



**Representations to Pendle Borough Council Core Strategy:
Examination – Inspector’s Matters and Issues – March 2015
On behalf of Beck Developments**

These representations are written on behalf of Beck Developments Ltd, a house building company active in the Borough and who wish to ensure that the Council’s policies will secure deliverable housing sites to meet development need.

The representations are presented in the format of direct responses to the particular questions raised by the Inspector in the Matters and Issues document. Where no further comments are proposed at this stage to a particular question/issue, that question/issue has not been included in the report. We do however wish to reserve the right to make comment at the relevant Examination Hearing.

Session 1

Issue 7 – is the Plan clear as to whether a review of Green Belt boundaries will be necessary as part of the SAP?

In our previous representations we postulated that the Council’s strategy to provide a percentage of housing requirement in Rural Pendle would require the expansion of the existing rural settlements. The Council outlines rural settlements that can accommodate growth, but also states in the Plan that the defined settlements in Rural Pendle will see limited growth, whilst development in the open countryside will be restricted, especially in those areas designated as Green Belt or AONB. We consider that specifying such restrictions in the Core Strategy will hinder the future identification of development in the Rural Pendle areas, therefore questioning the effectiveness of the Strategy.

Much of the open land in the southern half of the Borough is designated as Green Belt, and three of the four Rural Pendle Services Centres identified in Policy SDP2 are to some degree limited by the existing Green Belt. The existing settlement boundary for Fence, shown below, is drawn tightly to the existing properties with all land outwith the settlement forming Green Belt. Foulridge is similarly affected as a significant majority of the settlement is surrounded by Green Belt. Other smaller settlements, including Rural Villages in Policy SDP2, are also limited in development opportunities by the Green Belt.

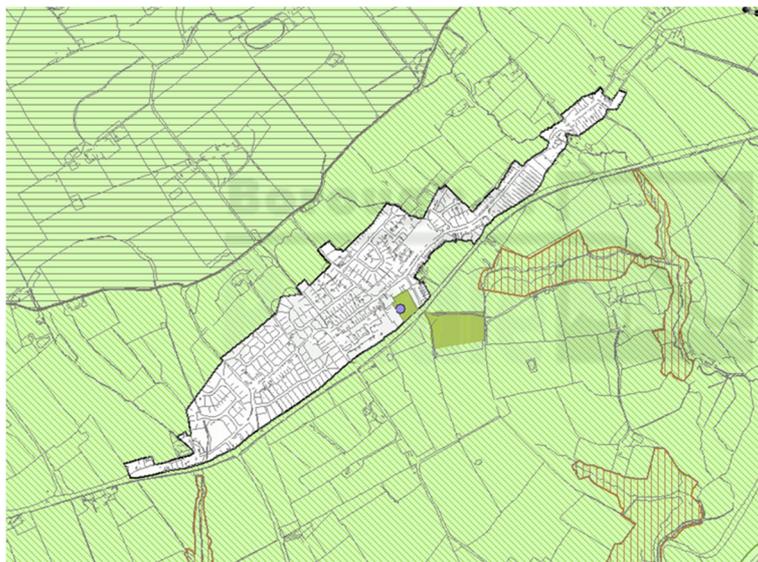
As the Council proposes growth across the district, and will need to provide suitable and attractive development sites for developers, it is imperative that a review of the Green Belt must form part of the evidence base for the future Site Allocation document, with the wording of the Core Strategy not only allowing for this, but specifically stating it in the approach to the assessment of future development sites. Not undertaking a Green Belt review will in effect push all development in the rural areas to the northern half of the Borough, providing a disproportionate level of growth inconsistent with the Core Strategy approach in Policy SDP2.

The new proposed Main Modification to Policy SDP2 proposes additional text to state that Rural Service Centres will 'provide the focus for growth in Rural Pendle'. As three out of four of these areas are limited by the Green Belt, it is imperative that this is addressed in the Core Strategy.

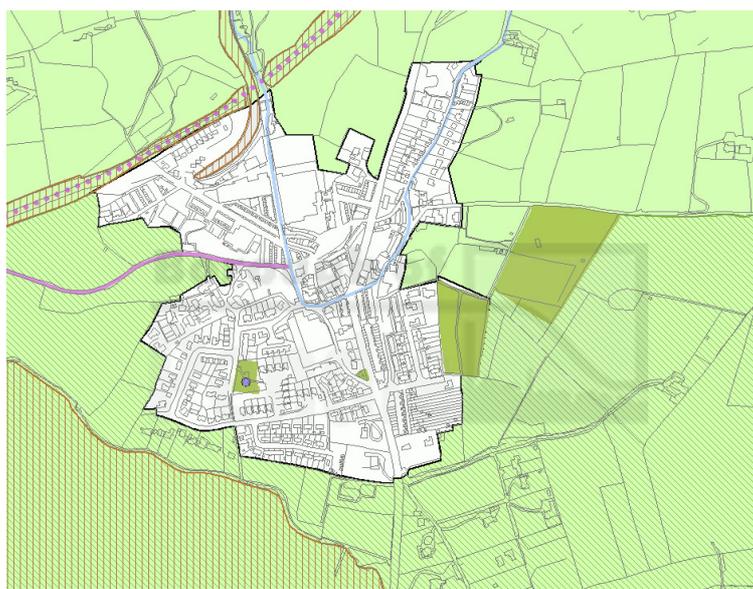
The National Planning Policy Framework (NPPF) is clear that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. This is therefore the correct and only time to review the Green Belt, particularly as the need for attractive sites in the Rural Pendle areas can help to deliver, and drive, housing growth across the Borough.

NPPF further states that when reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards

urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. These issues should form part of the assessment. Providing a commitment to a review of the Green Belt within the Core Strategy does not mean that Green Belt land will be lost to development in the intervening period, or that Green Belt land will necessarily be lost to development after the assessment. It simply allows for the relevant assessments to be made to potentially accommodate development in the locations already identified for growth in the Core Strategy. Failure to allow for a Green Belt review in the Core Strategy will jeopardise the future delivery of housing and make the plan unsound.



Fence - Completely Surrounded by Green Belt



Foulridge – Majority of Settlement Surrounded by Green Belt