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## Supporting Statement

### PiP application for the erection of up to 9No. dwellings

Land off Bentley Lane, Bury, BL9 6RZ

Cornell Group

October 2025



**RTPI**

mediation of space - making of place

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## **1 INTRODUCTION**

- 1.1 This Supporting Statement has been prepared by Edgeplan, to accompany a Stage 1 Permission in Principle application for the erection of up to 9No. dwellings on land off Bentley Lane, Bury.
- 1.2 A Permission in Principle application represents an alternative way in which to obtain planning permission for residential development, whereby the matters of principle are separated from the technical details. Therefore, there are two stages to obtaining this type of consent:
  - Stage 1: establishes whether a site is suitable in principle for housing-led development
  - Stage 2: concerns the consent of technical details and assessment of the detailed development proposals
- 1.3 Permission in Principle applications are considered in much the same way as standard planning applications in that they are determined in accordance with Section 38(6) of the Planning and Compulsory Purchase Act, considering the relevant policies in the Development Plan and any other material considerations. However, the scope for assessment of Stage 1 applications of this type is limited to, it's location, land use and the amount of development proposed. As such, a technical suite of reports is not required at the initial stage. Should Stage 1 approval be granted, technical details consent could be applied for under a future Stage 2 application.
- 1.4 This Statement therefore seeks to provide a description of the site's context and the development proposals, alongside an appraisal of the planning merits of the scheme as part of an assessment of the relevant planning policies. The conclusion is then reached that Stage 1 Permission in Principle should be granted.
- 1.5 In order to allow an assessment of the proposals, the following documentation is included with this submission:
  - Application form;
  - Location Plan;
  - Locational Sustainability Statement;
  - Density Analysis; and,
  - Landscape Statement.

## 2 THE SITE AND ITS SETTING

### The site

- 2.1 The site is some 0.64 hectares in extent and comprises of the entirety of the single land ownership parcel. It consists of greenfield land with an area of allotments to the southern boundary, consisting of a number of outbuildings/structures. The larger portion of the site to the north appears to have previously been in agricultural use.
- 2.2 The site rises quite significantly to approximately 173/5m AOD, towards a former quarry beyond the north western boundary and to the M66.
- 2.3 The site is within the Green Belt. There is no relevant planning history for this site.



### Setting

- 2.4 The site is visually contained, as explained in the submitted Landscape Statement:
- To the north east, the site borders the M66 motorway with open countryside beyond.
  - A former quarry lies to the north west boundary, and is now a mature woodland which physically and visually contains the site.
  - There is residential development to the south and west, along Bentley Lane and Walmersley Old Road.

- 2.5 A Density Assessment has been submitted in support of the application, demonstrating that the density of existing residential development adjoining the site is some 11 dwellings per hectare.

**Constraints**

- 2.6 As stated, the area edged red for the application is some 0.64ha in extent. However, it is important to note that the developable area will be significantly smaller. At this Stage, it is not possible to determine the exact extent of the developable area. The necessary technical assessments have not been undertaken and will follow at Stage 2 of the PiP process.

- 2.7 However, it is evident that:

- There are a number of mature trees surrounding the site, along or in close proximity to the boundary. The Root Protection Zones of these trees will need to be protected, reducing the developable area.
- The site is predominantly greenfield land and the Biodiversity Net Gain (BNG) baseline assessment has not been undertaken. It is reasonable to allow for on-site BNG as part of the development and as such, the developable area must be further reduced.
- The M66 forms the northeastern boundary to the site. A Noise Assessment has not been undertaken, but it is reasonable to assume that noise will be a technical constraint. It is expected that development will need to stand off from the M66, particularly given the levels of the site closest to the motorway.
  - It may be that there will need to be an acoustic bund with acoustic fencing.
  - Any such bund may need to be screened by structural landscaping from the development within the site and from the motorway.
  - It is likely that the residential development will need to front towards the M66 in the northeastern part of the site, to act as a further noise buffer protecting private amenity space from noise. This will have implications on the internal layout.
- The topography of the site will also be a constraint. The site rises towards the motorway, away from existing development along Bentley Lane.
  - Internally, retaining walls may be required and internal interface will need to be carefully considered.
  - Likewise, the interface with the existing properties will need to be carefully considered, particularly as some, such as 7 – 10 Bentley, front directly onto the road and the front elevations of others are in close proximity to the road. The Council's interface distance guidelines will need to be taken into account, along with the proposed dwellings being set at a higher level due to existing topography.
- Thought will need to be given to the existing use of the adjoining land to the west, in case there are incompatible uses that may require a stand-off, or if there is living accommodation that needs to be taken account of with regard interface.

- 2.8 There are a number of constraints that will result in the developable area being smaller than the full extent of the site. It is envisaged that these can be discussed with the LPA during the application process.

**Locational sustainability**

- 2.9 As demonstrated in the submitted Locational Sustainability Assessment, the site is located within a sustainable and well-connected area, offering good accessibility to a range of local services and facilities. The site is also well served by public transport, with a number of bus stops located within walking distance that provide frequent services to surrounding towns and urban centres, including the Metro interchange in Bury. There are cycle lanes along Walmersley Road that run towards Bury town centre.

### **3 PROPOSED DEVELOPMENT**

- 3.1 This application seeks PiP for the construction of up to 9No. dwellings on land off Bentley Lane, Bury. It is proposed that all dwellings are self-build properties.
- 3.2 Given the nature of self-build and the character of the surrounding area, it is expected that all (up to) 9 properties will be detached dwellings of 1.5 – 2-storeys in height. The materials palette will reflect that of the surrounding area, ensuring a development that achieves good design.
- 3.3 As discussed in Section 2 of this Statement, there are numerous constraints that will reduce the developable area significantly. The density will therefore undoubtedly reflect that surrounding the site, which is some 11 dph.

## 4 PLANNING POLICY

- 4.1 Planning policy is set out within the development plan, which comprises the Bury Unitary Development Plan (UDP) and Places for Everyone (PfE).

### Development plan

#### Proposals map

- 4.2 The combined UDP/PfE Proposals Map demonstrates that the site lies within the Green Belt.



#### Unitary Development Plan

- 4.3 The UDP was adopted in 1997, and policies were saved in 2007. However, the majority of UDP policies have now been superseded by PfE policies.
- 4.4 The following policies are considered relevant to the residential development of the site:

#### *Policies considered most important to the principle of residential development*

- H1/2: Further housing development
- OL1/2: New buildings in the Green Belt

#### *Other Policies*

- H2/1: The form of new residential development
- H2/2: The layout of new residential development
- EN1/2: Townscape and built design
- EN1/5: Crime prevention
- EN6/3: Features of ecological value

- EN6/4: Wildlife Links and Corridors
- HT2/4: Car parking and new development
- HT6/1: Pedestrian cyclist movement

### **Places for Everyone**

- 4.5 The PfE is a long-term plan of nine Greater Manchester districts, including Bury for new jobs, homes and sustainable growth. It was adopted by Bury Council on 21/03/2024.
- 4.6 The following policies are considered relevant to the residential development of the site:

#### *Policies considered most important to the principle of residential development*

- JP-H1: Scale, Distribution and Phasing of New Development
- JP-G9: The Green Belt

#### *Other Policies*

- JP-S1: Sustainable development
- JP-S2: Carbon and Energy
- JP-S4: Flood Risk and the water environment
- JP-S5: Clean Air
- JP-H2: Affordability of New Housing
- JP-H3: Type, Size and Design of New Housing
- JP-H4: Density of new housing
- JP-G1: Landscape Character
- JP-G7: Trees and Woodlands
- JP-G8: A Net Enhancement of Biodiversity and Geodiversity
- JP-P1: Sustainable Places
- JP-P6: Health
- JP-C5: Streets for All
- JP-C6: Walking and Cycling
- JP-C8: Transport requirements of new development

### **Other Local Documents**

#### **Supplementary Planning Document 8: New buildings and associated development in the Green Belt (Adopted 10/01/2007)**

- 4.7 This SPD is based on out-of-date National Policy. It does however provide some useful guidance on the Council's approach to new buildings in the Green Belt.

## **National Planning Policy Framework**

### **National Planning Policy Framework (NPPF) (2024)**

4.8 The NPPF is a material consideration in planning decisions. The following sections of the NPPF are considered relevant to this application:

- Achieving sustainable development;
- Decision-making;
- Delivering a sufficient supply of homes;
- Building a strong, competitive economy;
- Promoting healthy and safe communities;
- Promoting sustainable transport;
- Making effective use of land;
- Achieving well-designed and beautiful places;
- Protecting Green Belt land;
- Meeting the challenge of climate change, flooding and coastal change; and,
- Conserving and enhancing the natural environment.

## **5 HOUSING SUPPLY, DELIVERY AND NEED**

### **Housing Land Supply**

- 5.1 The National Planning Policy Framework (NPPF) states that LPAs are required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing.
- 5.2 Bury's Five year Housing Land Supply Statement states that the Council's deliverable five-year housing land supply, based on a five year requirement of 488 dwellings per annum, is 2,440 dwellings, which equates to 5.8 years supply. However, Edgeplan considers that a detailed assessment of the supply would result in a reduction to less than 5 years.

### **Housing Delivery Test**

- 5.3 It is identified that Bury have fallen below 75% on the recent Housing Delivery Test, scoring 64%.

### **Self-build Housing**

- 5.4 The Council acknowledges that there is a demonstrable unmet need for self-build housing in Bury. This is confirmed in the Council's own evidence base work.

## 6 PLANNING CASE

- 6.1 The scope of consideration for Stage 1 PiP applications is limited to location, land use and amount of development. Any future Stage 2 application will enable the consideration of other, technical matters.

### Grey Belt

- 6.2 The site is in the Green Belt and current development plan policy does not permit the form of development that is proposed. However, the 2024 NPPF is a material consideration and introduced Grey Belt. As stated at para. 155 of the NPPF:

*The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:*

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b. There is a demonstrable unmet need for the type of development proposed;*
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
- d. Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.*

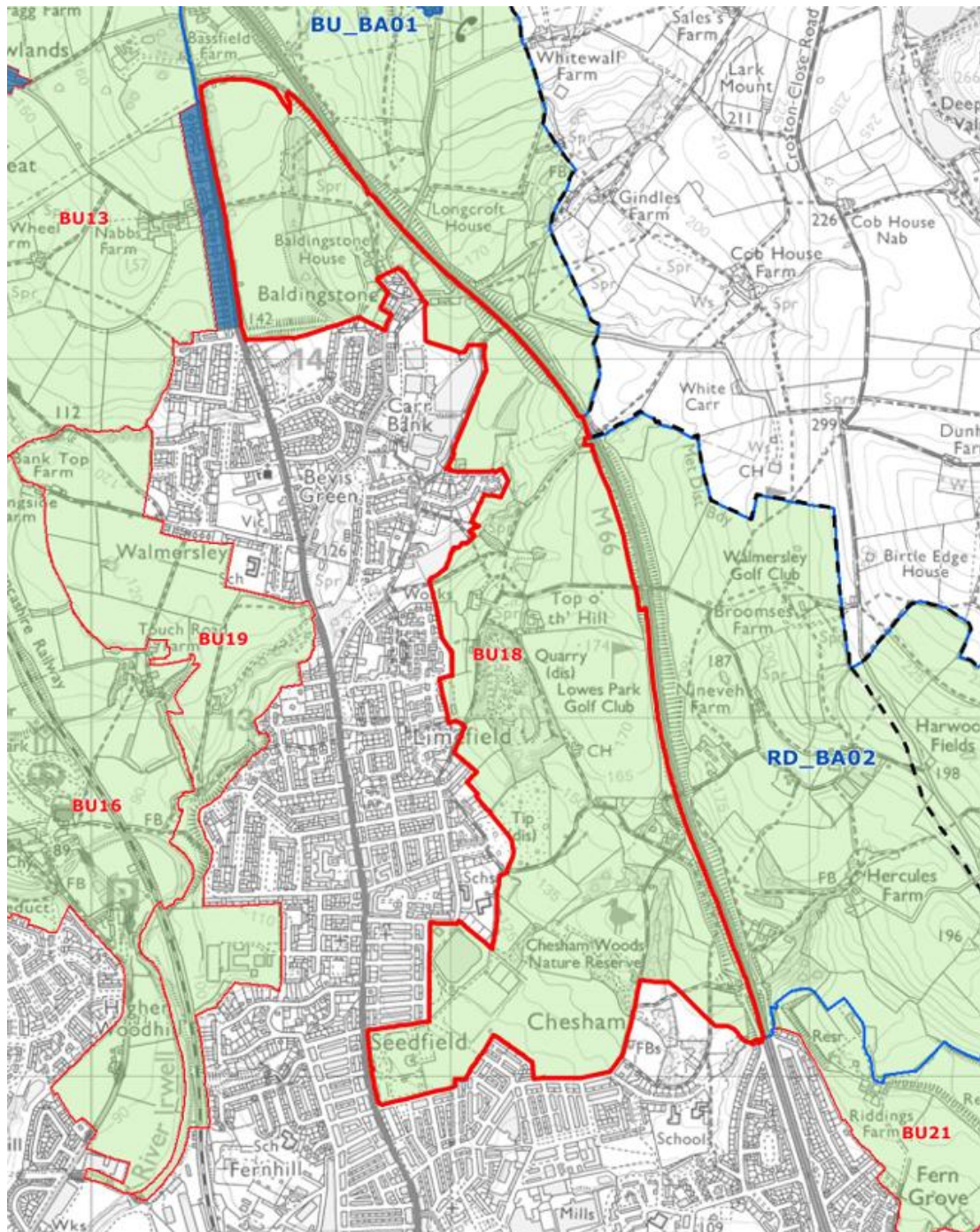
### **Ai: Can the site be classed as Grey Belt land?**

- 6.3 The glossary to the NPPF provides the following definition of Grey Belt:

**Grey belt:** *For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.*

### *Green Belt Assessment*

- 6.4 As part of the PFE process, a Green Belt Assessment (GBA) was undertaken. The site was assessed, but as part of a much larger parcel (BU18), which extended south to Clarence Park. The site is very well contained and is effectively disconnected from the wider parcel by existing development
- 6.5 As a result, the GBA is not particularly relevant to the overall assessment of the Grey Belt credentials of the application site.



*Purpose (a) – to check the unrestricted sprawl of large built up areas*

- 6.6 The GBA stated that Parcel BU18 performed strongly with regard purpose (a). However, as stated, this was with regard an extensive land parcel. The site was not individually assessed in this regard.
- 6.7 The site is well contained by existing built development. Sites which are adjacent to a large built-up area but are largely enclosed by significant existing development should be classed as making a weak contribution to purpose (a), as confirmed in the GBA.

- 6.8 It can therefore be concluded that the site does not make a strong contribution to checking the unrestricted sprawl of the built-up area.

*Purpose (b) – to prevent neighbouring towns merging into one another*

- 6.9 The GBA states that Parcel BU18 makes a weak contribution to this purpose. This is a reasonable conclusion as there are no settlements within close proximity to this Parcel, north or east. Parcel BU18 is of course much larger than the site, which must also perform weakly with regard purpose (b).

*Purpose (d) – to preserve the setting and special character of historic towns*

- 6.10 The GBA states that Parcel BU18 makes a moderate contribution to preserving the setting and character of historic towns. As a much smaller land parcel, which is enclosed by significant existing development, it can be reasonably concluded that the site makes a weak contribution to this purpose of the Green Belt as well.

*Footnote 7*

- 6.11 The development of the site would not impact upon any of the following:
- Habitat site;
  - SSSI;
  - Local Green Space;
  - National Landscape National Park; or,
  - Irreplaceable habitat.
- 6.12 The application of policies relating to the areas or assets in footnote 7 would not provide a strong reason for refusing or restricting development.

*Conclusion*

- 6.13 The site can be classed as Grey Belt land.

**Aii: Would the development fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan?**

- 6.14 The proposed development would not fundamentally undermine Parcel BU18, let alone the remaining Green Belt across Bury, which is extensive.

**B: Is there a demonstrable unmet need for the development being proposed?**

- 6.15 The most recent Housing Delivery Test was below 75% of the housing requirement over the previous three years and as such, there is a demonstrable need for the residential-led development of this site. There is also an unmet demonstrable need for self-build housing, as set out in the Council's own evidence base documents.

**C: Would the development be in a sustainable location?**

- 6.16 There are a number of services and facilities within easy walking distance of the site, such as Mulberry Bush Nursery, Springside Primary School and commercial units around Walmersley Post Office.

- 6.17 Furthermore, Walmersley Road has cycle lanes running north and south from the site, with Bury Town Centre and Bury Interchange being easily accessible by cycle.
- 6.18 There are also bus stops to the immediate west of the site with regular services running north towards Ramsbottom and Rawtenstall and south to Bury town centre and beyond. The Interchange is only 15 minutes by bus and regular metro services run south to Manchester city centre and beyond.
- 6.19 The site is evidently locationally sustainable.

**D: Does the development being proposed meet the 'Golden Rules' requirements?**

- 6.20 As the proposals are for up to 9No. dwellings, the Golden Rules are not applicable. However, it is worth noting that the site will accommodate some public open space, as landscaped buffering will likely be required to the M66 and land will also be needed for BNG.

**Amount of Development**

- 6.21 Section 4 has identified PfE policy JP-H4 as being relevant to the consideration of the amount of development. This policy seeks to deliver a development density of 35 dph but states that lower densities may be acceptable where they can be clearly justified by:
1. Local housing market issues, such as a demonstrable need for a particular type of housing that cannot be delivered at a higher density; or
  2. Site specific issues, such as the design context and any potential impact on the wider landscape or townscape.
- 6.22 The self-build housing cannot be delivered at a higher density than that being proposed. The 9No. dwellings will need to be detached units. Furthermore, as set out in Sections 2 and 3 of the Statement, there are site specific issues relevant to justifying the proposed density.
- 6.23 Section 2 of this Statement, the Landscape Report and the Density Assessment have considered the existing character and appearance of the area, including the existing density in the immediate environs of the site. Furthermore, this Statement has set out a number of technical constraints that will inevitably lead to the developable area being significantly smaller than the site area.
- 6.24 It can be reasonably concluded that the amount of development is entirely appropriate for this site.

**Summary**

- 6.25 The proposed development is appropriate in the Green Belt:
- A. The site is Grey Belt:
    - i. it does not perform strongly against purposes (a), (b) or (d) of the Green Belt and in fact, only makes a weak contribution to each purpose.
    - ii. Its development would not fundamentally undermine the purposes of remaining Green Belt across Bury.
  - B. There is a demonstrable unmet need for the type of development being proposed.

- C. The development would be in a sustainable location.
- D. The amount of development is appropriate to the site and self-build proposals.

6.26 The application proposals accord with the NPPF and relevant development plan policies. Stage 2 will consider all technical details.

## **7 CONCLUSIONS**

- 7.1 This application seeks to obtain Stage 1 Permission in Principle for up to 9 no. dwellings on land off Bentley Lane, Bury.
- 7.2 As a Stage 1 application, the proposals should only be assessed on the basis of the acceptability of the site's location, land use and the amount of development. Any technical matters beyond this are to be considered under any future Stage 2 submission.
- 7.3 This assessment has demonstrated that the site is Grey Belt and is locationally sustainable. The development of the site for up to 9No. dwellings is appropriate development in the Green Belt and the density is appropriate to the setting of the site, its constraints and the self-build scheme being proposed.
- 7.4 It is therefore considered that the development is acceptable in respect of its location, land use and the amount of development proposed, is in accordance with relevant planning policy and as such, the PiP should be granted.

