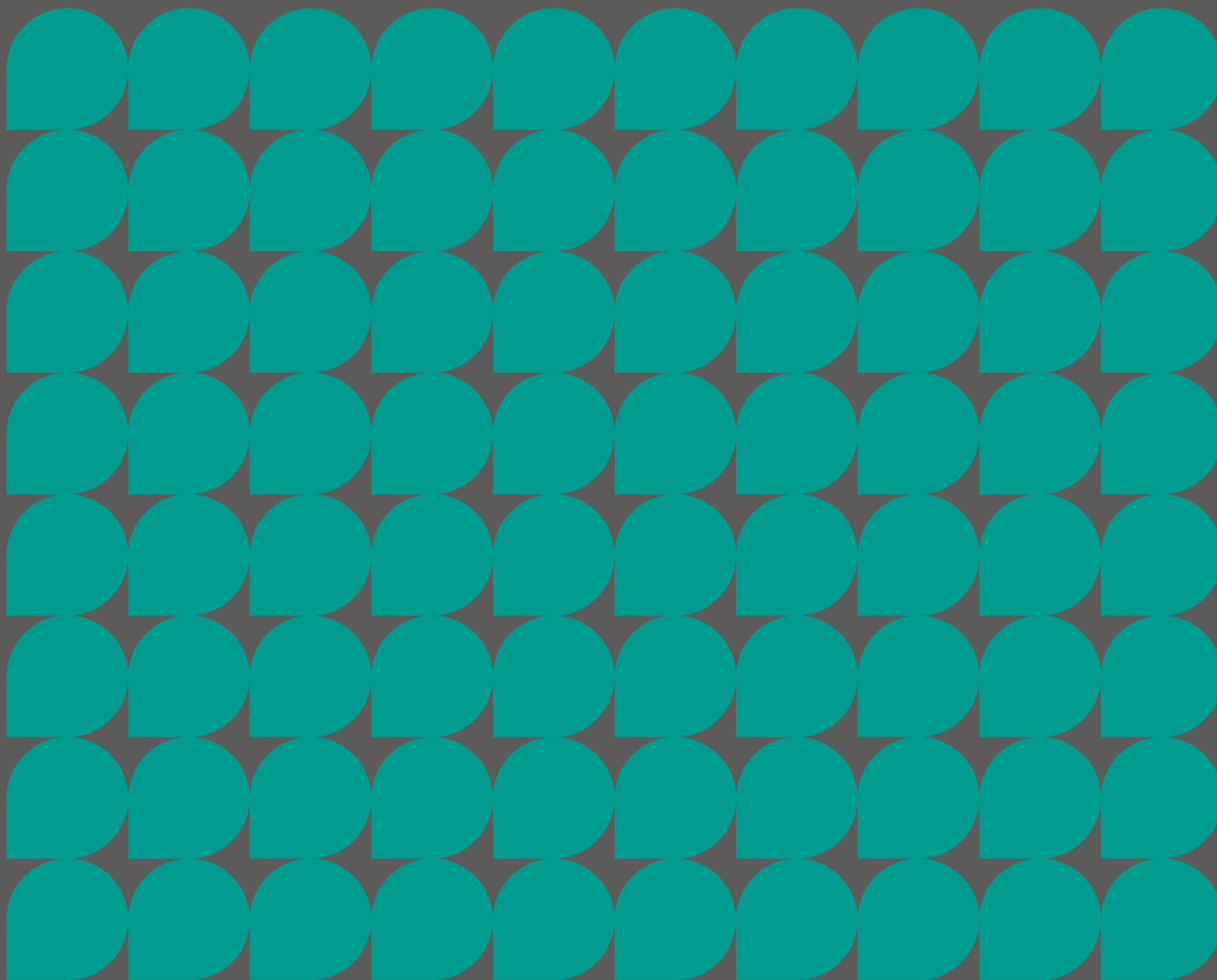


Places for Everyone

Bolton Additions to the Green Belt Issues
Summary

February 2022



Appendix B – Additions to the Green Belt (Bolton)

A summary of the issues raised in relation to Appendix B (Bolton) and the relevant respondents to PfE 2021 is set out below

PfE 2021 Appendix B – Additions to the Green Belt in Bolton

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
GBA.1	Land between Lever Park Avenue and Green Lane should be allocated as Green Belt land. This land is presently Other Protected Open Land. The land was subject of a planning application 08075/20 for the erection of 75 dwellings. This was refused by Bolton Council. This decision is being appealed by the developer. Should the appeal be dismissed then this land should become Green Belt land. This land is directly adjacent to existing green belt and marks a clear boundary establishing the extent of the Horwich settlement.	The site is currently protected by Bolton's Allocation Plan policy CG6AP. The evidence provided in the Green Belt Topic Paper [07.01.25] (Appendix 3, page 1) and [07.01.11] Stage 2 GM Green Belt Study – Contribution Assessment of proposed 2020 GMSF Green Belt Additions provide appropriate justification for the two Green Belt Additions proposed in the plan. Similar robust evidence has not been provided for this site. Coupled with uncertainty about the outcome of the forthcoming planning appeal no change is proposed.	Cllr Kevin McKeon Cllr Richard Silvester

PfE 2021 Appendix B – Additions to the Green Belt in Bolton (Policy Green Belt Addition 1 – Ditchers Farm, Westhoughton)

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Support		
GBA01.1	Support the new Green Belt addition.	Support noted	Christopher Harper Chris Green David Clough Rebecca Green Chris Green
GBA01.2	Support the new area of Green Belt. However, you can just build on them in the future and so their designation is a paper exercise only.	Support noted. Paragraph 140 of NPPF states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. As outlined in paragraph 141 this would be assessed through examination. Paragraph 147 of NPPF states that inappropriate development in the Green Belt should not be approved except in very special circumstances. No change is considered necessary.	Christopher Harper
	Evidence		
GBA01.3	There will need to be a specific assessment by a knowledgeable but independent party to check if this site will meet the purposes detailed. It is essential that the site selection process is transparent.	No change considered necessary. The approach in relation to the Green Belt additions is considered consistent with NPPF. The evidence provided in the Green Belt Topic Paper [07.01.25] (Appendix 3, page 1) provides appropriate justification for the Green Belt Additions.	Ian Culman
	LUC's Green Belt Study [07.01.11] scored this parcel strong/moderate with regard to Green Belt Purpose 1 (check the unrestricted sprawl of large built up areas).	No change necessary. It is considered that a proportionate evidence base has been produced. It can be found here: [07.01.11] Stage 2 GM Green Belt Study – Contribution Assessment of proposed 2020 GMSF Green Belt Additions	Mr Francis Lee

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	It is argued that the Land off Dixon Street (site plan in appendix 1 of representation) and the Land off Slack Lane (site plan in appendix 2 of representation) does not restrict the sprawl of large built-up areas to any meaningful extent and therefore can make no more than a weak contribution to purpose 1.		
GBA01.4	<p>LUC's Green Belt Study [07.01.11] scored this parcel moderate with regard to Green Belt Purpose 2 (to prevent neighbouring towns merging into one another).</p> <p>It is argued that the Land off Dixon Street (site plan in appendix 1 of representation) and the Land off Slack Lane (site plan in appendix 2 of representation) does not prevent neighbouring towns merging into one another and makes no more than a weak contribution to this purpose.</p>	<p>No change necessary. It is considered that a proportionate evidence base has been produced. It can be found here:</p> <p>[07.01.11] Stage 2 GM Green Belt Study – Contribution Assessment of proposed 2020 GMSF Green Belt Additions</p>	Mr Francis Lee
GBA01.5	<p>LUC's Green Belt Study [07.01.11] scored this parcel moderate with regard to Green Belt Purpose 3 (to assist in safeguarding the countryside from encroachment).</p> <p>It is argued that the Land off Dixon Street (site plan in appendix 1 of representation) and the Land off Slack Lane (site plan in appendix 2 of representation) does not safeguard the wider countryside from encroachment and makes no real contribution to this purpose.</p>	<p>No change necessary. It is considered that a proportionate evidence base has been produced. It can be found here:</p> <p>[07.01.11] Stage 2 GM Green Belt Study – Contribution Assessment of proposed 2020 GMSF Green Belt Additions</p>	Mr Francis Lee
GBA01.6	<p>LUC's Green Belt Study [07.01.11] scored this parcel moderate with regard to Green Belt Purpose 4 (to preserve the setting and special character of historic towns).</p> <p>It is argued that the site is not adjacent to a historic town and that it therefore does not contribute to this purpose</p>	<p>No change necessary. It is considered that a proportionate evidence base has been produced. It can be found here:</p> <p>[07.01.11] Stage 2 GM Green Belt Study – Contribution Assessment of proposed 2020 GMSF Green Belt Additions</p>	Mr Francis Lee
GBA01.7	The proposed Green Belt additions were not independently chosen; they were selected by the individual authorities. It is	No change considered necessary. The approach in relation to the Green Belt additions is considered consistent with NPPF. The evidence	Hollins Strategic Land LLP

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	questionable whether the methodology to identify sites was appropriate and evidence led.	provided in the Green Belt Topic Paper [07.01.25] provides appropriate justification for the Green Belt Additions.	
GBA01.8	It is clear that Green Belt release sites and addition sites were not assessed using the same methodologies.	No change considered necessary. The approach in relation to the Green Belt additions is considered consistent with NPPF. The evidence provided in the Green Belt Topic Paper [07.01.25] provides appropriate justification for the Green Belt Additions.	Hollins Strategic Land LLP
	Inappropriate Strategy		
GBA01.9	What is the point of designating new Green Belt land when you are simultaneously contradicting yourselves by building on existing greenbelt land?	No change is considered necessary. The case to deallocate Green belt for other uses is explained in appendices 1 and 2 of the Green Belt Topic Paper 07.01.25 . The justification for the Green Belt additions proposed is provided in Appendix 3 of the Green Belt Topic Paper [07.01.25] . The additions have not been identified as direct replacements, either in their extent or the use of the land identified, for the areas proposed for release through allocations in the Plan.	Linda Field
GBA01.10	The approach to the Green Belt has been inconsistently applied, given the inclusion of employment allocations JPA6 and JPA5, which are both on Green Belt land. In order to release JPA6 and JPA5 from the Green Belt it has been concluded that these sites do not meet their purposes of the Green Belt. This is inconsistent with the approach taken for GBA01. It appears that the proposed inclusion of GBA01 is partly in response to the proposed release of those nearby larger areas. This is inappropriate and has no basis in national planning policy.	No change necessary. It is considered that there are exceptional circumstances justifying the identification of new areas of Green Belt, including GBA01. The additions have not been identified as direct replacements, either in their extent or the use of the land identified, for the areas proposed for release through allocations in the Plan. There is not therefore intended to be a direct correlation between the areas released from the Green Belt and those proposed as additions. The justification for the Green Belt additions proposed is provided in Appendix 3, page 1 of the Green Belt Topic Paper [07.01.25] .	Mr Francis Lee
GBA01.11	This Green Belt addition GBA01, and employment allocations JPA5 and JPA6 all lie within the Wigan Bolton Growth Corridor. Given the importance the growth corridor will make to northern	No change considered necessary. The approach in relation to the Green Belt additions is considered consistent with NPPF. The evidence	Hollins Strategic Land LLP

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	competitiveness in a highly deprived area, it is unwise to reduce flexibility for meeting housing needs by extending the Green Belt at GBA01. This is especially the case where the sites do not perform the functions of the Green Belt.	provided in the Green Belt Topic Paper [07.01.25] (Appendix 3, page 1) provides appropriate justification for the Green Belt Addition. The PfE plan provides a sufficient supply of sites to meet identified needs for housing. Further detail is contained in the Housing Topic Paper [06.01.03]	
GBA01.12	The real reason for the proposed Green Belt addition is based on political considerations (being seen to minimise the net loss in Greater Manchester's Green Belt area). The Green Belt addition is just to 'hide' Green Belt loss elsewhere.	See response in row GBA01.3	Paul Roebuck Michael Hullock Ian Culman Tracy Raftery Juliet Eastham
GBA01.13	The Green Belt additions are the ones unable to be developed. They provide open space for recreation.	See response in row GBA01.3	Iain Brown
GBA01.14	Rather than adding new Green Belt just don't change existing Green Belt	No change necessary. It is considered that there are exceptional circumstances justifying the identification of new areas of Green Belt including GBA01. The additions have not been identified as direct replacements, either in their extent or the use of the land identified, for the areas proposed for release through allocations in the Plan. The justification for Green Belt addition GBA01 is provided in Appendix 3 of the Green Belt Topic Paper [07.01.25] (page 1). The justification for Green Belt losses are provided in the [07.01.25] Green Belt Topic Paper.	Julie Mills
GBA01.15	Re allocating a park to greenbelt status is a mockery	No change is considered necessary. Ditcher's Farm is not a park.	Iain Brown
	Quantity		
GBA01.16	These are just small parcels of land in comparison to the Green Belt that will be lost.	No change is considered necessary. The additions have not been identified as direct replacements, either in their extent or the use of the land identified, for the areas proposed for release through allocation(s) in the Plan. There is not therefore intended to be a direct correlation between the areas released from the Green Belt and those proposed as additions.	Kim Scragg

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
GBA01.17	There should be more Green Belt additions	No change is considered necessary. Paragraph 139 of the NPPF states that new Green Belts should only be established in exceptional circumstances. The evidence provided in the Green Belt Topic Paper [07.01.25] provides appropriate justification for the Green Belt Additions.	Chris Green
	Brownfield Land		
GBA01.18	There should be better use of brownfield sites and aged housing. Greenbelt release should be the final option.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]	Paul Roebuck Michael Hullock
	Opposition to Green Belt Loss		
GBA01.19	Local open and green spaces are being removed and allowing housing villages to merge.	Green Belt additions will help prevent this	Iain Brown
GBA01.20	The Green Belt additions do not change the need to limit Green Belt loss to the West of Wingates.	<p>No change necessary. It is considered that there are exceptional circumstances justifying the identification of new areas of Green Belt including GBA01.</p> <p>The additions have not been identified as direct replacements, either in their extent or the use of the land identified, for the areas proposed for release through allocations in the Plan. There is not therefore intended to be a direct correlation between the areas released from the Green Belt and those proposed as additions.</p> <p>The justification for the Green Belt addition proposed is provided in Appendix 3, page 1 of the Green Belt Topic Paper [07.01.25].</p>	Chris Green David Clough Rebecca Green Chris Green

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		The justification for the Green Belt loss at JPA6 West of Wingates M61 Junction 6 is provided in the [07.01.25] Green Belt Topic Paper and [10.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper (paragraph 14.13).	
GBA01.21	The Green Belt additions do not make Green Belt loss elsewhere acceptable. There should be no Green Belt loss.	The additions have not been identified as direct replacements, either in their extent or the use of the land identified, for the areas proposed for release through allocations in the Plan. The Green Belt Topic Paper [07.01.25] provides the strategic case supporting Green Belt release. No change is considered necessary.	Tracy Raftery
	Consultation		
GBA01.22	Part of the land is owned by Whittle House Farm and not Ditchers Farm. As land owners we need to be consulted/informed.	Comment not relevant to the content of Green Belt addition GBA01. Matter addressed elsewhere.	Shirley Jennings
	NPPF paragraph 139		
GBA01.23	Paragraph 139 of NPPF states new Green Belts should only be established in exceptional circumstances. There is no national planning policy suggesting that land should be added to the Green Belt as 'compensation' for sites being removed. Rather, paragraph 142 states that 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."	<p>No change necessary. It is considered that there are exceptional circumstances justifying the identification of new areas of Green Belt including GBA01.</p> <p>The additions have not been identified as direct replacements, either in their extent or the use of the land identified, for the areas proposed for release through allocations in the Plan. There is not therefore intended to be a direct correlation between the areas released from the Green Belt and those proposed as additions.</p> <p>The justification for the Green Belt addition proposed is provided in Appendix 3, page 1 of the Green Belt Topic Paper [07.01.25].</p>	Persimmon Homes North West
GBA01.24	Paragraph 139 of the NPPF, states that new Green Belt land should only be established in exceptional circumstances. These criteria have not been met and are not capable of being satisfied in the case of GBA01 Ditchers Farm.	No change is considered necessary. The justification for the Green Belt addition proposed is provided in Appendix 3, page 1 of the Green Belt Topic Paper [07.01.25] . This outlines how paragraph 139 of the NPPF is met.	Messers Keith, Helen and Shelia Roberts Mr Francis Lee
GBA01.25	This comment relates to criterion A of NPPF paragraph 139 which states 'any proposals for new Green Belts should be set out in	No change is considered necessary. This proposed Green Belt addition is considered to comply with paragraph 139 of the NPPF as set out in Appendix 3, page 1 of the Green Belt Topic Paper [07.01.25]	Hollins Strategic Land LLP

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>strategic policies, which should demonstrate why normal planning and development management policies would not be adequate’.</p> <p>The commentary in Appendix 3, page 1 of the Green Belt Topic Paper [07.01.25] is misleading and does not give the full picture. The settlement edge along the north of Westhoughton has remained largely intact for decades. It is only in circumstances where Bolton Council has fallen short of the five-year housing land supply that Other Protected Open Land policies have been given reduced weight and land has been subject to development. That is simply the operation of the NPPF and is not a reason to justify the exceptional circumstances test.</p>		
GBA01.26	<p>This comment relates to criterion B of NPPF paragraph 139 which states ‘any proposals for new Green Belts should be set out in strategic policies, which should set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary’.</p> <p>The commentary in Appendix 3, page 1 of the Green Belt Topic Paper [07.01.25] states that development has resulted in some change to the character of Westhoughton. This is considered to be an inevitable consequence of development. The commentary does not demonstrate how the character of the area is distinctive or contributes significantly to the character of Westhoughton. Retaining open countryside close to the town centre is not ‘vital’ in retaining what is a large urban settlement particularly as Westhoughton would continue to be surrounded on all sides by open countryside.</p>	<p>No change is considered necessary. This proposed Green Belt addition is considered to comply with paragraph 139 of the NPPF as set out in Appendix 3, page 1 of the Green Belt Topic Paper [07.01.25]</p>	Hollins Strategic Land LLP
GBA01.27	<p>This comment relates to criterion C of NPPF paragraph 139 which states ‘any proposals for new Green Belts should be set out in strategic policies, which should show what the consequences of the proposal would be for sustainable development’.</p>	<p>No change is considered necessary. This proposed Green Belt addition is considered to comply with paragraph 139 of the NPPF as set out in Appendix 3, page 1 of the Green Belt Topic Paper [07.01.25]</p>	Hollins Strategic Land LLP

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>The commentary (appendix 3, page 1 of the Green Belt Topic Paper [07.01.25]) suggests that by making the site Green Belt it can make a contribution to directing development towards brownfield sites within the urban area. This justification does not hold ground when looking at Bolton's track record in housing delivery.</p>		
GBA01.28	<p>This comment relates to criterion D of NPPF paragraph 139 which states 'any proposals for new Green Belts should be set out in strategic policies, which should demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas'.</p> <p>The commentary (appendix 3, page 1 of the Green Belt Topic Paper [07.01.25]) states that the assessment shows that GBA01 is strong in relation to the purpose of preventing urban sprawl because of the lack of urban sprawl within the parcel and because it is open. However, any undeveloped field on the edge of an urban settlement could come to the same conclusion.</p> <p>In addition, the commentary states GBA01 would contribute to preserving the gap between settlements and to safeguarding the countryside from encroachment. However, it is argued that the extent to which the parcel preserves the gap between it and Bolton and Horwich is limited due to the M61 and railway lines. Due to the settlement edge extending along three sides of the parcel, with the M61 completing the fourth, the only reasonable conclusion is that GBA01 is a strongly constrained site.</p> <p>The parcel is heavily influenced by physical features around its boundaries and therefore it's 'openness' is strictly limited to the parcel itself which could be said for any undeveloped field. The</p>	<p>No change is considered necessary. This proposed Green Belt addition is considered to comply with paragraph 139 of the NPPF as set out in Appendix 3, page 1 of the Green Belt Topic Paper [07.01.25]</p>	Hollins Strategic Land LLP

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>'Contribution of Proposed 2020 GMSF Green Belt Additions' states that there is no built development within GBA01. This is factually incorrect given the built form associated with Ditchers Farm and the paraphernalia associated with a gypsy and travelling people's site.</p>		
GBA01.29	<p>This comment relates to criterion E of NPPF paragraph 139 which states 'any proposals for new Green Belts should be set out in strategic policies, which should show how the Green Belt would meet the other objectives of the Framework'.</p> <p>The commentary (appendix 3, page 1 of the Green Belt Topic Paper [07.01.25]) states that the inclusion of GBA01 in the Green Belt would allow opportunities for environmental gains, habitat creation and improving public access. In the absence of any evidence in how GBA01, added to the Green Belt, would deliver the improvements more than would be achieved under its current designation as Protected Open Land the exceptional circumstances test is not met.</p>	<p>No change is considered necessary. This proposed Green Belt addition is considered to comply with paragraph 139 of the NPPF as set out in Appendix 3, page 1 of the Green Belt Topic Paper [07.01.25]</p>	Hollins Strategic Land LLP
	NPPF Paragraph 140		
GBA01.30	<p>The plan is not consistent with national policy as the test in NPPF paragraph 140 that 'once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified' has not been passed'. The necessary exceptional circumstances are not demonstrated.</p>	<p>No change is considered necessary. The justification for the Green Belt addition proposed is provided in Appendix 3, page 1 of the Green Belt Topic Paper [07.01.25].</p>	Mr Francis Lee Hollins Strategic Land LLP
	Site Specific Exceptional Circumstances		
GBA01.31	<p>In the case of Ditchers Farm, Westthoughton, the only potential purpose to which it is claimed that it would make a strong contribution would be in preventing urban sprawl. However, this would be true of any open land adjoining a built-up area and would prevent the natural growth of the settlement in the future. The Green Belt designation would be applied to an area which is currently safeguarded.</p>	<p>No change is considered necessary. The justification for the Green Belt addition proposed is provided in Appendix 3, page 1 of the Green Belt Topic Paper [07.01.25].</p>	Persimmon Homes North West

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	As safeguarded land is treated as Green Belt for development management purposes, there is no compelling case that exceptional circumstances exist.		
	Action		
GBA01.32	Delete proposed addition to Green Belt at Ditchers Farm, Westhoughton	No change is considered necessary. The justification for the Green Belt addition proposed is provided in Appendix 3, page 1 of the Green Belt Topic Paper [07.01.25] .	Persimmon Homes North West Mr Francis Lee Messers Keith, Helen and Shelia Roberts Hollins Strategic Land LLP

PfE 2021 Appendix B – Additions to the Green Belt in Bolton (Policy Green Belt Addition 2 – Horwich Golf Club/Knowles Farm)

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Support		
GBA02.1	Support the new Green Belt addition.	Support Noted	Christopher Harper Chris Green Chris Green Rebecca Green Cllr Kevin McKeon Cllr Richard Silvester CPRE The Stock Residents Association Malcolm Harrison
GBA02.2	Support the new area of Green Belt. However, you can just build on them in the future and so their designation is a paper exercise only.	Support noted. Paragraph 140 of NPPF states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. As outlined in paragraph 141 this would be assessed through examination. Paragraph 147 of NPPF states that inappropriate development in the Green Belt should not be approved except in very special circumstances. No change is considered necessary.	Christopher Harper
GBA02.3	Given the likely construction of more housing in Horwich (91352/14 , 09862/20 , 07245/19 and 09488/20) confirmation of Green Belt status for GBA02 could not be more urgent.	Noted	The Stock Residents Association
GBA02.4	Further evidence to support Green Belt addition GBA02 includes Bolton Council's Landscape Regeneration Manager, Landscape Development and Design in its report of 22 May 2018 (The	Noted	The Stock Residents Association Malcolm Harrison

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	'Landscape Report'). This was produced for the 2019 appeal on this land.		
	Evidence		
GBA02.5	There will need to be a specific assessment by a knowledgeable but independent party to check if this site will meet the purposes detailed. It is essential that the site selection process is transparent.	No change considered necessary. The approach in relation to the Green Belt additions is considered consistent with NPPF. The evidence provided in the Green Belt Topic Paper [07.01.25] (Appendix 3, page 1) provides appropriate justification for the Green Belt Additions.	Ian Culman
GBA02.6	The NPPF does not require a parcel of land to be classified as 'strong ' against all five of the Green Belt purposes and a 'strong' rating against any Green Belt purpose could be sufficient, on its own, to indicate that the land has potential to make an important contribution to the Green Belt. In its assessment of parcel GBA02 the LUC report [07.01.11] concluded that for three of the purposes there were 'strong' ratings and for the other two purposes there were 'moderate ratings'. These findings are supported.	Noted	The Stock Residents Association Malcolm Harrison
GBA02.7	The evidence justifying the addition of the land at GBA02 to the Green Belt is utterly deficient. In particular, it does not identify how the circumstances at the site have changed (since the land was excluded from the 1984 Greater Manchester Green Belt Plan).	No change necessary. It is considered that there are exceptional circumstances justifying the identification of new areas of Green Belt including GBA02. The justification for this Green Belt addition is provided in Appendix 3, page 3 of the Green Belt Topic Paper [07.01.25] . This is considered to be a robust policy approach, supported by a proportionate evidence base. The evidence base can be found here: [07.01.11] Stage 2 GM Green Belt Study – Contribution Assessment of proposed 2020 GMSF Green Belt Additions	Peel L&P Investments North Ltd
GBA02.8	LUC's Green Belt Study [07.01.11] scored this parcel strong/moderate with regard to Green Belt Purpose 1 (check the unrestricted sprawl of large built up areas). Contrary to the LUC assessment, the site is well contained by existing development. Any redevelopment of the parcel would not be perceived as urban sprawl, but rather infilling of a parcel of land surrounded by existing built development, in what is	No change necessary. It is considered that a proportionate evidence base has been produced. It can be found here: [07.01.11] Stage 2 GM Green Belt Study – Contribution Assessment of proposed 2020 GMSF Green Belt Additions	Peel L&P Investments North Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>otherwise an urban/residential area. This parcel does not perform a protective function to the Green Belt land to the north /east, as this is already provided by the Ridgmont Estate/Cemetery.</p>		
GBA02.9	<p>LUC's Green Belt Study [07.01.11] scored this parcel strong with regard to Green Belt Purpose 2 (prevent neighbouring towns merging into one another).</p> <p>It is argued that if the parcel were to be developed there would be no narrowing of the gap(s) between Horwich and Bottom O' th' Moor. Furthermore the parcel is surrounded on three sides by existing development which is at least as close, or closer, to Bottom O'th Moor. The site is not considered to perform any function in preventing neighbouring towns merging into one another.</p>	<p>No change necessary. It is considered that a proportionate evidence base has been produced. It can be found here:</p> <p>[07.01.11] Stage 2 GM Green Belt Study – Contribution Assessment of proposed 2020 GMSF Green Belt Additions</p>	Peel L&P Investments North Ltd
GBA02.10	<p>LUC's Green Belt Study [07.01.11] scored this parcel moderate with regard to Green Belt Purpose 3 (assist in safeguarding the countryside from encroachment).</p> <p>It is argued that the parcel is heavily influenced by existing development, has greater ties with the urban area of Horwich than the rural area and that the strong and defensible boundaries would prevent future development encroaching into the countryside.</p> <p>Additionally, LUC state that the site is not considered to form part of the wider countryside. In this case the site cannot play any role in safeguarding it from encroachment.</p>	<p>No change necessary. It is considered that a proportionate evidence base has been produced. It can be found here:</p> <p>[07.01.11] Stage 2 GM Green Belt Study – Contribution Assessment of proposed 2020 GMSF Green Belt Additions</p>	Peel L&P Investments North Ltd
GBA02.11	<p>LUC's Green Belt Study [07.01.11] scored this parcel strong with regard to Green Belt Purpose 4 (preserve the setting and 'special character' of a historic town).</p>	<p>No change necessary. It is considered that a proportionate evidence base has been produced. It can be found here:</p> <p>[07.01.11] Stage 2 GM Green Belt Study – Contribution Assessment of proposed 2020 GMSF Green Belt Additions</p>	Peel L&P Investments North Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	It is argued that this parcel makes no demonstrable contribution to the setting and special character of neighbouring historic towns. Views to and from the historic towns of Bolton and Horwich, if available at all, are considered very limited and localised.		
	Inappropriate Strategy		
GBA02.12	What is the point of designating new Green Belt land when you are simultaneously contradicting yourselves by building on existing greenbelt land?	No change is considered necessary. The case to deallocate Green belt for other uses is explained in appendices 1 and 2 of the Green Belt Topic Paper 07.01.25 . The justification for the Green Belt additions proposed is provided in Appendix 3 of the Green Belt Topic Paper [07.01.25] . The additions have not been identified as direct replacements, either in their extent or the use of the land identified, for the areas proposed for release through allocations in the Plan.	Linda Field
GBA02.13	The real reason for the proposed Green Belt addition is based on political considerations (being seen to minimise the net loss in Greater Manchester's Green Belt area). The Green Belt addition is just to 'hide' Green Belt loss elsewhere.	See response in row GBA02.5	Paul Roebuck Michael Hullock Ian Culman Tracy Raftery Juliet Eastham
BA02.14	The Green Belt additions are the ones unable to be developed. They provide open space for recreation.	See response in row GBA02.5	Iain Brown
GBA02.15	Rather than adding new Green Belt just don't change existing Green Belt.	No change necessary. It is considered that there are exceptional circumstances justifying the identification of new areas of Green Belt including GBA02. The additions have not been identified as direct replacements, either in their extent or the use of the land identified, for the areas proposed for release through allocations in the Plan. The justification for Green Belt addition GBA02 is provided in Appendix 3 of the Green Belt Topic Paper [07.01.25] (page 3). The justification for Green Belt losses are provided in the [07.01.25] Green Belt Topic Paper.	Julie Mills
GBA02.16	Re allocating a park to greenbelt status is a mockery	No change is considered necessary. Ditcher's Farm is not a park.	Iain Brown
	Brownfield Land		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
GBA02.17	There should be better use of brownfield sites and aged housing. Greenbelt release should be the final option.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]	Paul Roebuck Michael Hullock Patricia Boon The Stock Residents Association Malcolm Harrison
	Opposition to Green Belt loss elsewhere		
GBA02.18	Local open and green spaces are being removed and allowing housing villages to merge.	Green Belt additions will help prevent this.	Iain Brown
GBA02.19	The Green Belt additions do not change the need to limit Green Belt loss to the West of Wingates	<p>No change necessary. It is considered that there are exceptional circumstances justifying the identification of new areas of Green Belt including GBA02.</p> <p>The additions have not been identified as direct replacements, either in their extent or the use of the land identified, for the areas proposed for release through allocations in the Plan. There is not therefore intended to be a direct correlation between the areas released from the Green Belt and those proposed as additions.</p> <p>The justification for the Green Belt addition proposed is provided in Appendix 3, page 3 of the Green Belt Topic Paper [07.01.25].</p> <p>The justification for the Green Belt loss at JPA6 West of Wingates M61 Junction 6 is provided in the [07.01.25] Green Belt Topic Paper and [10.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper (paragraph 14.13).</p>	Chris Green Chris Green Rebecca Green
GBA02.20	The Green Belt additions do not make Green Belt loss elsewhere acceptable. There should be no Green Belt loss.	The additions have not been identified as direct replacements, either in their extent or the use of the land identified, for the areas proposed for release through allocations in the Plan. The Green Belt Topic Paper [07.01.25] provides the strategic case supporting Green Belt release. No change is considered necessary.	Tracy Raftery
	Quantity		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
GBA02.21	These are just small parcels of land in comparison to the Green Belt that will be lost.	No change is considered necessary. The additions have not been identified as direct replacements, either in their extent or the use of the land identified, for the areas proposed for release through allocation(s) in the Plan. There is not therefore intended to be a direct correlation between the areas released from the Green Belt and those proposed as additions.	Kim Scragg
	Existing Planning Permissions		
GBA02.22	Object to the planning permissions for new homes that are located within this proposed Green Belt addition. The application references are 07245/19 and 09488/20 .	Objection noted. These planning applications were refused by Bolton Council. The applicant appealed these decisions. The appeals were allowed by the Planning Inspectorate, thus planning permission was granted.	Karen Flanagan Patricia Boon Chris Hodgkinson CPRE The Stock Residents Association
GBA02.23	<p>Recently two planning applications, 07245/19 and 09488/20, to build on land at Horwich Golf Club and Knowles Farm were approved on appeal by the Planning Inspectorate. These are located within the proposed Green Belt addition.</p> <p>Notwithstanding this the Green Belt addition at this location should still proceed because the arguments made in favour of Green Belt designation remain relevant and persuasive. The land fits the criteria of Green Belt land being on the edge of the Horwich settlement and on the borders of the lower slopes of the surrounding Pennine Moors. At the inquiry there was considered to be tilted balance with the Inspector's view of the tilted balance concluding in favour of development. The granting of permission gives altogether greater force to meeting the key objectives of NPPF and the PPG and designation of Green Belt.</p> <p>There needs to be some modifications as regards the boundary. It is considered that the development proposals permitted allow for logical boundaries to be drawn for the Green Belt addition. Two possible boundary limits to the southern edge of the proposed Green Belt designation have been proposed, one for each</p>	No change is considered necessary. The justification for Green Belt addition GBA02 is provided in Appendix 3, page 3 of the Green Belt Topic Paper [07.01.25] .	Cllr Kevin McKeon Cllr Richard Silvester The Stock Residents Association Malcolm Harrison

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	planning permission. These boundaries have been drawn at the edges of the proposed housing developments.		
GBA02.24	Notwithstanding the planning permission given to part of the site this Green Belt addition should proceed. The very strong case previously made by Bolton Metropolitan Borough Council to give this area Green Belt designation continues to apply.	Comment noted.	Anthony Rigby
GBA02.25	Since the publication of PfE planning permission has been granted on this site. The application references are 07245/19 and 09488/20 . Following the delivery of the approved development, the site would not perform any of the purposes of the Green Belt and would not contribute to the openness of the wider area. There is therefore no justification for adding the site to the Green Belt.	See response in row GBA02.23	David Hawes Peel L&P Investments North Ltd Roderick Riesco
	Urban extension to Horwich	GBA02.20	
GBA02.26	The site lies within a highly sustainable location. It is well-related to the existing urban area and is a logical location for a sustainable urban extension of Horwich.	This matter is addressed elsewhere. Comment not relevant to the proposed addition of Green Belt at this location, which is considered to be a robust policy based on a proportionate evidence base. The justification for this Green Belt addition is provided in Appendix 3, page 3 of the Green Belt Topic Paper [07.01.25] . The evidence base can be found here: [07.01.11] Stage 2 GM Green Belt Study – Contribution Assessment of proposed 2020 GMSF Green Belt Additions	Peel L&P Investments North Ltd
	NPPF Paragraph 139 – Assessment of justification for proposed addition to the Green Belt		
GBA02.27	This comment relates to criterion A of NPPF paragraph 139 which states ‘any proposals for new Green Belts should be set out in strategic policies, which should demonstrate why normal planning and development management policies would not be adequate’. It is argued that PfE asserts that the land needs to remain permanently open without providing any reasons, or evidence of the consideration of the development potential of this site. There	No change is considered necessary. This proposed Green Belt addition is considered to comply with paragraph 139 of the NPPF as set out in Appendix 3, page 3 of the Green Belt Topic Paper [07.01.25]	Peel L&P Investments North Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>are no additional characteristics of the site which mean it should be permanently precluded from making a contribution to sustainable development.</p> <p>The existing policy framework provides appropriate protection.</p>		
GBA02.28	<p>This comment relates to criterion B of NPPF paragraph 139 which states 'any proposals for new Green Belts should be set out in strategic policies, which should set out whether any major changes of circumstance have made the adoption of this exceptional circumstance necessary'.</p> <p>It is argued that the PfE analysis addresses matters of character, urban form and landscape to which there has been no material change since designation of the Green Belt. It is also stated that the PFE analysis makes no reference to the significant increase in the needs for homes and employment over the 40 years since the Green Belt Local Plan was prepared. It is therefore deficient and does not provide an objective assessment of all relevant considerations.</p>	See response on row GBA01.27	Peel L&P Investments North Ltd
GBA02.29	<p>This comment relates to criterion C of NPPF paragraph 139 which states 'any proposals for new Green Belts should be set out in strategic policies, which should show what the consequences of the proposal would be for sustainable development'.</p> <p>It is argued that in granting planning permission on the site the Inspector confirmed that the proposed development of the site for housing comprises sustainable development.</p>	See response on row GBA01.27	Peel L&P Investments North Ltd
GBA02.30	This comment relates to criterion D of NPPF paragraph 139 which states 'any proposals for new Green Belts should be set out in	See response on row GBA01.27	Peel L&P Investments North Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>strategic policies, which should demonstrate the necessity for the Green Belt and its consistency with strategic polices for adjoining areas'.</p> <p>It is argued that it is evident from the recent grant of planning permission that the proposed addition to the Green Belt would conflict with strategic policies which seek to meet local housing needs.</p>		
GBA02.31	<p>This comment relates to criterion E of NPPF paragraph 139 which states 'any proposals for new Green Belts should show how the Green Belt would meet the other objectives of the Framework (NPPF)'.</p> <p>It is argued that the PfE analysis merely lists objectives of NPPF without assessment of any specific or exceptional contributions the site would make to them. It is also argued that the PfE analysis makes no attempt to balance social and environmental objectives with any consideration of any contribution the site could make to meeting other objectives of the NPPF.</p>	See response on row GBA01.27	Peel L&P Investments North Ltd
	Soundness		
GBA02.32	<p>In order to make the Plan sound and ensure that it contains sufficient allocations to meet the strategic priorities for boosting competitiveness in the northern boroughs, including ensuring Bolton has sufficient land to meet its development needs, the following modifications are required:</p> <ol style="list-style-type: none"> 1. Delete the proposed modification to the Green Belt boundary: Horwich Golf Course/Knowles Farm Policy GBA 2 2. Allocate the site for housing development to reflect that it now has outline planning consent. 	<p>The justification for this Green Belt addition is provided in Appendix 3, page 3 of the Green Belt Topic Paper [07.01.25]. The evidence base can be found here: [07.01.11] Stage 2 GM Green Belt Study – Contribution Assessment of proposed 2020 GMSF Green Belt Additions</p> <p>Planning permissions do not require allocation but would contribute to plan supply if implemented.</p>	Peel L&P Investments North Ltd

