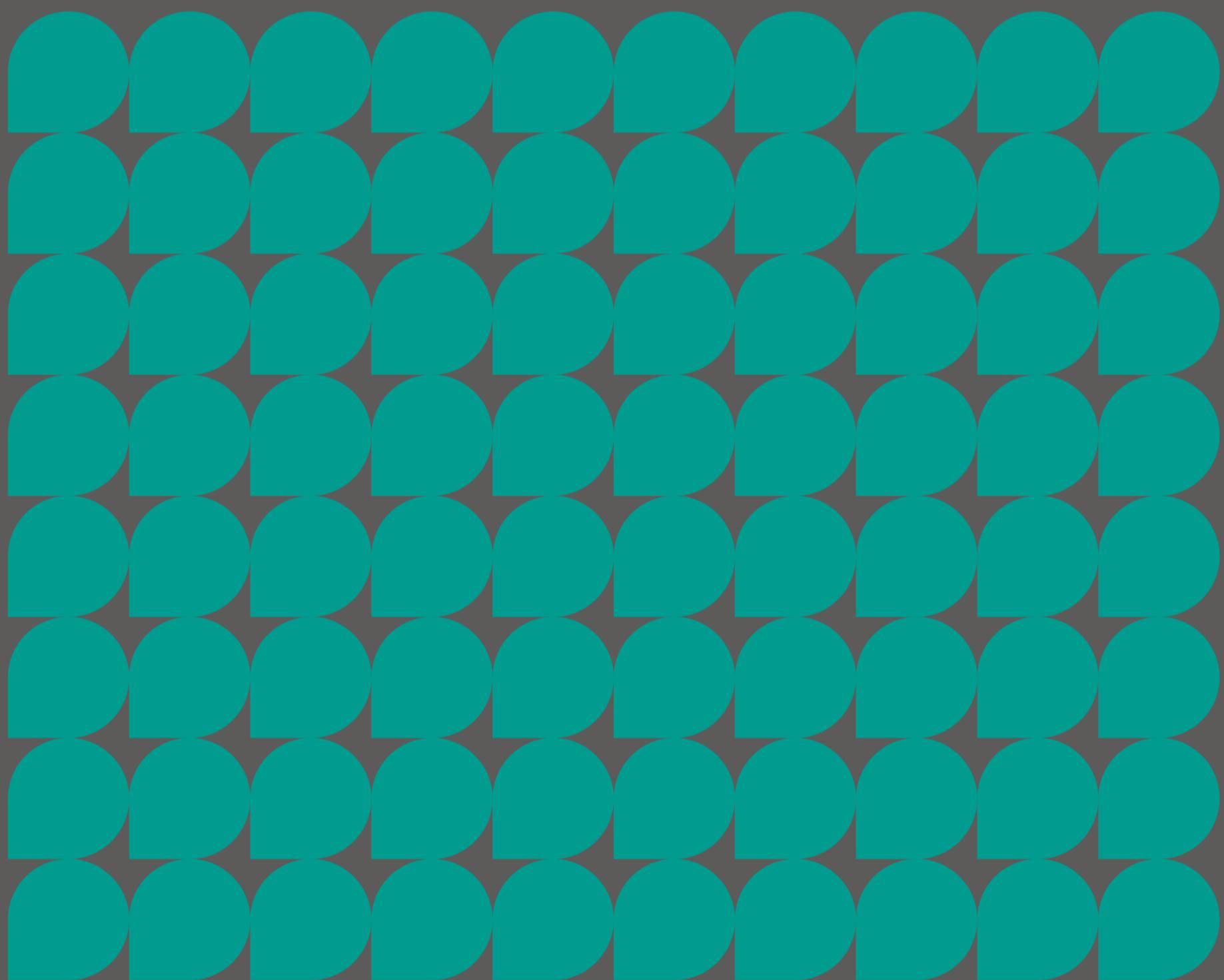


Places for Everyone

Salford Additions to the Green Belt Issues
Summary

February 2022



Appendix – Additions to the Green Belt (Salford)

A summary of the issues raised in relation to the policies within PfE 2021 Chapter 12 and the relevant respondents to PfE 2021 is set out below:

Additions to the Green Belt in Salford

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	General comments		
GBA.1	It is not appropriate to reclassify existing open space as Green Belt.	Appendix 3 of the Green Belt Topic Paper [07.01.25] sets out the justification for the Green Belt additions proposed. Given the above, no modifications are necessary for reasons of soundness.	Paul Roebuck
GBA.2	Support the new Green Belt additions.	Support noted	David Yates Louise Seddon
GBA.3	The new areas of Green Belt proposed will not have any protection given that proposals will remove the said same protection from current Green Belt.	Areas of land designated as Green Belt will be protected in line with national policy as set out in the National Planning Policy Framework. Given the above, no modifications are necessary for reasons of soundness.	Linda Field Louise Seddon Chris Waterfield
GBA.4	Exceptional circumstances have not been demonstrated to justify new Green Belt.	Comment noted, appendix 3 of the Green Belt Topic Paper [07.01.25] sets out the justification for the Green Belt additions proposed. Given the above, no modifications are necessary for reasons of soundness.	Peel L&P Investments (North) Ltd Casey Group
GBA.5	Objections relating to the development on Green Belt land including prioritisation of Brownfield land/ existing buildings.	Objections to development of land currently in the Green Belt are addressed in the response to the main issues raised to PfE under the each of the proposed allocations. As part of the evidence base, the case for exceptional circumstances to amend the Green Belt boundary is outlined in Annexes 1 and 2 of the Green Belt Topic Paper [07.01.25] . Each of the allocation topic papers for the four allocations proposed in Salford include a summary of the Green Belt assessment for that allocation (see chapters 5 of): • JPA26 Hazelhurst Allocation Topic Paper [10.07.68]	Kelly Moss Paul Roebuck Alastair Armer

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<ul style="list-style-type: none"> • JPA27 East of Boothstown Allocation Topic Paper [10/07/69] • JPA28 North of Irlam Station Allocation Topic Paper [10.07.71] • JPA29 Port Salford Extension Allocation Topic Paper [10.07.71] <p>Given the above, no modifications are necessary for reasons of soundness.</p>	
GBA.6	Contradicted by release of other parts of the Green Belt.	<p>Proposals for additions to the Green Belt are not considered to be contradicted by the release of other parts of the Green Belt. The National Planning Policy Framework allows for changes to Green Belt boundaries in exceptional circumstances. It is considered that such circumstances exist in this instance and justifications for changes to the Green Belt boundary (both additions and release) are provided in the Green Belt Topic Paper [07.01.25] and the allocation topic papers.</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	Linda Field
GBA.7	You say you want distinct separations between areas, but this is not the case in most areas.	<p>One of the five purposes of Green Belt identified in the National Planning Policy Framework (paragraph 138) is “to prevent neighbouring towns merging into one another”.</p> <p>The proposed additions, just as areas of existing Green Belt, will contribute to this purpose to differing degrees and this is reflected in the justifications set out in Appendix 3 of the Green Belt Topic Paper [07.01.25].</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	Linda Field
GBA.8	Criticism of Green Belt allocations exceeding the proposed additions.	<p>It is considered that there are exceptional circumstances justifying the identification of new areas of Green Belt. Part of this justification relates to the significant changes to the existing Green Belt boundary that would result from the allocations proposed in Places for Everyone.</p> <p>However, the additions in Salford have not been identified as direct replacements, either in their extent or the use of the land identified, for the areas proposed for release. The potential exception to this being the</p>	Paul Roebuck Sophie Hadfield

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>addition proposed at Land West of Burgess Farm (GBA29) which could mitigate some of the reduction in the separating role of Green Belt between Walkden and Tyldesley which would result from the Land North of Moseley Common allocation in Wigan (JPA36).</p> <p>There is not therefore intended to be a direct correlation between the areas released from the Green Belt and those proposed as additions.</p> <p>The justification for the Green Belt additions proposed is provided in Appendix 3 of the Green Belt Topic Paper [07.01.25].</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	
GBA.9	Comments suggesting that the purpose of some/all of the Green Belt additions being statistical to compare with the areas being lost through allocations.	<p>It is considered that there are exceptional circumstances justifying the identification of new areas of Green Belt. Further details are set out in the Green Belt Topic Paper [07.01.25].</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	Paul Roebuck Michael Hullock Ian Culman Chris Waterfield
GBA.10	An independent assessment of which sites meet the purposes is needed. It is essential that the site selection process is transparent.	<p>An independent assessment of the proposed additions has been undertaken by LUC consulting. Their findings in respect of the proposed additions in Salford are summarised in Appendix 3 of the Green Belt Topic Paper [07.01.25].</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	Ian Culman
GBA.11	In reference to traffic impacts in Walkden and Worsley from proposed development, it was stated that the proposed Green Belt swap within land at Little Hulton is a ridiculous proposition.	<p>It is considered that there are exceptional circumstances justifying the identification of a new areas of Green Belt. Part of this justification relates to the significant changes to the existing Green Belt boundary that would result from the allocations proposed in Places for Everyone.</p> <p>However, the additions in Salford have not been identified as direct replacements, either in their extent or the use of the land identified, for the areas proposed for release. The potential exception to this being the</p>	Patricia Hamilton

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>addition proposed at Land West of Burgess Farm (GBA29) which could mitigate some of the reduction in the separating role of Green Belt between Walkden and Tyldesley which would result from the Land North of Moseley Common allocation in Wigan (JPA36).</p> <p>There is not therefore intended to be a direct correlation between the areas released from the Green Belt and those proposed as additions.</p> <p>The justification for the Green Belt additions proposed is provided in Appendix 3 of the Green Belt Topic Paper [07.01.25].</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	
GBA.12	The proposed increase in greenbelt land in the local area is much less than that released to the detriment to the local residents. Reduce the size of the development, to match the size of greenbelt being added to the immediate area. A more sympathetic development of no more than 400 houses to the west of Honksford brook would be acceptable, which would also surround the new Parr Bridge commercial development. This would reduce the strain on Bridgewater Road and on the A577. Developing the area to the west of Tyldesley and St. George's park around the guided busway or south of the East Lancs in Higher Green would be fairer, to spread out the impact of any housebuilding to the local residents and road network.	Comment is relevant to separate site allocation/ designation and has been recorded against it	Alastair Armer
	GBA27 – West Salford Greenway		
GBA27.1	Specific support for GBA27, one representation identifying recreational value of the area and sense of countryside. Another stated that it should be larger. Another noted particular importance of having a green corridor abutting Worsley Woods.	Support noted.	David Yates Rachael Cutting John Marginson
GBA27.2	Question whether GBA27 is already Green Belt and as such how it could be considered an addition.	GBA27 is not currently designated as Green Belt through Salford's Unitary Development Plan (UDP), or in the Salford Local Plan: Development	Sophie Hadfield

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>Management Policies and Designations which is due to be adopted in Summer 2022 (and which will replace policies in the UDP).</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	
GBA27.3	Object to the inclusion of the GB Addition	<p>It is considered that there are exceptional circumstances justifying the inclusion of GBA27 within the Green Belt. This is set out in further detail in Appendix 3 of the Green Belt Topic Paper [07.01.25], pages 37 to 46.</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	Peel L&P Investments (North) Ltd
GBA27.4	The Greenway's physical interface with the wider expanse of Green Belt is very limited, being comprised of a short length along its western edge. The M60 forms a significant barrier between the main body of the Greenway and the wider Green Belt in this location. The area of interface between the Greenway and the Green Belt to the west of the M60 comprises the most developed part of the Greenway, including a hotel and associated infrastructure, housing and significant road infrastructure, including the M60 itself, Junction 13 slip roads, and other major roundabouts.	<p>The issue raised is addressed as part of the justification for the inclusion of GBA27 within the Green Belt as set out in Appendix 3 of the Green Belt Topic Paper [07.01.25], pages 37 to 46.</p> <p>Specifically, on page 44, it is described that "whilst it is recognised that Junction 13 of the M60 and development around it does create a barrier between areas of open land, major pieces of infrastructure are not uncommon within the Green Belt, indeed to the north junctions 14 and 15 of the M60 are both within the Green Belt."</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	Peel L&P Investments (North) Ltd
GBA27.5	It does not form any of the Green Belt purposes listed at paragraph 138 of the Framework and therefore its proposed addition to the Green Belt is neither justified nor consistent with National Policy.	<p>An assessment of the contribution that the proposed addition (GBA27) makes to the Green Belt has been undertaken by LUC on behalf of the GMCA [document reference [07.01.11]].</p> <p>As summarised in the Green Belt Topic Paper [07.01.25], Appendix 3, page 37, column 'd', the parcel contributes to a number of Green Belt purposes including in relation to preventing urban sprawl, safeguarding the countryside from encroachment and preserving the setting and special character of historic towns.</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	Peel L&P Investments (North) Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
GBA27.6	The retention of the Greenway in an open form would make very little contribution to Purpose 1. Natural and physical boundaries act as a restriction to the spread of development. Development within the Greenway would have a natural termination and there would be no material risk of further sprawl into the wider expanse of Green Belt to the west.	<p>The justification for the approach taken in respect of Purpose 1 is set out in paragraphs 3.27 to 3.31 of the Stage 2 Greater Manchester Green Belt Study Assessment of Proposed 2019 GMSF Allocations [07.01.08].</p> <p>As set out on the Green Belt Topic Paper [07.01.25], Appendix 3, page 37, column 'd', the parcel is considered to contribute to Green Belt purpose 1.</p> <p>In respect of parcel GBA27, the Assessment of Green Belt additions [07.01.11] notes the sense of openness within the parcel and the role it plays in inhibiting ribbon development along the A580 and internal minor access roads. This conclusion is reached whilst acknowledging that, as suggested in the representation, "as the parcel is largely surrounded by existing urbanising development with limited connectivity with the wider Green Belt, and further development within the parcel may not be perceived as sprawl".</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	Peel L&P Investments (North) Ltd
GBA27.7	Agree with the LUC assessment that the area would play little role in separating settlements (GB Purpose 2).	Comment noted	Peel L&P Investments (North) Ltd
GBA27.8	The retention of the Greenway would make no material contribution to GB Purpose 3. The area lacks a strong rural character and has a very limited physical relationship with areas more characteristic of the countryside beyond. The areas relationship with the urban area is visibly and audibly apparent.	<p>As set out on the Green Belt Topic Paper [07.01.25], Appendix 3, page 37, column 'd', the parcel is considered to contribute to Green Belt purpose 3.</p> <p>Whilst urbanising features are evident in parts, the parcel has an open character and displays characteristics of the countryside. In doing so it makes a significant contribution to the urban-rural environment that is a central part of Worsley's character.</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	Peel L&P Investments (North) Ltd
GBA27.9	The approach taken to the assessment of the Greenway against Purpose 4 is erroneous. Green Belt Purpose 4 is very clearly intended to be focused on preserving the settings of historic towns. The Conservation Areas around the Greenway represent clusters of buildings which reflect	<p>The justification for the approach taken in respect of Purpose 4 is set out in paragraphs 3.42 to 3.50 of the Stage 2 Greater Manchester Green Belt Study Assessment of Proposed 2019 GMSF Allocations [07.01.08]. It describes the consideration of the "relationship with designated</p>	Peel L&P Investments (North) Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>the historic pattern of development and their more rural origins. These are evidently not towns. The extent to which the Greenway contributes to the setting of the Conservation Areas would need to be defined in a manner which is proportionate to their scale. The extent of intervisibility between the Conservation Areas and sites within the Greenway is limited. Any such setting role is limited to very limited parts of the Greenway and this role is by no means sufficiently uniform to underpin a conclusion that the whole Greenway makes a strong contribution to Green Belt Purpose 4 as asserted. The result is that the LUC assessment significantly overstates the contribution which the Greenway makes to Green Belt Purpose 4.</p>	<p>"Conservation Areas" to be a "common approach" taken in Green Belt studies with regard to this purpose.</p> <p>It is recognised that the parcel does not have a uniform contribution to this purpose and the assessment of GBA27 in the Green Belt additions assessment [07.01.11], which considers the addition as a whole, refers back to an earlier assessment from 2016 [07.01.04] and [07.01.05] in which the Greenway was assessed in three parts. Parcels SA19, SA22 and SA24 in that document. The 2016 assessment concluded that all three parcels contributed to this purpose, parcels SA19 and SA22 making a strong contribution to purpose 4 and parcel SA24 a moderate contribution.</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	
	GBA28 – Part of Logistics North County Park		
GBA28.1	In reference to GBA28 and GBA29. To make this a "fair swap" some of the land being converted to green belt needs to be not already green space.	<p>It is recognised that the area proposed as a Green Belt addition is already greenspace.</p> <p>The designation would be a 'status change' rather than a change on the ground, specifically recognising the contribution that the land makes to Green Belt purposes and would ensure the ongoing protection of the land.</p> <p>It is considered that there are exceptional circumstances justifying the identification of new areas of Green Belt. Part of this justification relates to the significant changes to the existing Green Belt boundary that would result from the allocations proposed in Places for Everyone.</p> <p>However, the additions in Salford have not been identified as direct replacements, either in their extent or the use of the land identified, for the areas proposed for release. The potential exception to this being the addition proposed at Land West of Burgess Farm (GBA29) which could mitigate some of the reduction in the separating role of Green Belt between</p>	Chris Waterfield

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>Walkden and Tyldesley which would result from the Land North of Moseley Common allocation in Wigan (JPA36).</p> <p>There is not therefore intended to be a direct correlation between the areas released from the Green Belt and those proposed as additions.</p> <p>The justification for the Green Belt additions proposed is provided in Appendix 3 of the Green Belt Topic Paper [07.01.25].</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	
	GBA29 – Land west of Burgess Farm		
GBA29.1	In reference to GBA29 - this land is already green and woodland which people use so this is just going to be a status change rather than a creation of green space.	<p>It is recognised that the area proposed as a Green Belt addition is already greenspace, similarly that it is already designated as a site of biological importance.</p> <p>As suggested, the designation would be a ‘status change’ rather than a change on the ground, specifically recognising the contribution that the land makes to Green Belt purposes. In this regard it would complement existing designations and would ensure the ongoing protection of the land regardless of any potential changes to its ecological value.</p> <p>These issues are addressed in the justification for the addition as set out in Appendix 3 of the Green Belt Topic Paper [07.01.25], pages 48 to 50.</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	Sarah Lindley Robert Lindley
GBA29.2	In reference to GBA29 - Area of land is proposed in response to the North of Moseley Common allocation. It is too far away to be usable for residents of that area leaving them with no greenspace.	It is considered that there are exceptional circumstances justifying the identification of new areas of Green Belt. Part of this justification relates to the significant changes to the existing Green Belt boundary that would result from the allocations proposed in Places for Everyone.	Sarah Lindley Robert Lindley

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>However, the additions in Salford have not been identified as direct replacements, either in their extent or the use of the land identified, for the areas proposed for release. The potential exception to this being the addition proposed at Land West of Burgess Farm (GBA29) which could mitigate some of the reduction in the separating role of Green Belt between Walkden and Tyldesley which would result from the Land North of Moseley Common allocation in Wigan (JPA36). It is however recognised that this area may not be directly comparable for other reasons as suggested here.</p> <p>There is not therefore intended to be a direct correlation between the areas released from the Green Belt and those proposed as additions.</p> <p>The justification for the Green Belt additions proposed is provided in Appendix 3 of the Green Belt Topic Paper [07.01.25].</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	
GBA29.3	In reference to GBA 29 - Areas of development should be reduced to the size of Green Belt being added in the immediate area. Reference made to alternative locations in Wigan as an alternative location for development.	<p>It is considered that there are exceptional circumstances justifying the identification of new areas of Green Belt. Part of this justification relates to the significant changes to the existing Green Belt boundary that would result from the allocations proposed in Places for Everyone.</p> <p>However, the additions in Salford have not been identified as direct replacements, either in their extent or the use of the land identified, for the areas proposed for release. The potential exception to this being the addition proposed at Land West of Burgess Farm (GBA29) which could mitigate some of the reduction in the separating role of Green Belt between Walkden and Tyldesley which would result from the Land North of Moseley Common allocation in Wigan (JPA36).</p> <p>There is not therefore intended to be a direct correlation between the areas released from the Green Belt and those proposed as additions.</p>	Alastair Armer

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>The justification for the Green Belt additions proposed is provided in Appendix 3 of the Green Belt Topic Paper [07.01.25].</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	
GBA29.4	<p>This Green Belt addition is proposed alongside the removal of Green Belt as the North of Mosley Common allocation in Wigan.</p> <p>This land is already green and woodland which people use so this is just going to be a status change rather than a creation of green space.</p> <p>This space is so far away that it is basically unusable by local residents as its too far away to walk to leaving mosley common with no green space.</p> <p>Dont take all of our current green belt space in mosley common its so much for so many.</p>	<p>It is recognised that the area proposed as a Green Belt addition is already greenspace. The designation would be a 'status change' rather than a change on the ground, specifically recognising the contribution that the land makes to Green Belt purposes and would ensure the ongoing protection of the land.</p> <p>However, the additions in Salford have not been identified as direct replacements, either in their extent or the use of the land identified, for the areas proposed for release. The addition in this case could however specifically mitigate some of the reduction in the separating role of Green Belt between Walkden and Tyldesley which would result from the Land North of Moseley Common allocation in Wigan (JPA36). It is however recognised that this area may not be directly comparable for other reasons as suggested here.</p> <p>The justification for the Green Belt additions proposed is provided in Appendix 3 of the Green Belt Topic Paper [07.01.25].</p> <p>Comments regarding the Mosley Common allocation have been recorded and responded to in the relevant table.</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	Sarah Lindley
GBA30 – Blackleach Country Park			
GBA30.1	Object to the inclusion of the GB Addition	It is considered that exceptional circumstances exist to justify the designation of this area of land as Green Belt. This is set out in further detail in Appendix 3 of the Green Belt Topic Paper [07.01.25], pages 48 to 50.	Casey Group

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Given the above, no modifications are necessary for reasons of soundness.	
GBA30.2	<p>Area is designated as an SBI (UDP Policy EN8/20), A wildlife Corridor of Search (Policy EN9) and a Key Recreation Area (Policy R4/1). These existing policies protect the Park area from any significant development, and seek to protect those areas of the Park which have ecological value. There is no requirement for the Park to be added to the Green Belt, as these policy provisions already provide sufficient protection and control recognising its recreational and ecological value.</p>	<p>The justification for proposing this area of land as Green Belt is set out in Appendix 3 of the Green Belt Topic Paper [07.01.25], pages 48 to 50. This addresses the existing designations covering much of the area. In summary, whilst the area is already subject to protective designations reflecting its recreational and ecological value, its designation would ensure that the area's role from a Green Belt perspective is specifically recognised and would provide a clear statement of the council's intention in relation to the area's ongoing protection.</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	Casey Group
GBA30.3	<p>The Park has not previously been considered worthy of Green Belt designation, and there has been no exceptional change in circumstance to the Park to justify such a significant change as now proposed through the PfE DPD.</p>	<p>The justification for proposing this area of land as Green Belt is set out in Appendix 3 of the Green Belt Topic Paper [07.01.25], pages 48 to 50. This includes an explanation of the major changes in circumstances that have made the adoption of this exceptional measure necessary.</p> <p>In this regard it is stated that:</p> <p>“Significant changes to the boundary of the Greater Manchester Green Belt are proposed through the GMSF, resulting in the release of large areas of land from this protective designation. It is clear from representations to the GMSF that there is a great deal of support for restrictions imposed by a Green Belt designation. Within this context it is considered appropriate to give full consideration to the expansion of the designation in other areas to give further protection to land which performs a Green Belt function.</p> <p>In this instance the addition ensures that the area's role from a Green Belt perspective is recognised and provides a clear statement of the council's intention in relation to the area's ongoing protection.”</p>	Casey Group

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Given the above, no modifications are necessary for reasons of soundness.	
GBA30.4	The Park does not fulfil the five purposes of Green Belt as expressed in paragraph 138 of the NPPF and thus does not warrant Green Belt designation.	<p>An assessment of the contribution that the proposed addition (GBA30) makes to the Green Belt has been undertaken by LUC on behalf of the GMCA [document reference 07.01.11].</p> <p>As summarised in the Green Belt Topic Paper [07.01.25], Appendix 3, page 48, column 'd', the parcel contributes to a number of Green Belt purposes including in relation to preventing urban sprawl, preventing the merging of neighbouring towns and safeguarding the countryside from encroachment.</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	Casey Group
GBA30.5	Whilst our Client supports the protection of the Park and its natural features and ecological value, at the same time it does comprise land which offers limited ecological and nature conservation value which has the potential, if developed, to deliver wider economic benefits to the City. This therefore further weighs against its proposed Green Belt designation.	<p>The representation refers to an area of land within and to the eastern edge of proposed Green Belt addition reference GBA30 Blackleach Country Park.</p> <p>The site referred to is currently subject to a number of protective designations through Salford's Adopted Unitary Development Plan and will continue to be protected as part of a wider Green Infrastructure resource through Salford's emerging Local Plan: Development Management Policies and Designations (Policy R3) which is due to be adopted in summer 2022.</p> <p>Exceptional circumstances have been identified to justify the designation of the area of land as Green Belt along with the wider green infrastructure resource of which it forms a part. The exceptional circumstances are set out in further detail in the Green Belt Topic Paper, Appendix 3, page 50, GBA30 [07.01.25].</p> <p>Given the above, no modifications are necessary for reasons of soundness.</p>	Casey Group