



Planning Statement

**Land to the South East of
Milltown Street
Radcliffe**

**Permission in Principle for the
erection of up to 9 dwellings**



CONNOLLYS

Mr P Speak

February 2023

Report Drafted By	Report Checked By	Report Approved By
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1. INTRODUCTION

BRIEF

- 1.1 Connollys is instructed by Mr J P Speak (hereafter referred to as “the applicant”) to prepare this Planning Statement in support of an application for Permission in Principle (hereafter referred to as “PiP”) to Bury Council (hereafter referred to as “the Council”) relating to land to the south east of Milltown Street in Radcliffe.
- 1.2 The description of development given in the planning application form is:

“Proposed residential development of up to 9 no. dwellings”

BACKGROUND

- 1.3 Permission in Principle (also referred to as “PiP” in this Statement) is sought for the erection of up to 9 dwellings at this partially developed site, located to the south east of Milltown Street and to the north of Radcliffe New Road (the A665) in Radcliffe.
- 1.4 The site extends to 0.4 hectares in area. It is surrounded by development and built form on three sides, including a development of 14 houses which was granted permission in 2017 and has now been built out (Bury Council ref – 60723). An earlier PiP application (Bury ref – 68869) was withdrawn, this resubmission is subject to amendments seeking to address comments raised by the Council’s Strategic Planning and Infrastructure Team.

PURPOSE

- 1.5 The purpose of this Statement is to consider the primary issues associated with an application for PiP, which is limited in scope to matters of location; land use and the amount of development.
- 1.6 The ability to make an application for Permission in Principle is available under the Town and Country Planning Act 1990 via the Town and Country Planning (Permission in Principle) (Amendment) Order 2017.
- 1.7 The PiP route is a two stage process. The first is to establish whether a site is suitable in principle of the type and quantum of development proposed. The second, referred to as ‘Technical Details Consent’ considers detailed matters associated with the proposals.

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- 1.8 A decision whether to grant PiP in the first instance must be made in accordance with the relevant policies within the development plan, unless there are material considerations, such as those in the National Planning Policy Framework, which would indicate otherwise.
- 1.9 In accordance with Part 2A of the Order, the PiP process does not extend to 'major' development. Therefore it is limited to:
- The provision of less than 10 dwellings;
 - The provision of a building(s) where the floor space to be created is less than 1,000 square metres; and
 - Development carried out on a site having an area of 1 hectares or less.
- 1.10 Applications for PiP must be determined within 5 weeks, beginning on the day immediately following that on which a valid application is received by the Local Planning Authority.
- 1.11 As per the Order, this application is supported by the requisite level of information for the Council to consider the PiP:
- The relevant, completed application form; and
 - A site location plan identifying the land;

2. THE SITE & SURROUNDING AREA

SITE DESCRIPTION AND LOCATION

- 2.1 The site comprises a parcel of undeveloped land, measuring 0.4 hectares in area. It is irregular in shape, but bound on three sides by existing development, as shown the map excerpt below.

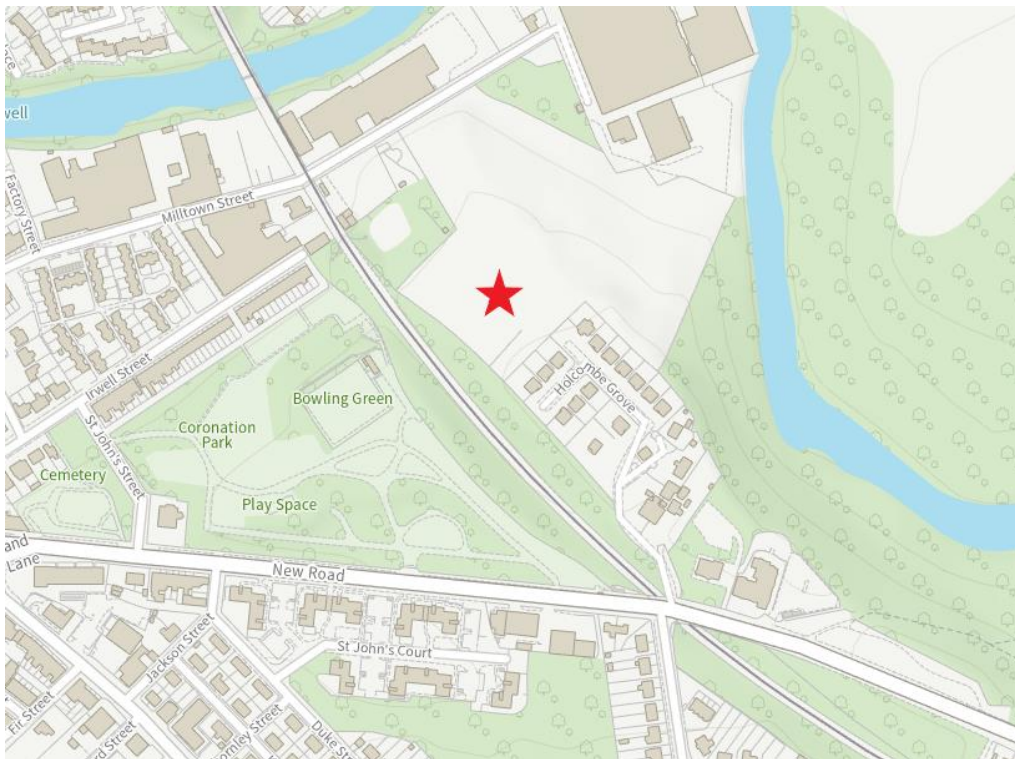


Figure. 2.1– Site Location (denoted by red star)

SURROUNDING AREA AND SUSTAINABILITY CREDENTIALS

- 2.2 The site is located within the settlement of Radcliffe and within walking distance of a number of local services and facilities on Milltown Street itself, with the town centre located just over 500m away. This contains larger scale convenience stores, medical facilities, bars and restaurants, places of worship and leisure centres.

- 2.3 Additionally there are a number of outdoor leisure opportunities in the vicinity, including parks, sports pitches and a public right of way network which leads into the surrounding countryside.
- 2.4 There are bus stops, accessed via a continuous footpath from the site, on Stand Lane which offer regular, daily services to Bury, Manchester and other towns between. The Radcliffe tram stop is also located only 400m north of the site and provides alternative means of transport to the aforementioned destinations, and also Altrincham.
- 2.5 These larger settlements offer a wider range of accessible services owing to their scale and status in Greater Manchester, and can be reached in a matter of minutes owing to the variety and regularity of public transport within Radcliffe.
- 2.6 Accordingly, the site represents a sustainable and accessible location for new housing development.

SUMMARY

- 2.7 In summary the site comprises a highly sustainable, accessible site, which can make a much needed contribution to housing within the Borough.

3. PLANNING HISTORY

- 3.1 This application is a resubmission of an earlier scheme at the site, also seeking permission in principle for the erection of 9 dwellings (Bury ref – 68869). That application was withdrawn following feedback from the Council which stated that (emphasis added):

“The proposed development of 9 dwellings would not meet any of the purposes permitted under Policy OL5/2 and would not be an appropriate development within the Green Belt and is therefore contrary to Policy OL5/2.

However, in terms of housing supply, the Borough has a shortfall of housing sites to meet local needs determined through the Government’s standard methodology and is unable to demonstrate a five year supply of housing land, and as such, additional housing land is needed and the NPPF tilted balance of the presumption in favour of sustainable development applies.

The NPPF supports the efficient use of land, and in areas such as Bury where there is a shortage of land for meeting identified housing needs there is a clear need to make best use of the available sites to avoid the need to release additional Green Belt land. In these circumstances, NPPF paragraph 125 states that local planning authorities should refuse applications which they consider fail to make efficient use of land. The current proposal for 9 dwellings on this 1 hectare site amounts to a density of only 9 dwellings per hectare. In the absence of any other identified constraints that would prevent the land from being developed at a higher density it is considered that the provision of only 9 dwellings on this site would not make optimal use of the potential of this site contrary to paragraph 125 of the NPPF. The application should be refused on this basis”

- 3.2 These comments have been considered and the resubmitted scheme seeks to address those points fully.
- 3.3 As referenced earlier in this Statement, consent has also been granted at an adjacent site for the erection of 14 dwellings (now known as ‘Holcombe Grove’) following an approval in April 2017.

4. STATUTORY AND OTHER DESIGNATIONS

HERITAGE DESIGNATIONS

- 4.1 There are no known Listed Buildings, Scheduled Ancient Monuments or Conservation Areas on or adjacent to the site which would be affected by the proposed development.

FLOOD RISK AND DRAINAGE

- 4.2 The entirety of the site lies within Flood Zone 1 as shown in the Environment Agency mapping excerpt below (Figure 4.1). A small section of the wider land to the north falls within Flood Zones 2 & 3, however no development is proposed in these areas. Accordingly there is no inherent risk associated with the proposals in this regard.

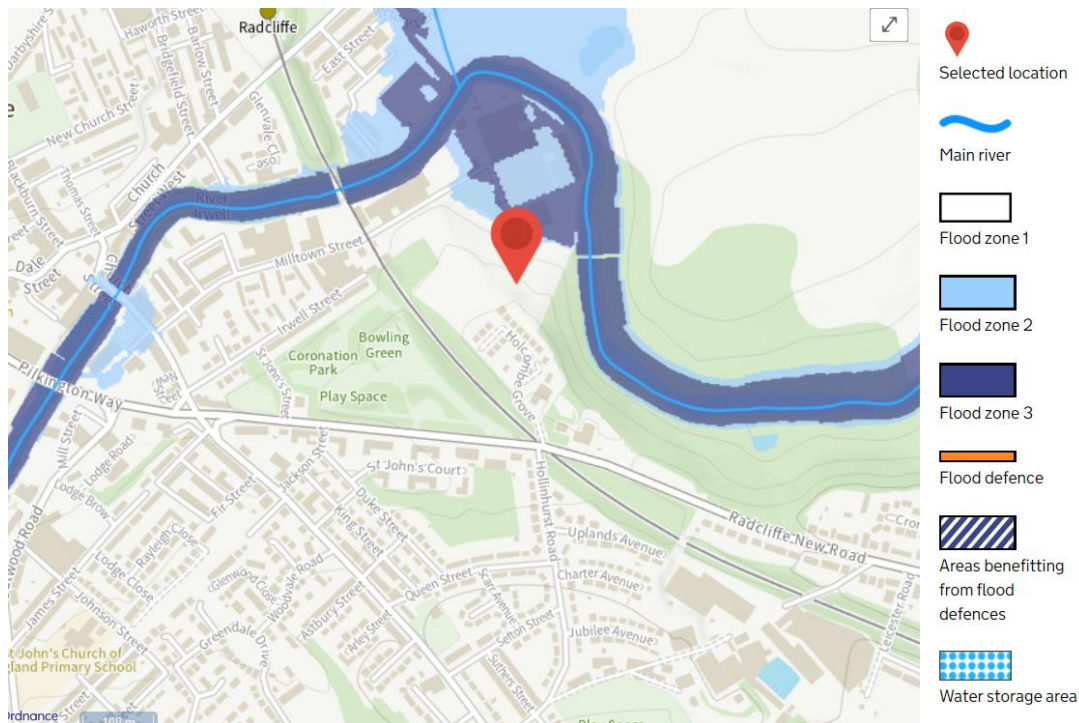


Figure 4.1 – Flood Zone designation (site denoted by red marker)

HIGHWAYS AND ACCESS

- 4.3 Access to the site is available from both Milltown Street and Radcliffe New Road. These matters will be considered in greater detail at the Technical Details Consent stage.

GROUND CONDITIONS

- 4.4 There are no known ground conditions which would preclude future residential development at this site and these matters will be considered in greater detail at the Technical Details Consent stage.

PUBLIC RIGHTS OF WAY

- 4.5 There are no public rights of way on or adjacent to the site which would be affected by the proposals.

TREES

- 4.6 No trees within or adjacent to the site are protected by preservation order, nor do they lie within a conservation area. Any future layout will consider potential impact on existing trees and hedgerows, as part of the Technical Details Consent application.

ECOLOGY

- 4.7 The site is not part of statutorily designated ecological site and any consideration of such issues would be reserved for a future Technical Details Consent application.

SUMMARY

- 4.8 The site is not constrained by any local, regional or national statutory or non-statutory designations such that would impact on the principle of future residential development.

5. THE PROPOSED SCHEME

DESCRIPTION OF DEVELOPMENT

5.1 The description of development given in the application forms is:

“Proposed residential development of up to 9 no. dwellings”

PROPOSALS

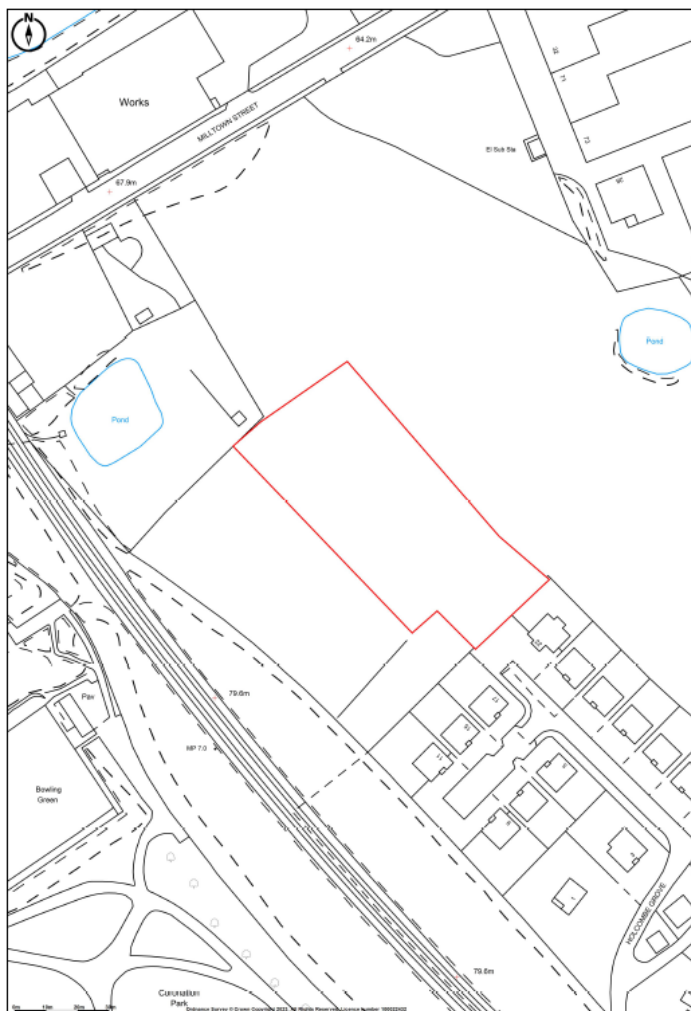


Figure 5.1 Site location plan

- 5.2 It is proposed to erect up to 9 dwellings within the parcel of land shown in Figure 5.1 above. In accordance with the PiP requirements, it is not necessary to provide any further information at this stage, as consideration is limited to matters of location, land use and the amount of development proposed.
- 5.3 The proposals are compliant with the parameters of the 2017 Order by virtue of being for a maximum of 9 dwellings, on an area of land less than 1 hectare in area. The principle of development therefore stands to be considered against the provisions of the adopted development plan and, where relevant, the National Planning Policy Framework.

6. THE DEVELOPMENT PLAN

INTRODUCTION

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that:

“where in making any determination under the planning Acts, regard is to be had to the Development Plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise”.

6.2 In this instance, the Development Plan comprises:

- The Bury Unitary Development Plan

THE UNITARY DEVELOPMENT PLAN

6.3 The Unitary Development Plan (“the UDP”) was adopted in 1997 and is currently still used in decision making. Preparation of the Council’s draft, emerging Local Plan began in 2015 and an ‘Issues and Options’ consultation subsequently took place in 2018. However, no further work has been undertaken on the Plan, pending progress of ‘Places for Everyone’ (“PfE”) (formerly known as the Greater Manchester Spatial Framework), which will set out an overarching, long term spatial plan for nine Greater Manchester Authorities, including Bury.

6.4 The PfE DPD has now been submitted to the Secretary of State for Levelling Up, Housing and Communities, for examination. Hearing sessions for the plan are underway at the time of writing. The relevance of this draft document will be considered in Section 7 of this Statement

6.5 Within the UDP the application site is shown as white land on the proposals maps and is within the settlement of Radcliffe. Beyond the site boundary, to the east of the River Irwell, the land is designated as Green Belt.

6.6 The current extent of the Green Belt is shown in the map excerpt below (Figures 6.1), taken from the Council’s online proposals map. Despite being unallocated white land, the site is considered to fall within the ‘river valleys’ area owing to its proximity to the Irwell. The UDP contains specific reference to these areas and has an adopted policy (ref – OL5/2) which will be considered in greater detail below.



Figure 6.1 UDP map excerpt (site denoted by red star)

GENERAL POLICY AND GUIDANCE CONSIDERATIONS

POLICY H1 – HOUSING LAND PROVISION

- 6.7 This policy sets out that the Council will seek to deliver the requisite amount of housing over the life of the Plan, however, the information contained within the policy is significantly out of date owing to its age.

POLICY H1/2 – FURTHER HOUSING DEVELOPMENT

- 6.8 This policy states that when considering housing proposals on land which is not formally allocated, the Council will consider a range of factors including the need to direct development towards the urban area; the availability of infrastructure; the need to release peripheral open land; the suitability of the site and any other policies within the development plan.

POLICY H5/1/2 – INNER RADCLIFFE

- 6.9 The policy states that due to high levels of poor housing and poor environment, inner Radcliffe has been identified as a renewal area.

POLICY OL5 – RIVER VALLEYS

- 6.10 The policy states that the Council will maintain and preserve the character of the Borough's river valleys. Subsection OL5/2 states that development within these areas will not generally be permitted unless a defined exception can be met, including limited infilling.
- 6.11 However, a review of this policy and the wider UDP, undertaken in 2013 to check consistency with the newly introduced Framework (at that time) also states:

“However until the Core Strategy is adopted this may be afforded less weight in view of the need to meet the national housing shortage – some recent case law has ruled that policies which protect land which does not have national designations are effectively cancelled out where there is no 5 year supply in place”

SUPPLEMENTARY GUIDANCE

- 6.12 In addition to the aforementioned suite of policies, the Council also have a number of supporting SPD's which are used in the decision making process. SPD7, which relates to managing housing land supply with Bury is partially out of date owing to its age. However, it does confirm that development opportunities within the Borough are limited owing to the tight constraints imposed by land designations such as the Green Belt and River Valleys. As such, there is a clear focus on development within existing urban areas.

ASSESSMENT

- 6.13 In the context of the aforementioned policies and guidance, this Statement will now consider the proposed development and demonstrate compliance with the UPD and the Framework.

PRINCIPLE OF DEVELOPMENT

- 6.14 The Bury UDP is now almost 25 years old and its review almost 10 years old, yet it is currently still used in decision making. Whilst some aspects of the Plan still reflect the aspirations and requirements of the most recent version of the Framework, a number of policies are silent or out of date.
- 6.15 In addition to this, the Council have experienced significant housing delivery issues over a sustained period. As a result it has failed the Housing Delivery Test. The Council cannot currently demonstrate a 5 year housing land supply and has been unable to for some time. This represents a significant material consideration in the determination of applications and engages paragraph 11 of the Framework.
- 6.16 Paragraph 11 confirms that plans and decisions should apply a presumption in favour of sustainable development. In relation to the subject application, for decision-taking, paragraph 11 d) is relevant. It states that:
- where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole
- 6.17 Footnote 7 sets out that the policies referred to at d)i are those in the Framework (rather than those in development plans), including Green Belt.
- 6.18 Footnote 8 confirms that the policies which are most important for determining the application can be considered out-of-date, for applications involving housing, where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.
- 6.19 Additionally, paragraph 60 sets out that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where

it is needed. Paragraph 69 also acknowledges the important contribution that small and medium sized sites can make to meeting the housing requirement and that they are often built out quickly. Local Planning Authorities should accommodate at least 10% of their housing requirement on sites no larger than one hectare.

- 6.20 Whilst the site may have been offered some protection by way of Policy OL5/2, the Council acknowledge in their 2013 UDP review that in the absence of an up to date development plan, this policy may carry less weight in the context of a housing shortage. Policy H1/2 also recognises that in such scenarios, it is beneficial to direct additional housing development (outside of allocated sites) towards the urban area.
- 6.21 The Council's Strategic Planning & Infrastructure Team have confirmed, by way of their response to the previous application, that the principle of development at this site is acceptable, subject to any future development making efficient use of the land in accordance with the Framework (paragraph 125). The revised proposals result in a yield of 22.5dph which is comparable to the neighbouring scheme at Holcombe Grove and appropriate for an edge of settlement location.
- 6.22 In addition to this, the application site has a clear and tangible relationship with the built form of Radcliffe and is within the settlement boundary. Residential development of a similar scale has been allowed immediately adjacent, within the river valleys designation. In the context of the urgent, unmet housing need in Bury, especially in Radcliffe where the existing housing stock is generally poor, the benefits of delivering a highly sustainable and accessible site which can contribute promptly to supply, would clearly outweigh any harm from a small loss of open land in this location.
- 6.23 The presumption in favour of sustainable development therefore must be applied and permission should be granted without delay.

CONCLUSIONS

- 6.24 It has been demonstrated above that the principle of residential development is wholly acceptable at this site. Accordingly, we now demonstrate that there are other material considerations that indicate planning permission should be granted in the following Chapter.

7. OTHER MATERIAL CONSIDERATIONS

INTRODUCTION

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

“In principle...any consideration which relates to the use and development of land is capable of being a planning consideration. Whether a particular consideration falling within that broad class is material in any given case will depend on the circumstances” (Stringer v MHLG 1971).

- 7.2 Material considerations must be genuine planning considerations, i.e. they must be related to the development and use of land in the public interest. The considerations must also fairly and reasonably relate to the application concerned (*R v Westminster CC ex-parte Monahan 1989 refers*).
- 7.3 The Courts are the arbiters of what constitutes a material consideration. All of the fundamental factors involved in land-use planning are included, such as the number, size, layout, siting, design and external appearance of buildings and the proposed means of access, together with landscaping, impact on the neighbourhood and the availability of infrastructure.
- 7.4 The Courts have also held that the Government’s statements of planning policy are material considerations which must be taken into account, where relevant, in decisions on planning applications. These statements cannot make irrelevant any matter which is a material consideration in a particular case. But where such statements indicate the weight that should be given to relevant considerations, decision-makers must have proper regard to them. If they elect not to follow relevant statements of the Government’s planning policy, they must give clear and convincing reasons (*E C Grandsen and Co Ltd v SSE and Gillingham BC 1985 refers*).
- 7.5 Emerging policies, in the form of draft policy statements and guidance, can be regarded as material considerations, depending on the context. Their existence may indicate that a relevant policy is under review; and the circumstances which have led to that review may need to be taken into account.
- 7.6 In those cases where the Development Plan is not relevant, for example because there are no relevant policies, or policies in the DPDs pull in opposite directions so that there is no clear guide for a particular

proposal, the planning application should be determined on its merits in the light of all the material considerations.

7.7 In this case the following material considerations are relevant.

NATIONAL PLANNING POLICY

NATIONAL PLANNING POLICY FRAMEWORK

7.8 A revised version of the National Planning Policy Framework (hereafter referred to as the Framework) was published on 20 July 2021. Whilst the Framework remains largely unchanged from the previous version in relation to the relevant considerations for the site, the new version is referred to throughout our representations to reflect the latest national policy position. The following extracts are relevant and are reproduced below for ease of reference together with commentary where necessary:

ACHIEVING SUSTAINABLE DEVELOPMENT

7.9 Section 2 sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. To achieve this, the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) **social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

7.10 The application proposals would deliver sustainable development in the following ways:

Economic The new dwellings would make a meaningful contribution to housing supply and help to vary the housing stock in the area. This would encourage new residents into the Borough who would generate expenditure within the local economy, supporting local shops, services and businesses across a number of sectors.

The development will result in job creation throughout the construction process, with associated expenditure within the local supply chain during the build.

The proposals are fully commensurate with the economic dimension of sustainable development and would represent a welcomed contribution to the economy of the area.

Social The proposals would help to broaden home ownership opportunities and create new, healthy communities within Radcliffe. The proposals would also facilitate the creation of jobs within the local labour pool during construction.

Environmental The proposals provide opportunities for biodiversity gain through the high-quality new landscaping scheme and cause no harm to protected species of habitats.

7.11 Paragraph 11 confirms that plans and decisions should apply a presumption in favour of sustainable development. Accounting for the Council's current 5YHLS position and the findings of their Housing Delivery Test, paragraph 11(d) is engaged. It has been confirmed that no conflict arises with paragraph 11(d)(i) or (ii).

DELIVERING A SUFFICIENT SUPPLY OF HOMES

7.12 Paragraph 60 sets out that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.

- 7.13 This site represents a sustainable location for new housing, with access to public transport and local services. The scheme would result in the delivery of up to 9 homes, making a valuable contribution to housing in Radcliffe.

DESIGN

- 7.14 The creation of high-quality buildings and places is outlined by the Government to be fundamental to what the planning and development process should achieve. A key element of sustainable development is good design, which should contribute positively to making places better for people. Paragraph 127 of the Framework sets out that planning policies and decisions should ensure that developments:

- a) Function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) Are sympathetic to local character and history, including the surrounding built environment and landscaping setting;
- d) Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
- e) Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses, and support local facilities and transport; and
- f) Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.

- 7.15 Any future development at the site would be controlled through the Technical Details Consent process and a high quality scheme can be achieved, which is appropriate in terms of scale, layout, density and appearance.

ENVIRONMENT

- 7.16 The Framework also requires that development proposals should also prevent new and existing development from contributing to or being put at an unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.

- 7.17 No unacceptable impacts or risks are known to present on site which would preclude residential development. Any associated assessments would be carried out at the Technical Details Consent stage.

PLANNING PRACTICE GUIDANCE

- 7.18 Planning Practice Guidance (PPG) was launched on 6 March 2014 in its final form and has subsequently been updated on numerous occasions. The PPG replaces some 230 planning guidance documents but results in no amendments to the Framework.
- 7.19 Regarding design, Paragraph ID: 26-001-20140306 reiterates the guidance set out in the Framework; that good quality design is an integral part of sustainable development. Furthermore, the PPG notes that:

“Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well and will adapt to the needs of future generations.”

- 7.20 The PPG makes it clear that planning policies and decisions should seek to ensure the physical environment supports the three strands of sustainable development (i.e. economic, social and environmental) and in doing so issues including the promotion of local character; designing safe connected and efficient streets; incorporating a network of greenspaces; promoting cohesive and vibrant neighbourhoods, should all be given careful consideration.
- 7.21 The PPG also reiterates the guidance set out in the Framework, that both Local Plans and planning decisions should be based upon and reflect the presumption in favour of sustainable development (Paragraph ID 21b-006-20140306 and ID 12-011-20140306).
- 7.22 This site is located adjacent to existing built form and would offer future residents direct access to a range of services and facilities in the vicinity, contributing to the creation of sustainable, accessible neighbourhoods. As such, the principle of development is acceptable.

EMERGING POLICIES – ‘PLACES FOR EVERYONE’

- 7.23 The emerging, publication draft of the PfE DPD not only seeks to remove land from the Green Belt in order to allocate new strategic development, but also seeks to make additions to the designation, following an assessment of the existing boundaries across the nine Authorities. The application site is included as a proposed addition to the Green Belt (see Figures 7.1 & 7.2 below for the current and proposed boundaries).



Figure 7.1 Existing extent of Green Belt (site denoted by red star)

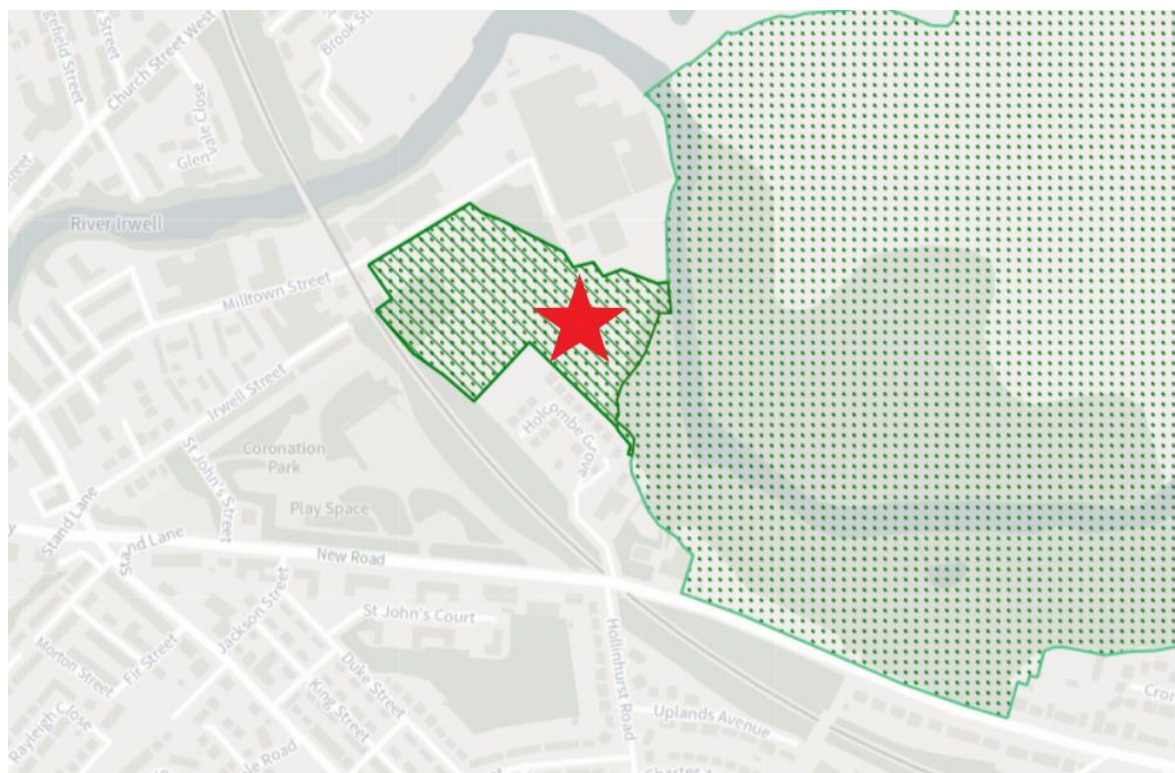


Figure 7.2 Proposed PfE addition to the Green Belt (site denoted by red star)

7.24 Justification for the inclusion of the site within the designation is set out within the PfE evidence base (site reference GBA07) and is summarised in the table below, taken from the Green Belt Topic Paper.

a. Demonstrate why normal planning and DM policies would not be adequate.	b. Set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary.	c. Show what the consequences of the proposal would be for sustainable development.	d. Demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas.	e. Show how the Green Belt would meet the other objectives of the NPPF.
The site comprises land at the south eastern edge of Radcliffe. Land within the parcel comprises sloping unmanaged grassland with pockets of tree cover present across the site. There is a pond within the site towards its north western corner. Parts of both the north west and north east of the site have been cleared for industrial or storage purposes and now serve as hardstanding This site is currently designated as River Valley. River Valley sites will be reviewed against latest evidence to consider whether they will be continued to be protected under a new Green Infrastructure designation in the Local Plan.	The site is currently undevelopable due to its topography. The River Valley boundary of the site will be reviewed as part of the Local Plan. Until this work is completed there is no guarantee that these sites will be protected. It is viewed that this is an opportunity to give the land greater protection given that the land is likely to remain open for an extended period of time.	The protection of the land as Green Belt can make a strategic contribution to urban regeneration by directing development towards derelict and underused sites in Bury and Radcliffe.	Green Belt designation is recognised as affording the highest level of protection, thereby giving the greatest level of certainty to the many who value this asset. Evidence in the Assessment of Additions to the Green Belt considers its performance against purposes. Under Purpose 1a (evidence of existing urban sprawl) the report gives the site a 'strong' scoring stating the urbanising features within the parcel are limited to the hardstanding areas towards the north western and north eastern corners of the parcel respectively. As such there are few urbanising features within the parcel and it remains open. The current boundary is arbitrary at the top of the plateau, including this addition allows the greenbelt boundary to extend to the urban area.	Designation as Green Belt will ensure that land in this location will remain open and will perform well against the primary purposes in national policy. The other objectives of the NPPF will be supported as follows: • Contribute to protecting and enhancing our natural environment (Para 8) • Help to improve biodiversity (Para 8) • Enable and support healthy lifestyles through safe and accessible green infrastructure (Para 91) • Providing access to a network of high quality open spaces (Para 96) • Encourage multiple benefits from both urban and rural land, including through...taking opportunities to achieve net environmental gains, such as developments that would enable new habitat creation or improve public access to the countryside (Para 118)
			Evidence in the GM Cumulative Harm Assessment finds that the addition is open but contained by existing development thereby limiting its contribution to preventing sprawl (Purpose 1), and that its role in preventing Radcliffe and Whitefield is stymied by the fact that the settlements have already merged to some degree (Purpose 2). The site would contribute towards safeguarding from encroachment at a local level (Purpose 3). The site is not contiguous with Green Belt that is of a strategic nature to affect adjoining districts and therefore it is judged that there would be no impact on strategic policies of adjoining districts.	• Promote the conservation, restoration and enhancement of priority habitats and ecological networks (Para 174) • Set a positive strategy for the conservation and enjoyment of the historic environment, taking into account...opportunities to draw on the contribution made by the historic environment to the character of a place (Para 185).

Figure 7.3 Excerpt from PfE document 'Green Belt Topic Paper – 2021'

PROPOSED GREEN BELT DESIGNATION

7.25 The PfE spatial plan seeks to include the application site, and surrounding land, within the Green Belt in an effort of offset the impact of large scale, strategic removal elsewhere in Greater Manchester. The applicant disagrees with the proposed designation and has made representations through the appropriate channels.

7.26 The Framework (para. 138) sets out five purposes which Green Belt is to serve:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;

- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, encouraging the recycling of derelict/other urban land

7.27 It will be demonstrated below that the land does not meet the requisite tests for inclusion and that the proposed designation should not present a barrier to the granting of Permission in Principle for a modest residential development.

Purpose 1 - Check The Unrestricted Sprawl Of Large Built Up Areas

Purpose 1a - Does The Parcel Exhibit Evidence Of Existing Urban Sprawl And Consequent Loss Of Openness?

7.28 The assessment which supports the proposed designation underplays the significant amount of previously developed land within the site along Milltown Street. That land (and the undeveloped land behind it) is seen in the context of existing industrial development to the north, the tramway viaduct to the west and Pioneer Mill at the end of the street. The context is one of an urban environment rather than a parcel of open land forming part of the wider countryside. Milltown Street is lit by street lights and there are large areas of palisade and post and wire fencing preventing access to the site. As such there is a consequent loss of openness from existing development. Openness has already been further reduced following completion of the 14 dwelling scheme referred to earlier in this Statement.

7.29 The site there for performs a Weak role in preventing sprawl.

Purpose 1b - Does The Parcel Protect Open Land From The Potential For Urban Sprawl To Occur?

7.30 Urban features can already be found on the parcel of land but they are far more prominent than acknowledged in the assessment which supports the designation. Contrary to the assessment the River Irwell only forms part of a very small element of the outer boundary of the site; the majority of boundaries being urban in form. A clear, defensible boundary already exists and its framed on two sides (to the north and south) by existing built form.

7.31 As such, the site performs a Weak role in protecting open land from urban sprawl.

Purpose 2 - To Prevent Neighbouring Towns From Merging Into One Another

7.32 The assessment confirms that the site performs a Weak role on this regard.

Purpose 3 – To Assist In Safeguarding The Countryside From Encroachment

- 7.33 The assessment erroneously states that the site is free from urban development. This is not the case. It does, however, acknowledge that the site is surrounded by industrial development and that it does not form part of the wider countryside.
- 7.34 Given the existing development on the land and its context, it clearly does not safeguard the countryside from encroachment.
- 7.35 The site therefore performs a Weak role in safeguarding the countryside from encroachment.

Purpose 4 – To Preserve The Setting & Special Character Of Historic Towns

- 7.36 The assessment confirms that the site serves no purpose in this regard.

Purpose 5 - Assist In Urban Regeneration By Encouraging The Recycling Of Derelict And Other Urban Land

- 7.37 Owing to its characteristics (which includes areas of previously developed land), relationship with existing built form, the site comprises the very type of urban land which should be developed. Given that this site is in a highly sustainable location and in the context of the Council's significant housing supply issues, the designation would be counter productive in this regard.
- 7.38 The assumptions made in Figure 6.4 of this Statement are disputed, insofar as they relate to the role and future of the land. The site is not undevelopable as suggested and the area proposed as part of this PIP application clearly lends itself to future housing, particularly given its relationship to the newly completed residential development to the south.
- 7.39 The land does not require 'greater protection' and it is not agreed that the site will "remain open for an extended period of time". It is recognised that the Council will consider the line and extent of the river valleys designation as part of their emerging Local Plan. Granting consent for 14 dwellings to the south has already eroded a significant proportion of this area and has further enclosed the land, adding to existing built form on its boundaries.
- 7.40 The existing Green Belt boundary lies at the bottom of the sloping land which reaches up to the plateau on which development is now proposed. This is a clear, legible, defensible boundary and there is no need to bring the designation into the heart of the urban area, in such a way that performs poorly against national purposes and prohibits the future development of a highly accessible site.

- 7.41 In the absence of a proposed Green Belt designation through the PfE process, the site would simply been seen as an appropriate and proportionate rounding off of existing built form, before the more rural landscape opens up to the north east of the land. It should therefore be treated as such.
- 7.42 The Framework (para.139) states that only 'exceptional circumstances' should lead to the creation of new Green Belts. The PfE justification confirms that the site is not contiguous with the Green Belt on a wider strategic scale, and it is argued that the proposed addition appears anomalous on plan, and on the ground, owing to all of the factors detailed above. Were the site to be designated, an opportunity would be lost to deliver sustainable development in an accessible location, on a site that does not need to be kept open.

SUMMARY

- 7.43 As outlined above, there are a number of compelling material considerations which support the principle of development, enabling it to deliver much needed housing growth in Radcliffe, and Bury as a whole.
- 7.44 Accounting for the Council's current position with regard to housing supply and delivery, the provision of up to 9 dwellings must be afforded significant weight in the decision making process.

8. SUMMARY OF BENEFITS AND CONCLUSIONS

- 8.1 Connollys is instructed by Mr P Speak to prepare this Planning Statement in support of an application for Permission in Principle to Bury Council, relating to land to the south east of Milltown St, Radcliffe.
- 8.2 The description of development given in the planning application forms is:
- “Proposed residential development of up to 9 no. dwellings”*
- 8.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that:
- “where in making any determination under the planning Acts, regard is to be had to the Development Plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise”*
- 8.4 It has been demonstrated in this Planning Statement that the principle of residential development is wholly compliant with the provisions of the relevant, up to date policies of the Bury UPD and the requirements of the National Planning Policy Framework. Additionally, there are other material considerations which support the granting of Permission in Principle.
- 8.5 It is set out herein that the proposals represent sustainable development and that there are significant benefits associated with the proposed development with material considerations that significantly and demonstrably outweigh those benefits.

THE BENEFITS OF THE PROPOSALS

- The development of a sustainably located site;
- Notable and positive contribution to general housing supply within the Borough;
- Creating mixed, inclusive and varied communities, which in turn will support the economic, environmental and social wellbeing of the area;
- Improvement and diversification of housing stock within Radcliffe;
- New employment opportunities during construction;
- Expenditure in the local supply chain during construction;
- Expenditure from future residents, supporting local businesses;

- No significant or demonstrable harm caused by the proposals.

8.6 For the reasons set out above we respectfully request on behalf of the applicant that Permission in Principle be granted without delay.