

Greater Manchester Combined Authority

Stage 2 Greater Manchester Green Belt Study Assessment of Proposed 2019 GMSF Allocations

Final report

Prepared by LUC
September 2020



Greater Manchester Combined Authority

**Stage 2 Greater Manchester Green Belt Study
Assessment of Proposed 2019 GMSF Allocations**

Project Number

10713

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PfE 2021 SITE REFERENCES INSERT

The Greater Manchester Spatial Framework (GMSF) was replaced by the Places for Everyone (PfE) Plan in 2021. This report still forms part of the PfE Plan evidence base, but the allocation policy numbers used in it have subsequently changed. The 2020 GMSF policy numbers (and in some instances the allocation names) were also different to the allocation references used by LUC in their original assessments. The table below sets out a comparison between the LUC Allocation references and names, the 2020 GMSF policy numbers and names, and the 2021 PfE policy numbers. The following map shows the allocation locations with their PfE Plan policy numbers.

District	LUC Allocation Ref	LUC Allocation Name	GMSF 2020 policy number	2020 GMSF / 2021 PfE Allocation Name	2021 PfE policy number
Cross Boundary	GM1.1	Northern Gateway: Heywood/Pilsworth	GMA1.1	Heywood / Pilsworth (Northern Gateway)	JPA1.1
Cross Boundary	GM1.2	Northern Gateway: Simister/Bowlee	GMA1.2	Simister and Bowlee (Northern Gateway)	JPA1.2
Bury	GM1.3	Northern Gateway: Whitefield	Deleted	N/A	N/A
Cross Boundary	GM2	Stakehill	GMA2	Stakehill	JPA2
Cross Boundary	GM3	Kingsway South	Deleted	N/A	N/A
Manchester	GM11	Roundthorn MediPark Extension	GMA3.1	Medipark	JPA3.1
Trafford	GM46	Timperley Wedge	GMA3.2	Timperley Wedge	JPA3.2
Bolton	GM4	Bewshill Farm	GMA4	Bewshill Farm	JPA4
Bolton	GM5	Chequerbent North	GMA5	Chequerbent North	JPA5
Bolton	GM6	West of Wingates / M61 Junction 6	GMA6	West of Wingates / M61 Junction 6	JPA6
Bury	GM7	Elton Reservoir	GMA7	Elton Reservoir	JPA7
Bury	GM8	Seedfield	GMA8	Seedfield	JPA8
Bury	GM9	Walshaw	GMA9	Walshaw	JPA9

District	LUC Allocation Ref	LUC Allocation Name	GMSF 2020 policy number	2020 GMSF / 2021 PfE Allocation Name	2021 PfE policy number
Manchester	GM10	Global Logistics	GMA10	Global Logistics	JPA10
Manchester	GM12	Southwick Park	GMA11	Southwick Park	JPA11
Oldham	GM14	Beal Valley	GMA12	Beal Valley	JPA12
Oldham	GM22	Woodhouses	GMA13	Bottom Field Farm (Woodhouses)	JPA13
Oldham	GM15	Broadbent Moss	GMA14	Broadbent Moss	JPA14
Oldham	GM18	Robert Fletchers	GMA15	Chew Brook Vale (Robert Fletchers)	JPA15
Oldham	GM16	Cowlshaw	GMA16	Cowlshaw	JPA16
Oldham	GM17	Hanging Chadder	GMA17	Hanging Chadder	Deleted
Oldham	GM13	Ashton Road Corridor	GMA18	Land south of Coal Pit Lane (Ashton Road)	JPA17
Oldham	GM19	South of Rosary Road	GMA19	South of Rosary Road	JPA18
Oldham	GM20	Spinners Way / Alderney Farm	Deleted	N/A	N/A
Oldham	GM21	Thornham Old Road	Deleted	N/A	N/A
Rochdale	GM23	Bamford / Norden	GMA20	Bamford / Norden	JPA19
Rochdale	GM24	Castleton Sidings	GMA21	Castleton Sidings	JPA20
Rochdale	GM25	Crimble Mill	GMA22	Crimble Mill	JPA21
Rochdale	GM26	Land north of Smithy Bridge	GMA23	Land north of Smithy Bridge	JPA22
Rochdale	GM27	Newhey Quarry	GMA24	Newhey Quarry	JPA23
Rochdale	GM28	Roch Valley	GMA25	Roch Valley	JPA24
Rochdale	GM29	Trows Farm	GMA26	Trows Farm	JPA25
Salford	GM30	Land at Hazelhurst Farm	GMA27	Land at Hazelhurst Farm	JPA26
Salford	GM31	East of Boothstown	GMA28	East of Boothstown	JPA27

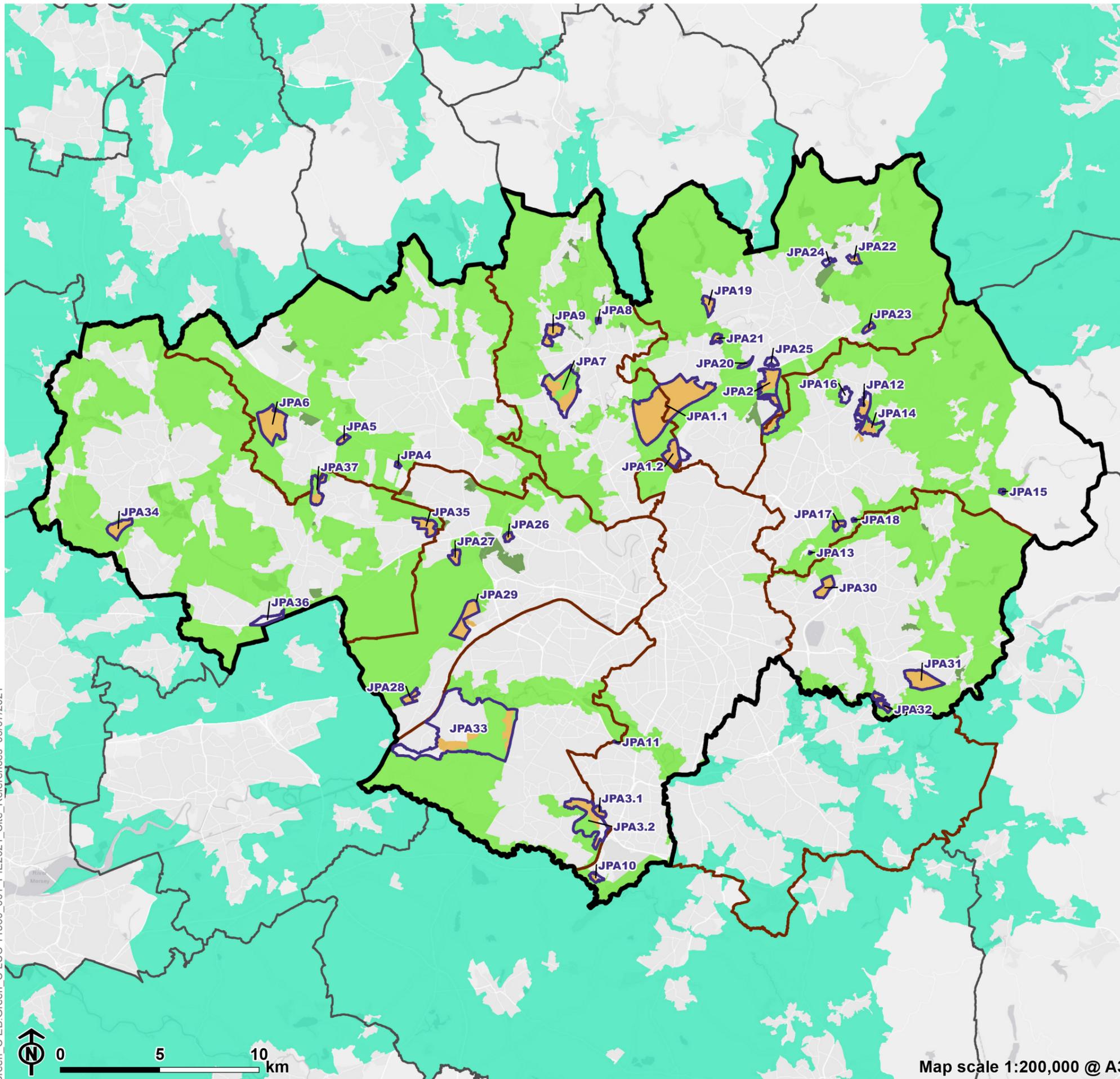
District	LUC Allocation Ref	LUC Allocation Name	GMSF 2020 policy number	2020 GMSF / 2021 PfE Allocation Name	2021 PfE policy number
Salford	GM32	North of Irlam Station	GMA29	North of Irlam Station	JPA28
Salford	GM33	Port Salford Extension	GMA30	Port Salford Extension	JPA29
Stockport	GM34	Bredbury Park Extension	GMA31	Bredbury Park Extension	Deleted
Stockport	GM35	Former Offerton High School	GMA32	Former Offerton High School	Deleted
Stockport	GM36	Gravel Bank Road / Unity Mill	Deleted	N/A	Deleted
Stockport	GM37	Heald Green	GMA33	Heald Green 1 (West)	Deleted
Stockport	GM40	Griffin Farm, Stanley Green	GMA34	Heald Green 2	Deleted
Stockport	GM38	High Lane	GMA35	High Lane	Deleted
Stockport	GM39	Hyde Bank Meadows	GMA36	Hyde Bank Meadows	Deleted
Stockport	GM41	Woodford Aerodrome	GMA37	Woodford Aerodrome	Deleted
Tameside	GM42	Ashton Moss West	GMA38	Ashton Moss West	JPA30
Tameside	GM43	Godley Green Garden Village	GMA39	Godley Green Garden Village	JPA31
Tameside	GM44	South of Hyde	GMA40	South of Hyde	JPA32
Trafford	GM45	New Carrington	GMA41	New Carrington	JPA33
Wigan	GM47	Land South of Pennington	Deleted	N/A	N/A
Wigan	GM48	M6, Junction 25	GMA42	M6 Junction 25	JPA34
Wigan	GM49	North of Mosley Common	GMA43	North of Mosley Common	JPA35
Wigan	GM50	Pocket Nook	GMA44	Pocket Nook	JPA36

District	LUC Allocation Ref	LUC Allocation Name	GMSF 2020 policy number	2020 GMSF / 2021 PfE Allocation Name	2021 PfE policy number
Wigan	GM51	West of Gibfield	GMA45	West of Gibfield	JPA37



PfE 2021 Site References

- Places for Everyone Plan boundary
- Greater Manchester Local Authority boundary
- Other Local Authority boundary
- Site allocation
- PfE 2021 Green Belt proposed for release
- PfE 2021 Green Belt land to be retained
- PfE 2021 Proposed additional Green Belt
- Green Belt outside PfE boundary



Map scale 1:200,000 @ A3

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Executive Summary

Introduction

Study Aim and Scope

1. This Stage 2 Green Belt study assesses the potential impact on the Green Belt that could result from release of land within the development allocations proposed in the Revised Draft (January 2019) of the Greater Manchester Spatial Framework (GMSF). Its intention is to inform the finalisation of the proposed Allocations.
2. It forms part of a suite of evidence prepared in relation to Stage 2 of the Green Belt assessment process. Other elements of Stage 2, which are presented as separate reports, include:
 - An assessment of the contribution to the Green Belt purposes that would be made by the addition of new Green Belt land¹.
 - An assessment of the combined effect of proposed releases and proposed new Green Belt on the strategic functioning of the Greater Manchester Green Belt².
 - An analysis of the potential to enhance the beneficial use of land which remains in the Green Belt close to the proposed Allocations³.

¹ Stage 2 Greater Manchester Green Belt Study - Contribution Assessment of Proposed 2020 GMSF Green Belt Additions (LUC, September 2020)

² Stage 2 Greater Manchester Green Belt Study - Cumulative Assessment of Proposed 2020 GMSF Allocations and Additions (LUC, September 2020)

³ Stage 2 Greater Manchester Green Belt Study - Identification of Opportunities to Enhance the Beneficial Use of the Green Belt in the vicinity of Proposed 2019 GMSF Allocations (LUC, September 2020)

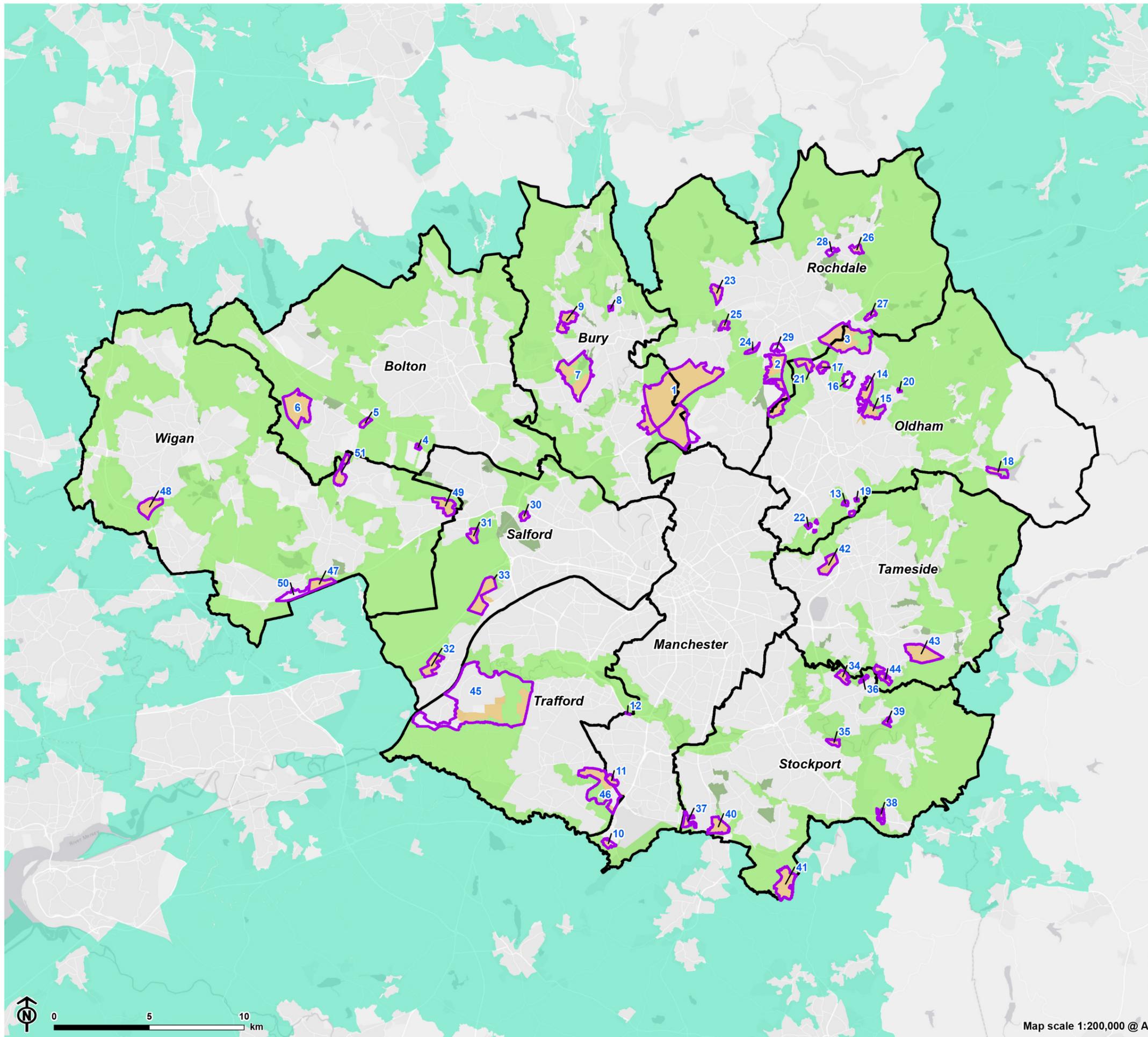
3. The Stage 1 Green Belt Study, which was undertaken by LUC in 2016, assessed the whole of the Green Belt in Greater Manchester, providing a comprehensive analysis of variations in contribution of land to the Green Belt purposes as set out in the National Planning Policy Framework (NPPF) (further details on the NPPF purposes are set out below).
4. Together, the Stage 2 reports provide a detailed assessment of the 'harm' to the Green Belt purposes that would result from the proposed development allocations in the Revised GMSF, the extent to which new Green Belt land could contribute to the Green Belt purposes and the opportunities to enhance the beneficial use of land that is retained in the Green Belt.
5. The study includes all 47 of the 51 proposed GMSF Allocations (as of January 2019) that lie entirely, or in part within the Green Belt (see below).
6. A glossary of key terms used within this report is provided in Appendix A.

Use of Study Main Outputs

7. The assessment provides guidance on:
 - the contribution individual Allocations make to the NPPF Green Belt purposes;
 - the harm that would result from the release of each allocated site, considering not just what contribution the land itself makes to the Green Belt purposes but also the potential impact on the integrity of adjacent Green Belt land (e.g. resulting from changes into the Green Belt boundary, and/or increased containment of open land);
 - variations in harm within potential Allocations, identifying areas that may be more or less suitable for development from a Green Belt perspective, with retention of the latter offering some potential to minimise harm.
8. The outputs, alongside assessments relating to other planning considerations, such as sustainability, transport, viability, etc. will inform decisions regarding the relative merits of the proposed Allocations.

Site Allocations

- Greater Manchester local authorities
- Site allocation
- GMSF 2019 Green Belt proposed for release
- GMSF 2019 Green Belt land to be retained
- GMSF 2019 Proposed additional Green Belt
- Green Belt outside Greater Manchester



Green Belt Policy and Context

9. To inform the Stage 2 Green Belt Study a review of the national and local Green Belt policy context was undertaken.

National Planning Policy and Guidance

10. Government policy on the Green Belt is set out in chapter 13 of the NPPF⁴: Protecting Green Belt Land. The NPPF states that “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.

11. The NPPF also states that Green Belts should serve five purposes:

The purposes of Green Belt

- 1) To check the unrestricted sprawl of large built-up areas.
- 2) To prevent neighbouring towns merging into one another.
- 3) To assist in safeguarding the countryside from encroachment.
- 4) To preserve the setting and special character of historic towns.
- 5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

12. The NPPF makes it clear that local planning authorities should establish and, if justified, only alter Green Belt boundaries through the preparation of their Local Plans; that once established, Green Belt boundaries should only be altered where 'exceptional circumstances'

⁴ Department of Communities and Local Government (2018) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>.

are fully evidenced and justified, through the preparation or updating of plans; and that local planning authorities should plan positively to enhance the beneficial use of the Green Belt.

13. The NPPF's Green Belt policies are supplemented by additional National Planning Practice Guidance (NPPG), which sets out some of the factors that should be taken into account when considering the potential impact of development on the openness of Green Belt land.

14. Neither the NPPF, or the NPPG provide guidance on how to undertake Green Belt reviews.

Origins and evolution of the Green Belt in Greater Manchester

15. The broad extent of the Green Belt in Greater Manchester appeared in draft in the 1978 Greater Manchester Structure Plan which was approved by the Secretary of State in 1981, with detailed boundaries introduced in the Greater Manchester Green Belt Local Plan adopted in 1984. The primary purposes of the Greater Manchester Green Belt, were set out in Policy OL1 of The Greater Manchester Green Belt Local Plan Written Statement (1981) and were in line with policy at a national level⁵; to check further growth of a built-up area, to prevent neighbouring towns from merging, and to preserve the special character of a town.

16. Since 1984, alterations to the Green Belt have taken place through individual Local Authority development plans where exceptional circumstances have justified amendments and where additional land has been added.

The Green Belt in Greater Manchester Today

17. A total of 59,550ha (46.7%) of Greater Manchester is currently designated as Green Belt. Since the original designation of the Green Belt in Greater Manchester was adopted in 1984, no full assessment of the Green Belt areas took place until 2016. The 2016 Stage 1 Green Belt Study assessed how the Greater Manchester Green Belt contributes to the five NPPF Green Belt purposes.

18. The report concluded that the Green Belt plays an important role in: restricting unplanned development; ensuring that cities, towns and smaller settlements retain their identity;

⁵ GMC (1981) Greater Manchester Structure Plan: Approved Written Statement.

maintaining the openness of the countryside; and protecting the setting and character of towns and cities that grew during the Industrial Revolution.

19. The 2016 report also examined the contribution of a number of areas of land not currently in the Green Belt to the NPPF Green Belt purposes, and this was followed by assessments in 2018 and 2019 of further potential additions to the Green Belt .

20. The 2016 Stage 1 Green Belt Study formed part of the evidence base informing the October 2016 Draft Greater Manchester Spatial Framework (GMSF). Three of the five main concerns raised in consultation responses on the draft plan related to Green Belt issues. These concerns were:

- Green Belt land was being released when there is a lot of brownfield land that could be used instead;
- too much Green Belt was being proposed for development; and
- the Green Belt sites would not be providing housing for local people.

21. The January 2019 Revised Draft of the Plan states that the Plan seeks to address these concerns, by reducing the net loss of Green Belt from 8.2%, as proposed in the 2016 Draft Plan, to 4.1%, as well as by providing stronger protection for important green infrastructure.

22. The 2019 Revised Draft Plan notes that although the majority of the development required to deliver the GMSF's spatial strategy will be within the existing urban area, there is insufficient land to meet the development needs of Greater Manchester. The Plan therefore sets out 51 sites outside the urban area which are proposed for allocation within the Plan, of which 47 lie either entirely, or partially within, the Green Belt. In addition to the identification of land proposed to be removed from the Green Belt, the Revised Draft Plan also identified 65 areas of land to be added to the Green Belt designation.

Harm Assessment Methodology

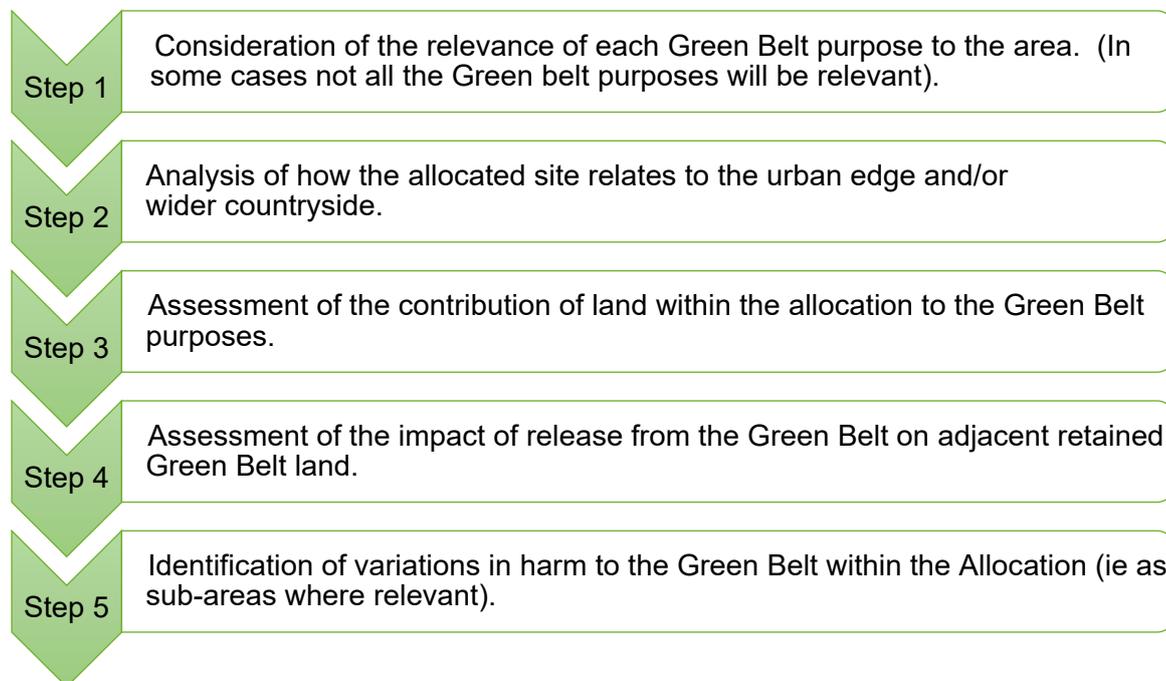
23. The assessment of harm considers the extent to which the release of land within each proposed site Allocation would reduce the contribution to Green Belt purposes, through both the loss of openness of the released land and the resulting impact that this could have on the adjacent Green Belt. The principal factors that inform this judgement are: the extent to which

adjacent retained Green Belt land would become contained by new development, and the impact on the strength of the remaining Green Belt boundaries.

24. Some of the draft Allocations propose to retain some Green Belt land within the sites. In these instances only land proposed to be released within the Allocation has been assessed. The text and mapping accompanying the assessments indicate the presence of such areas and highlight where these areas may be weakened as a result of release of land within the Allocation.

25. Certain designations are recognised as constituting an ‘absolute’ constraint to development – i.e. areas within which development would not be permitted (e.g. national and international nature conservation designations). Any function that constrained areas, either within or adjacent to Allocations, may perform as areas of open land and/or as boundary features has been taken into consideration in the assessment of harm.

26. The assessment process that was used to undertake the assessment of harm for each Allocation was broken down into five key steps:



27. The assessment of contribution to Green Belt purposes (Step 3) is the product of the analysis of Steps 1 and 2.

28. Step 4 rates the potential impact of the release of land (with the assumption that it will lose openness) on adjacent retained Green Belt land.

29. Step 5 combines the judgements from Steps 3 and 4 to arrive at conclusions regarding variations in harm, with sub-areas identified to reflect any variations.

Summary of Findings

30. The findings of the harm assessment are summarised by authority and Allocation in the table below.

31. It is recognised that the sites listed here may be subject to change in the planned 2020 iteration of the GMSF.

32. In each location where land is proposed to be removed from the Green Belt, a planning decision has to be made as to whether the wider benefits of development outweigh the potential harm to the Green Belt. In light of this, this assessment of harm to the Green Belt purposes does not draw conclusions on what land should be released to accommodate development, but identifies relative variations in harm to the designation.

Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ⁶	Harm rating
Cross-Boundary Strategic Allocations						
GM1.1	Bury / Rochdale	Heywood / Pilsworth	640.4	GM1.1-1	294.7	Very High
GM1.1	Bury / Rochdale	Heywood / Pilsworth	640.4	GM1.1-2	83.7	High
GM1.1	Bury / Rochdale	Heywood / Pilsworth	640.4	GM1.1-3	72.5	Moderate-High

⁶ Due to minor digitisation variations the Allocation area totals may not exactly equal the sum of the component areas, and some Allocation size figures also include land which lies outside of the Green Belt, and which is therefore not assessed.

Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ⁶	Harm rating
GM1.1	Bury / Rochdale	Heywood / Pilsworth	640.4	GM1.1-4	46.3	Low-Moderate
GM1.1	Bury / Rochdale	Heywood / Pilsworth	640.4	GM1.1-5	3.9	Low
GM1.1	Bury / Rochdale	Heywood / Pilsworth	640.4	Developed Land	135.2	Very Low
GM1.2	Bury / Rochdale	Simister / Bowlee	217.9	GM1.2-1	69.1	Moderate-High
GM1.2	Bury / Rochdale	Simister / Bowlee	217.9	GM1.2-2	148.3	High
GM2	Oldham / Rochdale	Stakehill	200.2	GM2-1	64.2	High
GM2	Oldham / Rochdale	Stakehill	200.2	GM2-2	18.0	Moderate
GM2	Oldham / Rochdale	Stakehill	200.2	GM2-3	27.1	Low-Moderate
GM2	Oldham / Rochdale	Stakehill	200.2	GM2-4	66.5	High
GM2	Oldham / Rochdale	Stakehill	200.2	Retained Green Belt	24.5	Retained Green Belt
GM3	Oldham / Rochdale	Kingsway South	278.7	GM3-1	120.2	Very High
GM3	Oldham / Rochdale	Kingsway South	278.7	GM3-2	17.6	High
GM3	Oldham / Rochdale	Kingsway South	278.7	GM3-3	36.1	Very High
GM3	Oldham / Rochdale	Kingsway South	278.7	GM3-4	14.2	High

Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ⁶	Harm rating
GM3	Oldham / Rochdale	Kingsway South	278.7	GM3-5	3.8	Moderate
GM3	Oldham / Rochdale	Kingsway South	278.7	GM3-6	5.1	Moderate-High
GM3	Oldham / Rochdale	Kingsway South	278.7	GM3-7	3.1	High
GM3	Oldham / Rochdale	Kingsway South	278.7	Retained Green Belt	75.8	Retained Green Belt
Bolton						
GM4	Bolton	Bewshill Farm	5.6	GM4	5.5	Low
GM5	Bolton	Chequerbent North	15.8	GM5-1	8.3	High
GM5	Bolton	Chequerbent North	15.8	GM5-2	7.5	Moderate
GM6	Bolton	West of Wingates / M61 Junction 6	183.7	GM6-1	161.2	High
GM6	Bolton	West of Wingates / M61 Junction 6	183.7	GM6-2	21.5	Moderate-High
Bury						
GM1.3	Bury	Whitefield	62.7	GM1.3-1	51.7	Low-Moderate
GM1.3	Bury	Whitefield	62.7	GM1.3-2	10.5	Low
GM7	Bury	Elton Reservoir	251.7	GM7-1	14.6	Moderate-High

Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ⁶	Harm rating
GM7	Bury	Elton Reservoir	251.7	GM7-2	36.3	High
GM7	Bury	Elton Reservoir	251.7	GM7-3	8.0	High
GM7	Bury	Elton Reservoir	251.7	GM7-4	41.6	Moderate-High
GM7	Bury	Elton Reservoir	251.7	GM7-5	16.0	High
GM7	Bury	Elton Reservoir	251.7	GM7-6	10.3	Moderate
GM7	Bury	Elton Reservoir	251.7	Retained Green Belt	112.7	Retained Green Belt
GM8	Bury	Seedfield	5.1	GM8	5.1	Very Low
GM9	Bury	Walshaw	64.1	GM9	61.3	Moderate
Manchester						
GM10	Manchester	Global Logistics	20.0	GM10	12.2	Moderate
GM11	Manchester	Roundthorn Medipark Extension	21.5	GM11	21.4	Moderate
GM12	Manchester	Southwick Park	1.0	GM12	0.7	Very Low
Oldham						
GM13	Oldham	Ashton Road Corridor	12.3	GM13-1	5.9	Moderate-High
GM13	Oldham	Ashton Road Corridor	12.3	GM13-2	5.5	Moderate-High

Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ⁶	Harm rating
GM14	Oldham	Beal Valley	51.2	GM14-1	37.5	High
GM14	Oldham	Beal Valley	51.2	GM14-2	2.0	Moderate
GM15	Oldham	Broadbent Moss	81.6	GM15-1	34.6	Moderate-High
GM15	Oldham	Broadbent Moss	81.6	GM15-2	2.8	Moderate
GM15	Oldham	Broadbent Moss	81.6	GM15-3	2.3	Moderate
GM15	Oldham	Broadbent Moss	81.6	Retained Green Belt	25.0	Retained Green Belt
GM17	Oldham	Hanging Chadder	22.7	GM17	22.7	Moderate-High
GM18	Oldham	Robert Fletchers	32.3	GM18	14.2	Moderate
GM18	Oldham	Robert Fletchers	32.3	Retained Green Belt	15.3	Retained Green Belt
GM19	Oldham	South of Rosary Road	2.7	GM19	2.3	Low-Moderate
GM19	Oldham	South of Rosary Road	2.7	Retained Green Belt	0.3	Retained Green Belt
GM20	Oldham	Spinners Way / Alderney Farm	2.0	GM20	2.0	Low-Moderate
GM21	Oldham	Thornham Old Road	34.7	GM21-1	20.3	High

Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ⁶	Harm rating
GM21	Oldham	Thornham Old Road	34.7	GM21-2	14.3	Moderate-High
GM22	Oldham	Woodhouses	9.0	GM22-1	3.4	High
GM22	Oldham	Woodhouses	9.0	GM22-2	2.4	High
GM22	Oldham	Woodhouses	9.0	GM22-3	2.0	Moderate-High
GM22	Oldham	Woodhouses	9.0	GM22-4	1.3	Moderate
Rochdale						
GM23	Rochdale	Bamford / Norden	35.6	GM23-1	22.5	Moderate
GM23	Rochdale	Bamford / Norden	35.6	GM23-2	13.0	Low-Moderate
GM24	Rochdale	Castleton Sidings	11.5	GM24	5.3	Moderate
GM24	Rochdale	Castleton Sidings	11.5	Retained Green Belt	3.1	Retained Green Belt
GM25	Rochdale	Crimble Mill	16.8	GM25-1	10.9	High
GM25	Rochdale	Crimble Mill	16.8	GM25-2	2.8	Moderate-High
GM25	Rochdale	Crimble Mill	16.8	Retained Green Belt	2.6	Retained Green Belt
GM26	Rochdale	Land North of Smithy Bridge	20.4	GM26	18.4	Low-Moderate
GM27	Rochdale	Newhey Quarry	13.6	GM27	13.5	Moderate-High

Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ⁶	Harm rating
Salford						
GM30	Salford	Land at Hazelhurst Farm	15.7	GM30	15.7	Low-Moderate
GM31	Salford	East of Boothstown	29.0	GM31-1	11.6	Low-Moderate
GM31	Salford	East of Boothstown	29.0	GM31-2	17.4	Moderate
GM32	Salford	North of Irlam Station	65.1	GM32	64.3	Moderate
GM33	Salford	Port Salford Extension	109.1	GM33-1	57.1	Moderate
GM33	Salford	Port Salford Extension	109.1	GM33-2	52.0	Moderate
Stockport						
GM34	Stockport	Bredbury Park Extension	28.5	GM34-1	11.8	High
GM34	Stockport	Bredbury Park Extension	28.5	GM34-2	11.6	Moderate-High
GM34	Stockport	Bredbury Park Extension	28.5	GM34-3	5.0	Moderate
GM35	Stockport	Former Offerton High School	16.9	GM35	16.9	Low
GM36	Stockport	Gravel Bank Road / Unity Mill	6.1	GM36	4.8	Moderate

Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ⁶	Harm rating
GM36	Stockport	Gravel Bank Road / Unity Mill	6.1	Developed Land	1.3	Very Low
GM37	Stockport	Heald Green	27.3	GM37-1	17.8	Moderate-High
GM37	Stockport	Heald Green	27.3	GM37-2	4.3	Low-Moderate
GM38	Stockport	High Lane	19.9	GM38	19.9	Moderate
GM39	Stockport	Hyde Bank Meadows	10.2	GM39-1	7.0	Moderate
GM39	Stockport	Hyde Bank Meadows	10.2	GM39-2	3.2	Low-Moderate
GM40	Stockport	Griffin Farm, Stanley Green	64.7	GM40-1	47.7	Moderate-High
GM40	Stockport	Griffin Farm, Stanley Green	64.7	GM40-2	16.9	Moderate
GM41	Stockport	Woodford Aerodrome	120.0	GM41-1	40.6	Moderate-High
GM41	Stockport	Woodford Aerodrome	120.0	GM41-2	7.6	Low-Moderate
GM41	Stockport	Woodford Aerodrome	120.0	GM41-3	3.1	Low
GM41	Stockport	Woodford Aerodrome	120.0	GM41-4	4.1	Low
GM41	Stockport	Woodford Aerodrome	120.0	GM41-5	1.8	Very Low
GM41	Stockport	Woodford Aerodrome	120.0	GM41-6	5.5	Low-Moderate

Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ⁶	Harm rating
GM41	Stockport	Woodford Aerodrome	120.0	GM41-7	1.9	Low
GM41	Stockport	Woodford Aerodrome	120.0	Developed Land	55.3	Very Low
Tameside						
GM42	Tameside	Ashton Moss West	58.2	GM42-1	36.5	Moderate
GM42	Tameside	Ashton Moss West	58.2	GM42-2	14.5	Low-Moderate
GM42	Tameside	Ashton Moss West	58.2	GM42-3	7.3	Low-Moderate
GM43	Tameside	Godley Green Garden Village	123.9	GM43	123.9	High
GM44	Tameside	South of Hyde	32.4	GM44-1	13.4	Moderate
GM44	Tameside	South of Hyde	32.4	GM44-2	9.4	Moderate-High
GM44	Tameside	South of Hyde	32.4	GM44-3	3.9	Moderate
GM44	Tameside	South of Hyde	32.4	GM44-4	1.8	Low-Moderate
GM44	Tameside	South of Hyde	32.4	GM44-5	1.9	Low-Moderate
GM44	Tameside	South of Hyde	32.4	Developed Land	2.0	Very Low

Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ⁶	Harm rating
Trafford						
GM45	Trafford	New Carrington	1137.7	GM45-1	4.6	High
GM45	Trafford	New Carrington	1137.7	GM45-2	62.3	Moderate-High
GM45	Trafford	New Carrington	1137.7	GM45-3	12.0	Moderate-High
GM45	Trafford	New Carrington	1137.7	GM45-4	52.1	Moderate-High
GM45	Trafford	New Carrington	1137.7	GM45-5	34.7	Moderate
GM45	Trafford	New Carrington	1137.7	GM45-6	55.0	Very High
GM45	Trafford	New Carrington	1137.7	GM45-7	20.1	Moderate-High
GM45	Trafford	New Carrington	1137.7	Retained Green Belt	306.8	Retained Green Belt
GM46	Trafford	Timperley Wedge	225.0	GM46-1	31.1	Moderate
GM46	Trafford	Timperley Wedge	225.0	GM46-2	11.8	High
GM46	Trafford	Timperley Wedge	225.0	GM46-3	8.4	Moderate
GM46	Trafford	Timperley Wedge	225.0	GM46-4	8.6	Moderate
GM46	Trafford	Timperley Wedge	225.0	GM46-5	19.6	Very High

Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ⁶	Harm rating
GM46	Trafford	Timperley Wedge	225.0	GM46-6	7.4	Moderate
GM46	Trafford	Timperley Wedge	225.0	GM46-7	10.4	Moderate
GM46	Trafford	Timperley Wedge	225.0	GM46-8	16.8	High
GM46	Trafford	Timperley Wedge	225.0	Retained Green Belt	73.9	Retained Green Belt
Wigan						
GM47	Wigan	Land South of Pennington	53.1	GM47	53.1	Very High
GM48	Wigan	M6, Junction 25	73.7	GM48	73.7	Very High
GM49	Wigan	North of Mosley Common	64.6	GM49-1	19.4	High
GM49	Wigan	North of Mosley Common	64.6	GM49-2	26.5	Moderate-High
GM49	Wigan	North of Mosley Common	64.6	GM49-3	18.5	Low-Moderate
GM51	Wigan	West of Gibfield	53.9	GM51-1	13.3	Very High
GM51	Wigan	West of Gibfield	53.9	GM51-2	9.2	Moderate-High
GM51	Wigan	West of Gibfield	53.9	GM51-3	31.3	Moderate

Making Changes to the Green Belt

33. This Stage 2 Green Belt study assesses the potential harm to the Green Belt purposes of releasing land for development within the Allocations proposed in the 2019 draft GMSF. The NPPF states that if changes are made to the Green Belt they should be made through the Development Plan process and that local authorities need to demonstrate the 'exceptional circumstances' why the any such changes are needed.

34. Before concluding that 'exceptional circumstances' exist to justify changes to the Green Belt, the NPPF states that local authorities should demonstrate that all other 'reasonable options' for meeting its identified need for development have been considered. In particular local authorities need to consider whether their strategy:

- makes effective use of suitable brownfield sites and underutilised land;
- optimises the density of development in town and city centres and other locations well served by public transport; and
- explores whether other authorities can help to meet some of the identified development requirement.

35. However, there are other important factors that need to be considered when establishing exceptional circumstances for making alterations to Green Belt boundaries, most notably the need for development and wider sustainability, viability and deliverability issues. Whilst the ideal would be to minimise harm to the Green Belt, it may be that the most sustainable locations for development will result in high harm to the Green Belt.

36. In releasing land from the Green Belt, the NPPF also states that careful consideration needs to be given to the potential opportunities to enhance the beneficial use of the remaining Green Belt. e.g. improving access, enhancing the landscape, protecting biodiversity. A review of these potential opportunities for each Allocation is set out in the accompanying report: Identification of Opportunities to Enhance the Beneficial Use of the Green Belt.

Chapter 1

Introduction

Study Aim and Scope

1.1 This study assesses the potential impact on the Green Belt that could result from release of land within the development allocations proposed in the Revised Draft (January 2019) of the Greater Manchester Spatial Framework (GMSF). Its intention is to inform the finalisation of the proposed Allocations.

1.2 It forms part of Stage 2 of the Green Belt assessment process. Other elements of Stage 2, which are presented as separate reports, are:

- An assessment of the contribution to the Green Belt purposes that would be made by the addition of new Green Belt land also proposed in the GMSF⁷.
- An assessment of the combined effect of proposed releases and proposed new Green Belt on the strategic functioning of the Greater Manchester Green Belt⁸.
- An analysis of the potential to enhance the beneficial use of the remaining Green Belt in the vicinity of the proposed Allocations⁹.

⁷ Stage 2 Greater Manchester Green Belt Study - Contribution Assessment of Proposed 2020 GMSF Green Belt Additions (LUC, September 2020)

⁸ Stage 2 Greater Manchester Green Belt Study - Cumulative Assessment of Proposed 2020 GMSF Allocations and Additions (LUC, September 2020)

⁹ Stage 2 Greater Manchester Green Belt Study - Identification of Opportunities to Enhance the Beneficial Use of the Green Belt in the vicinity of Proposed 2019 GMSF Allocations (LUC, September 2020)

1.3 The Stage 1 Green Belt Study, that was undertaken by LUC in 2016¹⁰, assessed the whole of the Green Belt in Great Manchester, providing a comprehensive analysis of variations in contribution of land to the Green Belt purposes as set out in the National Planning Policy Framework (NPPF). This was used to inform the draft GMSF Allocations on which the Stage 2 Green Belt Study is focused.

1.4 Together, the Stage 2 reports provide the analysis required to understand the harm to the Green Belt purposes that would result from the proposed development allocations, the potential to mitigate that harm and the opportunities to enhance the beneficial use of retained Green Belt land.

Assessment of Harm

1.5 As noted above, the Stage 1 Green Belt Study assessed contribution to the five purposes of the Green Belt, as set out in the National Planning Policy Framework (NPPF). This Stage 2 study goes beyond that and assesses the harm to Green Belt purposes that would result from releasing land for development.

1.6 The study encompasses those 47 of the 51 proposed GMSF Allocations (as of January 2019) that lie entirely, or in part within the Green Belt (see **Table 2.2** below).

1.7 Case law, as established in *Calverton Parish Council v Greater Nottingham Councils & others* (2015)¹¹, indicates that planning judgments setting out the ‘exceptional circumstances’ for the amendment of Green Belt boundaries require consideration of the ‘nature and extent of harm’ to the Green Belt and ‘the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent’. An extract from the Inspectors judgement is set out below:

“the planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2)

¹⁰ Greater Manchester Green Belt Assessment (LUC, June 2016)

¹¹ <http://www.hwa.uk.com/site/wp-content/uploads/2017/05/Calverton-PC-v-Nottingham-CC-Ors.pdf>

should, at least ideally, identify and then grapple with the following matters: (i) the acuteness/intensity of the objectively assessed need (matters of degree may be important); (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development; (iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt; (iv) the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and (v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.”

1.8 The approach to meeting this requirement for an assessment of harm, set out in **Chapter 4** below, has been informed by the requirements of the NPPF and consideration of local plan examination inspectors’ reports and case law. Although informed by the Stage 1 Green Belt Assessment analysis, this Stage 2 study has involved a more detailed level of assessment, resulting in the identification of variations in contribution (and in the subsequent harm that would result from release) for development allocations and, where appropriate, for smaller areas within them. The Stage 1 Green Belt Assessment ensured that Green Belt analysis has been suitably comprehensive, i.e. that all the Green Belt had been analysed, but Stage 2 provides more specific information which can be used to help limit the impacts of Green Belt release on the designation’s purposes.

Use of Study Main Outputs

1.9 The assessment provides guidance on:

- the contribution individual Allocation areas make to the NPPF Green Belt purposes, ensuring consistency with the original 2016 Greater Manchester Green Belt assessment;
- the harm that would result from the release of each allocated site, considering contribution to the Green Belt purposes together with any impact on the integrity of retained Green Belt land (either adjacent to or within Allocations) resulting from changes in boundary strength, and/or increased containment of open land;

- variations in harm within potential Allocations, suggesting areas that may be more or less suitable for development from a Green Belt perspective, with opportunities within and around the latter offering the potential to mitigate harm;
- the impact that keeping as Green Belt those areas of land indicated in the 2019 GMSF for retention would have on the assessed harm for release of each Allocation as a whole (this is only applicable to some of the Allocations).

1.10 The outputs, alongside analysis relating to other planning considerations, such as sustainability, transport implications, etc. will inform decisions regarding the relative merits of meeting Greater Manchester's development needs in different parts of the metropolitan area, including informing decisions on whether land should be released from the Green Belt.

1.11 The purpose of the study is not to set out what exceptional circumstances may exist for changing the Green Belt boundaries. Nor is its purpose to identify where or how much land should be released from the Green Belt. The study does not suggest that the sub-area boundaries identified, reflecting variations in harm, should necessarily form revised Green Belt boundaries, as there may be reasons other than those associated with Green Belt harm that have a bearing on this.

Report Authors

1.12 The report has been prepared by LUC, which has advised clients including local authorities across the country on Green Belt issues, as well as undertaking numerous independent Green Belt studies at a range of scales. LUC have completed Green Belt assessments or reviews on behalf of over 45 local authorities throughout England.

Report Structure

1.13 The remainder of this report is structured as follows:

- **Chapter 2:** sets out the national and local policy context and provides an overview of the Green Belt within Greater Manchester;
- **Chapter 3:** outlines the harm assessment methodology;
- **Chapter 4:** summarises the findings of the Green Belt harm assessment; and

- **Chapter 5:** sets out considerations relating to the amendment of Green Belt boundaries, potential design principles for minimising harm to the Green Belt and other considerations relating to enhancing the remaining Green Belt land.
- **Appendix A:** provides a glossary of key terms used within the report.
- **Appendix B:** presents the detailed harm assessments for each Allocation assessed

Chapter 2

Green Belt Policy and Context

2.1 This chapter provides a summary of national and local Green Belt policy, as well as a summary of the context of the Greater Manchester Green Belt and of the Stage 1 Green Belt review work carried out in 2016.

National Planning Policy and Guidance

National Planning Policy Framework

2.2 Government policy on the Green Belt is set out in chapter 13 of the adopted National Planning Policy Framework (NPPF)¹² Protecting Green Belt Land. Paragraph 133 of the NPPF states that “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.

2.3 This is elaborated in NPPF Paragraph 134, which states that Green Belts should serve five purposes, as set out below.

The purposes of Green Belt

1. To check the unrestricted sprawl of large built-up areas.
2. To prevent neighbouring towns merging into one another.
3. To assist in safeguarding the countryside from encroachment.
4. To preserve the setting and special character of historic towns.

¹² Department of Communities and Local Government (2018) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>.

5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.4 The NPPF emphasises in Paragraphs 135 and 136 that local planning authorities should establish and, if justified, only alter Green Belt boundaries through the preparation of their Local Plans. It goes on to state that:

“once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries having regard to their intended permanence in the long term, so they can endure beyond the plan period.”

2.5 Current planning guidance makes it clear that the Green Belt is a strategic planning policy constraint designed primarily to prevent the spread of built development and the coalescence of urban areas. The NPPF goes on to state:

“local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land” (Paragraph 141).

2.6 It is important to note, however, that these positive roles should be sought for the Green Belt once designated. The lack of a positive role, or the poor condition of Green Belt land, does not necessarily undermine its fundamental role to prevent urban sprawl by keeping land permanently open. Openness is not synonymous with landscape character or quality.

2.7 Paragraph 143 and 144 state that:

“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances... ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.”

2.8 New buildings are inappropriate in the Green Belt. There are exceptions to this which are set out in two closed lists. The first is in paragraph 145 which sets out the following exceptions:

- “buildings for agriculture and forestry;
- the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages;
- limited affordable housing for local community needs under policies set out in the development plan; and
- limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development, or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.”

2.9 Paragraph 146 sets out other forms of development that are not inappropriate provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in the Green Belt. These are:

- “mineral extraction;
- engineering operations;
- local transport infrastructure which can demonstrate a requirement for a Green Belt location;

- the re-use of buildings provided that the buildings are of permanent and substantial construction;
- material changes in the use of land (such as changes of use for outdoor sport or recreation or for cemeteries or burial grounds); and
- development brought forward under a Community Right to Build Order or Neighbourhood Development Order.”

Planning Practice Guidance

2.10 The NPPF's Green Belt policies are supplemented by additional National Planning Practice Guidance (NPPG). The guidance sets out some of the factors that should be taken into account when considering the potential impact of development on the openness of Green Belt land. The factors referenced are not presented as an exhaustive list, but rather a summary of some common considerations borne out by specific case law judgements. The guidance states openness is capable of having both spatial and visual aspects¹³. Other circumstances which have the potential to affect judgements on the impact of development on openness include:

- the duration of development and its remediability to the original or to an equivalent (or improved) state of, openness; and
- the degree of activity likely to be generated by development, such as traffic generation.

2.11 The guidance also elaborates on Paragraph 138 of the NPPF which requires local planning authorities to set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. The guidance endorses the preparation of supporting landscape, biodiversity or recreational need evidence to identify appropriate compensatory improvements, including:

¹³ Two important Planning Appeal judgements (Heath & Hampstead Society v Camden LBC & Vlachos (2008) and Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016)) define openness as having both a spatial aspect and a visual aspect. Further details are set out in Chapter 2 and in the case law section below.

- “new or enhanced green infrastructure;
- woodland planting;
- landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
- improvements to biodiversity, habitat connectivity and natural capital;
- new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision.”

2.12 Finally, the guidance offers some suggested considerations for securing the delivery of identified compensatory improvements – the need for early engagement with landowners and other interested parties to obtain the necessary local consents, establishing a detailed scope of works and identifying a means of funding their design, construction and maintenance through planning conditions, section 106 obligations and/or the Community Infrastructure Levy.

Planning Advisory Service Guidance

2.13 Neither the NPPF or NPPG provide guidance on how to undertake Green Belt reviews. However, the Planning Advisory Service (PAS) published an advice note¹⁴ (2015) that discusses some of the key issues associated with assessing the Green Belt. Reference to the PAS guidance is included in the Methodology section in **Chapter 3** where relevant.

Origins and evolution of the Green Belt in Greater Manchester

The Origins of the Greater Manchester Green Belt

2.14 In 1955 the Government established (through Circular 42/55) the first clear policy on the need for Green Belts in areas outside of London, including the Greater Manchester area. From

¹⁴ Planning on the Doorstep: The Big Issues – Green Belt,
<https://www.local.gov.uk/sites/default/files/documents/green-belt-244.pdf>

this original Governmental statement, there was uncertainty over the exact extent of the areas to be defined as Green Belt within areas such as Greater Manchester. This was due to the rapid economic expansion and rapid rate of house building which was seen in the 1960's¹⁵.

Population projections for the end of the century during the 1960s were not realised given the later dramatic drop in birth rates and outward migration in the Greater Manchester area.

Continued requirements for large tracts of building land, which were unquantifiable given the uncertainty of future growth levels, meant the size of areas to be included in the Green Belt were not clear.

2.15 Further difficulty deciding on an appropriate approach for the Green Belt arose with the evolution of the planning system in England towards the new Development Plan system under the Planning Acts of 1947 and 1962, as well as the re-organisation of local government. This latter change resulted in the creation of the Greater Manchester Council (GMC) and 10 metropolitan district councils in the north west in 1974¹⁶.

2.16 A 'patchwork-quilt' of Green Belt policies were inherited by the new authorities; for example the stretch of Green Belt which is in the vicinity of Manchester Airport had been established as part of an amendment to the Cheshire County Development Plan¹⁷ which considered the Green Belt in the north of the County. As such there was a need to rationalise and bring about consistency in the approach to Green Belt.

Greater Manchester Structure Plan (approved 1981)

2.17 The broad extent of the Green Belt in Greater Manchester appeared in draft in the 1978 Greater Manchester Structure Plan which was approved by the Secretary of State in 1981. Detailed boundaries were introduced in the Greater Manchester Green Belt Local Plan adopted in 1984 in the form of the Proposals Map. Since that time and following the GMC's abolition in

¹⁵ Entec for the Manchester Airport Group (2010) Local Development Framework Evidence Base

¹⁶ Local Government Act 1972.

¹⁷ Entec for the Manchester Airport Group (2010) Local Development Framework Evidence Base.

1986¹⁸ these boundaries have been carried forward and, in some cases,, amended through individual Local Plans, Unitary Development Plans and the Core Strategies for each of the ten GM districts.

2.18 One of the aims which emerged in the preparation of the GM Structure Plan was the regeneration of the older urban parts of the conurbation at Manchester and Salford in particular¹⁹. This was in addition to the more ‘traditional’ Green Belt roles of separating urban areas from each other and preventing further suburbanisation of countryside surrounding these areas. The primary purposes of the Greater Manchester Green Belt, were set out in Policy OL1 of The Greater Manchester Green Belt Local Plan Written Statement and were in line with policy at a national level²⁰:

- To check further growth of a built-up area.
- To prevent neighbouring towns from merging.
- To preserve the special character of a town.

2.19 The purposes were in support of the four main themes of the 1981 GM Structure Plan²¹:

- An emphasis upon urban concentration.
- An attempt to redirect development more towards the central core of the conurbation.
- The maintenance of the regional centre, a theme which is linked to the regeneration of Manchester’s and Salford’s inner areas.
- Resource conservation and amenity.

2.20 The Inspector’s report on the Greater Manchester Green Belt Local Plan clarifies that the Green Belt is one of the policies which can play a major contribution towards implementing these four themes. The Inspector identified that it would be appropriate to adopt an approach which established a buffer of open land between the inner edge of the Green Belt and the built

¹⁸ Local Government Act 1978.

¹⁹ Bury Council (2013) Bury Local Plan Environment Topic Paper.

²⁰ Former Ministry of Housing and Local Government (1955) Circular 42/55.

²¹ GMC (1981) Greater Manchester Structure Plan: Approved Written Statement.

up area in some areas. In other areas, it would be appropriate to draw boundaries which were tightly defined around existing edges of built up areas, particularly to prevent the merging of established settlements as supported by the advice of “The Green Belts” booklet. It was hoped that this approach would act as a severe restraint to development, thereby redirecting development towards more urban areas and serving the theme of urban concentration. In these situations, the Inspector concluded that the land must fulfil one or more of the three identified primary purposes of Green Belt²².

2.21 The 1981 GM Structure Plan, 1984 GM Green Belt Local Plan and the reviewed and superseded 1986 version of the GM Structure Plan specifically through Policy OL1 identified 26 “general areas” within the Green Belt. Since 1984, alterations to the Green Belt have occurred through individual Local Authority development plans where:

- exceptional circumstances have required amendments (such as the requirement to accommodate the expansion of Manchester Airport);
- additional land has been added to the Green Belt through Local Plans in the 1980’s (which was envisaged in the 1984 Plan)

The Green Belt in Greater Manchester Today

2.22 Figure 2.1 (on page 22) and Table 2.1 below shows the approximate distribution of Green Belt today within the 10 Greater Manchester authorities.

Table 2.1: Indicative extent of Green Belt by Greater Manchester Authority

Local Authority	Total Authority Area (ha)	Designated Green Belt area (ha)	Designated Green Belt area (%)
Bolton MBC	13,979	7,230	51.7
Bury MBC	9,946	5,920	59.5
Manchester City	11,565	1,280	11.1
Oldham MBC	14,235	6,250	43.9
Rochdale MBC	15,813	9,930	62.8

²² GMC (1982) The Greater Manchester Green Belt Local Plan Report of the Inspector.

Local Authority	Total Authority Area (ha)	Designated Green Belt area (ha)	Designated Green Belt area (%)
Salford City	9,720	3,370	34.7
Stockport MBC	12,604	5,860	46.5
Tameside MBC	10,315	5,070	49.1
Trafford MBC	10,604	3,990	37.6
Wigan MBC	18,817	10,650	56.6
TOTAL	127,598	59,550	46.7

Greater Manchester Spatial Framework

2.23 The Greater Manchester Spatial Framework: Greater Manchester's Plan for Homes, Jobs and the Environment (GMSF) (2019) set out how Greater Manchester should develop over the next two decades up to the year 2037. This includes identifying the amount of new development that will come forward across the ten districts, in terms of housing, offices, and industry and warehousing, and the main areas in which this will be focused .

2.24 The 2016 Green Belt Assessment formed part of the evidence base informing the October 2016 Draft GMSF. Over 27,000 consultation responses were received on the draft plan, and three of the five main concerns raised regarded the Green Belt. These concerns were:

- Green Belt land was being released when there is a lot of brownfield land that could be used instead;
- too much Green Belt is being proposed for development; and
- the Green Belt sites would not be providing housing for local people.

2.25 The January 2019 Revised Draft of the Plan states that the Plan seeks to address these concerns, including by reducing the net loss of Green Belt from 8.2%, as proposed in the 2016 Draft Plan, to 4.1%, as well as by providing stronger protection for important green infrastructure.

2.26 Policy GM-G11 The Greater Manchester Green Belt states that the Green Belt will be afforded strong protection in accordance with the NPPF and will continue to be managed

positively to serve the five NPPF defined Green Belt purposes. The policy notes that positive and beneficial use of the Green Belt will be supported where this will not harm the Green Belt, and in particular, the enhancement of its green infrastructure functions will be encouraged, such as: “improved public access and habitat restoration, helping to deliver environmental and social benefits for the residents of Greater Manchester and providing the high quality green spaces that will support economic growth”. The policy also states that where land is proposed to be released from the Green Belt, Green Belt policies will be strictly applied except in the case of planning applications complying with the relevant Allocation policies within the GMSF.

2.27 The 2019 Revised Draft Plan notes that although the majority of the development required to deliver the GMSF’s spatial strategy will be within the existing urban area, it has been identified that there is insufficient land to meet the development needs of Greater Manchester. The Plan states that it was determined, following discussions with neighbouring authorities, that it would not be appropriate for them to meet some of the development needs of Greater Manchester. The Plan therefore sets out 51 sites outside the urban area which are proposed for allocation within the Plan, of which 47 lie either entirely, or partially within, the Green Belt.

Figure 2.2 a-k set out the location of these sites. It is these 47 sites which are assessed in this study. These are listed in **Table 2.2** below with reference to their name, local authority area, size, development type and whether they lie totally, partially or not within the Green Belt. Those marked in grey have not been assessed within this study, as they do not lie within the Green Belt.

2.28 It is recognised that the sites listed here may be subject to change in the planned 2020 iteration of the GMSF.

2.29 In addition to the identification of land proposed to be removed from the Green Belt, the Revised Draft Plan also identified 65 areas of land to be added to the Green Belt designation. The Plan notes that these areas were identified as they were assessed to meet one or more of the five Green Belt purposes.

Table 2.2: Strategic Allocations within Draft GMSF (2019)

GMSF Allocation Reference	Local Authority	Allocation Name	Development Type	Area (Ha)	Within Green Belt?
01	Bury / Rochdale	Northern Gateway: Heywood/Pilsworth	Mixed	640.42	Partially
01	Bury / Rochdale	Northern Gateway: Whitefield	Mixed	62.71	Yes
01	Bury / Rochdale	Northern Gateway: Simister and Bowlee	Mixed	217.87	Yes
01	Bury / Rochdale	Northern Gateway: Simister and Bowlee	Mixed	22.99	No
02	Oldham / Rochdale	Stakehill	Mixed	200.23	Yes
03	Oldham / Rochdale	Kingsway South	Mixed	278.69	Yes
04	Bolton	Bewshell Farm	Industry / warehousing	5.59	Yes
05	Bolton	Chequerbent North	Industry / warehousing	15.82	Yes
06	Bolton	West of Wingates / M61 Junction 6	Industry / warehousing	183.69	Yes
07	Bury	Elton Reservoir	Housing	251.67	Partially
08	Bury	Seedfield	Housing	5.15	Yes
09	Bury	Walshaw	Housing	64.13	Partially

GMSF Allocation Reference	Local Authority	Allocation Name	Development Type	Area (Ha)	Within Green Belt?
10	Manchester	Global Logistics	Industry / warehousing	19.98	Partially
11	Manchester	Roundthorn Medipark Extension	Mixed	21.47	Yes
12	Manchester	Southwick Park	Housing	0.97	Partially
13	Oldham	Ashton Road Corridor	Housing	12.31	Partially
14	Oldham	Beal Valley	Housing	51.20	Partially
15	Oldham	Broadbent Moss	Mixed	81.63	Partially
16	Oldham	Cowlshaw	Housing	32.31	No
17	Oldham	Hanging Chadder	Housing	22.66	Yes
18	Oldham	Robert Fletchers	Mixed	32.27	Partially
19	Oldham	South of Rosary Road	Housing	2.66	Yes
20	Oldham	Spinners Way / Alderney Farm	Housing	2.00	Yes
21	Oldham	Thornham Old Road	Housing	34.73	Yes
22	Oldham	Woodhouses	Housing	9.03	Yes
23	Rochdale	Bamford / Norden	Housing	35.60	Yes
24	Rochdale	Castleton Sidings	Housing	11.54	Partially

GMSF Allocation Reference	Local Authority	Allocation Name	Development Type	Area (Ha)	Within Green Belt?
25	Rochdale	Crimble Mill	Housing	16.81	Partially
26	Rochdale	Land North of Smithy Bridge	Housing	20.38	Partially
27	Rochdale	Newhey Quarry	Housing	13.60	Yes
28	Rochdale	Roch Valley	Housing	14.05	No
29	Rochdale	Trows Farm	Housing	21.18	No
30	Salford	Land at Hazelhurst Farm	Housing	15.67	Yes
31	Salford	East of Boothstown	Housing	29.03	Yes
32	Salford	North of Irlam Station	Housing	65.09	Yes
33	Salford	Port Salford Extension	Industry / warehousing	109.14	Yes
34	Stockport	Bredbury Park Extension	Industry / warehousing	28.47	Yes
35	Stockport	Former Offerton High School	Housing	16.93	Yes
36	Stockport	Gravel Bank Road / Unity Mill	Housing	6.14	Yes
37	Stockport	Heald Green	Housing	27.28	Partially
38	Stockport	High Lane	Housing	19.89	Yes
39	Stockport	Hyde Bank Meadows	Housing	10.23	Yes

Chapter 2

Green Belt Policy and Context

Stage 2 Greater Manchester Green Belt Study
September 2020

GMSF Allocation Reference	Local Authority	Allocation Name	Development Type	Area (Ha)	Within Green Belt?
40	Stockport	Griffin Park, Stanley Green	Housing	64.70	Yes
41	Stockport	Woodford Aerodrome	Housing	120.01	Yes
42	Tameside	Ashton Moss West	Industry / warehousing	58.23	Yes
43	Tameside	Godley Green Garden Village	Housing	123.95	Yes
44	Tameside	South of Hyde	Housing	32.36	Yes
45	Trafford	New Carrington	Mixed	1137.73	Partially
46	Trafford	Timperley Wedge	Mixed	225.03	Partially
47	Wigan	Land South of Pennington	Industry / warehousing	53.14	Yes
48	Wigan	M6, Junction 25	Mixed	73.67	Yes
49	Wigan	North of Mosley Common	Housing	64.64	Yes
50	Wigan	Pocket Nook	Housing	51.94	No
51	Wigan	West of Gibfield	Mixed	53.92	Yes

Greater Manchester Green Belt Study (2016)

2.30 Since the original designation of the Green Belt in Greater Manchester was adopted in 1984, no full assessment of the Green Belt areas took place until 2016. LUC produced a report in July 2016 which included an assessment of the Green Belt within Greater Manchester. The overall aim of the study was 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.

2.31 It includes an assessment against the purposes of:

- the individual 'parcels' and broad strategic areas that make up the existing Green Belt; and
- potential additional areas of land that currently lie outside the Green Belt, to help understand whether they could be added to the Green Belt.

2.32 The assessment did not advise on the suitability or potential of land in Great Manchester for development. It also did not consider whether 'exceptional circumstances' exist or make any recommendations relating to the alteration or review of Green Belt boundaries.

2.33 The report concluded 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; and
- 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.

2.34 The 2016 report examined the contribution to the NPPF purposes of a number of areas of land not currently in the Green Belt. In 2018 and 2019, LUC was commissioned to undertake an assessment of further potential additions to the Green Belt.

Figure 2.1

Extent of Green Belt

- Greater Manchester Local Authority boundary
- Green Belt

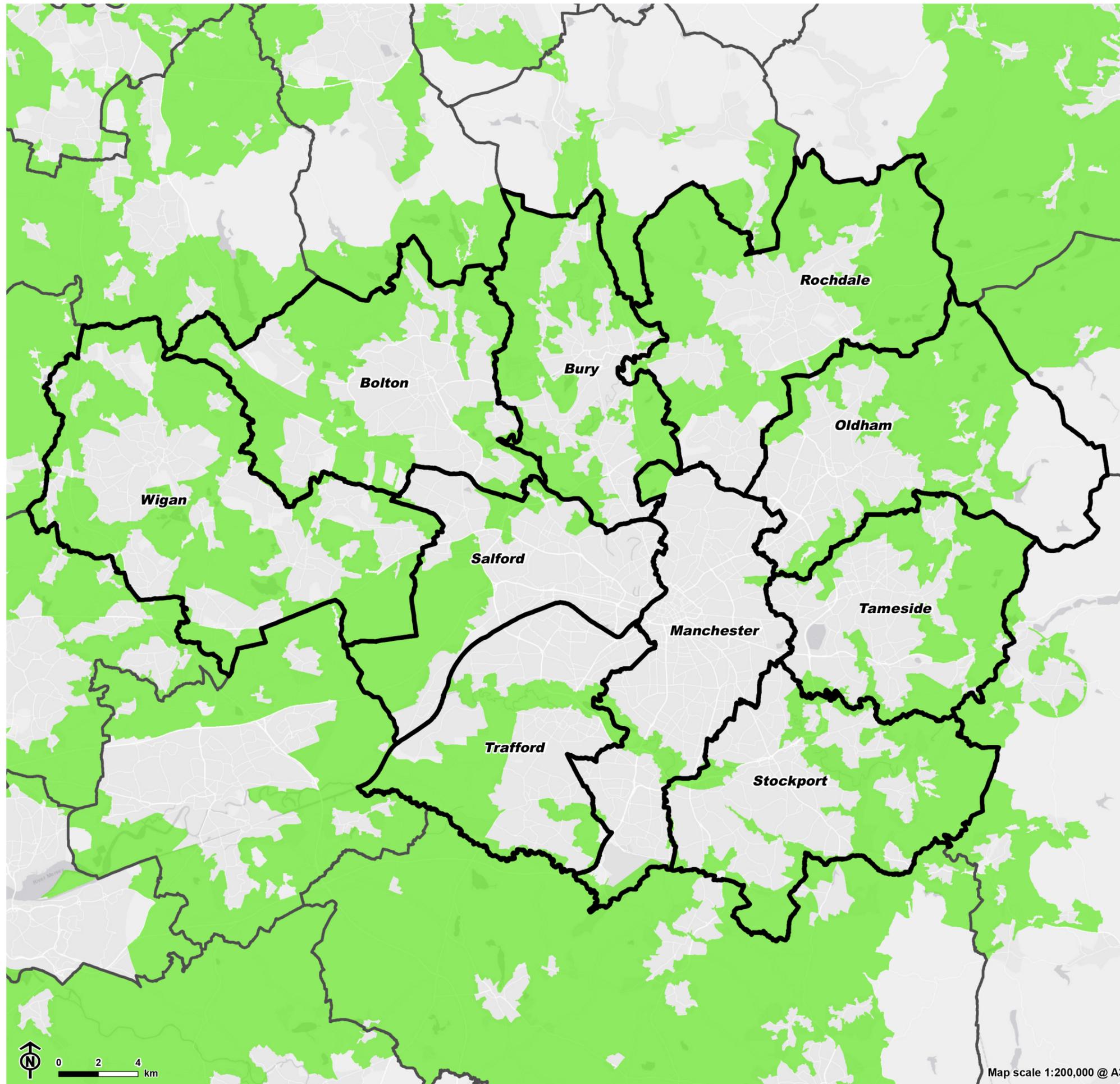
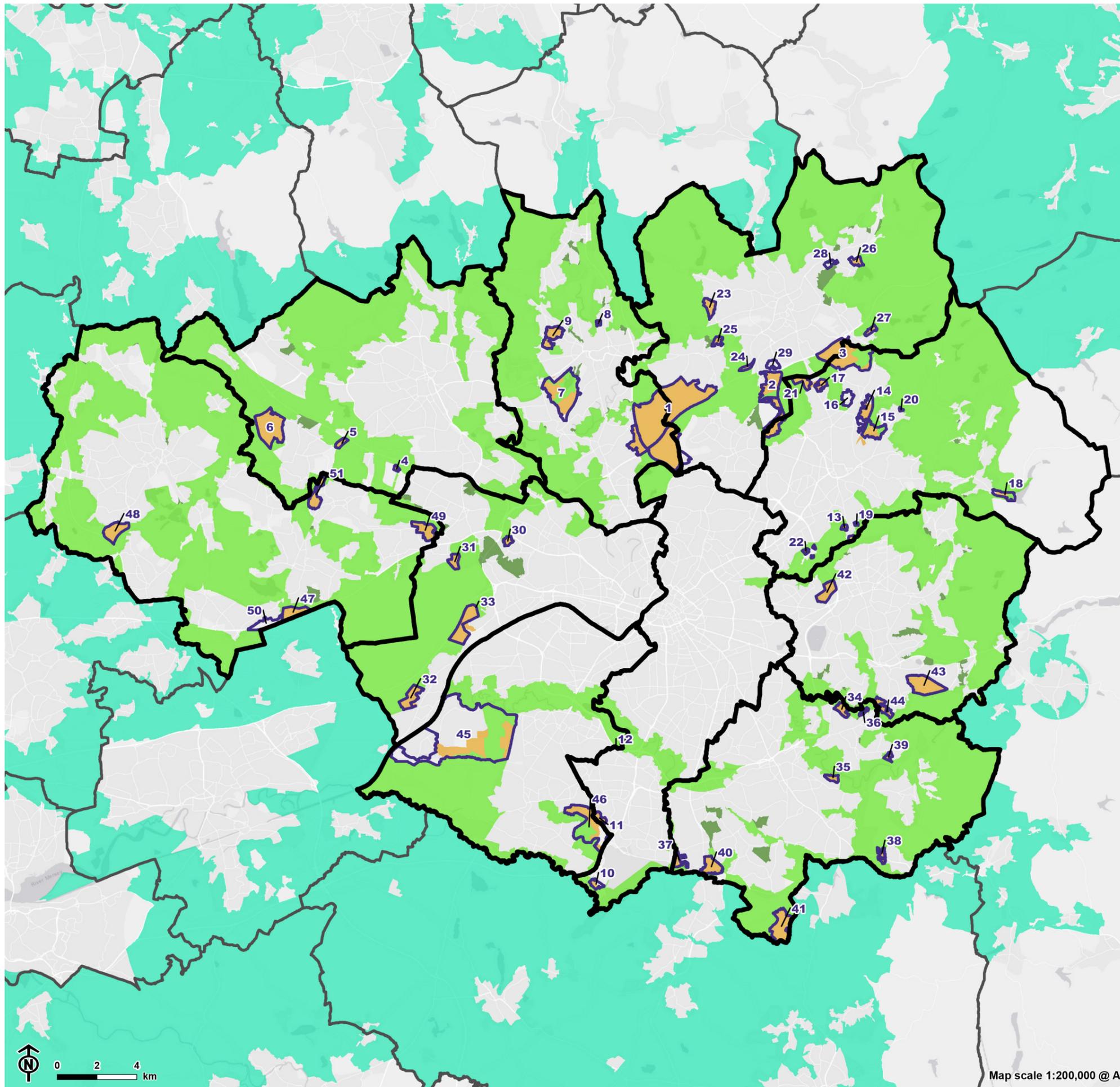


Figure 2.2a

Greater Manchester Allocations

-  Greater Manchester Local Authority boundary
-  Site allocation
-  GMSF 2019 Green Belt proposed for release
-  GMSF 2019 Green Belt land to be retained
-  GMSF 2019 Proposed additional Green Belt
-  Green Belt outside Greater Manchester

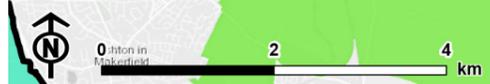
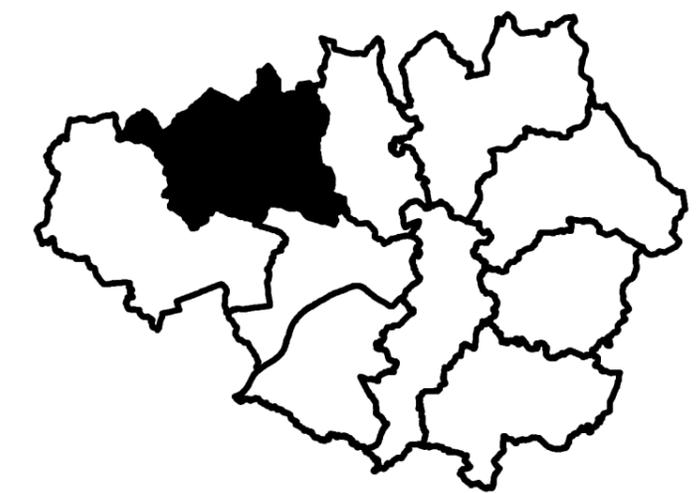
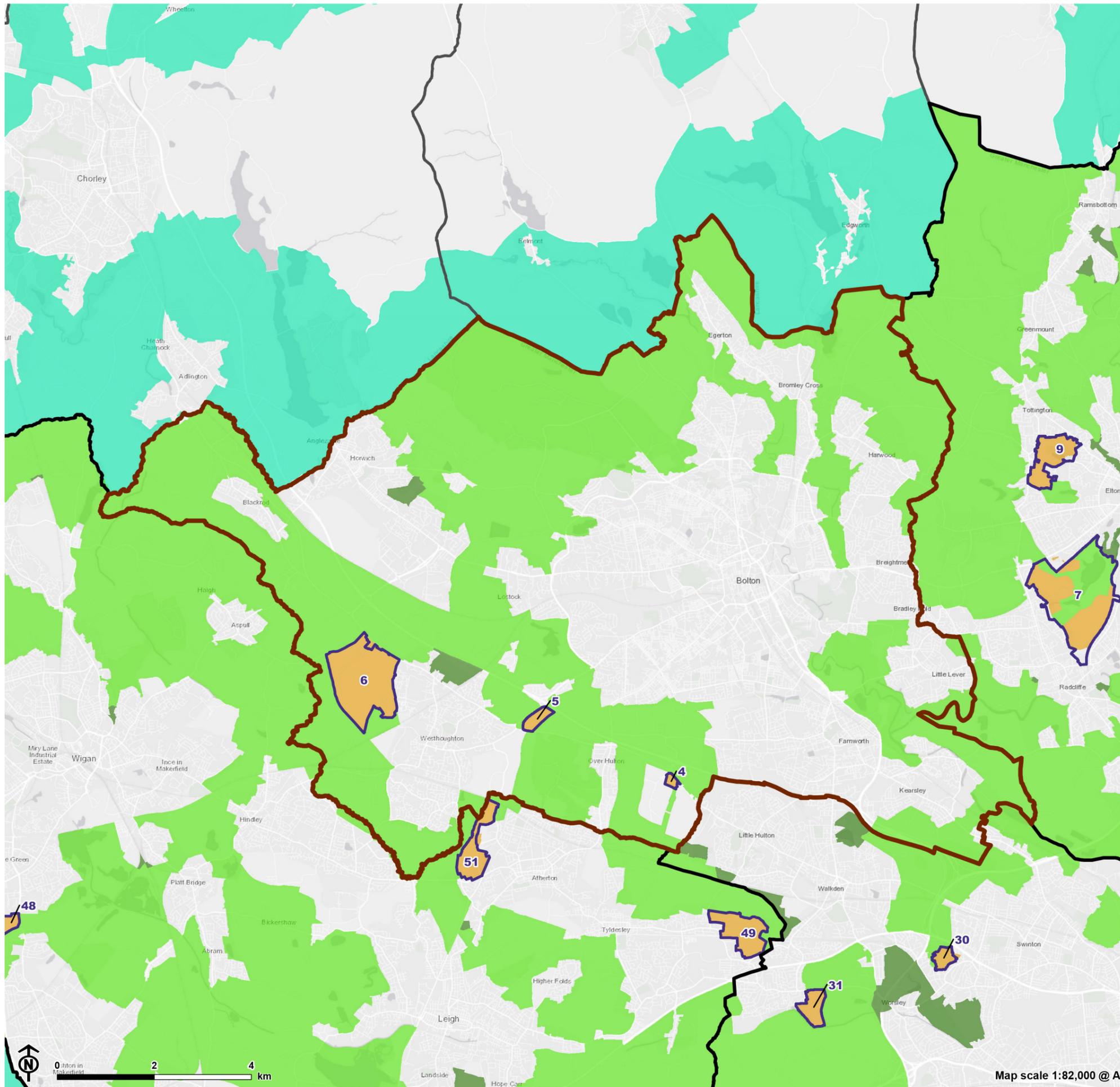


Map scale 1:200,000 @ A3

Figure 2.2b

Greater Manchester Allocations
Bolton Metropolitan Borough Council

- Greater Manchester Local Authority boundary
- Bolton Borough boundary
- Site allocation
- GMSF 2019 Green Belt proposed for release
- GMSF 2019 Green Belt land to be retained
- GMSF 2019 Proposed additional Green Belt
- Green Belt outside Greater Manchester



Map scale 1:82,000 @ A3

Figure 2.2c

Greater Manchester Allocations
Bury Metropolitan Borough Council

- Greater Manchester Local Authority boundary
- Bury Borough boundary
- Site allocation
- GMSF 2019 Green Belt proposed for release
- GMSF 2019 Green Belt land to be retained
- GMSF 2019 Proposed additional Green Belt
- Green Belt outside Greater Manchester

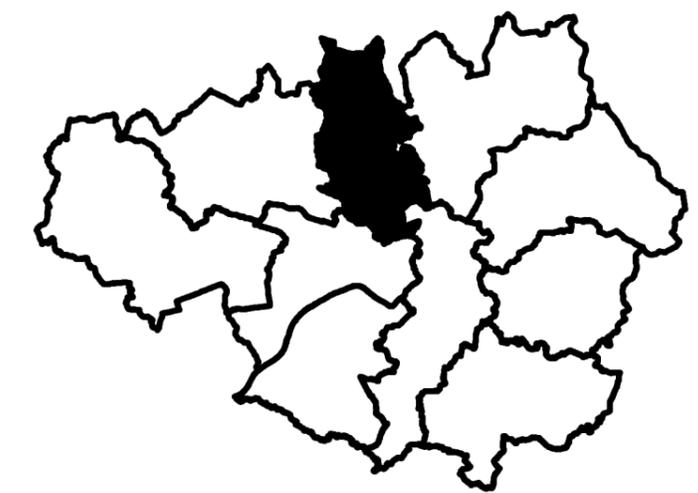
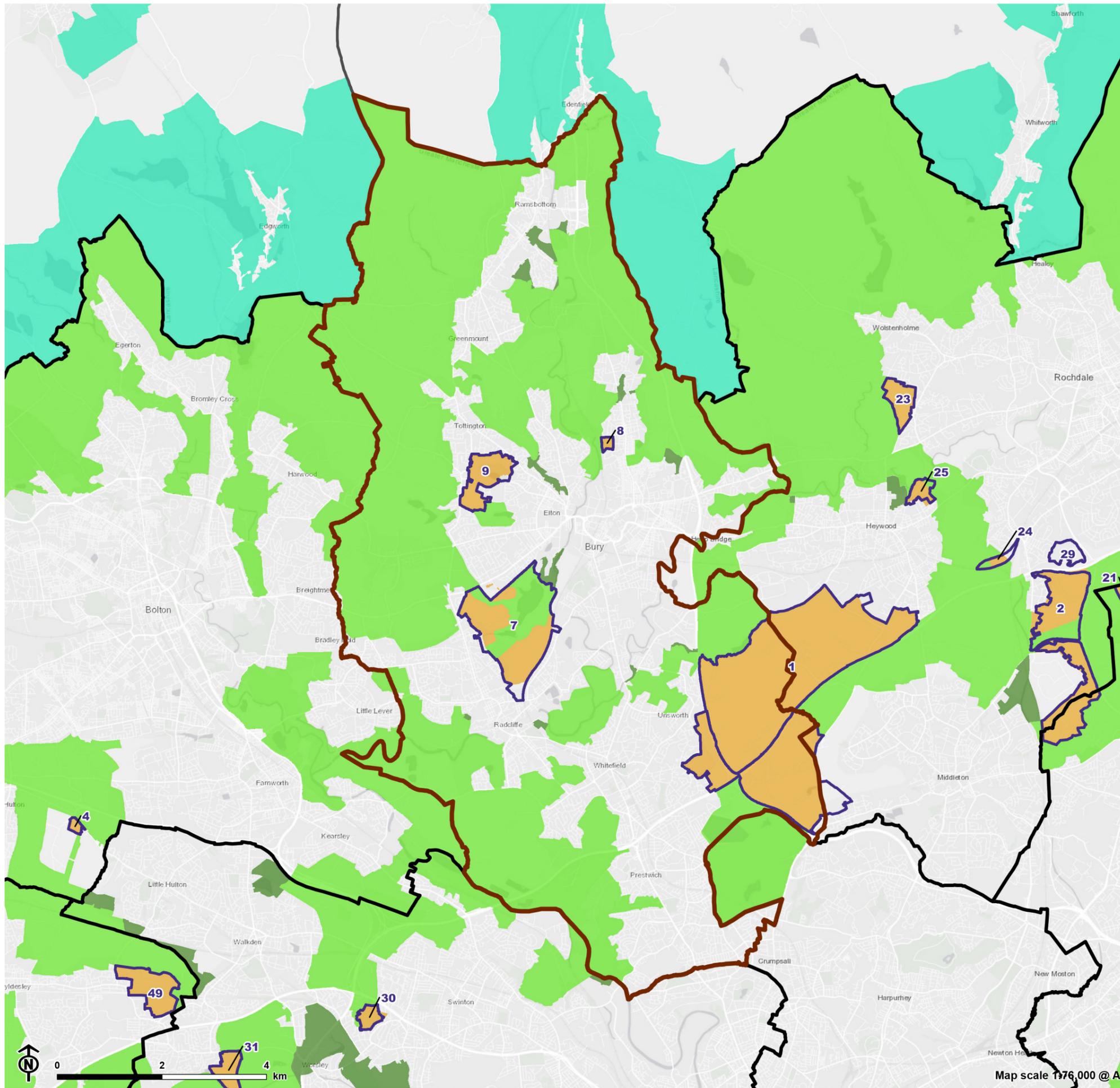
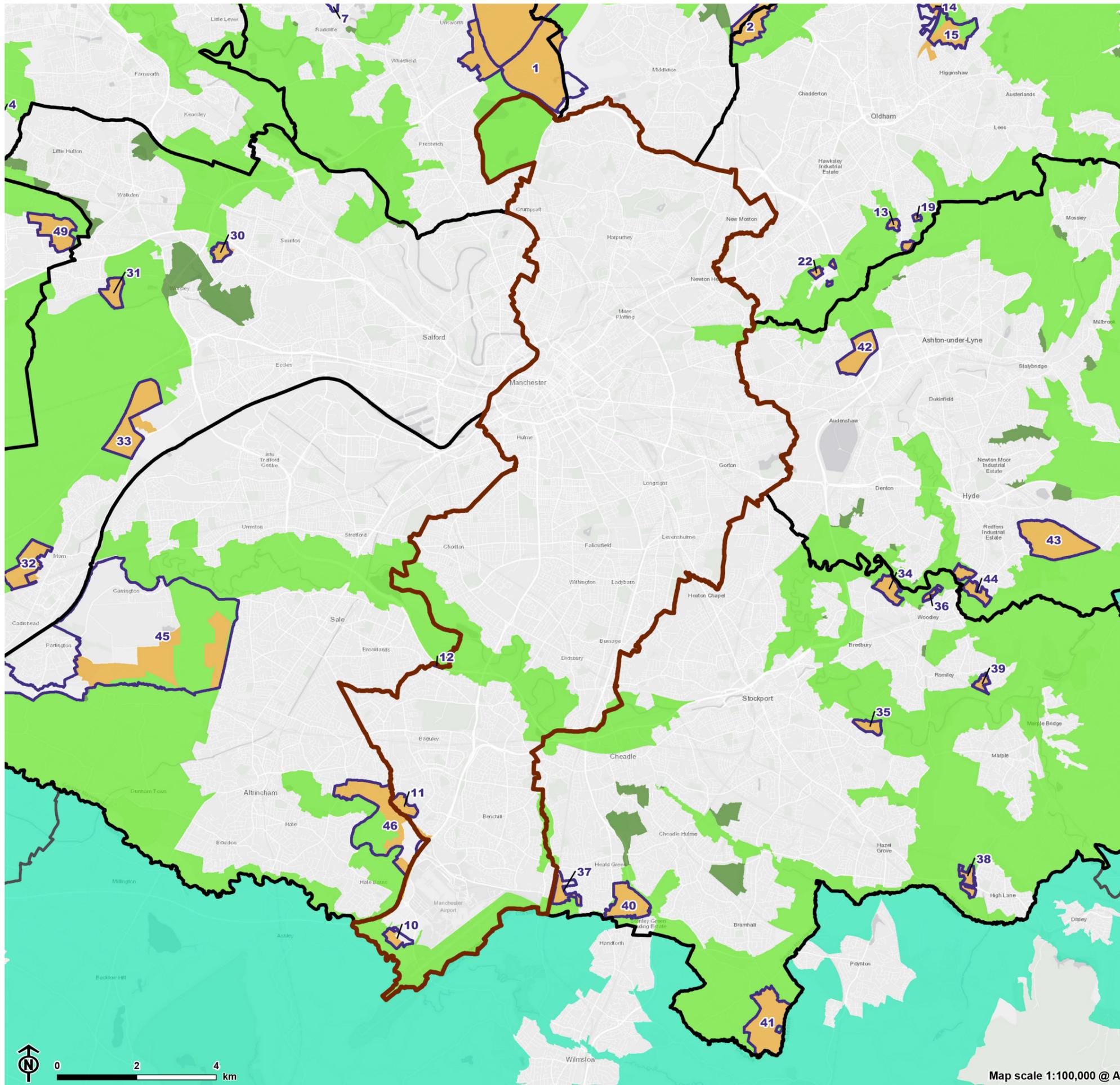


Figure 2.2d

**Greater Manchester Allocations
Manchester City Council**

- Greater Manchester Local Authority boundary
- Manchester City boundary
- Site allocation
- GMSF 2019 Green Belt proposed for release
- GMSF 2019 Green Belt land to be retained
- GMSF 2019 Proposed additional Green Belt
- Green Belt outside Greater Manchester

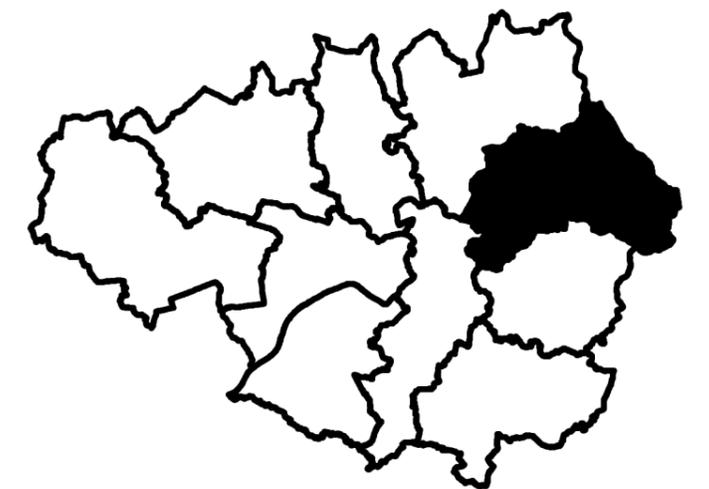
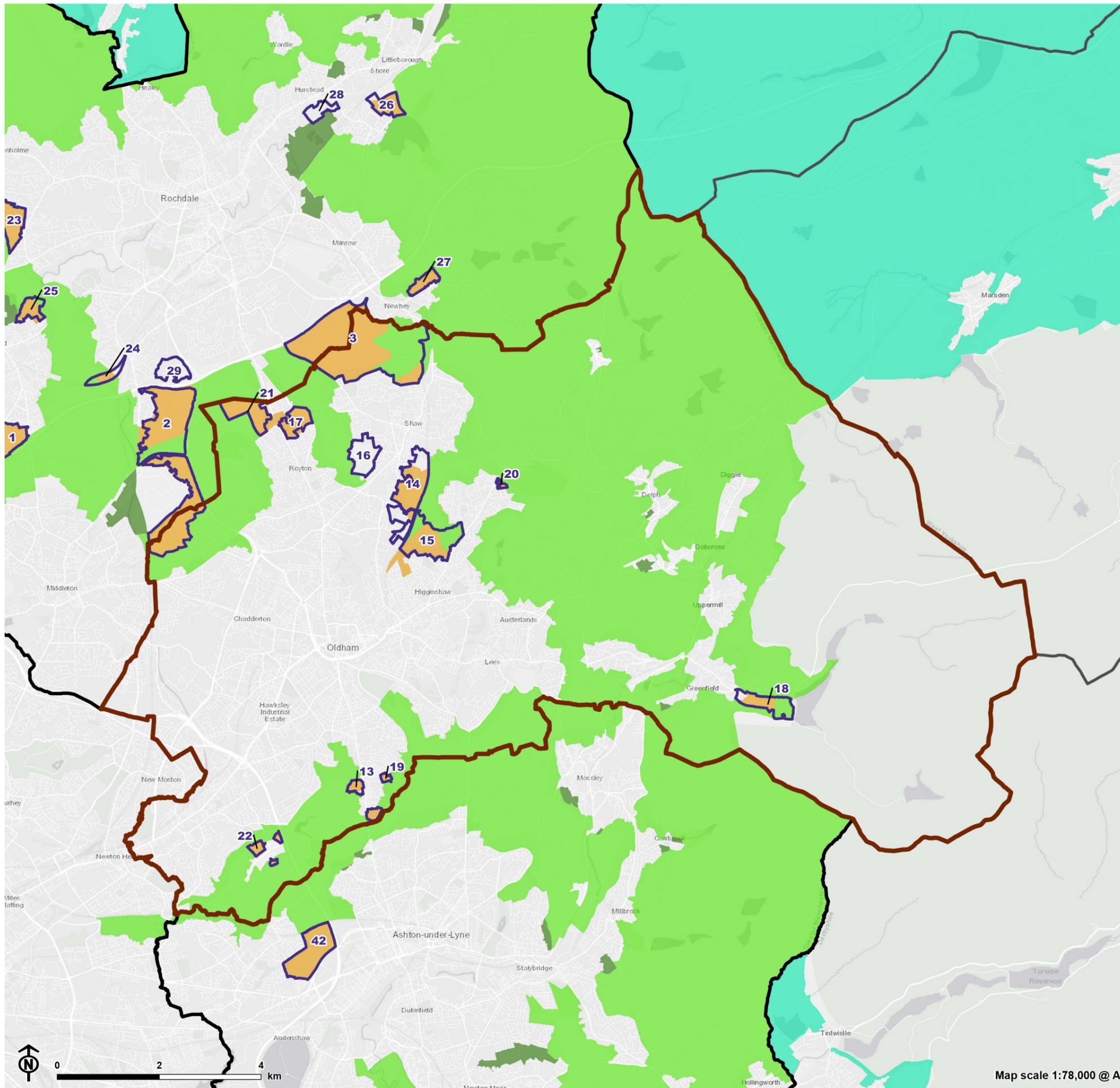


Map scale 1:100,000 @ A3

Figure 2.2e

Greater Manchester Allocations
Oldham Metropolitan Borough Council

- Greater Manchester Local Authority boundary
- Oldham Borough boundary
- Site allocation
- GMSF 2019 Green Belt proposed for release
- GMSF 2019 Green Belt land to be retained
- GMSF 2019 Proposed additional Green Belt
- Green Belt outside Greater Manchester



Map scale 1:78,000 @ A3

Figure 2.2f

Greater Manchester Allocations
Rochdale Metropolitan Borough Council

- Greater Manchester Local Authority boundary
- Rochdale Borough boundary
- Site allocation
- GMSF 2019 Green Belt proposed for release
- GMSF 2019 Green Belt land to be retained
- GMSF 2019 Proposed additional Green Belt
- Green Belt outside Greater Manchester

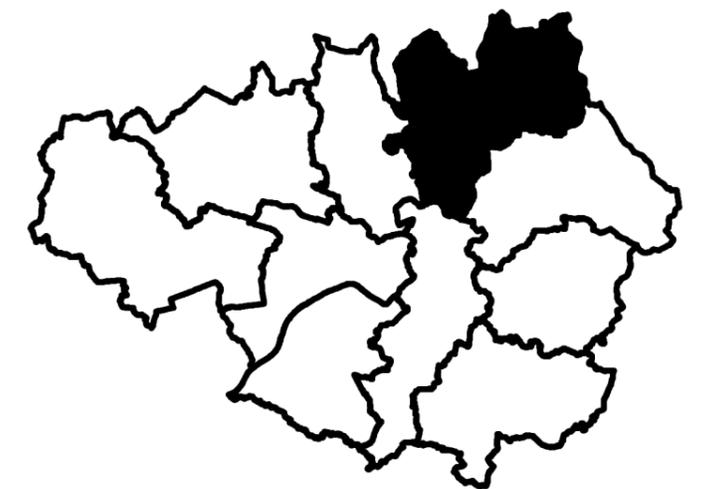
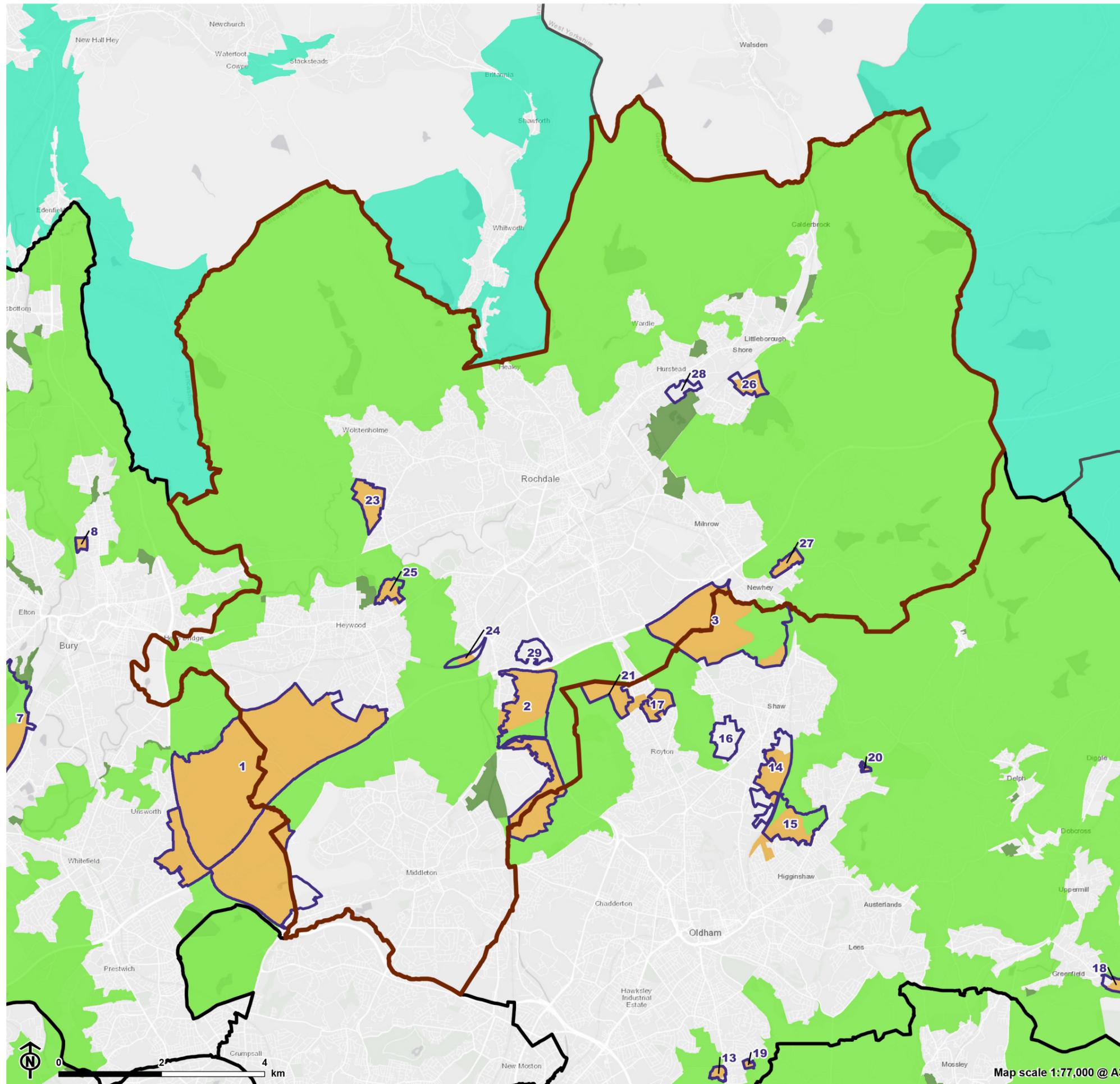


Figure 2.2g

Greater Manchester Allocations
Salford City Council

- Greater Manchester Local Authority boundary
- Salford City boundary
- Site allocation
- GMSF 2019 Green Belt proposed for release
- GMSF 2019 Green Belt land to be retained
- GMSF 2019 Proposed additional Green Belt
- Green Belt outside Greater Manchester

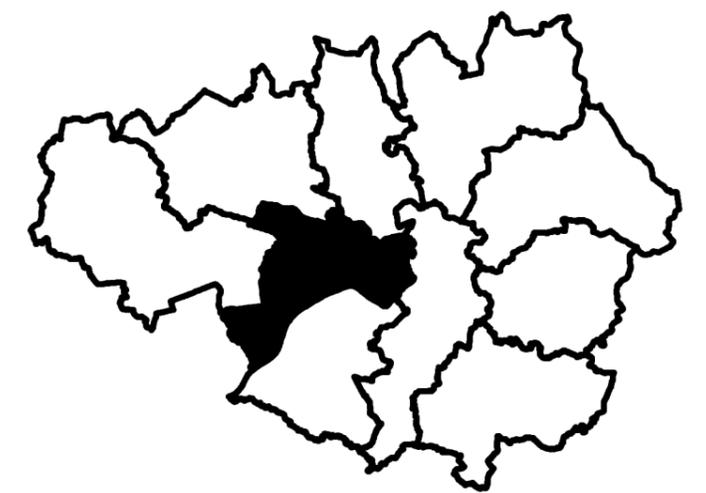
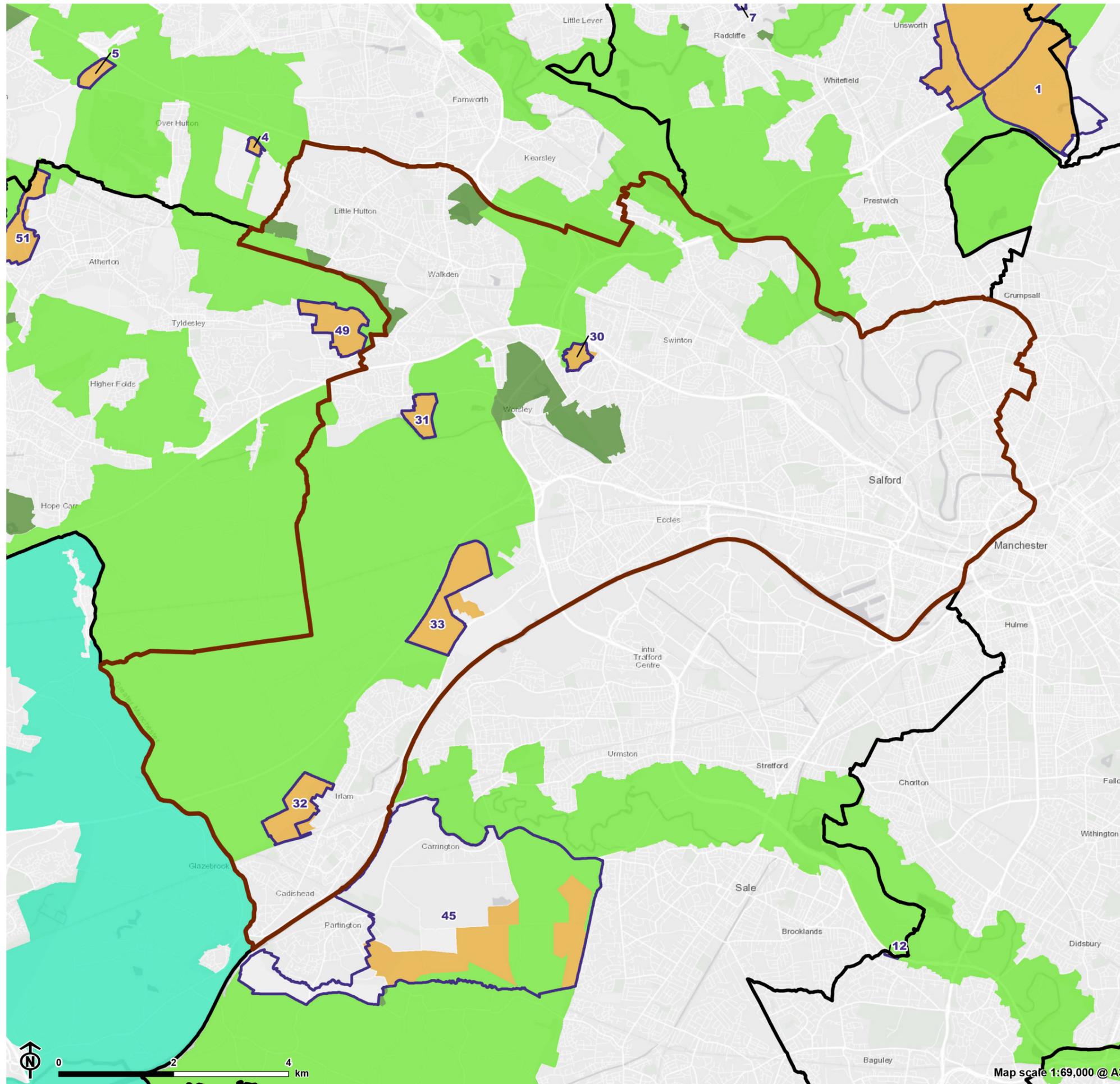
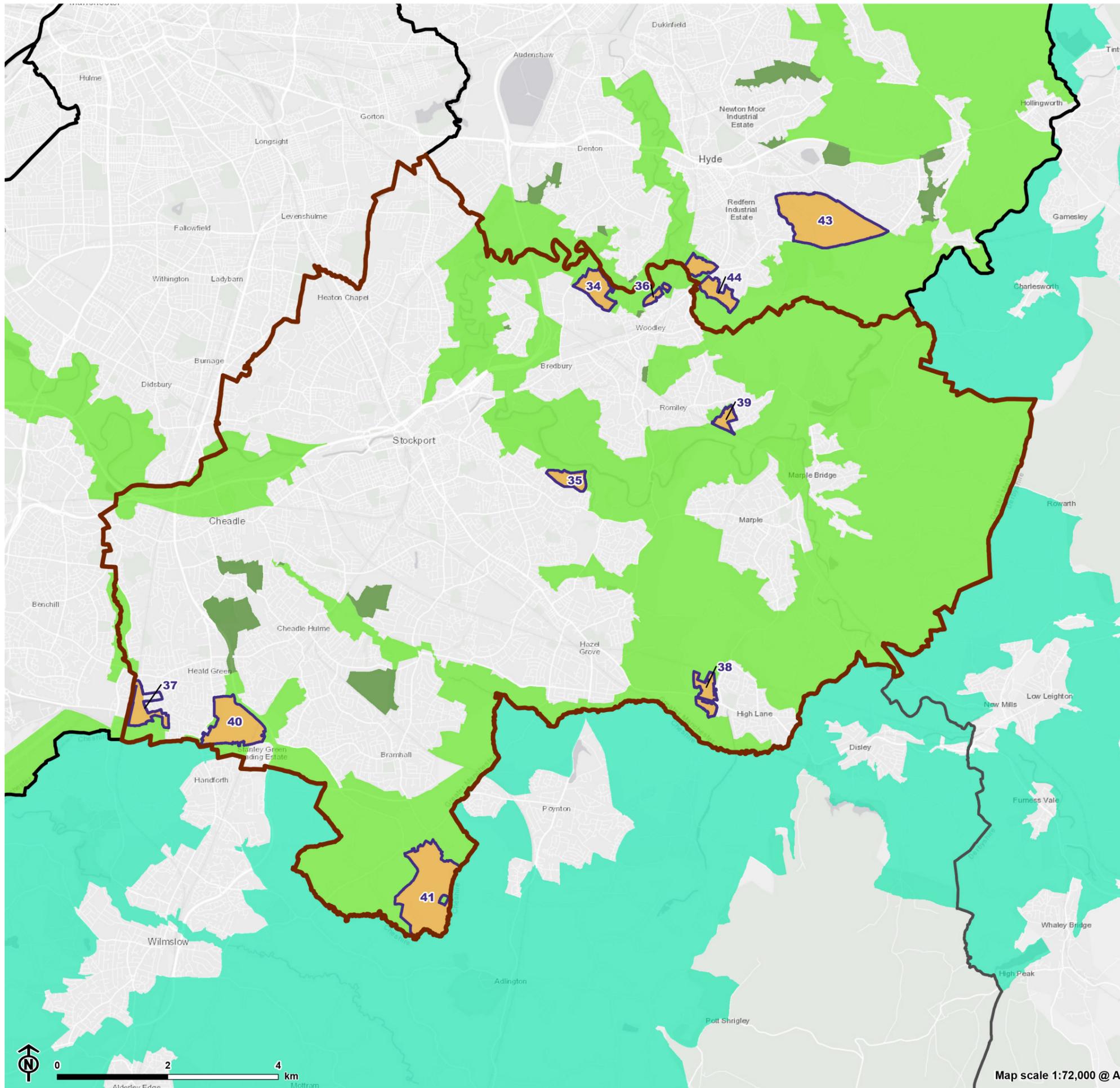


Figure 2.2h

Greater Manchester Allocations
Stockport Metropolitan Borough Council

- Greater Manchester Local Authority boundary
- Stockport Borough boundary
- Site allocation
- GMSF 2019 Green Belt proposed for release
- GMSF 2019 Green Belt land to be retained
- GMSF 2019 Proposed additional Green Belt
- Green Belt outside Greater Manchester



Map scale 1:72,000 @ A3

Figure 2.2i

Greater Manchester Allocations
Tameside Metropolitan Borough Council

- Greater Manchester Local Authority boundary
- Tameside Borough boundary
- Site allocation
- GMSF 2019 Green Belt proposed for release
- GMSF 2019 Green Belt land to be retained
- GMSF 2019 Proposed additional Green Belt
- Green Belt outside Greater Manchester

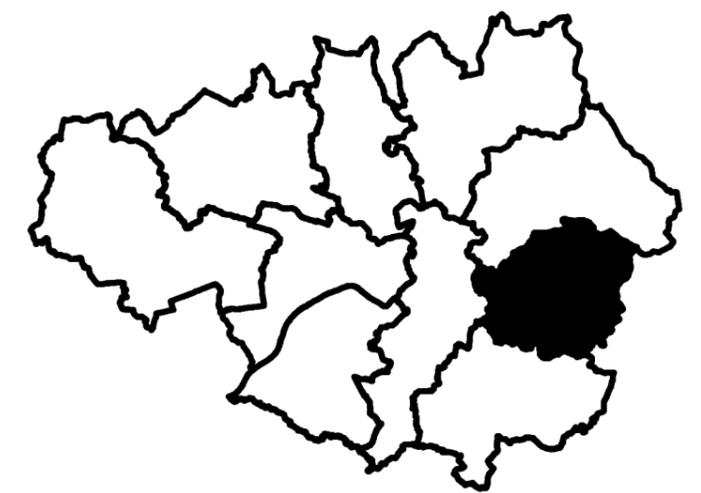
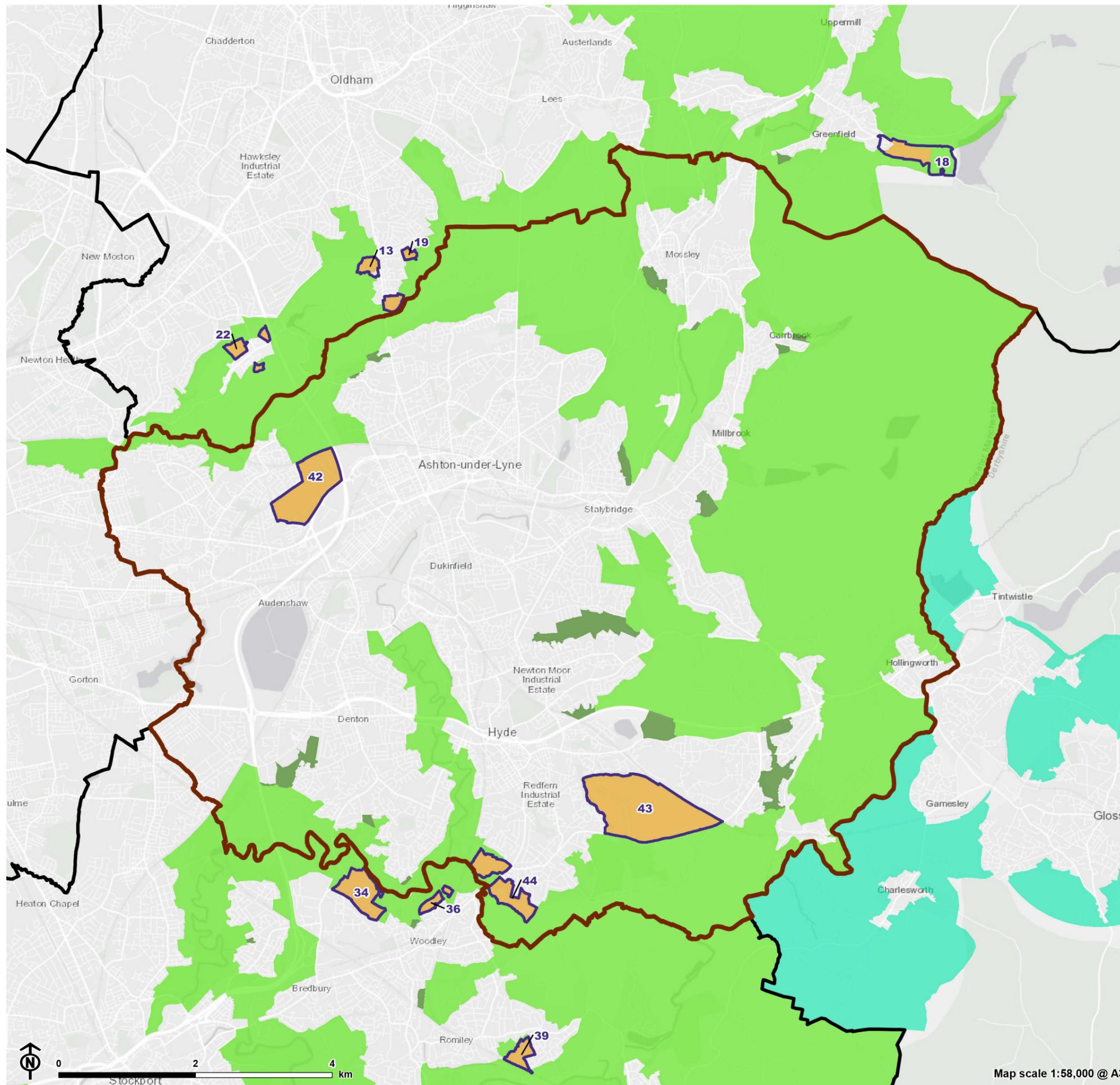


Figure 2.2j

Greater Manchester Allocations
Trafford Metropolitan Borough Council

- Greater Manchester Local Authority boundary
- Trafford Borough boundary
- Site allocation
- GMSF 2019 Green Belt proposed for release
- GMSF 2019 Green Belt land to be retained
- GMSF 2019 Proposed additional Green Belt
- Green Belt outside Greater Manchester

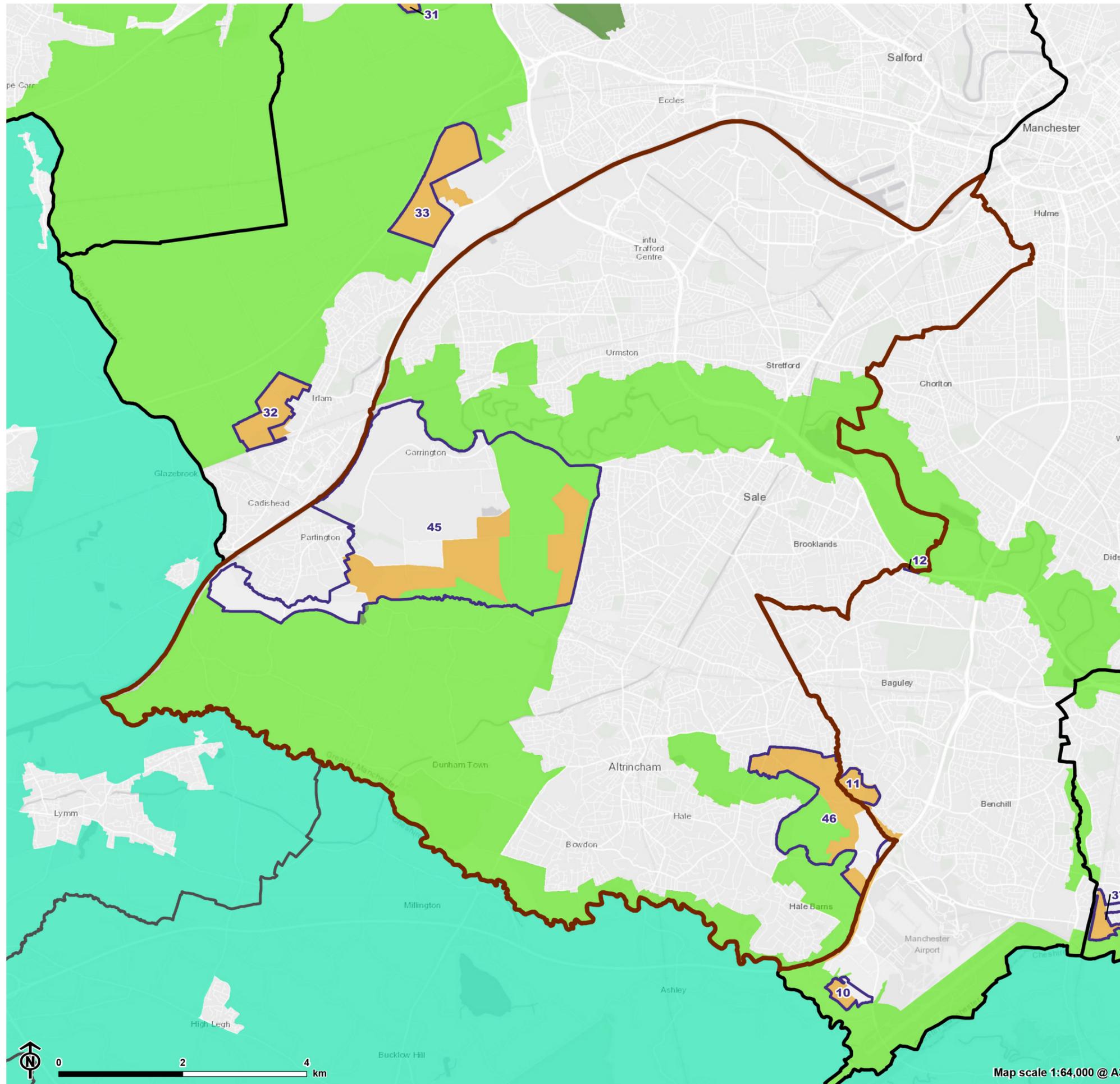
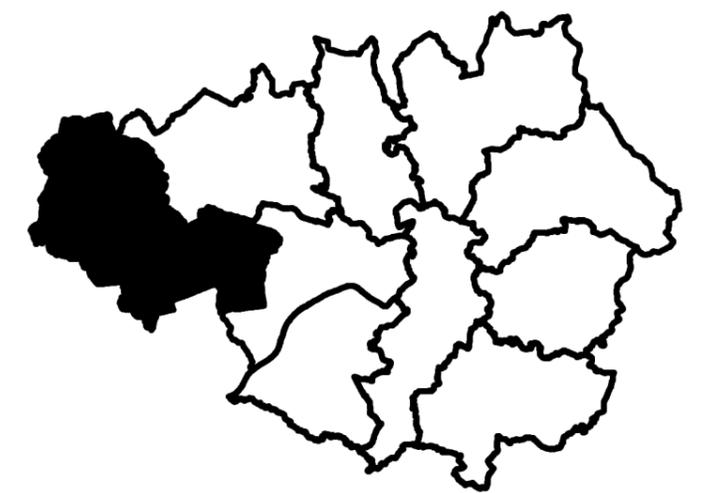
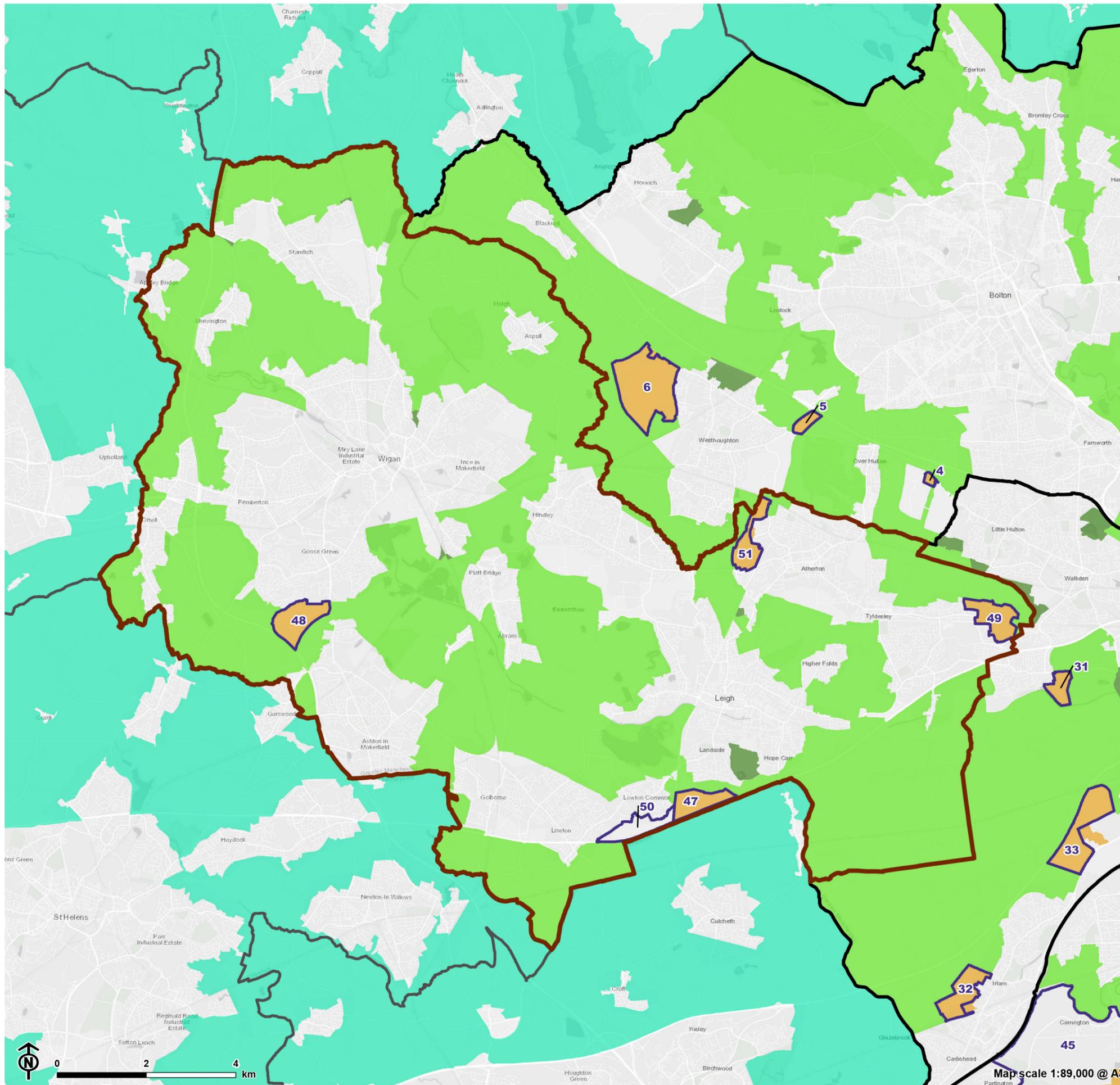


Figure 2.2k

Greater Manchester Allocations
Wigan Metropolitan Borough Council

- Greater Manchester Local Authority boundary
- Wigan Borough boundary
- Site allocation
- GMSF 2019 Green Belt proposed for release
- GMSF 2019 Green Belt land to be retained
- GMSF 2019 Proposed additional Green Belt
- Green Belt outside Greater Manchester



Chapter 3

Harm Assessment Methodology

3.1 This chapter sets out the methodology used to undertake an assessment of the variations in harm to the Green Belt purposes that would result from the release of Green Belt land within the Allocations proposed in the Greater Manchester Spatial Framework (GMSF).

3.2 Throughout the methodology, green boxes are included to clarify the method undertaken or highlight evidence, such as policy, guidance and case law, which supports the method of approach.

Assessment Approach

Key components

3.3 The 'Stage 1' Green Belt study carried out by LUC in 2016 included an assessment of the contribution to Green Belt purposes made by pre-defined parcels of land which together covered the whole of the Greater Manchester Green Belt. Now that specific development allocations have been proposed in the Draft GMSF (as outlined above), there is a need to consider more specifically the harm to Green Belt purposes that would result from release of land for development.

3.4 The assessment of harm considers the extent to which the release of land within the proposed site Allocation would reduce the contribution to Green Belt purposes, through both the loss of openness of the released land and the resulting impact that this could have on the strength of the adjacent Green Belt. The principal factors that need to be considered to make this judgement are: the extent to which adjacent retained Green Belt land would become contained by new development, and whether the resulting boundaries would affect the degree of distinction between inset settlement and remaining Green Belt.

3.5 Some of the draft Allocations propose to retain some Green Belt land within the sites. In these instances only land proposed to be released within the Allocation has been assessed.

The text and mapping accompanying the assessments indicate the presence of such areas and highlight where these areas may be weakened as a result of release of land within the Allocation.

3.6 For each variation identified within an Allocation area, ratings and supporting analysis are provided in relation to each assessed Green Belt purpose, and considered in combination with the potential impact on the integrity of the neighbouring Green Belt to arrive at a single overall harm rating.

3.7 The assessments assume that land will be released in association with existing inset settlement edges, rather than as isolated new areas of removal from the Green Belt. There is only one site (Woodford Aerodrome - Strategic Allocation 41) that does not lie adjacent to an existing urban edge. In this case, the assessment assumes that development will lead to the creation of a new inset area within the Green Belt.

Relationship with the Stage 1 Study

3.8 In common with most Green Belt assessment methodologies, the 2016 study defined assessment parcels on the basis of physical features that could form clear Green Belt boundaries and then considered, in isolation, the role each parcel played in contributing to the Green Belt purposes. The harm assessment process for each draft Allocation (with the exception of Woodford) works outwards from the adjacent inset settlement edge, identifying any thresholds beyond which the further release of land would increase harm to the Green Belt purposes. This approach means that variations in harm can be more clearly be identified than by the analysis of pre-defined parcels, within which variations may occur.

3.9 The definitions that underpin the analysis of the Green Belt purposes, of large built-up areas, towns and historic towns, are unchanged from the 2016 study, and the factors that are considered within the harm analysis are the same as those considered in the 2016 study – namely the strategic factors associated with location in relation to large built-up areas, towns and historic settlement areas, and the more localised considerations of the openness of land, the relationship with inset settlement and the relationship with the wider countryside. However the assumptions regarding development, the avoidance of predefining parcels and the consideration of impact on remaining Green Belt allows a more precise analysis to be carried

out, with results that may indicate a greater variation in harm than might be expected when only the contribution of the predefined 2016 parcels was taken into account.

Other considerations

3.10 The impact on Green Belt purposes of the release of land is not inherently related to the size of the area released, in that the contribution of land depends on its relationship with settlements (large built-up areas, neighbouring or historic towns) and countryside. However, the release of a larger area clearly has more potential to weaken the Green Belt by extending into areas that have a greater distinction from urban edges, by diminishing settlement separation and by diminishing the extent to which remaining open land relates to the wider countryside. The analysis of harm as a progression of land release from an inset settlement edge allows variations in this impact to be judged; something which cannot so readily be achieved when considering the overall contribution made by a predefined parcel of land.

3.11 The desk-based assessment was supported by site visits to all the areas being assessed. This was important to ensure that the assessment is robust and that initial judgements could be checked and verified in the field.

3.12 The assessment has assumed that all land within the urban area and settlements inset from the Green Belt (including Protected Open Land), unless constrained by absolute constraints (see paragraph 3.19), could potentially be developed, and therefore potentially has a containing impact on the adjacent Green Belt.

3.13 Likewise, the assessment has assumed that any land released from the Green Belt would, unless constrained by absolute constraints (see paragraph 3.19), be 'developed' and would not retain any 'openness'. It is recognised that specific development proposals may include, within the area to be released, the retention of undeveloped land, and/or the implementation of landscaping measures – e.g. to create a stronger boundary – that could potentially reduce harm to Green Belt purposes – however the study has not taken any such proposals into account, since they are at varying stages of development and certainty.

3.14 In some locations committed development is coming forward. As this is committed, this has been taken into consideration in terms of its urbanising impact on surrounding land and lack of contribution to Green Belt purposes, including where located within Allocation boundaries.

3.15 With regards to GM Allocation 41: Woodford Aerodrome, the majority of this Allocation has been granted planning permission. As such, it is considered to be committed development and the baseline for this assessment is based on the 2013 Design and Access Statement²³ for the development.

Extent of Assessment Area

3.16 As noted in **Table 2.2**, the Stage 2 study examines 47 allocated sites which lie partially or wholly within designated Green Belt land.

3.17 Some of the draft Allocations propose retention of some Green Belt land within their bounds. In these instances only land proposed to be released within the Allocation has been assessed. The text and mapping accompanying the assessments indicate the presence of such areas and highlight where these areas may be weakened as a result of release of land within the Allocation.

3.18 There are also some areas of proposed new Green Belt outside of the Allocation areas. Where these lie adjacent to Allocations they are noted, but their potential contribution to Green Belt purposes is the subject of separate assessments^{24 25}.

²³ Planit IE (2013) Woodford Aerodrome Design and Access Statement. Available at: Stockport Borough Council Planning application: DC/053832.

²⁴ LUC (July 2016) Greater Manchester Green Belt Assessment. Available at: www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework/gmsf-documents.

²⁵ LUC (December 2018) Greater Manchester Green Belt: Additional Assessment of Sites Outside the Green Belt. Available at: www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework/gmsf-documents.

3.19 Certain designations are recognised as constituting an ‘absolute’ constraint to development – i.e. areas within which development would not be permitted. The following are considered to be absolute constraints²⁶, although in practice there are only small areas within a few of the proposed Allocations which include any constrained land:

- Special Protection Areas.
- Special Areas of Conservation.
- Ramsar sites.
- Sites of Special Scientific Interest.
- Ancient woodland.
- Scheduled Monuments.
- Registered Parks and Gardens.
- Common land.
- Flood Zone 3.
- Cemeteries.

3.20 Any function that constrained areas, either within or adjacent to Allocations, may perform as areas of open land and/or as boundary features has been taken into consideration in the assessment of harm.

²⁶ It is recognised that in some cases the constraint to built development will extend beyond the actual boundary of the designation (ie a buffer zone).

Exclusion of constrained land

The Inspector's Letter (M Middleton) to Welwyn Hatfield Borough Council (December 2017) noted that there is no need to assess land that is unlikely to ever be developed:

“There are of course sites, which for other purposes are unlikely to ever be developed. I would include the statutory conservation sites, land potentially at risk of flooding, and the major heritage assets in this category but the final choice should be a rational value judgement on the importance of the protection. It nevertheless seems pointless to me to carry out a detailed Green Belt assessment for such sites however they are defined.” –

Examination Document Reference [EX39](#).

Harm Assessment: Steps

3.21 The assessment process applied to the land within each Allocation is split into 5 steps, as shown in **Figure 3.1**.

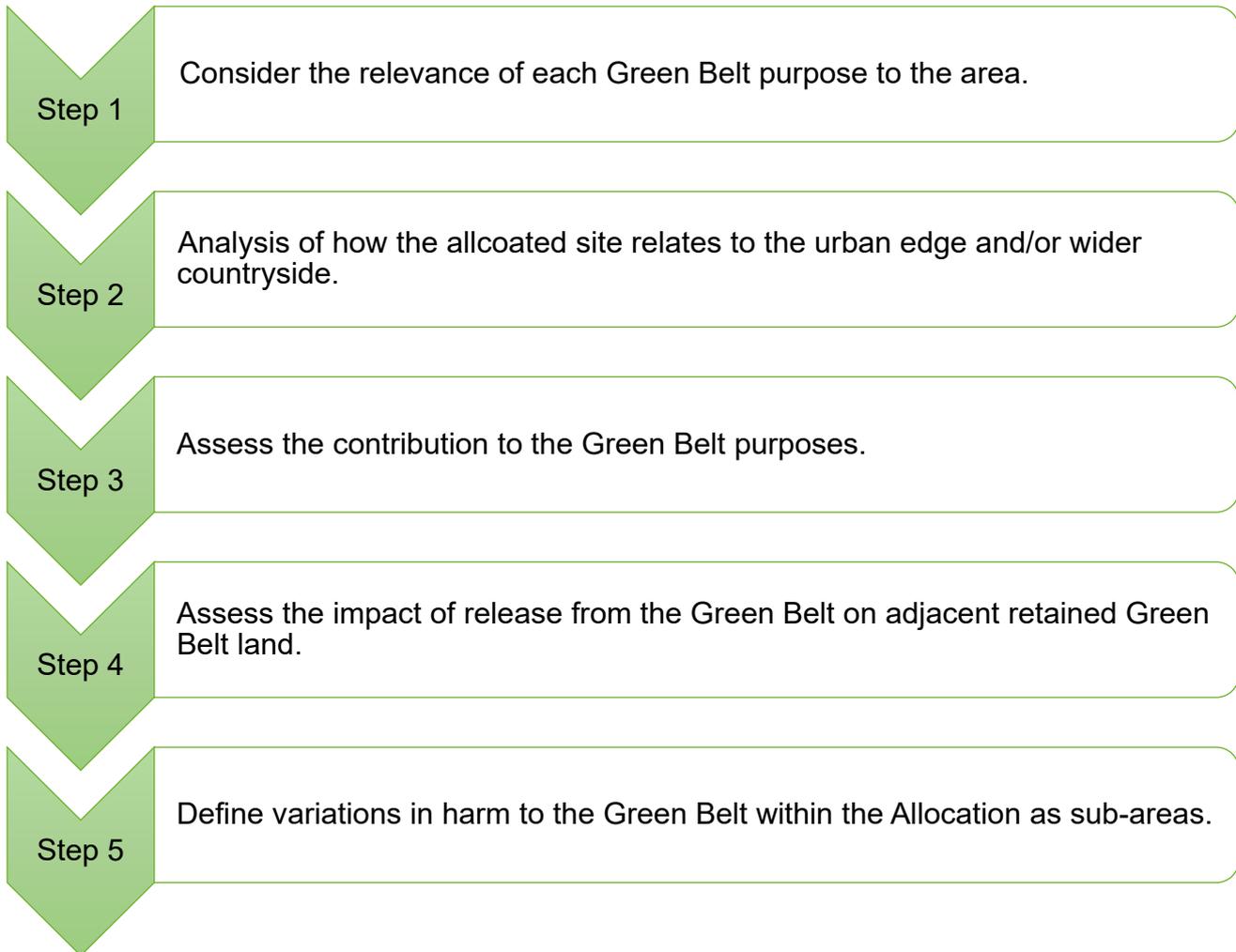
3.22 The assessment of contribution to Green Belt purposes (Step 3) is the product of the analysis of two distinct elements: consideration of the extent to which each of the Green Belt purposes is applicable in any given area (Step 1); and consideration of the more localised variations in contribution that result from how the sites relates to the urban edge and/or wider countryside (Step 2).

3.23 Step 4 rates the potential impact of the release of land (with the assumption that it will lose openness) on adjacent retained Green Belt land.

3.24 Step 5 combines the judgements from Steps 3 and 4 to arrive at conclusions regarding variations in harm, with sub-areas being defined to reflect these variations.

3.25 Each step is explained in further detail below.

Figure 3.1: Harm Assessment Steps



Step 1: Consider the relevance of each Green Belt purpose

3.26 The first step of the assessment process is to identify if the Green Belt land within the Allocation areas has the potential to contribute to any of the NPPF Green Belt purposes, based on the location of the land. As noted in **Chapter 2**, there is no defined approach set out in national guidance as to how Green Belt studies should be undertaken. However, case law highlights the importance of assessment against the Green Belt purposes within Green Belt assessments. There are five Green Belt purposes as defined in paragraph 134 of the NPPF:

The purposes of Green Belt

- 1) To check the unrestricted sprawl of large built-up areas.
- 2) To prevent neighbouring towns merging into one another.
- 3) To assist in safeguarding the countryside from encroachment.
- 4) To preserve the setting and special character of historic towns.
- 5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Consideration of Green Belt purposes

The Inspector's interim findings (H Stephens) to Durham City Council (November 2014) clarified that assessments against the Green Belt purposes should form the basis of any justification for releasing land from the Green Belt, and in reviewing land against the purposes Green Belt studies should consider the reasons for a Green Belt's designation. – Interim Report.

The Inspectors' Letter (L Graham) to Cambridge City and South Cambridgeshire Councils (May 2015) emphasised that Green Belt studies should make clear "how the assessment of 'importance to Green Belt' has been derived" from assessments against the individual purposes of the Green Belt and highlighted the importance of revisions to Green Belt boundaries to "take account of the need to promote sustainable patterns of development, as required by Paragraph 85 [2012 NPPF, paragraph 139 of the 2019 NPPF] [even if] such an exercise would be carried out through the SEA/SA process." – Examination Letter
Reference: CCC/SCDC/Insp/Prelim.

Does the land have the potential to play a role with regards to Purpose 1: to check the unrestricted sprawl of large built-up areas?

3.27 It is possible to argue that all land within the Green Belt prevents the unrestricted sprawl of large built up urban areas, because that is its principal purpose as a strategic planning designation. However, the study requires the definition of variations in the extent to which land performs this purpose. This requires an area-based assessment against this strategic purpose.

3.28 For the purpose of this study, it is necessary to define what constitutes a 'large built-up area' within and in close proximity to Greater Manchester, and what is meant by the term 'sprawl'.

Definition of the large built-up area

There is no definition provided in the NPPF for a large built-up area. Green Belt studies in different locations have ranged from considering the large built-up area as just the principal settlement around which the Green Belt was defined to considering all inset settlement to be large built-up areas.

3.29 The 2016 Stage 1 study identified which settlements within Greater Manchester were *not* included in the 'large built-up area':

- Hunger Hill; Chew Moor; Bottom o'th Moor, and Blackrod (Bolton);
- Denshaw, Diggle, Uppermill, Dobcross, Delph, Grasscroft, Greenfield, and Woodhouses (Oldham);
- Wardle (Rochdale);
- High Lane, Marple, and Marple Bridge (Stockport);
- Hollingworth and Heyrod (Tameside);
- Aspull, Appley Bridge, Shevington, and Bamfurlong & Bryn Gate (Wigan).

3.30 For the purpose of this assessment, all other settlements were understood as components of the large built-up area of Greater Manchester, consistent with the 2016 study. Whilst definitions of sprawl vary, the implication of the terminology is that planned development may not contravene this purpose. However, in assessing the impact of releasing land in the context of a strategic Green Belt study, no assumptions about the form of possible future development can be made, so the role an area of land plays will be dependent on its relationship with a large built-up area.

3.31 Land that, if developed, would clearly constitute an extension of a large built-up area will make the strongest contribution to preventing its sprawl. However, it is recognised that a smaller inset settlement area close to a large built-up area can have a relationship with it such that expansion of the latter, particularly if it narrows the gap between the two, can also be considered detrimental to this purpose.

Definition of sprawl

The PAS guidance emphasises in relation to Purpose 1 the variable nature of the term ‘sprawl’ and questions whether positively planned development constitutes ‘sprawl’. – PAS Planning on the Doorstep.

The RTPI Research Briefing No. 9 (2015) on Urban Form and Sustainability is also not definitive on the meaning of sprawl, noting “a variety of urban forms have been covered by the term ‘urban sprawl’, ranging from contiguous suburban growth, linear patterns of strip development, leapfrog and scattered development.” – RTPI Research Briefing No. 9.

Green Belt land has potential to play a stronger role with regards to

Purpose 1 if:

- the adjoining inset settlement is the large built-up area; or
- the adjoining inset settlement is close enough to the large built-up area for development of the land released from the Green Belt to be associated with it.

Green Belt land has less potential to play a role with regards to Purpose 1 if:

- the adjoining inset settlement is not close enough to the large built-up area for development of the land released from the Green Belt to be associated with it.

Does the land have the potential to play a role with regards to Purpose 2: to prevent neighbouring towns merging into one another?

3.32 The concept of what constitutes a ‘town’ has been widely interpreted in different Green Belt studies, ranging from settlements classified as towns in Local Plan settlement hierarchies to all urban areas inset from the Green Belt regardless of size.

3.33 This assessment remains consistent with the 2016 assessment in terms of its identification of settlements considered relevant to the assessment of gaps between neighbouring towns. Therefore it includes **all** inset settlements in Greater Manchester, together with the following settlements in adjacent districts: Walsden, Whitworth, Edenfield, Stubbins, Edgworth, Adlington, Appley Bridge, Up Holland, Bilinge, Ashton in Makerfield, Garswood and Downall Green, Newton Le Willows, Culcheth/Twiss Green, Lymm/Rushgreen/ Outrightington, Handforth/Wilmslow, Poynton, Disley, New Mills, Hadfield/Brookfield/Tintwistle/Woolley Bridge, Gamesley, Charlesworth and Hollins Green.

3.34 Regardless of whether a particular settlement is large enough to realistically be considered a town, it can be acknowledged that smaller settlements may lie in between larger ones, such that loss of separation between them may in turn have a significant impact on the overall separation between larger ‘towns’.

3.35 The concept of ‘merging’ is clearer, but assessing the extent to which land between towns contributes to preventing this is less so. However, it is generally acknowledged that the role open land plays in preventing the merging of towns is more than a product of the size of the gap between them. The assessments therefore considers both the physical and visual role that intervening Green Belt land plays in preventing the merging of settlements.

3.36 Both built and natural landscape elements can act to either decrease or increase perceived separation, for example intervisibility, a direct connecting road or rail link or a shared landform

may decrease perceived separation, whereas a separating feature such as a woodland block or hill may increase the perception of separation.

3.37 This study identifies that land that is juxtaposed between towns makes a contribution to this purpose, and the stronger the relationship between the towns – i.e. the more fragile the gap – the stronger the potential contribution to this purpose of any intervening open land. Physical proximity is the initial consideration, however, where settlements are very close, a judgement is made as to whether their proximity is such that the remaining open land does not play a critical role in maintaining a distinction between the two towns, i.e. that the characteristics of the open land relate more to the towns areas themselves than to the open land in between. Where this is the case, the impact of release of land for development on Purpose 2 may be reduced.

Physical and visual role of preventing merging

PAS guidance, which is commonly referenced in Green Belt studies, states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another. The PAS guidance also refers to settlement character and the character of land in between as being relevant considerations when looking at retaining separate identities. – [PAS Planning on the Doorstep](#).

Green Belt land has the potential to play a stronger role with regards to Purpose 2 if:

- the adjoining inset settlement is a town and the Green Belt land is located directly between this and another town, with no significant features to maintain separation;

Green Belt land has the potential to play some role with regards to Purpose 2 if:

- towns are close together but retain a significant separating feature;
- towns are already joined in places, but retain some separation elsewhere;
- the adjoining inset settlement is a smaller settlement but is also located directly between two towns that have limited separation.

Green Belt land has less potential to play a role with regards to Purpose 2 if:

- the adjoining inset settlement is a smaller settlement and is not located directly between two towns that are close enough to be considered 'neighbouring'.

Does the land have the potential to play a role with regards to Purpose 3: to assist in safeguarding the countryside from encroachment?

3.38 This considers the extent to which land can be considered to constitute 'countryside' on the basis of its usage, as opposed to reflecting urban influence.

3.39 Land may through its usage have a stronger relationship with the adjacent urban area and, as a result, not be considered 'countryside' to the same degree as other open land.

3.40 Equally land may be largely contained by urban development but may nonetheless retain, as a result of its usage and its size, a countryside character. Also, contribution to Purpose 3 does not equate to the extent of built development, as development that is rural in form is not considered to detract from countryside character.

3.41 It is important not to stray from assessing the Green Belt purposes into assessing landscape character, sensitivity or value as whilst Green Belt land may be valuable in these respects, it is not a requirement or purpose of the designation to provide such qualities. Therefore, the condition of land is not taken into consideration: the poor condition of Green Belt land does not necessarily undermine its fundamental role of preventing urban sprawl by keeping land permanently open.

Widely applicable purpose

PAS guidance presumes that all Green Belt contributes to this purpose to some degree, but suggests that:

"The most useful approach is to look at the difference between urban fringe – land under the influence of the urban area - and open countryside, and to favour the latter in

determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved.”

PAS guidance also highlights that the quality of the landscape of an area should not be a consideration when assessing the contribution of Green Belt to the fulfilment of Green Belt purposes, including Purpose 3. This could be a planning consideration in its own right when seeking a suitable location for development. – [PAS Planning on the Doorstep](#).

Green Belt land therefore has the potential to play a stronger role with regards to Purpose 3 if:

- the land is perceived as open countryside, or is settlement or other development of a form, density and character that does not significantly detract from rural character – e.g. farmland, a farmstead or a rural hamlet.

Green Belt land has less potential to play a role with regards to Purpose 3 if:

- it is characterised by development which, although it may be an ‘appropriate’ use within the Green Belt, and therefore not to diminish Green Belt openness (see Step 2), is more strongly associated with the urban area – e.g. school playing fields, recreation grounds.

Does the land have the potential to play a role with regards to Purpose 4: to preserve the setting and special character of historic towns?

3.42 This purpose makes specific reference to ‘historic towns’, not to individual historical assets or smaller settlements such as villages and hamlets. Green Belt studies have offered a range of interpretations, with a common approach being to consider the relationship with designated Conservation Areas regardless of their location.

Definition of historic towns considered under Purpose 4

An extract from Hansard in 1988 clarifies which historic settlements in England were considered ‘historic towns’ in the context of the Green Belt purposes. The Secretary of

State for the Environment clarified in answer to a parliamentary question that the purpose of preserving the special character of historic towns is especially relevant to the Green Belts of York, Chester, Bath, Oxford and Cambridge. Durham has since been added to this list. – Examination Document Reference [1048107](#).

This is supported by the PAS guidance which states: that “This purpose is generally accepted as relating to very few settlements in practice.” – [PAS Planning on the Doorstep](#).

It is noted that, the Inspector’s interim views (S J Pratt) to Cheshire East Council (October 2014) and further interim views (December 2015) highlighted that with regards to Purpose 4 the study assessed smaller settlements which “could be criticised as being too detailed for a Green Belt assessment” but was “not necessarily inappropriate or irrelevant”. – Examination document references [PS A017b](#) and [RE A021](#).

However, some recent consultation responses from Historic England (e.g. in relation to a 2019 review of the Green Belt around Blackburn) support the view that this purpose is of particular importance to the Green Belts around Bath, Cambridge, Chester, Oxford, Durham and York only.

3.43 In the 2016 Stage 1 study, historic settlements were identified by selecting Conservation Areas that encompassed a block of residential settlement and which were located within one of the settlements assessed in Purpose 2. The area of each historic settlement was defined by expanding the corresponding Conservation Area to include any pre 20th century settlement identified in the Historic Landscape Classification data. Any relatively small Conservation Areas that were not surrounded by pre 20th settlement were not included, nor were Conservation Areas which were comprised only of historic industrial development.

3.44 To inform understanding of the role that Green Belt provides in preserving the setting of historic towns, intervisibility analysis was undertaken as part of the desk-based assessment of land parcels. In essence, this identified the extent to which each Green Belt parcel is visually connected with one or more historic town or settlement.

3.45 The process by which this analysis took place is as follows:

- A digital ground model of the study area was constructed using OS digital contour data;

- The footprint of pre 20th century (or comparable time slice) urban areas and current conservation areas was overlaid;
- A notional building height of 10m was applied to these areas (it was not possible to model specific buildings or structures such as chimneys);
- Digital analysis was used to identify which Green Belt parcels are intervisible with these urban areas within a radius of 5km.

3.46 This theoretical analysis, which was based on standard building height and ‘bare ground topography’ (i.e. not taking account of the screening effect of intervening structures or land cover such as trees and woodland), provided a tool to inform the desk-based analysis and information which was then tested during field survey work.

3.47 The desk analysis identified those land parcels which could have the potential to form an important part of the setting of an historic settlement, considering the extent of intervisibility and the distance at which it occurs.

3.48 The field survey then explored this on the ground, considering in particular:

- the strength of the visual relationship (e.g. the influence of screening or intervening features / development, the presence of key views and vistas);
- the balance between historic and more recent development;
- the prominence of key historic features such as mill buildings, chimneys, churches etc.;
- the presence of any obvious functional relationships between the historic town and the Green Belt parcel (e.g. canals, current or disused railway lines); and
- where appropriate, views out from settlements as well as views of urban areas from the Green Belt.

3.49 The methodology of the 2016 analysis was applied to the assessment of the draft GMSF Allocations.

3.50 Recognising that Purpose 4 has been interpreted in different ways, the findings of the 2016 Green Belt Study were reviewed for those parcels in which draft Allocations are located, in order to determine whether the contribution to Purpose 4 was stronger than the contribution to any

other purpose, and so likely to be the key factor in any of the harm assessments. The review concluded that Purpose 4 was not significant in this way and that the definition of what constitutes a historic town would not have affected the assessment of harm for the draft GMSF Allocations.

Green Belt land, therefore, has the potential to play a stronger role with regards to Purpose 4 if:

- the land plays a major role in the setting and or special character of historic towns in terms of its physical extent and degree of visibility and/or its significant contribution to special character.

Green Belt land has less potential to play a role with regards to Purpose 4 if:

- it does not form part of the setting or contribute to the special character of a historic settlement.

Does the land have the potential to play a role with regards to Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land?

3.51 Most Green Belt studies do not assess individual Green Belt land parcels against Purpose 5, and either do not rate them or rate them all equally, on the grounds that it is difficult to support arguments that the release one parcel of Green Belt land has a greater impact on encouraging re-use of urban land than another.

Equal contribution of Green Belt to Purpose 5

The PAS guidance states:

“...it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. If Green Belt achieves this purpose, all Green Belt does to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose.”

In other words, it is highly unlikely that development pressures operate at a sufficiently localised level to draw out meaningful judgements on the relative impact of discrete parcels of Green Belt land on Purpose 5. – [PAS Planning on the Doorstep](#).

The Inspector’s report (D Smith) to the London Borough of Redbridge (January 2018) notes that with regards to Purpose 5 “this purpose applies to most land” but that “it does not form a particularly useful means of evaluating sites ” – File reference: [PINS/W5780/429/10](#).

3.52 We concur with the judgement in the 2016 study that all land can be considered to contribute equally to this Purpose, and the impact of release of land for development on Purpose 5 is considered to be uniform. This study does not therefore undertake any further assessment in relation to Purpose 5.

Step 2: Identify variations in relationship between Green Belt land and development

3.53 Having considered in general terms the variations in the relevance of each of the Green Belt purposes around an inset settlement, the next step in the assessment process was to identify more localised variations in the relationship between Green Belt land and development with an urbanising influence. Land that is related more strongly to urbanising development typically makes a weaker contribution to the first three of the Green Belt purposes, being less likely to be perceived as sprawl (Purpose 1), narrowing the gap between towns (Purpose 2) or encroachment (Purpose 3). These factors do not apply to Purpose 4, as a stronger relationship with the urban area will frequently increase contribution to historic setting and character.

3.54 ‘Urbanising development’ is defined as development which, with reference to the lists provided in paragraphs 145 and 146 of the NPPF, is considered ‘inappropriate’.

Appropriate Development

Appropriate development within the Green Belt cannot, according to case law²⁷, be considered to have an urbanising influence and therefore harm Green Belt purposes. For the purposes of this study therefore, development deemed to be 'appropriate' within the Green Belt (as defined in the closed lists within paragraphs 145 and 146 of the NPPF) is not considered to constitute an urban land use, or an urban influence in the countryside. However, what is deemed to be appropriate development in the NPPF has to be carefully considered as developments such as the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments are only considered appropriate as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.

Caution is therefore exercised in the application of what is defined as an appropriate use. It is not possible within a Strategic Green Belt study to review each form of development within the Green Belt and ascertain whether it was permitted as appropriate development or not, unless it is clear cut. For example, buildings for agriculture and forestry are deemed to be appropriate development regardless of whether they preserve the openness, or conflict with Green Belt purposes. For other land uses such as outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments, a considered view is taken on the extent to which the proposed land use has affected Green Belt purposes, for example by affecting openness, or encroaching on the perception of countryside i.e. the sense of distinction between the urban area and countryside.

3.55 Urbanising development could be located within the inset settlement or washed over by the Green Belt. In some cases, land on the fringe of an inset settlement is not currently developed and is sometimes designated as 'Protected Open Land'. However, unless the development of

²⁷ This is set out in case law where the Court of Appeal addressed the proper interpretation of Green Belt policy in *R (Lee Valley Regional Park Authority) v Epping Forest DC* [2016] EWCA Civ 404.

such land is constrained by other factors or designations deemed to be ‘absolute constraints’ (see paragraph 3.19), the assumption is made that it will be developed, and that it therefore cannot be considered ‘open’.

3.56 The relationship between open land and developed land is considered under three headings:

- distinction;
- openness; and
- containment.

3.57 Distinction, openness and containment are common factors that affect the first three Green Belt purposes, and their consideration allows for a finer grain of assessment which cannot be achieved through consideration of the broader applicability of the purposes alone (Step 2).

These three factors are discussed in the paragraphs below.

Distinction: to what extent does landform and/or land cover create distinction between inset land and the Green Belt?

3.58 ‘Distinction’ considers the relationship between the existing inset settlement and the Green Belt. Landform and/or landcover can create a physical distinction between development and Green Belt land, limiting the relationship between the two. We assume that Green Belt land with a weaker distinction from the urban area(s) will serve to diminish contribution to Purposes 1-3, being less likely to be perceived as sprawl (Purpose 1), narrowing the gap between towns (Purpose 2) or encroachment into the countryside (Purpose 3).

3.59 As examples in the table below indicate, the physical scale of a boundary feature, its consistency over distance and its impact on views are all taken into consideration.

Description		Example Features
No perception of development beyond, with boundary feature creating physical gap; or physical feature significantly restricts access and forms consistent edge	<p data-bbox="683 600 986 638">Stronger Distinction</p>  <p data-bbox="691 1503 978 1541">Weaker Distinction</p>	<p data-bbox="1043 479 1273 517">Woodland block</p> <p data-bbox="1043 551 1182 589">Motorway</p> <p data-bbox="1043 622 1267 660">River/floodplain</p>
Development perceptible but clear sense of distinction; or physical feature restricts access and/or forms relatively consistent edge over wider area.		<p data-bbox="1043 790 1453 936">Strong landform distinction - e.g. consistent ridge crest or valley</p> <p data-bbox="1043 969 1198 1008">Major road</p>
Development perceptible but generally not visible.		<p data-bbox="1043 1081 1442 1160">Linear tree cover or mature, well-treed hedgerow</p> <p data-bbox="1043 1193 1150 1232">Stream</p> <p data-bbox="1043 1265 1469 1303">Moderate landform distinction</p> <p data-bbox="1043 1337 1315 1375">Minor through road</p>
Development clearly perceptible and generally visible.		<p data-bbox="1043 1435 1410 1514">Regular garden/ building boundaries or hedgerows</p> <p data-bbox="1043 1547 1315 1585">Estate/access road</p>
No clear physical definition - settlement edge is blurred		<p data-bbox="1043 1641 1442 1720">Some development crosses boundary</p>

Openness: to what extent is the land free from ‘urbanising development’?

3.60 The NPPF identifies openness as an ‘essential characteristic’ of the Green Belt, rather than a function or purpose. The presence of ‘urbanising development’ within the Green Belt can increase the relationship between Green Belt and an inset settlement. Green Belt openness relates to lack of ‘inappropriate development’ rather than to visual openness; thus both undeveloped land which is screened from view by landscape elements (e.g. tree cover) and development which is not considered ‘inappropriate’, are still ‘open’ in Green Belt terms.

Absence of urban influence and visual impact

As noted by the Inspector to the Welwyn Hatfield Borough Council Local Plan Examination (2017), openness is not concerned about the character of the landscape, but instead relates to the “absence of built development and other dominant urban influences”. – Examination Document Reference [EX38](#).

Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016) was an appeal heard in the High Court relating to a previous appeal judgement in which a refusal for planning permission in the Green Belt by East Dorset District Council was upheld. The High Court appeal was dismissed, but the judgement concluded that:

“Openness is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs...and factors relevant to the visual impact on the aspect of openness which the Green Belt presents.

The question of visual impact is implicitly part of the concept of ‘openness of the Green Belt’ as a matter of the natural meaning of the language used in para. 89 of the NPPF... There is an important visual dimension to checking ‘the unrestricted sprawl of large built-up areas’ and the merging of neighbouring towns...openness of aspect is a characteristic quality of

the countryside, and ‘safeguarding the countryside from encroachment’ includes preservation of that quality of openness. The preservation of ‘the setting ... of historic towns’ obviously refers in a material way to their visual setting, for instance when seen from a distance across open fields.” – Neutral Citation Number: [\[2016\] EWCA Civ 466](#).

3.61 In carrying out the assessments we have taken note of planning applications in the Green Belt within or close to Allocation areas that could have a bearing on openness.

Containment: to what extent is the land contained by urbanising influences?

3.62 Urbanising influences, whether on land inset from the Green Belt or on land within the Green Belt (i.e. likely ‘inappropriate’ development in Green Belt terms), can contain Green Belt land from the wider countryside and increase its relationship with development.

3.63 This factor relates to containment of Green Belt land by urbanising influences only, and does not include the presence of ‘natural’ landscape features. The extent to which particular natural landscape features might serve to contain an area of released land, and as a result limit its adverse impact on the remaining Green Belt, is considered in Step 4 below.

Infill Development

Paragraph 145 of the NPPF notes that ‘limited infilling’ is not inappropriate within the Green Belt. – Paragraph 145.

PAS guidance states that development that would effectively be ‘infill’, due to the land’s partial enclosure by development, would have a relatively limited impact in terms of Green Belt contribution. – [PAS Planning on the Doorstep](#).

Examples of land which lack urbanising influences, and is therefore considered to be open in Green Belt terms, and which would not have a containing influence on other Green Belt land, are:

- Any land without built form;

- Agricultural/horticultural/forestry buildings (e.g. farms, glasshouses);
- Mineral extraction or engineering operations that preserve its openness and do not conflict with the purposes of including land within it; and
- Low density or small-scale rural settlement.

Examples of urbanising development which could potentially reduce Green Belt openness, and which could therefore be considered a containing influence, are:

- Buildings other than those for agriculture/horticulture/forestry;
- Solar farms;
- Car parks.

Step 3: Assessing the contribution of land to the Green Belt Purposes

3.64 Step 3 combines Step 1 (the identification of the potential for Green Belt land to contribute to the Green Belt purposes) and Step 2 (the assessment of relationship of the Green Belt with development) to assess the contribution of Green Belt land within the draft Allocation areas to each of the assessed Green Belt purposes. This provides a more localised assessment than the 2016 Stage 1 assessment, which typically assessed larger land parcels.

3.65 The 2016 study used a five-point rating scale for assessing contribution: strong, moderate, weak, no contribution and not applicable. This analysis has also applied a five-point scale, but the focus is on providing more distinction between ratings at the higher end of the 2016 scale. A rating of limited/no contribution in effect covers the latter three points on the 2016 scale, and four ratings - significant, relatively significant, moderate and relatively limited – provide a more precise analysis of variation where the contribution to the Green Belt purposes is not weak:

2016 Study Rating	New Study Rating
Strong	Significant Relatively significant
Moderate	Moderate Relatively limited
Weak	Limited/no contribution
No contribution	Limited/no contribution
Not applicable	Limited/no contribution

What contribution does land make to Purposes 1 - 4?

3.66 Examples for each of the five rating levels are set out in **Table 3.1**, **Table 3.2**, **Table 3.3** and **Table 3.4**, although other combinations of factors may be possible. Professional judgement is used, alongside the guiding criteria to determine the most appropriate rating.

3.67 These tables show that Green Belt which has been weakened as a result of development within or around the area in question is considered to make a weaker contribution to Purposes 1, 2 and 3. It is recognised that there is an argument that Green Belt is playing a stronger protective role if land is already weakened, but the end product of our analysis is judgement of harm to the Green Belt purposes. All other factors being equal, there is considered to be greater harm associated with release of land that has strong separation from the urban area than with release of land that is already significantly influenced by urban development.

3.68 Where settlement gaps are concerned, the increased relevance of Purpose 2 where a gap is more fragile will elevate the level of contribution, but the assumption that stronger distinction from the urban area, and greater openness, make for a higher level of contribution still holds true. It is also noted that there is a point at which a gap becomes too weak to be considered to function as a gap between distinctly different settlements, and so the relevance of Purpose 2 diminishes accordingly.

Table 3.1: Approach that will be used to assess the contribution of land to Purpose 1

Purpose 1: Check the unrestricted sprawl of large built-up areas	
Significant contribution to purpose	The settlement in question is a large built-up area, or the release of land would leave only a narrow gap to a nearby large built-up area, and the land contains no or very limited urban development, is not itself contained by any urban development, and has strong distinction from the inset settlement edge.
Relatively significant contribution to purpose	The settlement in question is a large built-up area, or the release of land would leave only a narrow gap to a nearby large built-up area, and the land contains very limited urban development and has a strong sense of openness. The land is not strongly related to the inset settlement.
Moderate contribution to purpose	The settlement in question is a large built-up area, or the release of land would leave only a narrow gap to a nearby large built-up area, and the land contains limited urban development and has a relatively strong sense of openness. The land may relate to both the settlement and the wider countryside or have a degree of separation from both.
Relatively limited contribution to purpose	The settlement in question is a large built-up area, or the release of land would leave only a narrow gap to a nearby large built-up area, but the land already contains urban development compromising the sense of openness, or it relates more strongly to the urban area than to the wider countryside.
Limited or No contribution to purpose	The settlement in question is a large built-up area, or the release of land would leave only a narrow gap to a nearby large built-up area, but the land is already fully developed or contained by urban development; or

Purpose 1: Check the unrestricted sprawl of large built-up areas

The land is not close enough to a large built up area for development to have an association with it.

Table 3.2: Approach that will be used to assess the contribution of land to Purpose 2

Purpose 2: Prevent neighbouring towns from merging	
Significant contribution to purpose	<p>Release would result in physical or visual coalescence of towns; or</p> <p>Would leave a narrow physical gap with no physical elements to preserve separation; or</p> <p>Would result in a significant reduction in gap size, where the land in question relates more strongly to the countryside than any inset settlement.</p>
Relatively significant contribution to purpose	<p>Release would result in significant narrowing of the physical gap, but physical feature(s) would preserve a sense of separation; or</p> <p>Would result in a significant reduction in gap size, where the land in question has some degree of containment, or does not have strong boundary distinction from an inset settlement, or has diminished openness; or</p> <p>Would significantly diminish gap size, but the settlements are already to a degree connected; or</p> <p>Would increase the relationship between settlements that have narrow separation, with no significant separating features, but would not significantly narrow the gap - e.g. by widening the frontage of a settlement.</p>
Moderate contribution to purpose	<p>Release would result in significant narrowing of the physical gap, but urbanising containment, weak distinction from the urban edge, limited openness or existing linkage between settlements mean that the land has a stronger association with the urban area than the wider Green Belt; or</p>

Purpose 2: Prevent neighbouring towns from merging	
	<p>Would result in a moderate narrowing of a wider gap, where land has a stronger relationship with open countryside than with an inset settlement; or.</p> <p>Would increase the relationship between settlements that have fairly narrow separation, but would not significantly narrow the gap - e.g. by widening the frontage of a settlement.</p>
Relatively limited contribution to purpose	<p>Development would result in a limited narrowing of a wider gap; or</p> <p>The gap is not too narrow, and urbanising containment, weak distinction from the urban edge, limited openness or existing linkage between settlements mean that the land has a strong association with the urban area.</p>
Limited or No contribution to purpose	<p>The land is not located within a gap between towns; or</p> <p>The land plays no role, or a very limited role in maintaining the separation between towns due to the presence of significant separating features and/or significant distances between the towns; or</p> <p>The land plays no significant role due to the extent of development; or</p> <p>The land forms a gap that is too narrow and lacking in separating features to create any clear distinction between towns (i.e. a sense of leaving one and arriving in another).</p>

Table 3.3: Approach used to assess the contribution of land to Purpose 3

Purpose 3: Assist in safeguarding the countryside from encroachment	
Significant contribution to purpose	The land contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms), is not itself contained by any urban development and has strong distinction from the inset settlement edge.
Relatively significant contribution to purpose	The land contains the characteristics of open countryside. It relates more strongly to the wider countryside than the settlement and has very limited urbanising development.
Moderate contribution to purpose	The land contains the characteristics of open countryside but has a relationship with the settlement; or The land is open but has a usage that strengthens its relationship with the settlement.
Relatively limited contribution to purpose	The land has very limited characteristics of open countryside and has urbanising development that compromises openness. The land relates more strongly to the settlement than to the wider countryside.
Limited or No contribution to purpose	The land contains urbanising development of a scale, density or form that significantly compromises openness; or It is too influenced and contained by urban development to retain any sense of being countryside, or sharing a relationship with the wider countryside.

Table 3.4: Approach used to assess the contribution of land to Purpose 4

Purpose 4: Preserve the setting and special character of historic towns	
Significant contribution to purpose	The land plays a significant role in the setting and or special character of historic towns in terms of its physical extent and degree of visibility and/or its significant contribution to special character.
Relatively significant contribution to purpose	The land plays a relatively significant role in the setting and or special character of historic towns in terms of its physical extent and degree of visibility and/or its significant contribution to special character.
Moderate contribution to purpose	The land plays a moderate role in the setting of historic towns in terms of its physical extent and degree of visibility and/or its contribution to special character.
Relatively limited contribution to purpose	The land plays a minor role as it lacks any direct visual relationship with historic towns, and is not visible in the context of views to it. It does however contribute in some way to the wider setting.
Limited or No contribution to purpose	Land makes no contribution – i.e. does not form part of the setting or contribute to the special character of historic towns.

What contribution does land make to Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land?

3.69 As noted under Step 2, all Green Belt land is considered to make an equal contribution to Purpose 5. For completeness, standard text is provided in the assessment outputs set out in **Appendix B** to state this.

Step 4: Assess impact of release on adjacent Green Belt land

3.70 The nature of any boundary features are considered as part of the assessment of the potential impact of releasing land from the Green Belt on the Green Belt purposes. This determines the extent to which adjacent retained Green Belt land incurs loss of integrity through increased containment and/or loss of distinction between development and open land.

3.71 Typically a weakening of distinction between urban and open land as a result of adjacent Green Belt release would have some degree of adverse impact on an area's contribution to Purposes 1-3, although because narrower settlement gaps are, to a point, considered to increase contribution to Purpose 2 the reduction in a gap between inset settlements could actually increase contribution. This is why the assessment of impact on adjacent retained Green Belt focuses on loss of distinction and increase in containment, rather than on contribution.

3.72 If a revised Green Belt boundary results in a less distinct boundary between the settlement and the countryside, the release of the area of Green Belt under assessment is likely to weaken the land that remains designated as Green Belt. However, even if a strong alternative boundary can be defined, there is potential for land that remains designated as Green Belt to be weaker, due to increased containment. However, in some locations it may be possible for a clearer Green Belt boundary to be defined – e.g. through use of a feature that marks a stronger (see paragraph 3.59), or more widely consistent, distinction between a built-up area and countryside.

3.73 The extent of this impact upon the adjacent land that remains designated as Green Belt is limited by the strength of adjacent Green Belt land in relation to the Green Belt purposes. For example, the increased containment of land that is already contained by development, and therefore plays a relatively limited role in relation to the Green Belt purposes, will constitute less of an impact than the containment of land that has a stronger relationship with the wider countryside, and therefore plays a more significant role in relation to the Green Belt purposes. Only the increased containment or weakening of the Green Belt boundary of adjacent retained Green Belt land that makes a stronger contribution to Green Belt purposes than the land being assessed for release will increase the overall harm of the release.

3.74 Green Belt land that is occupied by absolute constraints cannot be impacted by release of adjacent land, as this land is protected from development and as such its integrity cannot be weakened.

3.75 The assessment assumes that the existing boundary features between land proposed for release and the Green Belt will be retained. For example, if land proposed for release is comprised of woodland, it is assumed that the woodland would be lost to development, but that the edge of this woodland adjoining the Green Belt would be retained.

3.76 Considering the impact on containment and impact on distinction in combination provides a rating for the impact that the release of Green Belt land has on the integrity of adjacent retained Green Belt land, using a four-point scale of: significant / moderate / minor / no or negligible.

3.77 Guidelines for each of the four rating levels are set out in **Table 3.5**.

Table 3.5: Factors affecting the impact of release on adjacent Green Belt land.

Impact on Adjacent Green Belt	
Major impact	<p>Development has major impact on adjacent Green Belt as:</p> <ul style="list-style-type: none"> ■ it significantly increases the containment of adjacent retained Green Belt land that plays a stronger role in relation to the Green Belt purposes than the land being released. <p>And</p> <ul style="list-style-type: none"> ■ it results in a significantly weaker distinction between the inset settlement and the Green Belt (i.e. changing from a strong Green Belt boundary to a weaker, or more convoluted boundary).
Moderate impact	<p>Development has a moderate impact on adjacent Green Belt as:</p> <ul style="list-style-type: none"> ■ it significantly increases the containment of adjacent retained Green Belt land that plays a stronger role in relation to the Green Belt purposes than the land being released. <p>Or</p>

Impact on Adjacent Green Belt	
	<ul style="list-style-type: none"> ■ it results in a significantly weaker distinction between the inset settlement and the Green Belt (i.e. changing from a strong Green Belt boundary to a weaker, or more convoluted boundary). <p>Or</p> <ul style="list-style-type: none"> ■ it moderately increases the containment of adjacent retained Green Belt land that plays a stronger role in relation to the Green Belt purposes than the land being released; and ■ it results in a moderately weaker distinction between the inset settlement and the Green Belt (i.e. changing from a strong Green Belt boundary to a weaker, or more convoluted boundary).
Minor impact	<p>Development has a minor impact on adjacent Green Belt as:</p> <ul style="list-style-type: none"> ■ it moderately increases the containment of adjacent retained Green Belt land that plays a stronger role in relation to the Green Belt purposes than the land being released. <p>Or</p> <ul style="list-style-type: none"> ■ it results in a moderately weaker distinction between the inset settlement and the Green Belt (i.e. changing from a strong Green Belt boundary to a weaker, or more convoluted boundary). <p>Or</p> <ul style="list-style-type: none"> ■ it minimally increases the containment of adjacent retained Green Belt land that plays a stronger role in relation to the Green Belt purposes than the land being released; and ■ it results in a minimally weaker distinction between the inset settlement and the Green Belt (i.e. changing from a strong Green Belt boundary to a weaker, or more convoluted boundary).

Impact on Adjacent Green Belt	
No/Negligible impact	<p>Development has no or negligible impact on adjacent Green Belt as:</p> <ul style="list-style-type: none"> ■ it does not lead to the containment of any adjacent retained Green Belt land; or ■ it contains adjacent retained Green Belt land that plays a weaker role in relation to the Green Belt purposes than the land being released. <p>And</p> <ul style="list-style-type: none"> ■ it results in no significant change in strength of distinction between the inset settlement and the Green Belt (i.e. resulting in no significant change in strength of Green Belt boundary); or ■ it results in a clearer or more consistent distinction between the inset settlement and the Green Belt (i.e. resulting in a clearer or more consistent Green Belt boundary).

Impact on Containment and Distinction

PAS guidance notes the types of areas of land that might seem to make a relatively limited contribution to the Green Belt, or which might be considered for development through a review of the Green Belt according to the five Green Belt purposes, including:

- land where development would be well contained by the landscape; and
- land where a strong boundary could be created with a clear distinction between ‘town’ and ‘country’. – [PAS Planning on the Doorstep](#).

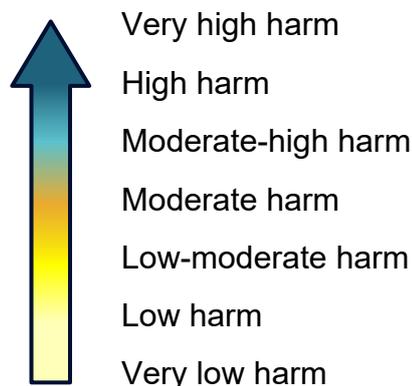
Step 5: Define variations in harm to the Green Belt within the Allocations as sub-areas

3.78 The assessed contribution of land within the Allocations to the Green Belt purposes (Step 3) is combined with the assessed impact of its release on remaining land designated as Green Belt (Step 4) to determine an overall assessment of the harm of releasing land from the Green Belt. Variations in harm rating within an Allocation are reflected in the definition of sub-areas, where appropriate.

3.79 Sub-areas are defined where it is appropriate to reflect clear variations in identified harm of Green Belt release, as well as variations in the reasons for identified harm of Green Belt release. This does not extend to picking out very small areas of variation – typically less than a hectare – which can be considered too small to be ‘strategic’.

3.80 Where an allocation is split into multiple sub-areas, the overall harm of the release will reflect the rating of the sub-area assessed as causing the highest harm – for example if, moving outwards from a settlement edge, there is a progression in levels of harm from low to moderate to high, the overall harm of the Allocation’s release will be high.

3.81 Green Belt harm is rated using a seven-point scale ranging from very high to very low harm:



3.82 Some developed land within the draft Allocations has been noted in the assessment text as making no contribution to the Green Belt purposes but has not, due to lack of development potential, been defined as separate sub-areas.

3.83 Figure 3.2 provides an indication as to how loss of contribution to the Green Belt purposes (Step 3) and the impact on adjacent Green Belt (Step 4) influence the overall harm of Green Belt release, and benchmark examples for each of the five rating levels are set out in **Table 3.6**.

3.84 Greater impact on adjacent retained Green Belt land will serve to increase harm, whereas lack of impact on adjacent retained Green Belt will serve to reduce harm. Loss of contribution to multiple Green Belt purposes can also increase harm. However professional judgement has been used in each individual case to consider how much weight to attach to each contributing element. Clear and detailed justification is provided in **Appendix B** for all ratings given in relation to how the overall judgement of Green Belt harm has been reached.

3.85 Figure 3.3 presents an example of the harm assessment text for an Allocation / sub-area.

Figure 3.2: Guidelines for rating harm on the basis of contribution to Green Belt purposes and impact of release on adjacent Green Belt

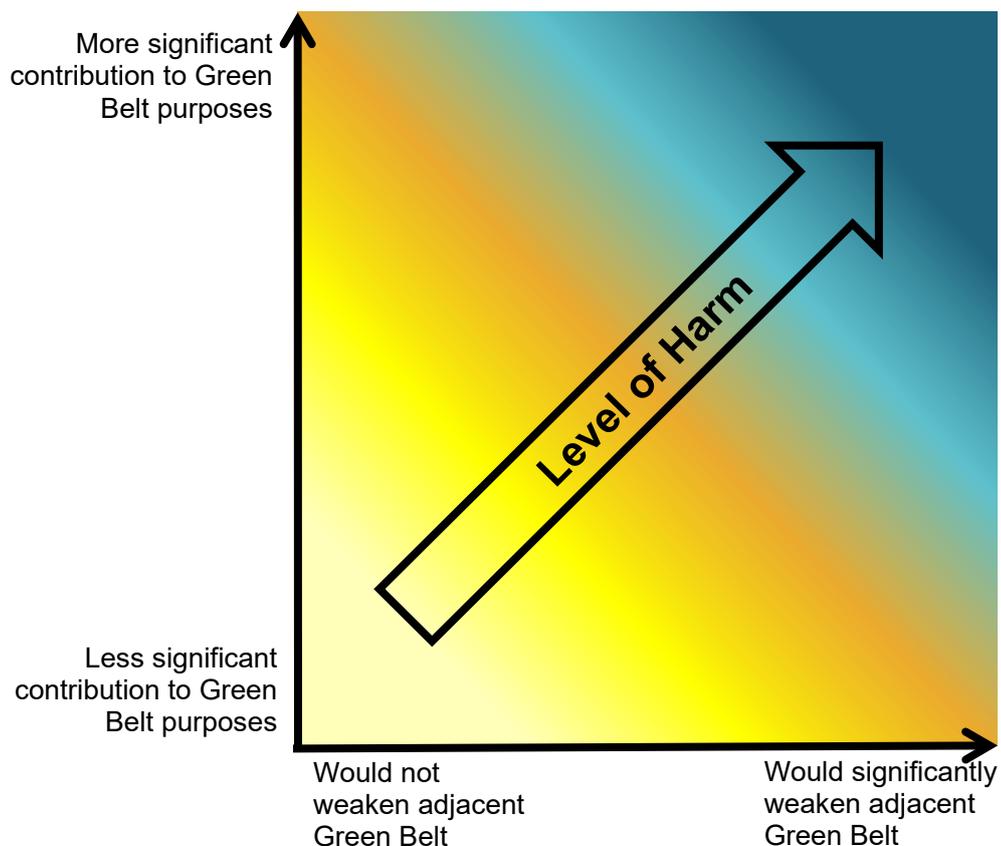
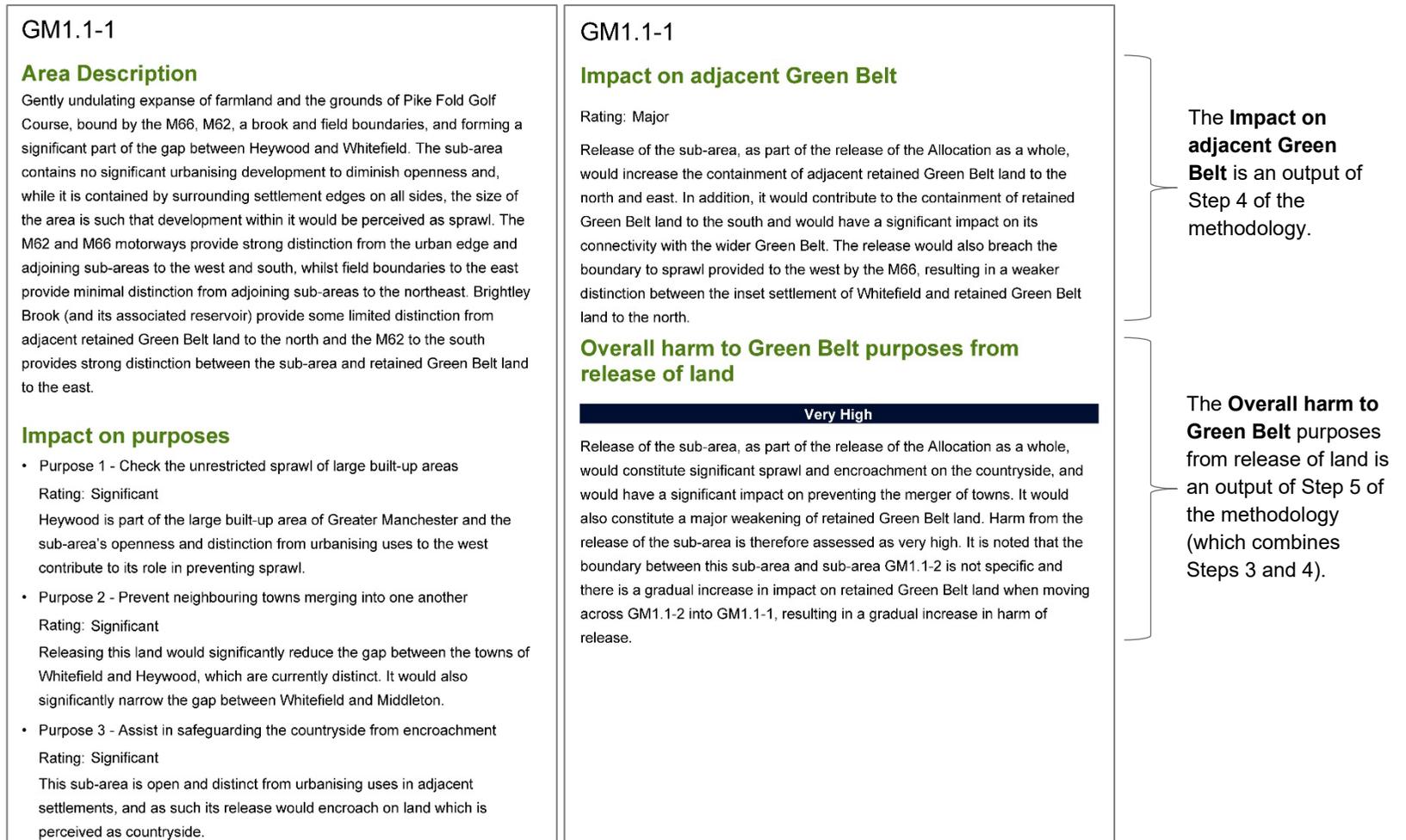


Table 3.6: Examples of overall judgements of Green Belt harm.

Harm to the Green Belt Purposes	
Very high harm	Release of land results in a loss of significant contribution to at least one of the Green Belt purposes, and would constitute at least a moderate weakening of the integrity of land that remains designated as Green Belt.
High harm	Release of land results in a loss of significant contribution to at least one of the Green Belt purposes, and would constitute at least a minor weakening of the integrity of land that remains designated as Green Belt.
Moderate-high harm	Release of land from the Green Belt would mean a relatively significant loss of contribution to one of the Green Belt purposes and a less significant loss of contribution to others, and would cause a minor weakening of the integrity of land that remains designated as Green Belt.
Moderate harm	Release of land from the Green Belt would mean a moderate loss of contribution to one of the Green Belt purposes and a less significant loss of contribution to others, and would cause a minor weakening of the integrity of land that remains designated as Green Belt.
Low-moderate harm	Release of land from the Green Belt would mean a relatively limited loss of contribution to one of the Green Belt purposes and a limited loss of contribution to others, and would cause a minor weakening of the integrity of land that remains designated as Green Belt.

Harm to the Green Belt Purposes	
Low harm	Release of land from the Green Belt would mean limited or no loss of contribution to all of the Green Belt purposes and a limited loss of contribution to others, and would cause no more than a minor weakening of the integrity of land that remains designated as Green Belt.
Very low harm	Release of land from the Green Belt would mean limited or no loss of contribution to all of the Green Belt purposes and a limited loss of contribution to others, and would not weaken the integrity of land that remains designated as Green Belt.

Figure 3.3: Example of Detailed Harm Assessment



The **Impact on purposes** is an output of Step 3 (an output of Steps 1 and 2) of the Methodology (which combines Steps 1 and 2). This continues onto a second page of the outputs.

Assessment Outputs

3.86 The Allocation assessments contain the following:

- an OS map showing the Allocation boundary, existing Green Belt land, proposed Green Belt land to be removed or added, and any absolute constraints;
- a location map showing the location of the Allocation within Greater Manchester;
- a description of the Allocation and its location;
- a summary page with:
 - an OS map showing the Allocation with colour-shaded variations showing the harm rating(s) for sub-areas and any areas of absolute constraint;
 - a table showing the areas (in hectares) of land assessed at different levels of harm, the total size of the Allocation (which may also include land that is not in the Green Belt) and, where applicable, the area of land within the Allocation proposed for retention in the Green Belt;
 - a description and rating of the harm from release of the Allocation as a whole, with comments on the impact of proposed retention of Green Belt within the Allocation and opportunities to minimise harm through mitigation measures;
- For each sub-area (or for the Allocation as a whole, if no sub-areas):
 - an aerial view showing the sub-area boundary and location;
 - an OS map showing the sub-area boundary, existing Green Belt land, proposed Green Belt land to be removed or added, and any absolute constraints;
 - a description of the sub-area, including its boundaries and relationship with inset settlements and the wider Green Belt;
 - rating and supporting text assessing loss of contribution to the Green Belt Purposes 1-5 resulting from release of the sub-area (see example in **Figure 3.3**);
 - an analysis of the potential impact of release on the strength of adjacent retained Green Belt land and Green Belt boundaries (see example in **Figure 3.3**); and

- rating and supporting text assessing the overall harm to the Green Belt purposes of release of the sub-area, considering loss of contribution to the Green Belt purposes and impact on the strength of adjacent retained Green Belt land (see example in **Figure 3.3**).

Chapter 4

Summary of Findings

4.1 This chapter sets out the findings of the assessment of Green Belt harm.

Summary of Harm Assessment Findings

4.2 The findings of the assessment of harm are summarised by authority and Allocation in **Table 4.1** and **Figure 4.1a-k** show the potential degree of harm to the Green Belt purposes that would result if the Allocations, or parts of them, were released.

4.3 In each location where alterations to Green Belt boundaries are being considered, planning judgement is required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation. In light of this, this assessment of harm to the Green Belt purposes does not draw conclusions as to where land should be released to accommodate development, but identifies relative variations in harm to the designation.

4.4 It is recognised that the sites listed here may be subject to change in the planned 2020 iteration of the GMSF.

4.5 Detailed findings of the assessment of harm are included in **Appendix B**, organised by Local Authority.

Table 4.1: Green Belt assessment of harm ratings.

Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ²⁸	Harm rating
Cross-Boundary Strategic Allocations						
GM1.1	Bury / Rochdale	Heywood / Pilsworth	640.4	GM1.1-1	294.7	Very High
GM1.1	Bury / Rochdale	Heywood / Pilsworth	640.4	GM1.1-2	83.7	High
GM1.1	Bury / Rochdale	Heywood / Pilsworth	640.4	GM1.1-3	72.5	Moderate-High
GM1.1	Bury / Rochdale	Heywood / Pilsworth	640.4	GM1.1-4	46.3	Low-Moderate
GM1.1	Bury / Rochdale	Heywood / Pilsworth	640.4	GM1.1-5	3.9	Low
GM1.1	Bury / Rochdale	Heywood / Pilsworth	640.4	Developed Land	135.2	Very Low
GM1.2	Bury / Rochdale	Simister / Bowlee	217.9	GM1.2-1	69.1	Moderate-High
GM1.2	Bury / Rochdale	Simister / Bowlee	217.9	GM1.2-2	148.3	High
GM2	Oldham / Rochdale	Stakehill	200.2	GM2-1	64.2	High
GM2	Oldham / Rochdale	Stakehill	200.2	GM2-2	18.0	Moderate
GM2	Oldham / Rochdale	Stakehill	200.2	GM2-3	27.1	Low-Moderate

²⁸ Due to minor digitisation variations the Allocation area totals may not exactly equal the sum of the component areas, and some Allocation size figures also include land which lies outside of the Green Belt, and which is therefore not assessed.

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Summary of Findings

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Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ²⁸	Harm rating
GM2	Oldham / Rochdale	Stakehill	200.2	GM2-4	66.5	High
GM2	Oldham / Rochdale	Stakehill	200.2	Retained Green Belt	24.5	Retained Green Belt
GM3	Oldham / Rochdale	Kingsway South	278.7	GM3-1	120.2	Very High
GM3	Oldham / Rochdale	Kingsway South	278.7	GM3-2	17.6	High
GM3	Oldham / Rochdale	Kingsway South	278.7	GM3-3	36.1	Very High
GM3	Oldham / Rochdale	Kingsway South	278.7	GM3-4	14.2	High
GM3	Oldham / Rochdale	Kingsway South	278.7	GM3-5	3.8	Moderate
GM3	Oldham / Rochdale	Kingsway South	278.7	GM3-6	5.1	Moderate-High
GM3	Oldham / Rochdale	Kingsway South	278.7	GM3-7	3.1	High
GM3	Oldham / Rochdale	Kingsway South	278.7	Retained Green Belt	75.8	Retained Green Belt
Bolton						
GM4	Bolton	Bewshell Farm	5.6	GM4	5.5	Low
GM5	Bolton	Chequerbent North	15.8	GM5-1	8.3	High
GM5	Bolton	Chequerbent North	15.8	GM5-2	7.5	Moderate

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Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ²⁸	Harm rating
GM6	Bolton	West of Wingates / M61 Junction 6	183.7	GM6-1	161.2	High
GM6	Bolton	West of Wingates / M61 Junction 6	183.7	GM6-2	21.5	Moderate-High
Bury						
GM1.3	Bury	Whitefield	62.7	GM1.3-1	51.7	Low-Moderate
GM1.3	Bury	Whitefield	62.7	GM1.3-2	10.5	Low
GM7	Bury	Elton Reservoir	251.7	GM7-1	14.6	Moderate-High
GM7	Bury	Elton Reservoir	251.7	GM7-2	36.3	High
GM7	Bury	Elton Reservoir	251.7	GM7-3	8.0	High
GM7	Bury	Elton Reservoir	251.7	GM7-4	41.6	Moderate-High
GM7	Bury	Elton Reservoir	251.7	GM7-5	16.0	High
GM7	Bury	Elton Reservoir	251.7	GM7-6	10.3	Moderate
GM7	Bury	Elton Reservoir	251.7	Retained Green Belt	112.7	Retained Green Belt
GM8	Bury	Seedfield	5.1	GM8	5.1	Very Low
GM9	Bury	Walshaw	64.1	GM9	61.3	Moderate

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Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ²⁸	Harm rating
Manchester						
GM10	Manchester	Global Logistics	20.0	GM10	12.2	Moderate
GM11	Manchester	Roundthorn Medipark Extension	21.5	GM11	21.4	Moderate
GM12	Manchester	Southwick Park	1.0	GM12	0.7	Very Low
Oldham						
GM13	Oldham	Ashton Road Corridor	12.3	GM13-1	5.9	Moderate-High
GM13	Oldham	Ashton Road Corridor	12.3	GM13-2	5.5	Moderate-High
GM14	Oldham	Beal Valley	51.2	GM14-1	37.5	High
GM14	Oldham	Beal Valley	51.2	GM14-2	2.0	Moderate
GM15	Oldham	Broadbent Moss	81.6	GM15-1	34.6	Moderate-High
GM15	Oldham	Broadbent Moss	81.6	GM15-2	2.8	Moderate
GM15	Oldham	Broadbent Moss	81.6	GM15-3	2.3	Moderate
GM15	Oldham	Broadbent Moss	81.6	Retained Green Belt	25.0	Retained Green Belt
GM17	Oldham	Hanging Chadder	22.7	GM17	22.7	Moderate-High
GM18	Oldham	Robert Fletchers	32.3	GM18	14.2	Moderate

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Summary of Findings

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Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ²⁸	Harm rating
GM18	Oldham	Robert Fletchers	32.3	Retained Green Belt	15.3	Retained Green Belt
GM19	Oldham	South of Rosary Road	2.7	GM19	2.3	Low-Moderate
GM19	Oldham	South of Rosary Road	2.7	Retained Green Belt	0.3	Retained Green Belt
GM20	Oldham	Spinners Way / Alderney Farm	2.0	GM20	2.0	Low-Moderate
GM21	Oldham	Thornham Old Road	34.7	GM21-1	20.3	High
GM21	Oldham	Thornham Old Road	34.7	GM21-2	14.3	Moderate-High
GM22	Oldham	Woodhouses	9.0	GM22-1	3.4	High
GM22	Oldham	Woodhouses	9.0	GM22-2	2.4	High
GM22	Oldham	Woodhouses	9.0	GM22-3	2.0	Moderate-High
GM22	Oldham	Woodhouses	9.0	GM22-4	1.3	Moderate
Rochdale						
GM23	Rochdale	Bamford / Norden	35.6	GM23-1	22.5	Moderate
GM23	Rochdale	Bamford / Norden	35.6	GM23-2	13.0	Low-Moderate
GM24	Rochdale	Castleton Sidings	11.5	GM24	5.3	Moderate

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Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ²⁸	Harm rating
GM24	Rochdale	Castleton Sidings	11.5	Retained Green Belt	3.1	Retained Green Belt
GM25	Rochdale	Crimble Mill	16.8	GM25-1	10.9	High
GM25	Rochdale	Crimble Mill	16.8	GM25-2	2.8	Moderate-High
GM25	Rochdale	Crimble Mill	16.8	Retained Green Belt	2.6	Retained Green Belt
GM26	Rochdale	Land North of Smithy Bridge	20.4	GM26	18.4	Low-Moderate
GM27	Rochdale	Newhey Quarry	13.6	GM27	13.5	Moderate-High
Salford						
GM30	Salford	Land at Hazelhurst Farm	15.7	GM30	15.7	Low-Moderate
GM31	Salford	East of Boothstown	29.0	GM31-1	11.6	Low-Moderate
GM31	Salford	East of Boothstown	29.0	GM31-2	17.4	Moderate
GM32	Salford	North of Irlam Station	65.1	GM32	64.3	Moderate
GM33	Salford	Port Salford Extension	109.1	GM33-1	57.1	Moderate
GM33	Salford	Port Salford Extension	109.1	GM33-2	52.0	Moderate

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Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ²⁸	Harm rating
Stockport						
GM34	Stockport	Bredbury Park Extension	28.5	GM34-1	11.8	High
GM34	Stockport	Bredbury Park Extension	28.5	GM34-2	11.6	Moderate-High
GM34	Stockport	Bredbury Park Extension	28.5	GM34-3	5.0	Moderate
GM35	Stockport	Former Offerton High School	16.9	GM35	16.9	Low
GM36	Stockport	Gravel Bank Road / Unity Mill	6.1	GM36	4.8	Moderate
GM36	Stockport	Gravel Bank Road / Unity Mill	6.1	Developed Land	1.3	Very Low
GM37	Stockport	Heald Green	27.3	GM37-1	17.8	Moderate-High
GM37	Stockport	Heald Green	27.3	GM37-2	4.3	Low-Moderate
GM38	Stockport	High Lane	19.9	GM38	19.9	Moderate
GM39	Stockport	Hyde Bank Meadows	10.2	GM39-1	7.0	Moderate
GM39	Stockport	Hyde Bank Meadows	10.2	GM39-2	3.2	Low-Moderate

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Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ²⁸	Harm rating
GM40	Stockport	Griffin Farm, Stanley Green	64.7	GM40-1	47.7	Moderate-High
GM40	Stockport	Griffin Farm, Stanley Green	64.7	GM40-2	16.9	Moderate
GM41	Stockport	Woodford Aerodrome	120.0	GM41-1	40.6	Moderate-High
GM41	Stockport	Woodford Aerodrome	120.0	GM41-2	7.6	Low-Moderate
GM41	Stockport	Woodford Aerodrome	120.0	GM41-3	3.1	Low
GM41	Stockport	Woodford Aerodrome	120.0	GM41-4	4.1	Low
GM41	Stockport	Woodford Aerodrome	120.0	GM41-5	1.8	Very Low
GM41	Stockport	Woodford Aerodrome	120.0	GM41-6	5.5	Low-Moderate
GM41	Stockport	Woodford Aerodrome	120.0	GM41-7	1.9	Low
GM41	Stockport	Woodford Aerodrome	120.0	Developed Land	55.3	Very Low
Tameside						
GM42	Tameside	Ashton Moss West	58.2	GM42-1	36.5	Moderate
GM42	Tameside	Ashton Moss West	58.2	GM42-2	14.5	Low-Moderate
GM42	Tameside	Ashton Moss West	58.2	GM42-3	7.3	Low-Moderate

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Stage 2 Greater Manchester Green Belt Study
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Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ²⁸	Harm rating
GM43	Tameside	Godley Green Garden Village	123.9	GM43	123.9	High
GM44	Tameside	South of Hyde	32.4	GM44-1	13.4	Moderate
GM44	Tameside	South of Hyde	32.4	GM44-2	9.4	Moderate-High
GM44	Tameside	South of Hyde	32.4	GM44-3	3.9	Moderate
GM44	Tameside	South of Hyde	32.4	GM44-4	1.8	Low-Moderate
GM44	Tameside	South of Hyde	32.4	GM44-5	1.9	Low-Moderate
GM44	Tameside	South of Hyde	32.4	Developed Land	2.0	Very Low
Trafford						
GM45	Trafford	New Carrington	1137.7	GM45-1	4.6	High
GM45	Trafford	New Carrington	1137.7	GM45-2	62.3	Moderate-High
GM45	Trafford	New Carrington	1137.7	GM45-3	12.0	Moderate-High
GM45	Trafford	New Carrington	1137.7	GM45-4	52.1	Moderate-High
GM45	Trafford	New Carrington	1137.7	GM45-5	34.7	Moderate
GM45	Trafford	New Carrington	1137.7	GM45-6	55.0	Very High

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Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ²⁸	Harm rating
GM45	Trafford	New Carrington	1137.7	GM45-7	20.1	Moderate-High
GM45	Trafford	New Carrington	1137.7	Retained Green Belt	306.8	Retained Green Belt
GM46	Trafford	Timperley Wedge	225.0	GM46-1	31.1	Moderate
GM46	Trafford	Timperley Wedge	225.0	GM46-2	11.8	High
GM46	Trafford	Timperley Wedge	225.0	GM46-3	8.4	Moderate
GM46	Trafford	Timperley Wedge	225.0	GM46-4	8.6	Moderate
GM46	Trafford	Timperley Wedge	225.0	GM46-5	19.6	Very High
GM46	Trafford	Timperley Wedge	225.0	GM46-6	7.4	Moderate
GM46	Trafford	Timperley Wedge	225.0	GM46-7	10.4	Moderate
GM46	Trafford	Timperley Wedge	225.0	GM46-8	16.8	High
GM46	Trafford	Timperley Wedge	225.0	Retained Green Belt	73.9	Retained Green Belt
Wigan						
GM47	Wigan	Land South of Pennington	53.1	GM47	53.1	Very High
GM48	Wigan	M6, Junction 25	73.7	GM48	73.7	Very High

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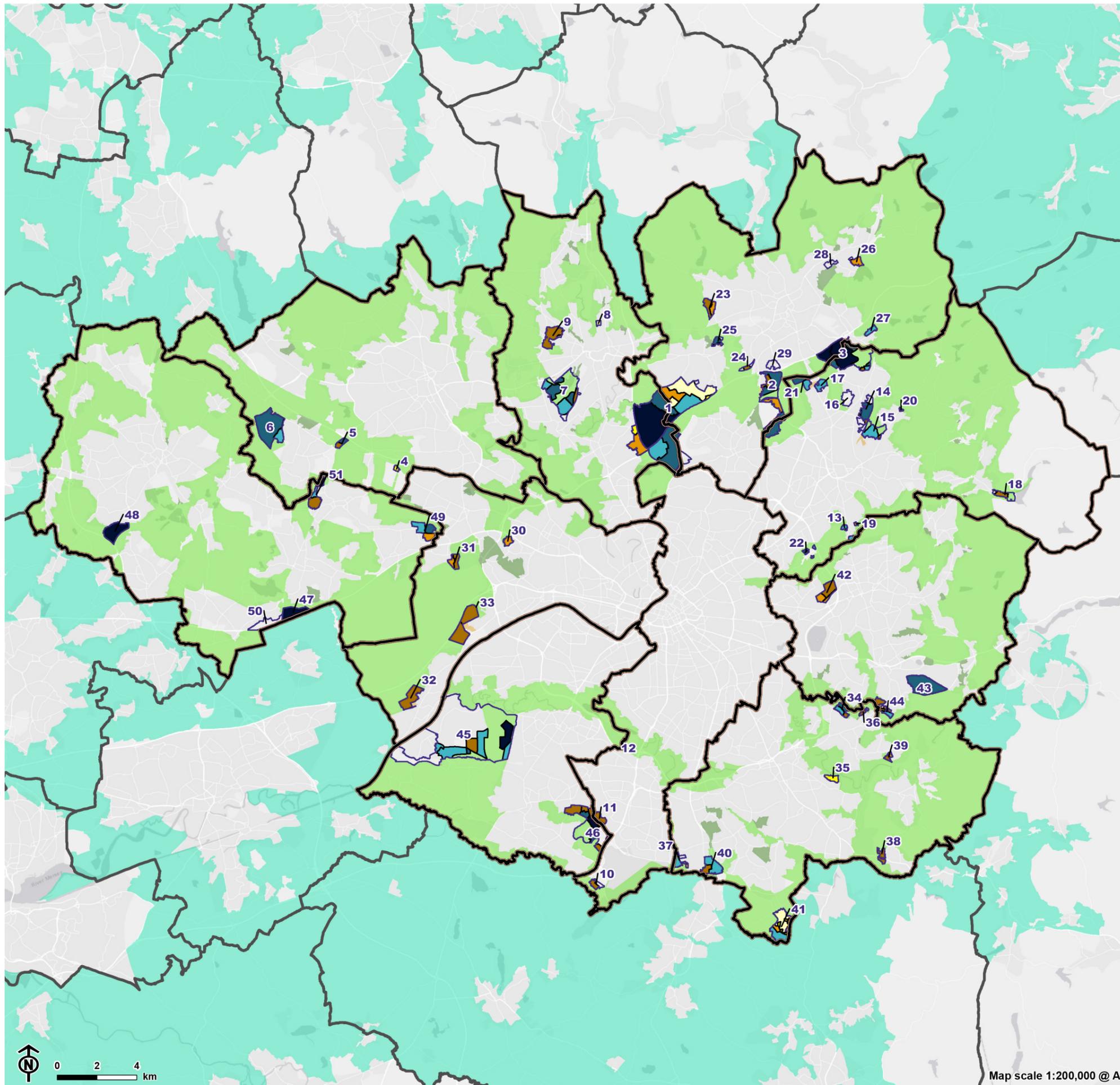
Summary of Findings

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Allocation Reference	Local Authority	Allocation Name	Allocation area (ha)	Allocation / Sub-area Reference	Allocation / Sub-area area assessed (ha) ²⁸	Harm rating
GM49	Wigan	North of Mosley Common	64.6	GM49-1	19.4	High
GM49	Wigan	North of Mosley Common	64.6	GM49-2	26.5	Moderate-High
GM49	Wigan	North of Mosley Common	64.6	GM49-3	18.5	Low-Moderate
GM51	Wigan	West of Gibfield	53.9	GM51-1	13.3	Very High
GM51	Wigan	West of Gibfield	53.9	GM51-2	9.2	Moderate-High
GM51	Wigan	West of Gibfield	53.9	GM51-3	31.3	Moderate

Figure 4.1a

Harm Assessment: Greater Manchester Allocations



- Greater Manchester Local Authority boundary
 - Site allocation
 - GMSF 2019 Green Belt proposed for release
 - GMSF 2019 Green Belt land to be retained
 - GMSF 2019 Proposed additional Green Belt
 - Green Belt outside Greater Manchester
- Rating**
- Very High
 - High
 - Moderate-High
 - Moderate
 - Low-Moderate
 - Low
 - Very Low

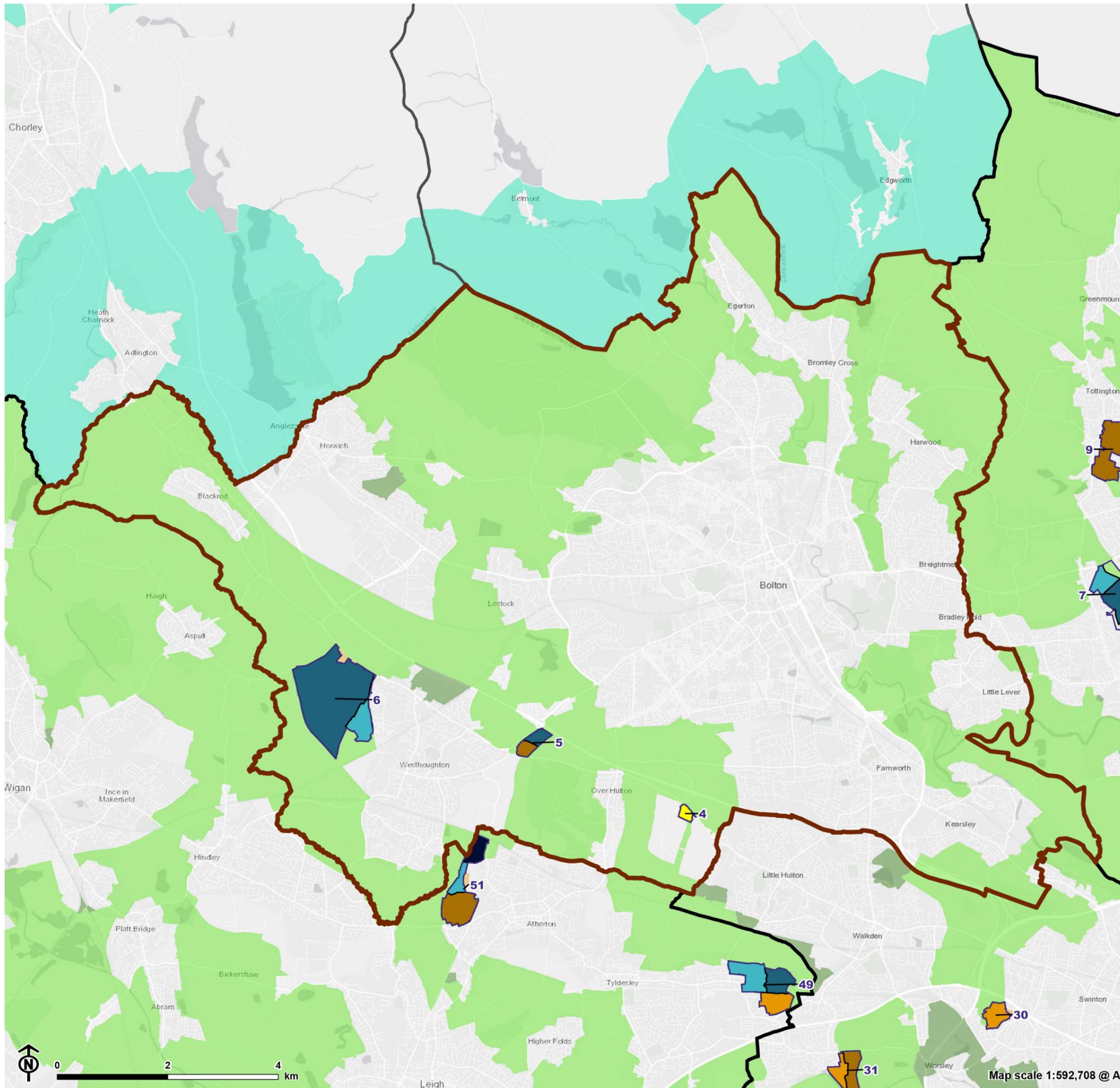
Allocation numbers and names are listed in Table 2.2



Map scale 1:200,000 @ A3

Figure 4.1b

**Harm Assessment: Greater Manchester Allocations
Bolton Metropolitan Borough Council**



- Greater Manchester Local Authority boundary
 - Bolton Borough boundary
 - Site allocation
 - GMSF 2019 Green Belt proposed for release
 - GMSF 2019 Green Belt land to be retained
 - GMSF 2019 Proposed additional Green Belt
 - Green Belt outside Greater Manchester
- Overall harm rating**
- Very High
 - High
 - Moderate-High
 - Moderate
 - Low-Moderate
 - Low
 - Very Low

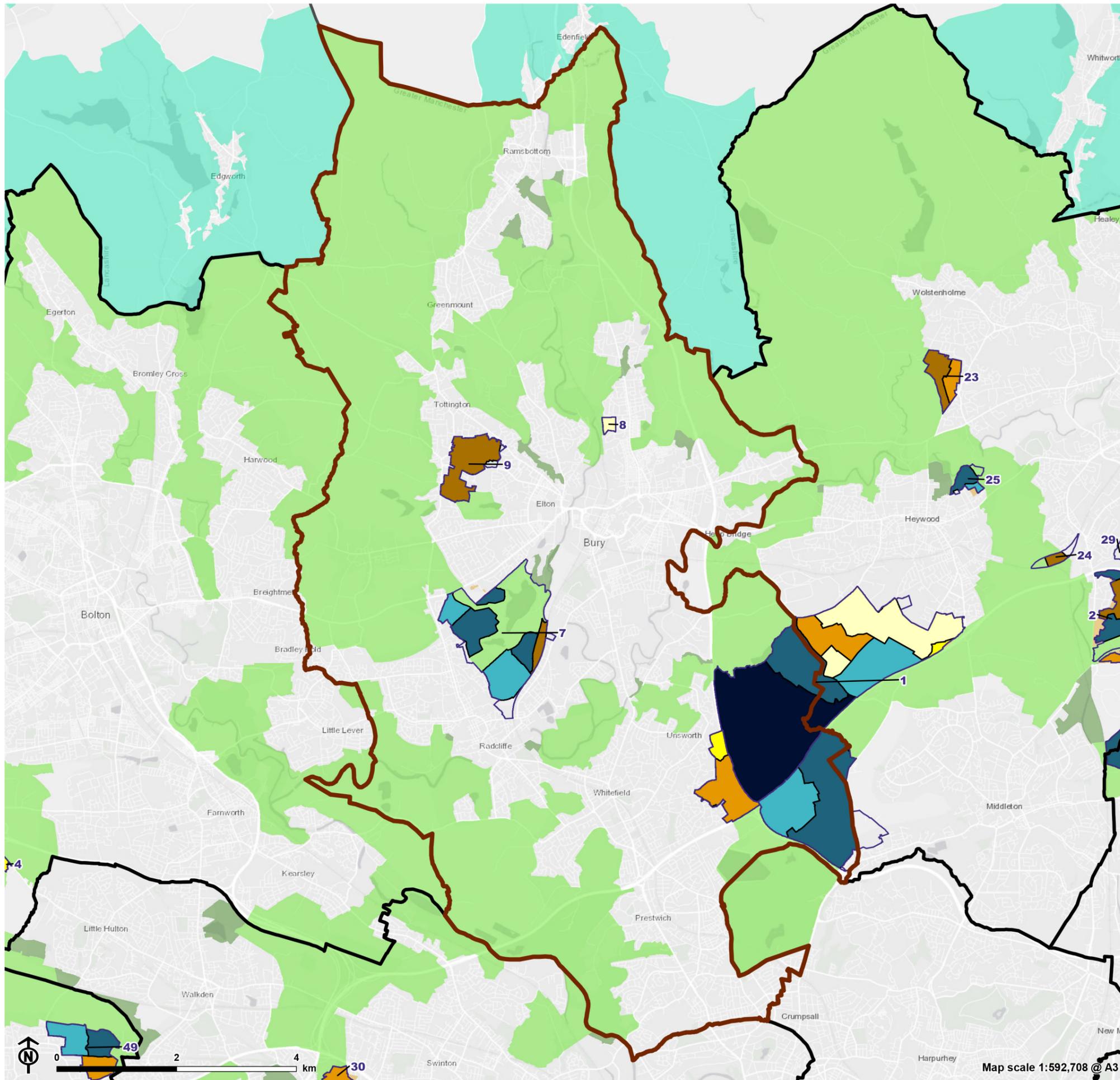
Allocation numbers and names are listed in Table 2.2



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Figure 4.1c

**Harm Assessment: Greater Manchester Allocations
Bury Metropolitan Borough Council**



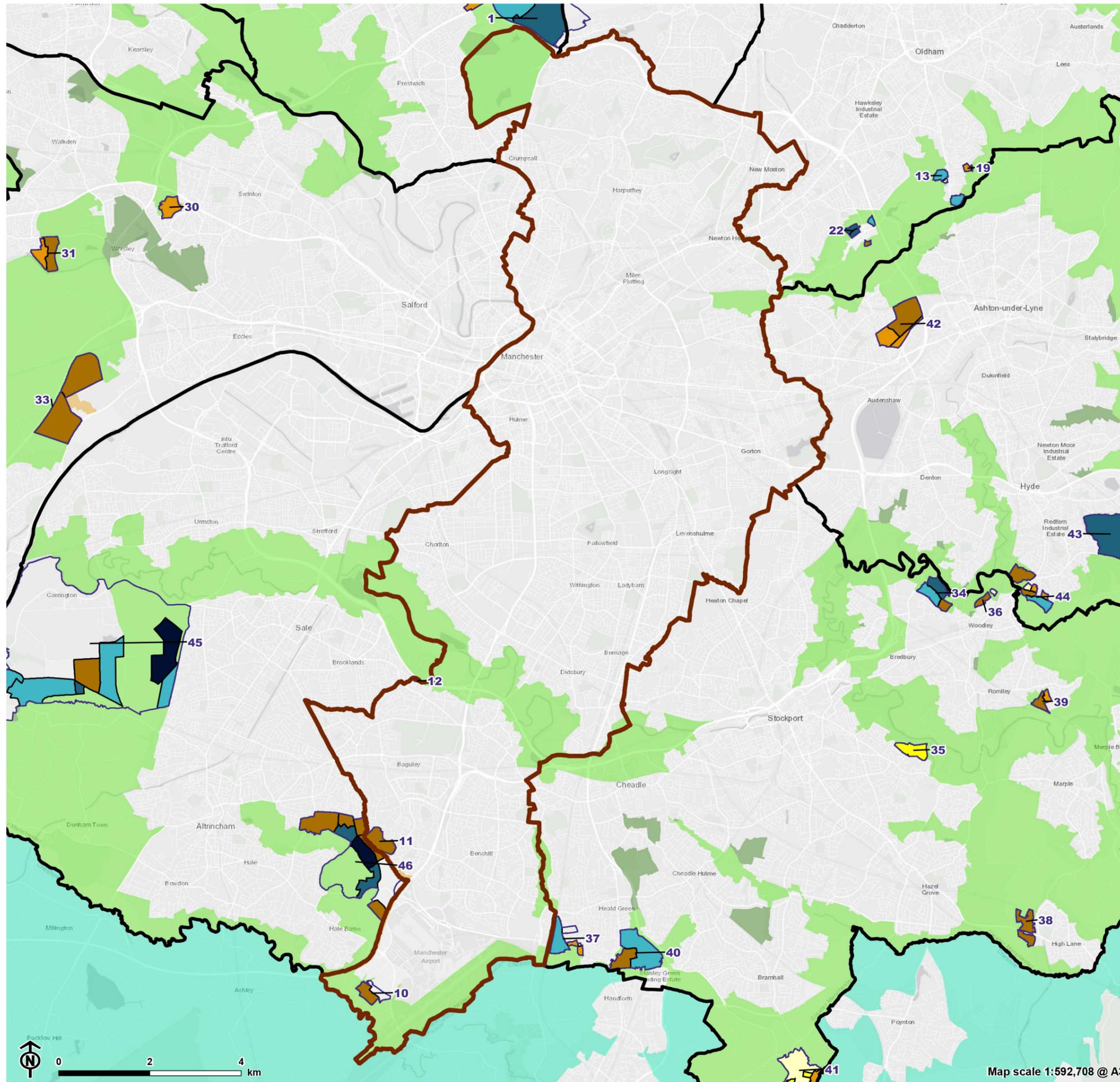
- Greater Manchester Local Authority boundary
 - Bury Borough boundary
 - Site allocation
 - GMSF 2019 Green Belt proposed for release
 - GMSF 2019 Green Belt land to be retained
 - GMSF 2019 Proposed additional Green Belt
 - Green Belt outside Greater Manchester
- Overall harm rating**
- Very High
 - High
 - Moderate-High
 - Moderate
 - Low-Moderate
 - Low
 - Very Low

Allocation numbers and names are listed in Table 2.2



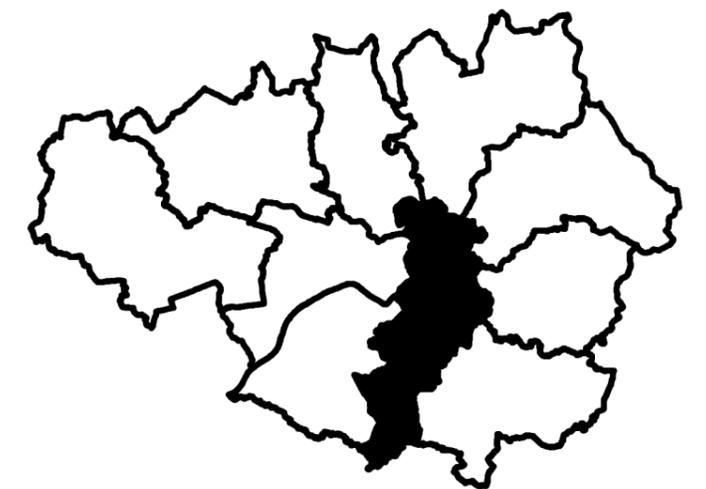
Figure 4.1d

**Harm Assessment: Greater Manchester Allocations
Manchester City Council**



- Greater Manchester Local Authority boundary
 - Manchester City boundary
 - Site allocation
 - GMSF 2019 Green Belt proposed for release
 - GMSF 2019 Green Belt land to be retained
 - GMSF 2019 Proposed additional Green Belt
 - Green Belt outside Greater Manchester
- Overall harm rating**
- Very High
 - High
 - Moderate-High
 - Moderate
 - Low-Moderate
 - Low
 - Very Low

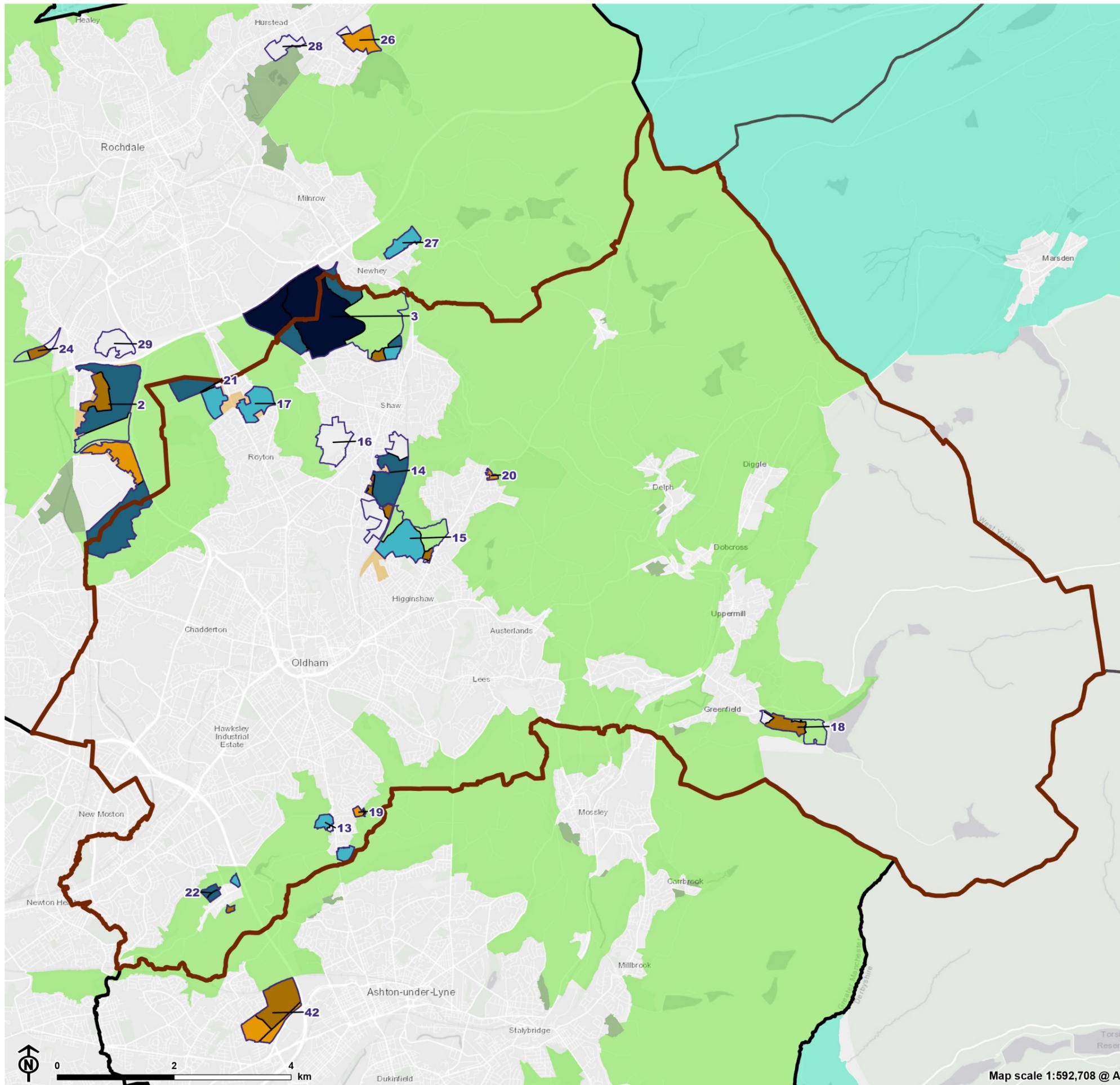
Allocation numbers and names are listed in Table 2.2



Map scale 1:592,708 @ A3

Figure 4.1e

**Harm Assessment: Greater Manchester Allocations
Oldham Metropolitan Borough Council**



- Greater Manchester Local Authority boundary
 - Oldham Borough boundary
 - Site allocation
 - GMSF 2019 Green Belt proposed for release
 - GMSF 2019 Green Belt land to be retained
 - GMSF 2019 Proposed additional Green Belt
 - Green Belt outside Greater Manchester
- Overall harm rating**
- Very High
 - High
 - Moderate-High
 - Moderate
 - Low-Moderate
 - Low
 - Very Low

Allocation numbers and names are listed in Table 2.2

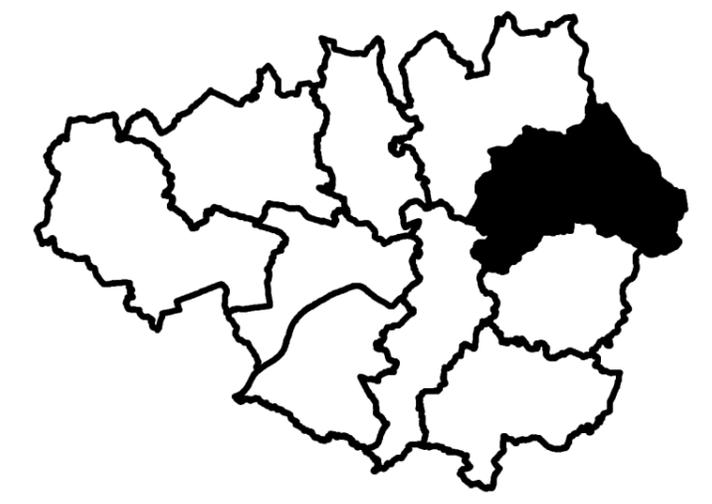
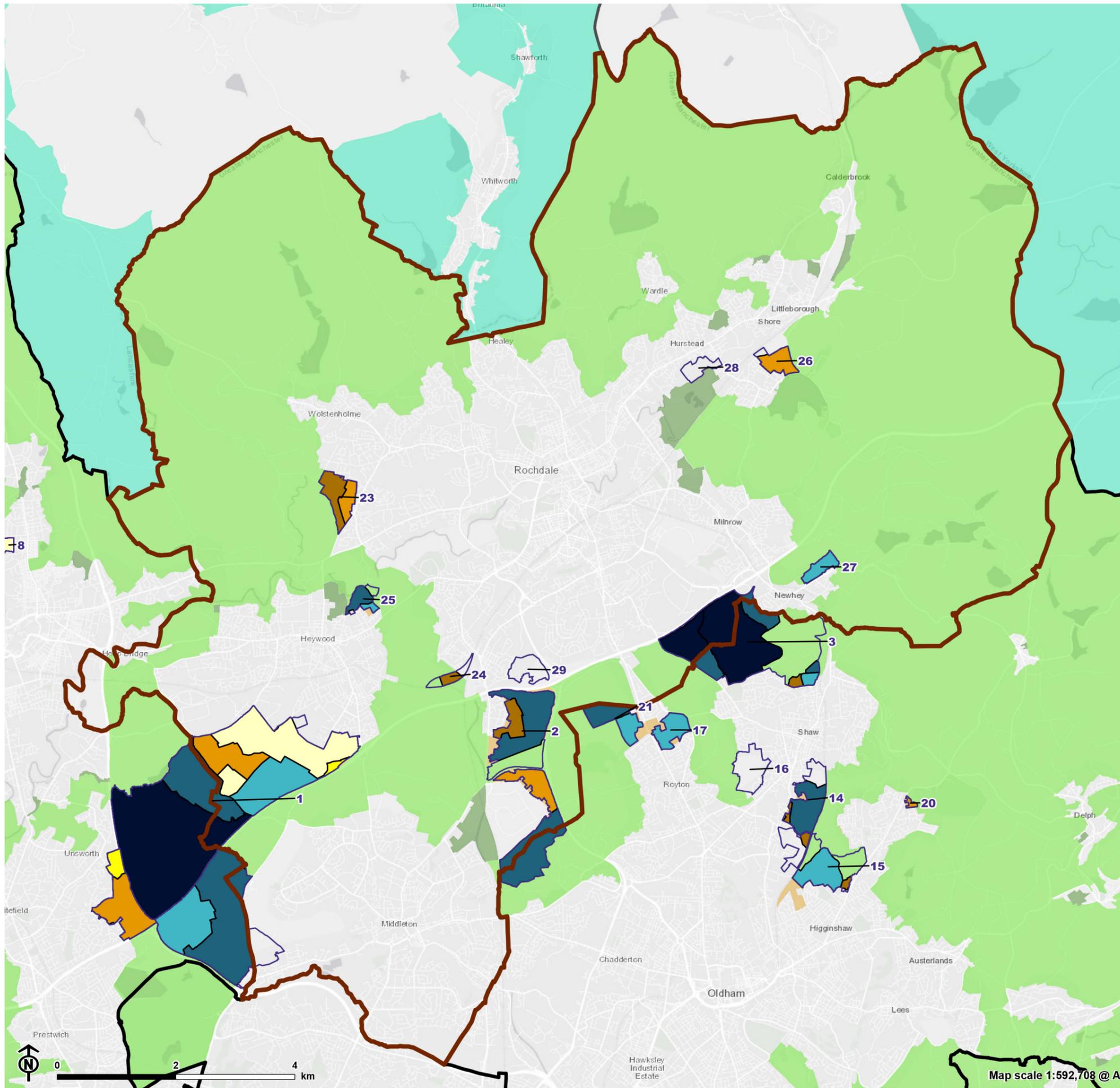


Figure 4.1f

**Harm Assessment: Greater Manchester Allocations
Rochdale Metropolitan Borough Council**



- Greater Manchester Local Authority boundary
 - Rochdale Borough boundary
 - Site allocation
 - GMSF 2019 Green Belt proposed for release
 - GMSF 2019 Green Belt land to be retained
 - GMSF 2019 Proposed additional Green Belt
 - Green Belt outside Greater Manchester
- Overall harm rating**
- Very High
 - High
 - Moderate-High
 - Moderate
 - Low-Moderate
 - Low
 - Very Low

Allocation numbers and names are listed in Table 2.2

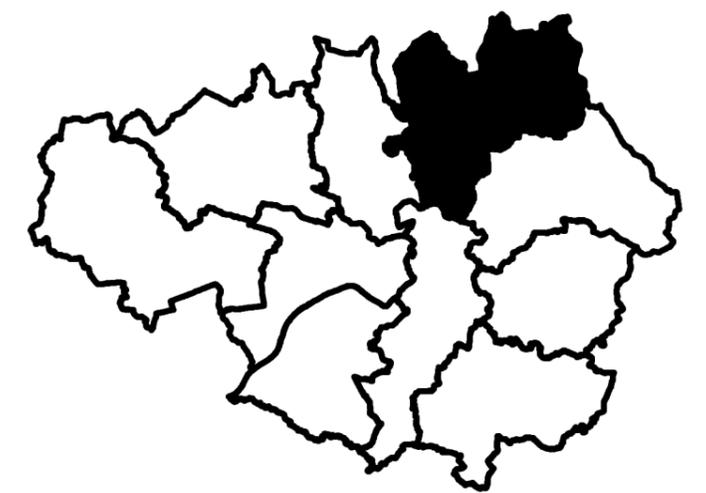
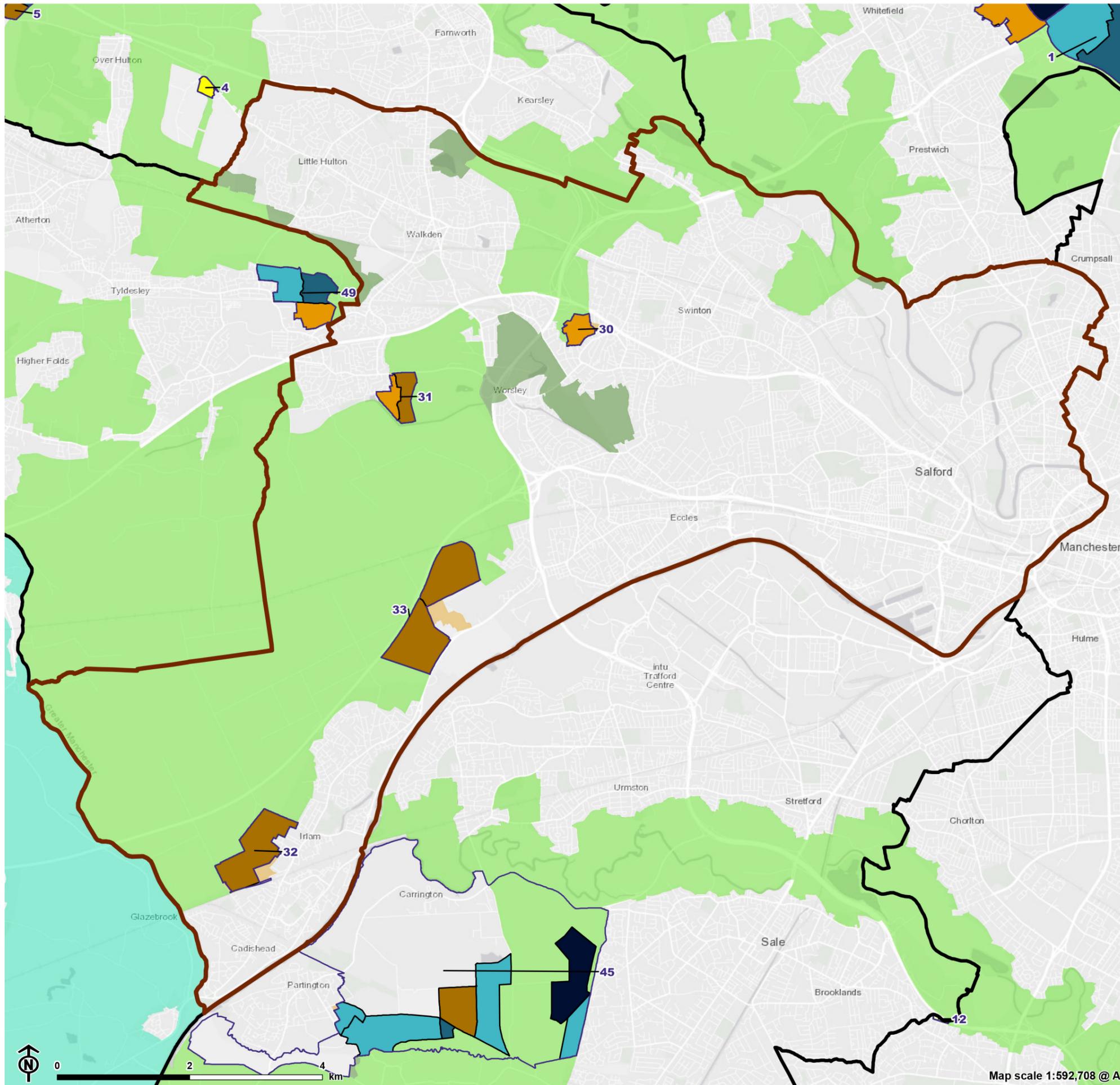


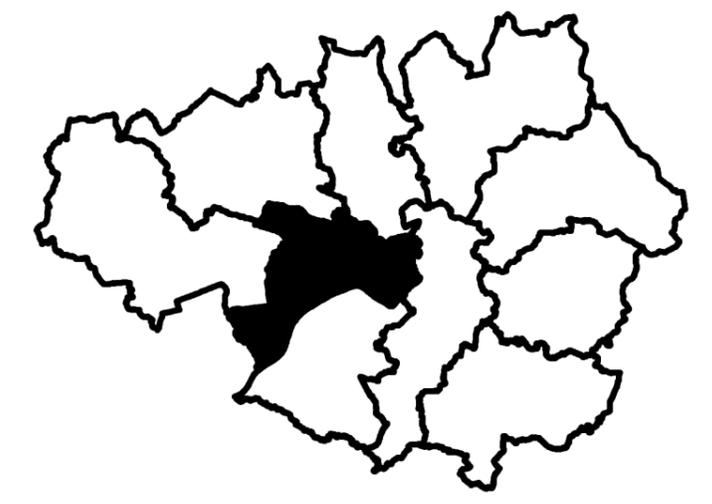
Figure 4.1g

**Harm Assessment: Greater Manchester Allocations
Salford City Council**



- Greater Manchester Local Authority boundary
 - Salford City boundary
 - Site allocation
 - GMSF 2019 Green Belt proposed for release
 - GMSF 2019 Green Belt land to be retained
 - GMSF 2019 Proposed additional Green Belt
 - Green Belt outside Greater Manchester
- Overall harm rating**
- Very High
 - High
 - Moderate-High
 - Moderate
 - Low-Moderate
 - Low
 - Very Low

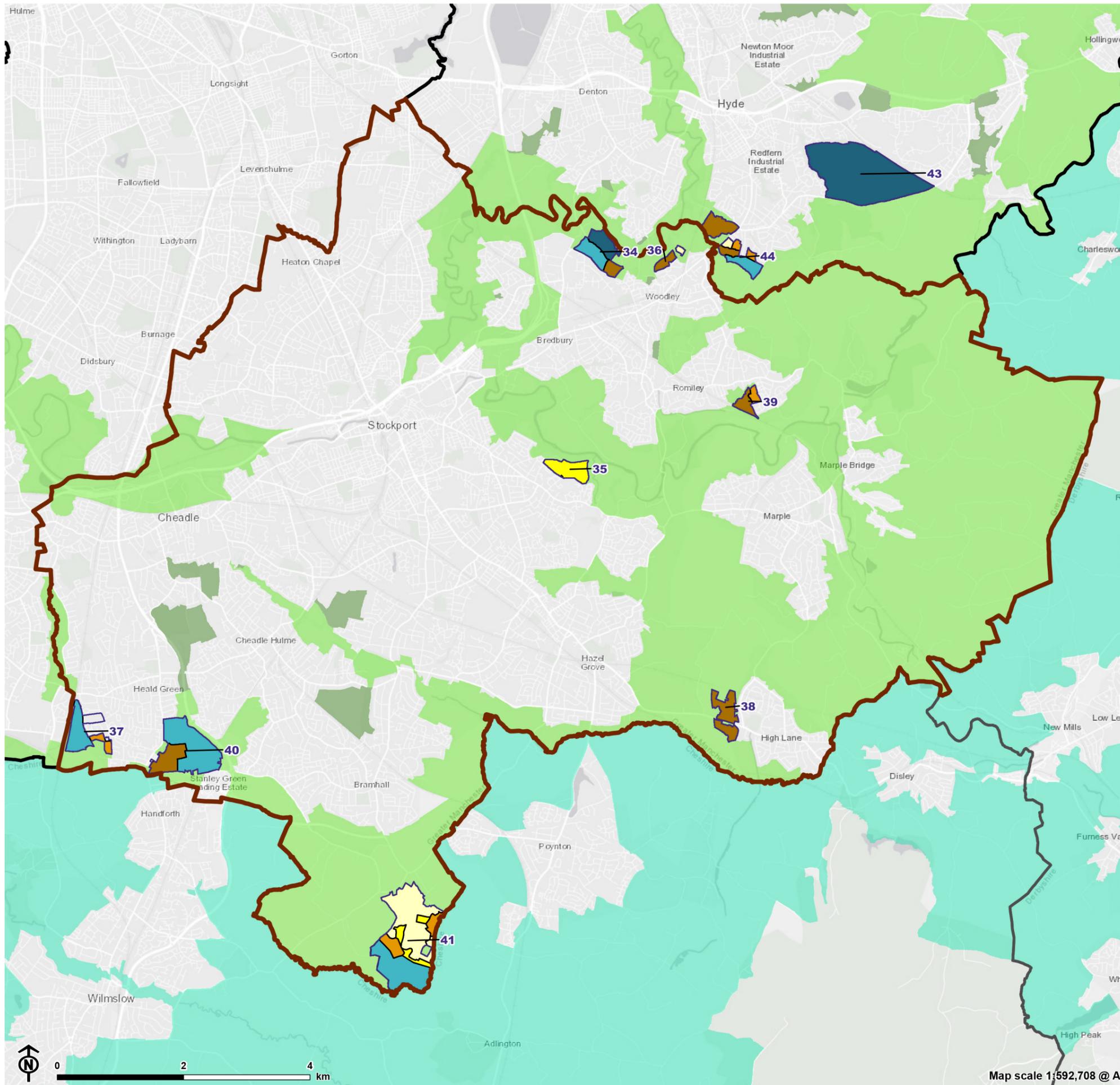
Allocation numbers and names are listed in Table 2.2



Map scale 1:592,708 @ A3

Figure 4.1h

**Harm Assessment: Greater Manchester Allocations
Stockport Metropolitan Borough Council**



- Greater Manchester Local Authority boundary
 - Stockport Borough boundary
 - Site allocation
 - GMSF 2019 Green Belt proposed for release
 - GMSF 2019 Green Belt land to be retained
 - GMSF 2019 Proposed additional Green Belt
 - Green Belt outside Greater Manchester
- Overall harm rating**
- Very High
 - High
 - Moderate-High
 - Moderate
 - Low-Moderate
 - Low
 - Very Low

Allocation numbers and names are listed in Table 2.2



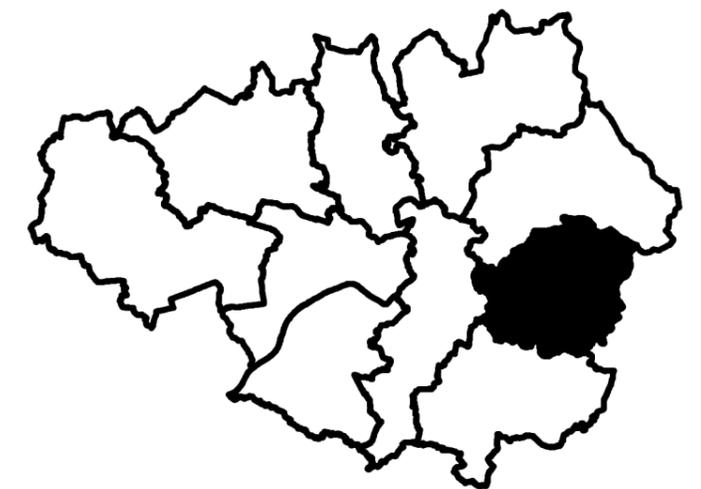
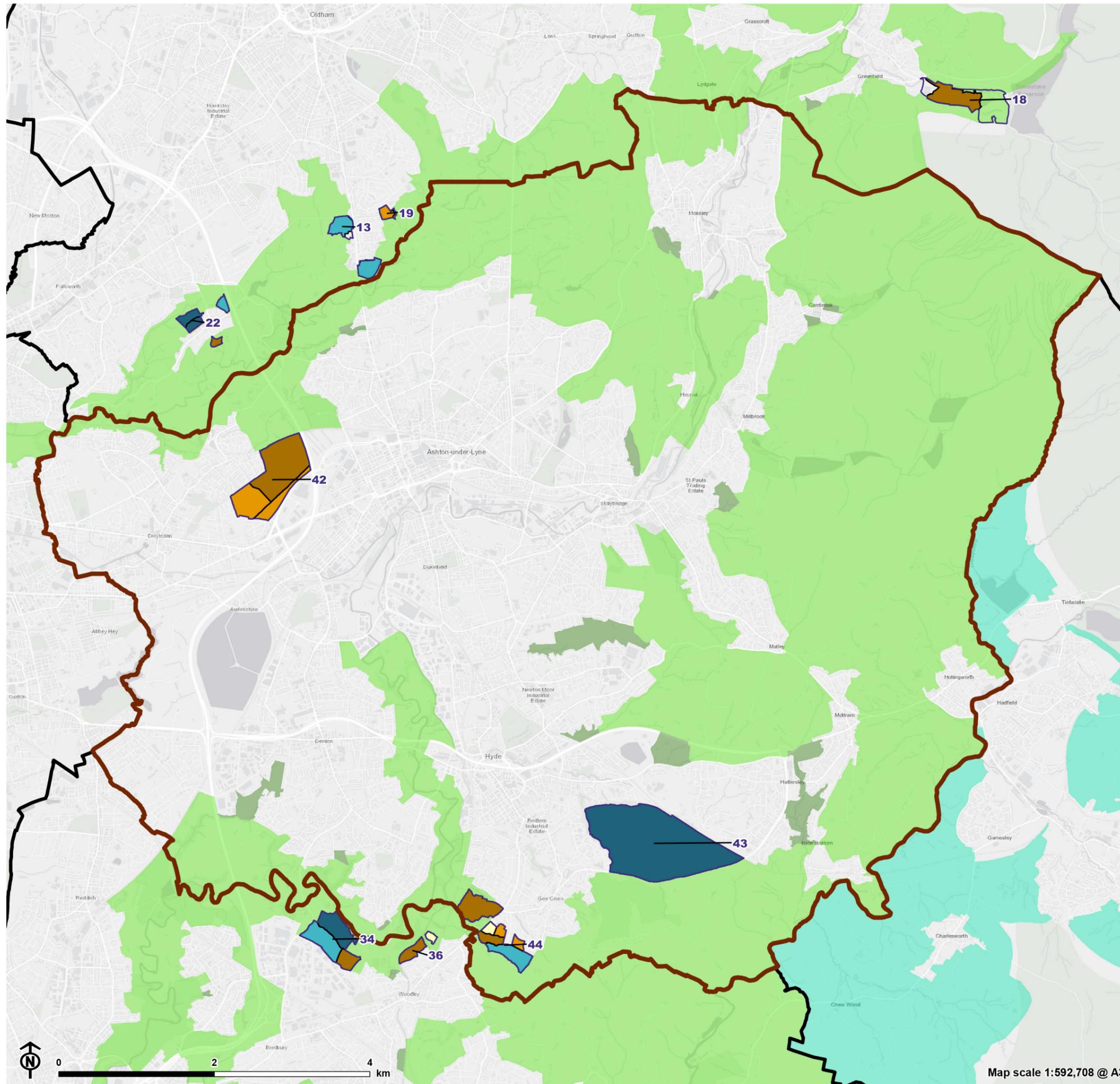
Map scale 1:592,708 @ A3

Figure 4.1i

**Harm Assessment: Greater Manchester Allocations
Tameside Metropolitan Borough Council**

- Greater Manchester Local Authority boundary
 - Tameside Borough boundary
 - Site allocation
 - GMSF 2019 Green Belt proposed for release
 - GMSF 2019 Green Belt land to be retained
 - GMSF 2019 Proposed additional Green Belt
 - Green Belt outside Greater Manchester
- Overall harm rating**
- Very High
 - High
 - Moderate-High
 - Moderate
 - Low-Moderate
 - Low
 - Very Low

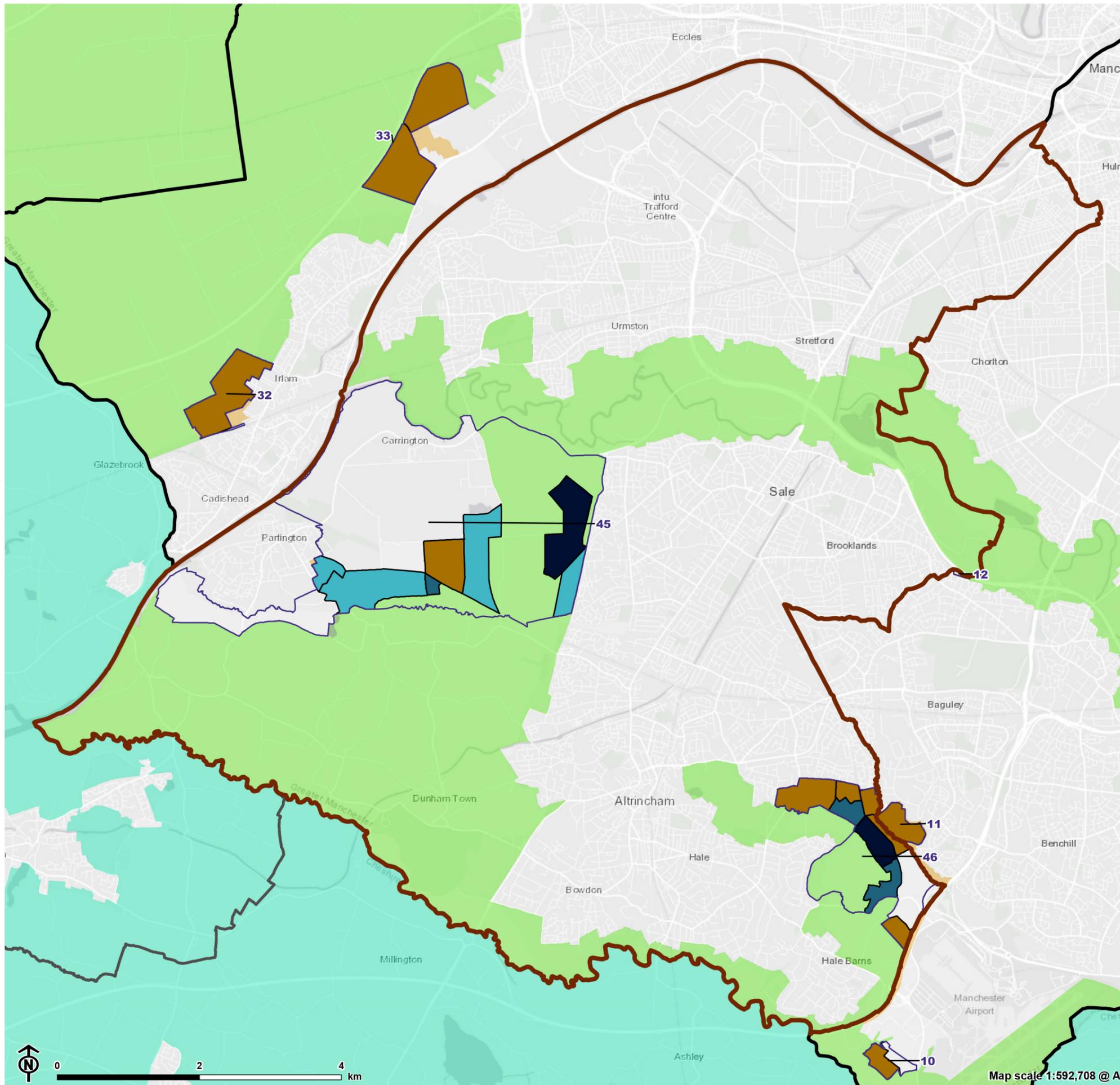
Allocation numbers and names are listed in Table 2.2



Map scale 1:592,708 @ A3

Figure 4.1j

**Harm Assessment: Greater Manchester Allocations
Trafford Metropolitan Borough Council**



- Greater Manchester Local Authority boundary
 - Trafford Borough boundary
 - Site allocation
 - GMSF 2019 Green Belt proposed for release
 - GMSF 2019 Green Belt land to be retained
 - GMSF 2019 Proposed additional Green Belt
 - Green Belt outside Greater Manchester
- Overall harm rating**
- Very High
 - High
 - Moderate-High
 - Moderate
 - Low-Moderate
 - Low
 - Very Low

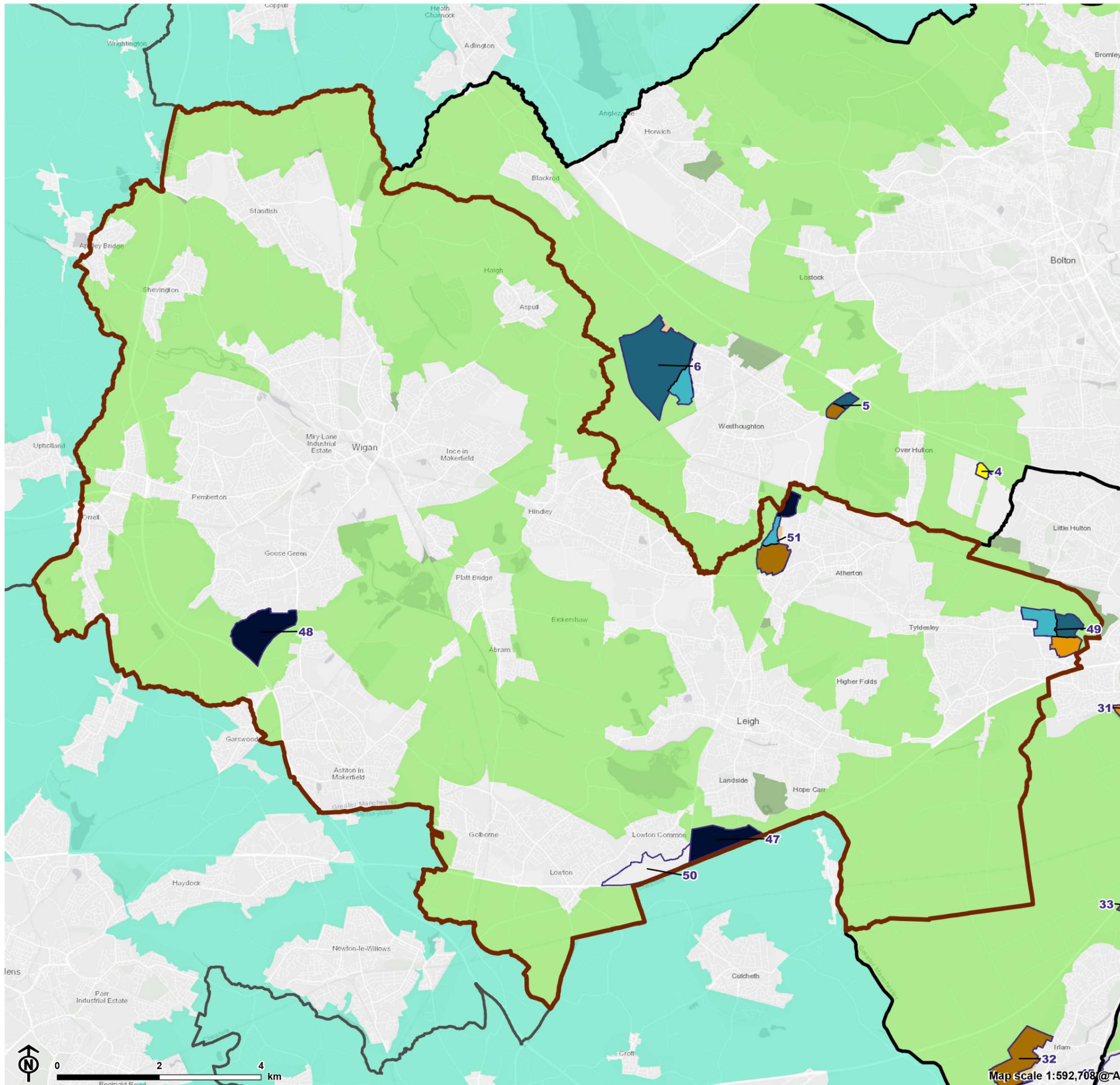
Allocation numbers and names are listed in Table 2.2



Map scale 1:592,708 @ A3

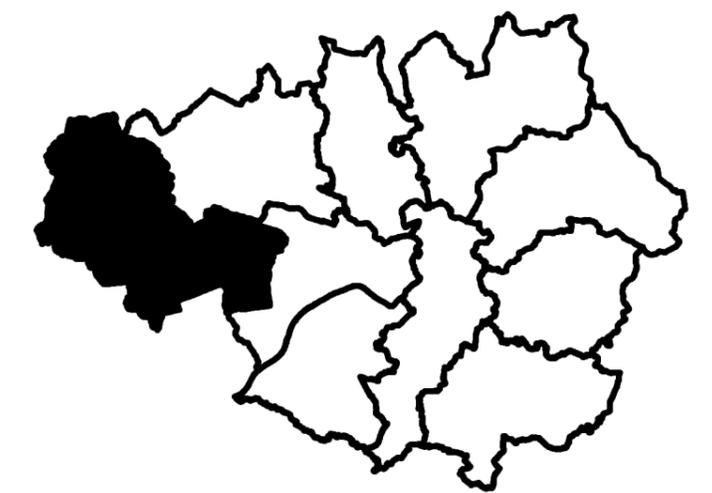
Figure 4.1k

**Harm Assessment: Greater Manchester Allocations
Wigan Metropolitan Borough Council**



- Greater Manchester Local Authority boundary
 - Wigan Borough boundary
 - Site allocation
 - GMSF 2019 Green Belt proposed for release
 - GMSF 2019 Green Belt land to be retained
 - GMSF 2019 Proposed additional Green Belt
 - Green Belt outside Greater Manchester
- Overall harm rating**
- Very High
 - High
 - Moderate-High
 - Moderate
 - Low-Moderate
 - Low
 - Very Low

Allocation numbers and names are listed in Table 2.2



Map scale 1:592,708 @A3

Chapter 5

Making Changes to the Green Belt

5.1 The following chapter sets out the key steps that the GMCA should consider where there is an identified need to release land from the Green Belt. The chapter also sets out potential mitigation measures that could be applied to reduce the potential harm to the Green Belt, if land is released. This is followed by a discussion of the requirement for consideration of potential opportunities for enhancing the beneficial use of the Green Belt (in line with Paragraph 141 of the NPPF). A separate LUC report identifies potential opportunities to help inform preparation of measures to enhance the remaining Green Belt to compensate for its loss elsewhere.

Making changes to the Green Belt

5.2 The NPPF requires changes to the Green Belt to be made through the Development Plan process. If such changes are made, the process should include demonstration of exceptional circumstances, including consideration of the need to promote sustainable patterns of development, i.e. planning for economic growth, housing need, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience.

5.3 A common interpretation of the policy position is that, where necessitated by development requirements, plans should identify the most sustainable locations for growth. This policy position should be maintained unless outweighed by adverse effects on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt based around the five purposes. In other words, the relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt. Conversely, higher performing Green Belt may be appropriate for release where exceptional circumstances are demonstrated.

5.4 A separate analysis of the cumulative impact on the Green Belt purposes that would result from release of all the proposed Allocations is to be carried out to help inform these judgements.

5.5 Before concluding that 'exceptional circumstances' exist to justify changes to the Green Belt, Paragraph 137 of the NPPF states that local authorities should demonstrate that all other 'reasonable options' for meeting its identified need for development have been considered. In particular local authorities need to consider whether their strategy:

- makes effective use of suitable brownfield sites and underutilised land;
- optimises the density of development in town and city centres and other locations well served by public transport; and
- explores whether other authorities can help to meet some of the identified development requirement.

5.6 Should the GMCA decide to release land from the Green Belt, careful consideration also needs to be given to the form of the amended Green Belt boundaries. As set out in Para 139 of the NPPF:

- "When defining Green Belt boundaries, plans should:
- ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, 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;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;
- be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."

5.7 Further guidance on establishing the necessary ‘exceptional circumstances’ for making alterations to Green Belt boundaries is set out in the recent High Court judgement: *Compton Parish Council and others v Guildford Borough Council and others* (2019). This involved an appeal opposed to the principle and extent of land proposed for release from the Green Belt in the Council’s submitted Local Plan. The judge concluded:

- there is no definition of the policy concept of ‘exceptional circumstances’ for altering Green Belt boundaries. “This itself is a deliberate policy decision, demonstrating that there is a planning judgment to be made in all the circumstances of any particular case.”
- “The ‘exceptional circumstances’ can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary...there will almost inevitably be an analysis of the nature and degree of the need, allied to consideration of why the need cannot be met in locations which are sequentially preferable for such developments, an analysis of the impact on the functioning of the Green Belt and its purpose, and what other advantages the proposed locations, released from the Green Belt, might bring, for example, in terms of a sound spatial distribution strategy.”

Mitigation to reduce harm to Green Belt

The concept of mitigation

5.8 One of the factors weighed up in the judgement of harm resulting from the release of a Green Belt area, is the impact that the loss of openness would have on other Green Belt land. This is assessed by considering how neighbouring land would be affected in terms of its contribution to Green Belt purposes were the area in question to be urbanised i.e. would its contribution be weakened? In many cases this is a key factor in the judgement: a site might in itself be small but its development could represent a more significant change than its physical area might suggest if, for example, it resulted in the breaching of a strong boundary feature, or an increase in the built containment of adjacent land.

5.9 There is the potential to reduce harm to the remaining Green Belt by implementing measures which will affect the relationship between the remaining Green Belt land and urban areas. Measures which increase the contribution that land is judged to make to Green Belt purposes, offsetting to some degree the predicted reduction in contribution, could strengthen the case for release of a particular area. However, any release of Green Belt land will still require 'exceptional circumstances' to be demonstrated.

5.10 Mitigation could apply either to land being released or land being retained as Green Belt. There is an overlap between the latter and the concept of beneficial use of Green Belt land as set out in the NPPF, in that mitigation can also present an opportunity to enhance beneficial use.

Mitigation themes

5.11 The extent to which harm can be mitigated will vary from site to site, but potential measures can be considered under different themes. The Green Belt purposes are considered to relate to the relationship between the land area in question, developed land, and the countryside. This relationship is influenced by: the location of the area; the extent of openness within it; and the role of landscape/physical elements, including boundary features (in either separating the area from, or connecting it to) built-up areas and the wider countryside.

5.12 **Table 5.1** below lists some mitigation measures that could be considered as part of the planning and development process. Which mitigation measures are the most appropriate will vary, depending on local circumstances and will need to be defined as part of the master planning process.

Table 5.1: Potential measures to mitigate harm to Green Belt

Mitigation measure	Benefits	Considerations
Use landscaping to help integrate a new Green Belt boundary with the existing edge, aiming to maximise consistency over a longer distance.	Maintaining sense of separation between urban and open land.	A boundary that is relatively homogeneous over a relatively long distance, such as a main road, is likely to be stronger than one which has more variation. Landscaping works can help to minimise the impact of 'breaches' in such boundaries.
Strengthen boundary at weak points – e.g. where 'breached' by roads	Reducing opportunities for sprawl.	The use of buildings and landscaping can create strong 'gateways' to strengthen settlement-edge function.
Define Green Belt edge using a strong, natural element which forms a visual barrier – e.g. a woodland belt.	Reducing perception of urbanisation, and may also screen residents from intrusive landscape elements within the Green Belt (e.g. major roads).	Boundaries that create visual and movement barriers can potentially have detrimental effects on the character of the enclosed urban areas and the amenity of residents.
Create a transition from urban to rural, using built density, height, materials and landscaping to create a more permeable edge.	Reducing perception of urbanisation.	This may however have implications in terms of reducing housing yield.

Mitigation measure	Benefits	Considerations
Consider ownership and management of landscape elements which contribute to Green Belt purposes.	Ensuring permanence of Green Belt.	Trees and hedgerows require management to maintain their value in Green Belt terms, and the visual screening value that can be attributed to them is more limited if they are under private control (e.g. within back gardens).
Enhance visual openness within the Green Belt.	Increasing perception of countryside.	Although openness in a Green Belt sense does not correspond directly to visual openness, a stronger visual relationship between countryside areas, whether directly adjacent or separated by other landscape elements, can increase the extent to which an area is perceived as relating to the wider countryside.
Improve management practices to enhance countryside character.	Increasing strength of countryside character.	Landscape character assessment can help to identify valued characteristics that should be retained and where possible strengthened, and intrusive elements that should be diminished and where possible removed.

Mitigation measure	Benefits	Considerations
Design and locate buildings, landscaping and green spaces to minimise intrusion on settlement settings.	Maintaining perceived settlement separation by minimising the extent to which new development intrudes on the settings of other settlements.	Analysis of settlement settings, including consideration of viewpoints and visual receptors, can identify key locations where maintenance of openness and retention of landscape features would have the most benefit.
Maintain/create separation between existing washed-over settlement and new inset settlement.	Minimising urbanising influences that could weaken the justification for retaining the washed-over settlement's status.	Ensure that the gap is sufficiently wide to maintain a sense of separation. There is no recognised guidance on this, so it is a matter for local interpretation using professional judgement.
Design road infrastructure to limit perception of increased urbanisation associated with new development.	Reducing perception of urbanisation.	Increased levels of 'activity' can increase the perception of urbanisation.

Mitigation measure	Benefits	Considerations
Use sustainable drainage features to define/enhance separation between settlement and countryside.	Strengthening separation between urban and open land.	Need to determine if local topography and ground conditions are suitable.

Beneficial use of Green Belt

5.13 The purposes of the Green Belt do not make any reference to the quality or use of land falling within the designation, but Paragraph 141 of the NPPF, states that:

“Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”

5.14 Furthermore, Paragraph 138 of the NPPF states that where it has been concluded that it is necessary to release Green Belt land for development, plans should “set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”. This could be achieved through legal agreements in conjunction with the release of land and planning consent for development, or through strategic enhancement initiatives e.g. creation of community woodland.

5.15 The NPPF suggests different types of beneficial use. They relate principally to the environmental quality of the land, but can also, through strengthening boundary/buffer roles and affecting landscape and visual character, affect the contribution of land to Green Belt purposes.

5.16 The updated Planning Policy Guidance (PPG) also endorses the preparation of supporting landscape, biodiversity or recreation evidence to identify appropriate compensatory improvements, including:

- “new or enhanced green infrastructure;
- woodland planting;
- landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
- improvements to biodiversity, habitat connectivity and natural capital;
- new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision”.

5.17 Some of the mitigation measures listed in the previous section which relate to Green Belt land can also be considered beneficial uses, but there is broader scope for introducing or enhancing uses of Green Belt land that (by adding to its value) will strengthen the case for that land’s future protection, regardless of whether it is classified as Green Belt. Some examples are provided in **Table 5.2** below, but potential opportunities to enhance the beneficial use of Green Belt in the locality of the proposed Allocations is considered in a separate report for the Stage 2 Green Belt work²⁹.

5.18 Beneficial uses could be achieved through planning conditions, section 106 obligations and/or the Community Infrastructure Levy. The PPG stresses the need for early engagement with landowners and other interested parties to obtain the necessary local consents, establishing a detailed scope of works and identifying a means of funding their design, construction and maintenance.

5.19 It is noted however, that Local Authorities may still be able to protect features such as open spaces, leisure facilities, burial grounds and nature conservation sites through other policy approaches / designations.

²⁹ Identification of Opportunities to Enhance the Beneficial Use of the Green Belt (LUC, May 2020).

Table 5.2: Potential beneficial uses of Green Belt

Beneficial use	Considerations
Improving access	Enhancing the coverage and condition of the rights of way network and increasing open space provision.
Providing locations for outdoor sport	Some outdoor sports can represent an urbanising influence; an emphasis on activities which do not require formal facilities is less likely to harm Green Belt purposes.
Landscape and visual enhancement	Using landscape character assessment as guidance, intrusive elements can be reduced and positive characteristics reinforced.
Increasing biodiversity	Most Green Belt land has potential for increased biodiversity value – e.g. the management of hedgerows and agricultural field margins, and provision of habitat connectivity, planting of woodland. There may also be opportunities to link enhancements with requirements to deliver ‘biodiversity net gain’ associated with development proposals.
Improving damaged and derelict land	Giving land a functional, economic value is a key aspect in avoiding damage and dereliction through lack of positive management, but this needs to be achieved with minimum harm to characteristics/qualities which help it contribute to Green Belt purposes.

Conclusion

5.20 This study has assessed the harm to the Green Belt purposes of releasing land for development within the Allocations proposed in the 2019 draft GMSF. The findings of this study, and of the associated assessment of cumulative impact on the functioning of the Greater Manchester Green Belt, will form an important piece of evidence for the emerging GMSF.

5.21 However, as outlined above there are other important factors that need to be considered when establishing exceptional circumstances for making alterations to Green Belt boundaries, most notably sustainability, viability and deliverability issues. Whilst the ideal would be to minimise harm to the Green Belt, it may be that the most sustainable locations for development will result in high harm to the Green Belt.

5.22 In each location where alterations to Green Belt boundaries are being considered, planning judgement is required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation. In addition, consideration will also need to be given to potential measures to mitigate harm to the Green Belt, as well as potential opportunities to enhance the beneficial use of the Green Belt.

Appendix A

Glossary of key terms

Key Term	Definition
Allocations / development allocations	Sites proposed to be allocated for development within the GMSF.
Appropriate development	Development that cannot be considered to have an urbanising influence and therefore harm Green Belt purposes. This includes built development within the Green Belt that is listed as being 'not inappropriate' within paragraphs 145 and 146 of the NPPF.
Boundary features	Physical features that mark the existing or potential Green Belt edge.
Case law	The law as established by the outcome of former cases.
Constrained land	Land that is restricted to development, for example due to it being covered by 'absolute constraints' such as floodplain or designated sites (see paragraph 3.19).
Containment	The enclosure of Green Belt land from the wider countryside by urbanising influences, both inset and washed over.
Contribution	The extent to which Green Belt land fulfils the purposes of the Green Belt (as set out in the NPPF).
Distinction	Distinction considers the relationship between the existing inset settlement and the Green Belt. Landform and/or landcover can create a physical

Key Term	Definition
	distinction between development and Green Belt land, limiting the relationship between the two.
Encroachment	The advancement of urban development and influence into the countryside.
Exceptional circumstances	Justifiable reasons for the alteration of Green Belt boundaries. There is no definition of the policy concept of 'exceptional circumstances'. This can include consideration of the need to promote sustainable patterns of development, i.e. planning for economic growth, housing need, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience. The relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt. Conversely, higher performing Green Belt may be appropriate for release where exceptional circumstances are demonstrated.
Fragile gap	A gap of open land between settlements that is narrow and as such development within this gap would significantly reduce or entirely remove the gap between settlements.
GMSF	Greater Manchester Spatial Framework.
Green Belt	Land designated to prevent urban sprawl by keeping land permanently open. The NPPF defines the essential characteristics of Green Belts to be their openness and their permanence.
Green Belt boundary	The inset settlement edge adjoining the Green Belt.

Key Term	Definition
Green infrastructure	The NPPF defines Green Infrastructure to be a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
Harm	The impact of release of land from the Green Belt on the Green Belt purposes.
Inappropriate development	Built development within the Green Belt that is not listed as being 'not inappropriate' within paragraphs 145 and 146 of the NPPF.
Infill development	Development within the Green Belt in an area that is already enclosed by existing development, such as in villages that are washed over by the Green Belt.
Inset	Settlements or areas of land that are not covered by the Green Belt designation but are surrounded by Green Belt land (i.e. settlements or areas that are not 'washed over' but the Green Belt).
Inspector's reports	Reports produced by Planning Inspectors as part of the examination of Local Plans, which outline the Inspector's views on the soundness of a Local Plan and its evidence base (including Green belt studies).
Intervisibility	The ability to see in a direct line of sight from one position to another, considering the intervening landform and landcover. For example, intervisibility between neighbouring towns.
Large built-up area	There is no definition provided in the NPPF for a large built-up area. Green Belt studies in different locations have ranged from considering the large built-up area as just the principal settlement around which the Green Belt was defined to considering all inset settlements to be large built-up areas.
Merging of towns	The expansion of development that results in towns becoming physically connected and thus indistinguishable from one another.

Key Term	Definition
Mitigate	Measures that can reduce harm to the remaining Green Belt as a result of release of land.
NPPF	National Planning Policy Framework.
NPPG	National Planning Practice Guidance.
Openness	Green Belt openness relates to lack of 'inappropriate development' rather than to only visual openness; thus both undeveloped land which is screened from view by landscape elements (e.g. tree cover) and development which is not considered 'inappropriate', are still 'open' in Green Belt terms.
Parcels	Pre-defined areas of land that were assessed in the 2016 Stage 1 Green Belt study.
PAS	Planning Advisory Service.
Purposes	NPPF Paragraph 134 states that Green Belts should serve five purposes: <ol style="list-style-type: none"> 1) To check the unrestricted sprawl of large built-up areas. 2) To prevent neighbouring towns merging into one another. 3) To assist in safeguarding the countryside from encroachment. 4) To preserve the setting and special character of historic towns. 5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
Release	Removal of land from the Green Belt designation.
Relevance	The potential for land to contribute to a Green Belt purpose.
Sub-area	Sub-sections of Allocations for which the release of which would result in differing degrees of harm.

Key Term	Definition
Sustainable development	The NPPF summarises sustainable development to be development that which meets the needs of the present without compromising the ability of future generations to meet their own needs.
Urban sprawl	Definitions of sprawl vary and mainly refer to the unrestricted growth of urban areas.
Urbanising development / influence	Built development that is inappropriate within the Green Belt (that is not listed as being 'not inappropriate' within paragraphs 145 and 146 of the NPPF.)
Washed over	Land (open or developed) that is within the Green Belt designation (i.e. not 'inset').