous ref no.)		B 1a	1b	7	က	4
District		Bury				
Site area (Ha.)		14.54				
Address		Lower Hinds				
Ref		6				

Is Green Belt necessary to maintain openness?	considered to be a designation which would maintain openness and provide permanence. Would lead to a more defensible boundary using water features.	Current designation: River Valley, Protected Recreation. It is expected that the site will continue to be protected as part of the GI network in the Local Plan.
Why should it be ls kept permanently nopen?	0 m × E O Q Q > E Q ×	Open land, largely in private ownership d Excellent contiguity V with wider Green Relt, separated only by a path from wider park. No development potential due to p dense tree cover.
Assessment against purposes		Moderate N/C Moderate Strong
Assess		1 1 1 2 8 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4
Source (Previous ref no.)		М
District		Bury
Site area (Ha.)		2.97
Address		North of Nuttall Park
Ref		10

e Is Green Belt Iy necessary to maintain openness?	The resultant Green Belt boundary is more defensible.		-	Recreation.	It is expected that the site will	continue to be protected as part of the GI network	in the Local Plan.	However, the site is surrounded on	3 sides by Green Belt.	The resultant Green Belt	boundary is more defensible.
Why should it be kept permanently open?		It is open land and	nas good contiguity with the wider	Green Belt.							
Assessment against purposes		Strong	Strong	Weak	Moderate	N/C					
Asse		1a	1b	2	က	4					
Source (Previous ref no.)		В									
District		Bury									
Site area (Ha.)		0.36									
Address		Nuttall West									
Ref		12									

Ref	Address	Site area (Ha.)	District	Source (Previous ref no.)	Assessr	Assessment against purposes	Why should it be kept permanently open?	Is Green Belt necessary to maintain openness?
13	Off New Road,	3.33	Bury	В	1 a	Strong	Open land, in	Current
	Кадсите			ı	1b	Moderate	private ownersnip. Undevelopable due	designations: River Valley,
					2	Weak	to topography.	Wildlife Links and Corridors.
					က	Moderate		Current boundary
					4	N/C		is arbitrary at the top of the plateau and makes more sense tight up to urban area.
14	Pigs Lea Brook 1	5.54	Bury	В	1a	Moderate	Open land, largely	Current
					1b	Moderate	ın private ownership.	designation: Kiver Valley.
				1	2	Weak	Much of it is	It is expected that
				ı	က	Moderate	undevelopable due to topography.	the site will continue to be
					4	N/C		protected as part of GI in the Bury Local Plan.
								Pigs Lea Brook is a tributary of the Irwell and its valley is a

Is Green Belt necessary to maintain openness?	continuous finger of open land connected to this.	Current	designation: Kiver Valley.	The River Valley	designation will be replaced	largely by a Strategic Gl network and this is not likely to form a significant part of it. Logical extension to Green Belt in this location in absence of River Valley designation.
Why should it be kept permanently open?		Open land, in	private ownersnip.	Undevelopable due to topography		
Assessment against purposes		Moderate	Moderate	Weak	Moderate	O _N
Assess		1 a	1b	2	3	4
Source (Previous ref no.)		В				
District		Bury				
Site area (Ha.)		0.62				
Address		Pigs Lea Brook 2				
Ref		15				

Is Green Belt necessary to maintain openness?	Current designations: River Valley, Protected Recreation, Recreational Route. It is expected that the site will continue to be protected as part of the GI network in the Local Plan. However, this is the only part of Kirklees Valley (which is a key local green corridor for the Borough) that is not in the Green not in the Green	Belt. Would lead to a more defensible boundary.
Why should it be kept permanently open?	Open land, largely in private ownership Protecting a key recreational route. No development potential due to terrain and Borough significance for GI.	
Assessment against purposes	Strong Moderate Weak Weak Weak	
Ass	1 d d d d d d d d d d d d d d d d d d d	
Source (Previous ref no.)	ω	
District	Bury	
Site area (Ha.)	12.48	
Address	Woolfold	
Ref	16	

	<u> </u>																	
Is Green Belt necessary to maintain openness?	Consideration could be given to	the site in the Green Belt given	its strong rural	characteristics and little	encroachment.		Although the	parcel is not of	critical	importance to the	separation of	Greenfield and	Mossley if	development took	place it could lead	to the perception	of narrowing this	gap.
Why should it be kept permanently open?	The parcel contains the incised valley of	is covered in mature woodland	and remains largely	urbanising influences located	outside its	boundaries. It has	an intact rural	character and	displays	characteristics of	the countryside.							
Assessment against purposes	N/A	Moderate	Strong	Weak														
Asses	1a 1b	2	က	4														
Source (Previous ref no.)	A																	
District	Oldham																	
Site area (Ha.)	2.09																	
Address	Dacres																	
Ref	17																	

1b N/A 2 N/C 3 Moderate 4 Strong

Ref	Address	Site area (Ha.)	District	Source (Previous ref no.)	Assessi	Assessment against purposes	Why should it be kept permanently open?	Is Green Belt necessary to maintain openness?
19	Stoneswood	1.58	Oldham	В	1 a	N/C	The parcel displays	Consideration
				ı	1b	N/C	tne cnaracteristics of open countryside	could be given to the inclusion of
					2	N/C	similar to those of the Green Belt	the site as the parcel displays
					က	Strong	beyond and is	characteristics of the countryside
					4	Strong	one or more of the	The openness
							purposes of the Green Belt.	plays an important role in the setting of the historic settlement area.
20	Wall Hill	5.84	Oldham	В	1a	N/C	The parcel displays	Consideration
					1b	N/C	the characteristics of open countryside	could be given to the inclusion of
					2	N/C	similar to those of the Green Belt	the site in the Green Belt given
				1	8	Strong	beyond and is	its countryside
					4	Strong	one or more of the	including its
							Green Belt.	nature. The land
								displays characteristics of
								the countryside

Is Green Belt necessary to maintain openness?	agricultural use and has little sense of encroachment. The Green Belt boundary is made up of field boundaries in part linking it more closely to the Green Belt beyond. The site also scores strongly against preserving the special character and setting of historic towns.	The site is	currently FOL and protected as	Recreational Open Space with	the 'saved' policy of the 206 UDP	An equivalent
Why should it be kept permanently open?		This area contains	a large number or playing pitches and	acts as a major playing pitch 'hub'	as identified in the latest Playing pitch	Strategy
Assessment against purposes		Moderate	Moderate	Weak	Moderate	Weak
Source As (Previous ref no.)		A 1a	1b	2	8	4
District		Rochdale				
Site area (Ha.)		17.35				
Address		Land at Firgrove	Playing Fleids, Rochdale			
Ref		21				

Is Green Belt necessary to maintain openness?	designation for the site is proposed in the Draft Allocations Plan. Despite the existing local protection and the fact that it is Council owned, it is considered that adding the site into the Green Belt would increase its protection and provide some compensation for the loss of POL and Green Belt within this part of the borough.
Why should it be kept permanently open?	
Assessment against purposes	
Source (Previous ref no.)	
District	
Site area (Ha.)	
Address	
Ref	

Land at Queens	(На.)		ref no.)	nd	pulposes	kept permanently open?	necessary to maintain openness?
	15.79	Rochdale	В	1a	Moderate	Queens Park is an	The site is
гагк, пеуwood				1b	Strong	award winning park to the north of	currently protected as
			•	2	Moderate	Heywood. It assists in	Recreational Open Space with
				3	Moderate	providing physical and visual	the 'saved' policy of the 206 UDP
				4	N/C	separation between	An equivalent
						Heywood and the south west corner	designation for the site is
						of Bamford to the	proposed in the
						north	Draft Allocations
							Plan.
							Despite the
							existing local
							protection and the
							fact that it is
							Council owned, it
							is considered that
							adding the park
							into the Green
							Belt would
							increase its
							protection and
							provide some
							compensation for
							the loss of Green

Is Green Belt necessary to maintain openness?	Belt associated with the proposed GMSF allocation at Crimble Mill which lies immediately to the east of the park.	The site is POL	only has the	benefit of local protection. It is	sensible for this	have the same	designation as the land surrounding it.
Why should it be kept permanently open?		This small area of	Something of an	anomaly as it comprises a single	field whilst the g	Green Belt.	The development of this land would create an illogical addition to the built up area in this vicinity.
Assessment against purposes		Strong	Strong	Moderate	Strong	N/C	
Asse		1a	1b	2	3	4	
Source (Previous ref no.)		В					
District		Rochdale					
Site area (Ha.)		1.34					
Address		ummit,	Deywood				
Ref		23					

Ref	Address	Site area (Ha.)	District	Source (Previous ref no.)	Assess	Assessment against purposes	Why should it be kept permanently open?	Is Green Belt necessary to maintain openness?
24	Land at Townhouse	4.79	Rochdale	A	1a	Strong	The site is currently	The site is POL
	Brook, Littleborough				1b	Strong	Flotected Open Land.	and merelore only has the
					2	N/C	The Townhouse	benefit of local protection. It is
					3	Moderate	Brook area contains some flood risk and	sensible for this
					4	Moderate	water management features which	parcel to have the benefit of Green
							need to be retained and kept open.	Belt protection to link into the land to the north.
25	Land between	9.58	Rochdale	A	1a	Strong	The area is	The site is POL
	rallway line and Rochdale Canal,				1b	Weak	currently POL and does assist in	and tnererore only has the
	Littleborough				2	N/C	maintaining a physical separation	benefit of local protection. It is
					3	Moderate	between	sensible for this
					4	Weak	urban development	parcel to have the
							Summit.	Belt protection to
								link into the land to the east.
26	Land north of	2.74	Rochdale	A	1a	Strong	This small area of	In this instance
	Snore, Littleborough				1b	Strong	roc nas been created as the	this Green Belt

Is Green Belt necessary to maintain openness?	land is	considered necessary to	create a more logical Green Belt boundary.		The site is	currently protected as	Recreational Open Space with	the 'saved' policy	An equivalent designation for the site is
Why should it be kept permanently open?	y recent	nousing development to the	south did not continue to the Green Belt for reasons of topography.	This area is therefore currently something of an anomaly given that the land around it is Green Belt	The land is	currently occupled by playing fields	and a cemetery related to the	adjacent church. The site links in well	with a wider area of Green Belt to the north
Assessment against purposes	N/C	Strong	Weak		Moderate	Moderate	N/C	Moderate	Weak
Asses: p	2	က	4		1 a	1b	7	က	4
Source (Previous ref no.)					В				
District					Rochdale				
Site area (Ha.)					8.58				
Address					Land north of St	Andrew's Cnurch, Dearnley			
Ref					27				

Is Green Belt necessary to maintain openness?	proposed in the Draft Allocations Plan. Despite the existing local protection and the fact that it is Council owned, it is considered that adding the site into the Green Belt would increase its protection and provide some compensation for the loss of POL and Green Belt within this part of the borough.	The current	designation is Protected Open	Land (POL). This is a local planning	policy which
Why should it be kept permanently open?		This area of POL	currently has an important role in	separating Stakehill Industrial Estate	
Assessment against purposes		Strong	Moderate	N/C	Moderate
		1 a	1b	7	3
Source (Previous ref no.)		4			
District		Rochdale			
Site area (Ha.)		46.62			
Address		Land to west of	Stakenili business Park		
Ref		28			

Is Green Belt necessary to maintain openness?	applies to all land between the Defined Urban Area and the Green Belt Whilst the area is constrained by natural and man-made features the area would benefit from a Green belt designation to avoid this relatively narrow separation being eroded.
Why should it be kept permanently open?	from existing residential areas in the north of Middleton. The proposed expansion of Stakehill Industrial Estate through the NG2 allocation increases the value of the area as open land and provides some compensatory Green Belt close to an area of potential Green belt loss
Assessment against purposes	N/C
Assess	4
Source (Previous ref no.)	
District	
Site area (Ha.)	
Address	
Ref	

	Г																					
Is Green Belt necessary to maintain openness?	The current designation is	Protected Open	Land (POL). This is a local planning	policy which applies to all land	between the	Defined Urban	Area and the	Green Belt.	Other areas of	POI have been	developed in	sustainable	locations where it	can be	demonstrated	that the need for	additional	housing	outweighs the	value of the	retained POL.	argued this would
Why should it be kept permanently open?	Contributes to the wider Roch Valley	corridor in this	location Helps to provide	separation between Smithy Bridge and	Rochdale.	Whilst some of the	valley is considered	appropriate for	development (on	Diver Poch) this	area provides an	open area that lead	out the countryside	and the wider South	Pennine Moors	beyond.	The land does	provide an	opportunity to	deliver	infrastructure to	assist with 1100d risk
Assessment against purposes	Strong	Moderate	Strong	Moderate	Weak																	
Asses	1 a	1b	2	3	4																	
Source (Previous ref no.)	۷																					
District	Rochdale																					
Site area (Ha.)	68.21																					
Address	Land within Roch Valley, Smallbridge)																				
Ref	29																					

Is Green Belt necessary to maintain openness?	not be the case in this instance Green Belt protection would give greater certainty in terms of maintaining the openness of this part of the river valley.	Designation	specifically recognises that	the parcel contributes to	Green Belt	Consistent with protection afforded to other country parks in locality Green Belt designation is recognized as	affording the
Why should it be kept permanently open?	and water management within the Roch Valley.	Parcel comprises	Park	Contributes to Green Belt	purposes including the separation	between Walkden (Salford) and Kearsley (Bolton).	
Assessment against purposes		Strong	Moderate	Strong	Moderate	N/C	
Asses		1 a	1b	2	က	4	
Source (Previous ref no.)		В					
District		Salford					
Site area (Ha.)		30.33					
Address		Blackleach Country	¥ <u></u> <u>u</u>				
Ref		30					

Is Green Belt necessary to maintain openness?	highest level of protection, thereby also giving the greatest level of certainty to those wishing to see the land kept permanently open.	The parcel of land	of, and shares	similar characteristics	with, a wider area	designated as Green Belt extending to the north west in Salford and north east in Bury. The designation would bring consistency
Why should it be kept permanently open?		Part of and	Brook Open Space,	the large majority of which is already	designated as	
Assessment against purposes		Moderate	Moderate	Weak	Weak	Weak
Ass		1 a	1b	7	3	4
Source (Previous ref no.)		A				
District		Salford				
Site area (Ha.)		4.06				
Address		Land to south east	Open Space			
Ref		31				

Is Green Belt necessary to maintain openness?	across Slack Brook open space and importantly extend the protection over an entrance into the open space Green Belt designation is recognized as affording the highest level of protection, thereby also giving the greatest level of certainty to those wishing to see the land kept permanently open.	Designation specifically recognises that the parcel
Why should it be kept permanently open?		Contributes to Green Belt purposes including
Assessment against purposes		A (Ref - SA13)
Source A: (Previous ref no.)		A/B
District		Salford
Site area (Ha.)		25.08
Address		Land west of Burgess Farm
Ref		32

Is Green Belt necessary to maintain openness?	contributes to	Green Belt purposes.	Whilst currently	protected as a Site of Biological	Importance the	designation would	ensure that the parcel's open	contribution to	Green Belt purposes would	be protected	ecological status	change. Revised	boundary, alongside recent	and planned development to	the east, would	Green Belt
Why should it be kept permanently open?	the separation	an). an). se ween ould loss.														
Assessment against purposes	Strong	Moderate	Moderate	Moderate	N/C	В	(Ref - LUC20)	,	Strong	Strong	Weak	Moderate	N/C			
Assess	1a	1b	2	3	4				1a	1b	2	3	4			
Source (Previous ref no.)																
District																
Site area (Ha.)																
Address																
Ref																

Is Green Belt necessary to maintain openness?	boundary in accordance with NPPF Para 139(f). Green Belt designation is recognized as affording the highest level of protection, thereby also giving the greatest level of certainty to those wishing to see the land kept permanently open.	Designation	specifically recognises that	the parcel contributes to	Green Belt purposes
Why should it be kept permanently open?		Contributes to	Green Beit purposes including	the separation	
Assessment against purposes		Moderate	Strong	Moderate	
		1a	1b	2	
Source (Previous ref no.)		A			
District		Salford			
Site area (Ha.)		15.25			
Address		Ę	Country Park		
Ref		33			

Is Green Belt necessary to maintain openness?	land kept permanently open.	The parcel of land	makes a significant	contribution to the setting and	special character	town of Worsley.	Whilst protected	as an important area of Green	Infrastructure, a Green Belt	designation would	recognise the	Important contribution it	makes to this Green Belt	purpose.	
Why should it be kept permanently open?	Contributes to Green Belt purposes in purposes in particular the setting of the historic town of Sensitivity to development which would erode the historic character of the landscape and recreational value of the area. Highly valued by relocal community. In purposes in purposes in purposes in purposes in purpose in the landscape and life the landscape and life in the landscape an														
Assessment against purposes		3A19	Moderate	Moderate	Weak	Moderate	Strong	SA22	Moderate	Moderate	N/C	Moderate	Strong	3A24	Strong
Asses		Ref - SA19	1a	1b	2	3	4	Ref - S	1a	1b	7	က	4	Ref - SA24	1a
Source (Previous ref no.)		A													
District		Salford													
Site area (Ha.)		183.98													
Address		West Salford	Greenway												
Ref		34													

Is Green Belt necessary to maintain openness?	Green Belt	designation is recognized as	affording the highest level of	protection, thereby also	giving the greatest level of	certainty to those	wishing to see the land kept	permanently	oben.	Designation	provides a nign level of protection	for an open entrance route in	to Logistics North	(already	designated as Green Belt) for	residents in	Salford.	
Why should it be kept permanently open?											Supports the positive use of Green Belt Significant incursions into Green Belt in the local area							
Assessment against purposes	Moderate	Weak	Moderate	Moderate						Strong	Moderate	Weak	Weak	N/C				
Assess	1b	2	3	4						1a	1b	2	3	4				
Source (Previous ref no.)										A								
District										Salford								
Site area (Ha.)										7.89								
Address										Wharton Playing	rieids							
Ref										35								

Is Green Belt necessary to maintain openness?	Green Belt designation is recognized as affording the highest level of protection, thereby also giving the greatest level of certainty to those wishing to see the land kept permanently open.	It is of a strategic	nature and creating	separation between	settlements is not	for protecting as open space.	Its strategic	nature and helping to form a
Why should it be kept permanently open?		It forms a	separation between settlements of	Adswood, Cheadle Hulme and	Bramhall.		The site forms part	or the Ladybrook Valley LCA. The
Assessment against purposes		Moderate	Moderate	Moderate	Moderate	N/C	Moderate	Moderate
		1a	1 1	7	က	4	1a	9
Source (Previous ref no.)		В					В	
District		Stockport					Stockport	
Site area (Ha.)		28.76					47.50	
Address		Adswood					Bramhall Park Golf	Course
Ref		36					37	

Moderate highlights how the settlements are separation between set out as its core settlements. Weak settlements. UDP. These are not reasons to protect it as Open space going forward according to the definition of open space in the NPPF. Green Belt designation is recognised as affording the highest level of protection, thereby giving the greatest level of certainty to the many who value this asset.
settlements.
protect it as O space going forward accord to the definition open space in NPPF. Green Belt designation is recognised as affording the highest level operation, thereby giving greatest level certainty to the many who valathis asset.
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Is Green Belt necessary to maintain openness?	Green Belt	designation is recognised as	affording the highest level of	protection, thereby giving the	greatest level of	certainty to those wishing to	prevent urban	sprawl and to	protect trie		Its strategic	nature and helping to form a	separation between	settlements are	values in the UDP.	
Why should it be kept permanently open?	Although broken by											separation for Gatley/Heald Green	and Cheadle/Cheadle	Hulme as quoted in	policy.	
Assessment against purposes	Moderate	Weak	Weak	Moderate	N/C						Moderate	Moderate	Moderate	Moderate	N/C	
Assess	1a	1b	2	3	4						1a	1b	2	3	4	
Source (Previous ref no.)	В										В	•				
District	Stockport										Stockport					
Site area (Ha.)	26.17										58.87					
Address	Brookfield	Course									Bruntwood Park	and Adjacent Green Chain				
Ref	38										39					

ls Green Belt ly necessary to maintain openness?	These are not reasons to protect it as Open space going forward according to the definition of open space in the NPPF. Green Belt designation is recognised as affording the highest level of protection, thereby giving the greatest level of certainty to the many who value this asset.			ith, affording the highest level of		
Why should it be kept permanently open?		The site is a	shares similar	characteristics with, the remainder of	Reddish Vale	boundary should follow the
Assessment against purposes		Moderate	Moderate	Weak	Weak	N/C
Ass		1a	1b	7	3	4
Source (Previous ref no.)		В				
District		Stockport				
Site area (Ha.)		0.75				
Address		South of Dartmouth	Crescent, Brinnington			
Ref		40				

Is Green Belt necessary to maintain openness?	wishing to prevent urban sprawl. The NPPF does reference compensation as a method of avoiding harm to biodiversity, which is also championed by DEFRA in terms of offsetting, this could lead to SBIs being displaced.	See above as to why SBI designation is not adequate to maintain openness.	
Why should it be kept permanently open?	remainder of the SBI and woodland area. It will help establish the boundary of the GB in this location and help provide separation between Brinnington and Reddish.	The boundary should follow the remainder of the SBI. This forms a natural extension of the countryside setting which	includes some farm settlements. This parcel of green belt
Assessment against purposes		Moderate Weak Moderate	O/N
		1 1 1 1 1 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3	4
Source (Previous ref no.)		ω	
District		Stockport	
Site area (Ha.)		2.71	
Address		Star Field, Romiley	
Ref		14	

ta Strong The size, shape 1a Strong Weak Weak A N/C N/C Doundary. The size, shape a logical extension of this parcel of land forms affording the textension to the Green Belt appropriate appropriate boundary. Strong A N/C Doundary. The size, shape designation is parcel of land forms affording the protection, thereby giving the appropriate poundary. Certainty that the existing use as public open space and therefore the openness will be protected from development. It is also a logical extension of the existing Green Belt, as such its inclusion would act to tidy up the boundary.
and location of this and location of this parcel of land forms a logical extension to the Green Belt resulting in a more appropriate boundary.
Weak Weak Strong N/C boundary.
Weak Strong Strong Appropriate boundary.
Strong resulting in a more appropriate boundary.
N/C boundary.
existing use as public open space and therefore the openness will be protected from development. It is also a logical extension of the existing Green Belt, as such its inclusion would act to tidy up the boundary.
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ls Green Belt necessary to maintain openness?	Green belt designation is recognised as	affording the highest level of	protection, thereby giving the	greatest level of	existing use as	public open	space and therefore the	openness will be	protected from development.	<u>(</u>	It is also a logical extension of the	existing Green	Belt, as such its	inclusion would	act to tidy up the houndary and	contribute toward	preserving the	setting of a
Is Green necessal maintain opennes	Gree desig	afford highe	prote there	great	existi	public	space	open	prote devel			existi	Belt,	inclus	act to	contr	prese	settin
Why should it be kept permanently open?	This parcel of land contributes toward preserving the	setting of Mottram and its designation	as a Conservation Area This parcel of	land also forms a	en Belt	resulting in a more	late r√.											
Why sh kept pe open?	This parcel of Loontributes tow preserving the	setting a	as a Co Area Th	land als	the Green Belt	resulting	appropriate boundary.											
Assessment against purposes	Strong	Strong	Moderate	Weak														
Assessmo	1a S 1b S	2 8	3	4 >														
Source (Previous ref no.)	4	•																
District	Tameside																	
Site area (Ha.)	1.10																	
Address	Ashworth Lane, Mottram																	
Ref	43																	

Is Green Belt necessary to maintain openness?	designated Conservation Area.	Green belt designation is recognised as affording the highest level of protection, thereby giving the greatest level of certainty that the woodland, cloughs, partial designation as Site of Biological Interest and existing use as public open space and therefore the openness will be protected from development.	
Why should it be kept permanently open?		This parcel of land contributes toward preserving the setting of Broadbottom and the designation of the latter as a Conservation Area. This parcel of land also forms a logical extension to the Green Belt resulting in a more appropriate boundary.	
Assessment against purposes		Strong Strong Moderate Weak	
Assess		19 19 2 8 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	
Source (Previous ref no.)		∢	
District		Tameside	
Site area (Ha.)		18.83	
Address		Broadbottom Broadbottom	
Ref		44	

Is Green Belt necessary to maintain openness?	It is also a logical extension of the existing Green Belt, as such its inclusion would act to tidy up the boundary and contribute toward preserving the setting of a designated Conservation Area.	Green belt	designation is recognised as	affording the highest level of	protection,	greatest level of certainty that the woodland, partial designation as Site of Biological Interest and existing use as
Why should it be kept permanently open?		The size, shape	and location of this parcel of land forms	a logical extension to the Green Belt,	resulting in a more	boundary and contributes to the separation of Denton and Stockport.
Assessment against purposes		Strong	Moderate	Weak	Moderate	N/C
Asse		1a	1	7	3	4
Source (Previous ref no.)		٨				
District		Tameside				
Site area (Ha.)		2.21				
Address		Cemetery Road,	Denton			
Ref		45				

Is Green Belt necessary to maintain openness?	public open space and therefore the openness will be protected from development.	It is also a logical extension of the existing Green Belt, as such its inclusion would act to tidy up the boundary.	Green belt	designation is recognised as	affording the highest level of	protection,	greatest level of	woodland,	cloughs and existing use	predominantly as
Why should it be kept permanently open?			The size, shape	and location or this parcel of land forms	a logical extension to the Green Belt	resulting in a more	boundary.			
Assessment against purposes			Strong	Strong	N/C	Weak	N/C			
Ass			1a	1b	2	3	4			
Source (Previous ref no.)			A							
District			Tameside							
Site area (Ha.)			18.26							
Address			City Avenue,	Denton						
Ref			46							

Is Green Belt necessary to maintain openness?	public open space and therefore the openness will be protected from development.	It is also a logical extension of the existing Green Belt, as such its inclusion would act to tidy up the boundary.	Green Belt	designation is recognised as	affording the highest level of	protection,	greatest level of	existing use as	space and therefore the
Why should it be kept permanently open?			The size, shape	and location of this parcel of land forms	a logical extension to the Green Belt	resulting in a more	boundary.		
Assessment against purposes			Moderate	Moderate	Weak	Weak	N/C		
As			1a	1b	7	က	4		
Source (Previous ref no.)			A						
District			Tameside						
Site area (Ha.)			4.70						
Address			Danby Road, Hyde						
Ref			47						

Is Green Belt necessary to maintain openness?	openness will be protected from development.	It is also a logical extension of the existing Green Belt, as such its inclusion would act to tidy up the boundary.	Green Belt	designation is recognised as	affording the highest level of	protection, thereby giving the	greatest level of	existing use as public open	space and therefore the	openness will be protected from	development.
Why should it be kept permanently open?			The size, shape	his on or ore							
Assessment against purposes			Strong	Strong	N/C	Moderate	Strong				
Asse			1 a	1b	2	3	4				
Source (Previous ref no.)			4								
District			Tameside								
Site area (Ha.)			79.7								
Address			Demesne Drive,	Copley, Stalybridge							
Ref			48								

Is Green Belt necessary to maintain openness?	It is also a logical extension of the existing Green Belt, as such its inclusion would act to tidy up the boundary.	Green Belt	designation is recognised as	affording the highest level of	protection, thereby giving the	greatest level of certainty that the existing use as public open space and therefore the openness will be protected from development. It is also a logical extension of the existing Green
Why should it be kept permanently open?		This parcel of land	contributes toward preserving the	setting of Mossley and forms a logical	extension to the Green Belt resulting	in a more appropriate boundary.
Assessment against purposes		Strong	Strong	Weak	Strong	Weak
Ass		1a	1b	2	3	4
Source (Previous ref no.)		٨				
District		Tameside				
Site area (Ha.)		7.89				
Address		Fox Platt, Mosley				
Ref		49				

Is Green Belt necessary to maintain openness?	Belt, as such its inclusion would act to tidy up the boundary.	Green belt designation is recognised as	affording the highest level of	protection, thereby diving the	greatest level of certainty that the cloughs and existing use as public open space and therefore the openness will be protected from development. It is also a logical extension of the existing Green Belt, as such its inclusion would				
Why should it be kept permanently open?		This parcel of land contributes toward preserving the setting of Mottram and its designation has a Conservation Area. This parcel of land also forms a logical extension to the Green Belt resulting in a more appropriate boundary.							
Assessment against purposes		Strong Moderate	Strong	Weak	Weak				
Asses		1a 1b	2	က	4				
Source (Previous ref no.)		4							
District		Tameside							
Site area (Ha.)		10.04							
Address		Hyde Road, Mottram							
Ref		50							

Is Green Belt necessary to maintain openness?	act to tidy up the boundary and contribute toward preserving the setting of a designated Conservation Area.	Green Belt	recognised as	affording the highest level of	protection,	greatest level of certainty that the existing use as public open space and therefore the openness will be protected from development.
Why should it be kept permanently open?		This parcel of land	preserving the	setting of Carrbrook and its designation	as a Conservation	
Assessment against purposes		Strong	Strong	Weak	Moderate	Strong
Ass		1 a	1b	2	3	4
Source (Previous ref no.)		A				
District		Tameside				
Site area (Ha.)		1.83				
Address		Long Row,	Carrotok, Stalybridge			
Ref		51				

Is Green Belt necessary to maintain openness?	It is also a logical extension of the existing Green Belt, as such its inclusion would act to tidy up the boundary and contribute toward preserving the setting of a designated Conservation Area.	Green belt designation is recognised as affording the highest level of protection, thereby giving the greatest level of certainty that the cloughs and their partial designation as a Site of Biological Importance along
Why should it be kept permanently open?		The size, shape and location of this parcel of land forms a logical extension to the Green Belt resulting in a more appropriate boundary.
Assessment against purposes		This proposed addition will only be carried forward if considered suitable by an independent assessment against the purposes of the Green Belt.
Source (Previous ref no.)		O
District		Tameside
Site area (Ha.)		16.78
Address		Longlands House, Mottram Road, Hyde
Ref		52

Is Green Belt necessary to maintain openness?	with use as public open space and therefore openness will be reinforced and protected from development. It is also a logical extension of the existing Green Belt, as such its inclusion would act to tidy up the boundary.	Green Belt designation is recognised as affording the highest level of protection, thereby giving the greatest level of certainty that the existing use as public open space and
Why should it be kept permanently open?		This parcel of land contributes toward preserving the setting of Mossley and forms a logical extension to the Green Belt resulting in a more appropriate boundary and contributes toward
Assessment against purposes		1a Strong 1b Moderate 2 Weak 3 Strong 4 Weak
Source // (Previous ref no.)		4 0 6 4
District		Tameside
Site area (Ha.)		0.87
Address		Manchester Road, Mossley
Ref		53

Is Green Belt necessary to maintain openness?	therefore the openness will be protected from development. It is also a logical extension of the existing Green Belt, as such its inclusion would act to tidy up the boundary.	Green belt	designation is recognised as	affording the highest level of	protection, thereby giving the	greatest level of certainty that the	existing use as public open space and	therefore the
Why should it be kept permanently open?	preventing further ribbon development.	The size, shape	and location of this parcel of land forms	a logical extension to the Green Belt,	resulting in a more	boundary, contributes to the	Separation of Ashton-under-Lyne and Oldham and	prevents further sprawl and encroachment.
Assessment against purposes		Strong	Strong	Weak	Strong	Weak		
Ass		<u>1</u> a	15	7	က	4		
Source (Previous ref no.)		A						
District		Tameside						
Site area (Ha.)		0.78						
Address		Manor Farm Close,	Waterloo, Ashton-under-Lyne					
Ref		54						

Is Green Belt necessary to maintain openness?	openness will be protected from development.	It is also a logical extension of the existing Green	Belt, as such its inclusion would act to tidy up the	boundary.	Green belt	designation is recognised as	affording the highest level of	protection,	greatest level of	clough including	the part designated as a	Site of Biological		
Why should it be kept permanently open?					The size, shape	and location of this parcel of land forms	a logical extension to the Green Belt	resulting in a more	boundary,	preventing further	ribbon development along Oldham Road	and the separation	Ashton-under-Lyne	and Oldham.
Assessment against purposes					Moderate	Moderate	Weak	Moderate	Weak					
Asses					1a	1b	2	3	4					
Source (Previous ref no.)					A									
District					Tameside									
Site area (Ha.)					3.17									
Address					Oaken Clough,	vvaterioo, Ashton-under-Lyne								
Ref					22									

t be Is Green Belt antly necessary to maintain openness?	be reinforced and protected from development.	Green Belt fthis designation is		Islon affording the Selt, highest level of	nore protection, thereby giving the				space and the the	openness will be	protected from	development.	It is also a logical	extension of the	existing Green	Belt, as such its	act to tidy up the	boundary.
Why should it be kept permanently open?		The size, shape and location of this	parcel of land forms	a logical extension to the Green Belt,	resulting in a more	boundary and	separation of	Stalybridge and	Heyrod.									
Assessment against purposes		Strong	Moderate	Weak	Moderate	Strong												
Asses		1a	1b	7	3	4												
Source (Previous ref no.)		4																
District		Tameside																
Site area (Ha.)		08.9																
Address		Ridge Hill Lane, Ridge Hill,	Stalybridge															
Ref		56																

				<u>a</u>	<u>ب</u> ب				<u>ه</u>		<u> </u>	<u> </u>		ر٥	Φ		<u>5</u>	
Belt y to s?	t on is	d as	affording the highest level of	protection, thereby giving the	greatest level of	se as	<u> </u>	:he	openness will be	from ent.	It is also a logical	extension of the	reen	Belt, as such its	act to tidy up the	and	contribute toward	g the
ls Green Belt necessary to maintain openness?	Green Belt designation is	recognised as	affording the highest level	protection, thereby giv	test le	existing use as	public open	space and therefore the	ness	protected from development.	also a	nsion	existing Green	as su	o tidy	boundary and	ibute	preserving the setting of a
ls Green necessal maintain opennes	Gree desig	reco	affor highe	prote	great	exist	publi	there	oper	prote deve	It is	exter	exist	Belt,	act te	bour	conti	prese settir
be ntly	and		rook tion	ion el of	a	1	ore											
Why should it be kept permanently open?	This parcel of land contributes toward	g the	setting of Carrbrook and its designation	as a Conservation Area. This parcel of	land also forms a	Belt	resulting in a more	טַ										
shou pern ງ?	parce ribute	preserving the	ng of (its de	Cons	also also	the Green Belt	lting i	appropriate boundary.										
Why sk kept pe open?	This	pres	settir	as a Area	land	the (resu	app bour										
iinst				е														
nt aga ses	Strong	Strong	()	Moderate	Strong													
ssment ag purposes	Str	Str	N/C	Mo	Str													
Assessment against purposes	1a	1b		~~														
	7		2	3	4													
Source (Previous ref no.)																		
S <u>a</u>	A																	
District	eside																	
Dis	Tame																	
Site area (Ha.)	2.11																	
	2.																	
S.																		
Address	/iew, ok,	idge																
Ă	South View, Carrbrook,	Stalybridge																
je –		<u></u> \(\tilde{\omega} \)																
Ref	22																	

it be Is Green Belt nently necessary to maintain openness?	designated Conservation Area.		Norms recognised as ension affording the Bolt highest load of			o the certainty that the existing use partly		space and goil club and	therefore the	protected from	development.	It is also a logical extension of the existing Green
Why should it be kept permanently open?		The size, shape and location of this	parcel of land forms a logical extension	resulting in a more	boundary and	contributes to the separation of	Dukinfield and	пуdе.				
Assessment against purposes		Strong	Strong	Moderate	N/C							
Assess		1a 14	2 2	3	4							
Source (Previous ref no.)		A										
District		Tameside										
Site area (Ha.)		35.98										
Address		Yew Tree Lane, Dukenfield										
Ref		58										

Is Green Belt necessary to maintain openness?	inclusion would act to tidy up the boundary.	Green Belt	designation is recognised as	affording the highest level of	protection,	greatest level of	certainty to those	wishing to see the land kept	permanently open.	Green Belt	designation is recognised as	affording the highest level of	protection, thereby giving the
Why should it be kept permanently open?		Area will help to	prevent urban encroachment into	the large area of countryside to the	south and east					The size, shape	and location or this parcel of land form	a logical extension to the Green Belt.	
Assessment against purposes		Moderate	Moderate	Strong	Moderate	N/C				Moderate	Moderate	N/C	Weak
Asses		1a	1b	2	3	4				1a	1b	2	က
Source (Previous ref no.)		A								В			
District		Trafford								Wigan			
Site area (Ha.)		2.71								3.72			
Address		Land south of	ratington							Coppull Lane,	Wigan		
Ref		59								09			

it be Is Green Belt nently necessary to maintain openness?	land greatest level of certainty to those wishing to see the land kept permanently open.	<u> </u>		ension any other Belt designation		of the existing Green Belt boundary, as such it's inclusion would act to tidy up the boundary.	5	eu1	and the included within ierce the employment	
Why should it be kept permanently open?	This piece of land contributes to the separation of Swinley and Whelley.	The size, shape	parcel of land forms	a logical extension to the Green Belt	resulting in a more	boundary.	This parcel of land	contributes to the separation of	Pennington and the Leigh Commerce	Park.
Assessment against purposes	Moderate	Weak	Weak	Weak	Weak	N/C	Strong	Moderate	Weak	Moderate
Assess	4	1a	1b	2	3	4	1a	1b	2	က
Source (Previous ref no.)		В					В			
District		Wigan					Wigan			
Site area (Ha.)		2.08					40.88			
Address		Crow Orchard	Road, Standish				Hope Carr Nature	Keserve		
Ref		61					62			

Address	Site area (Ha.)	District	Source (Previous ref no.)	Assessi	Assessment against purposes	Why should it be kept permanently open?	Is Green Belt necessary to maintain openness?
				4	Weak	It is a Nature Reserve with aspirations and funding for future biodiversity improvement.	expansion of the business park. Inclusion within the Green Belt would add an extra layer of protection to this site.
0	3.25	Wigan	В	1a	Moderate	The size, shape	Green Belt
Manchester/Ince Junctions, Ince				1b	Moderate	and location of this parcel of land forms	recognised as
				2	Weak	a logical extension to the Green Belt	affording the highest level of
				3	Weak	resulting in a more	protection, thereby giving the
				4	N/C	boundary.	greatest level of certainty to those wishing to see the land kept permanently open.
North of Bradley	1.24	Wigan	В	1a	Strong	The size, shape	This piece of land
Lane, Standish				1b	Moderate	and location of this parcel of land forms	requirements of
			,	2	Weak	a logical extension to the Green Belt	any other designation

ls Green Belt ly necessary to maintain openness?		logical extension of the existing Green Belt boundary, as such its inclusion would act to tidy up the boundary.				Green Belt designation is	recognised as affording the	highest level of protection,	thereby giving the	greatest level of	existing sports	provision and	therefore the	openness will be	development.
Why should it be kept permanently open?	resulting in a more	appropriate boundary.	This parcel of land	critical gap between	Leigh and Atherton and helps to	prevent	between the settlements.								
Assessment against purposes	Strong	O/N	Strong	Strong	Strong	Moderate	Weak								
Asse	3	4	1a	1b	2	3	4								
Source (Previous ref no.)			В												
District			Wigan												
Site area (Ha.)			31.20												
Address			Pennington FC	Playing pitches, Howe Bridge											
Ref			65												

Is Green Belt necessary to maintain openness?	Although this site is included within Wigan Council's Playing Pitch Strategy 2017 this may not be enough to defend against future development.
Why should it be Is Green Belt kept permanently necessary to open? openness?	
Assessment against Why should it be Is Green Belt kept permanently necessary to open? maintain open?	
Source (Previous ref no.)	
District	
Site area (Ha.)	
Address	
Ref	

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