

**Appendix 6: Comments relating to the Local Green Space Assessment,
Council response and changes made**

Appendix 6: Local Green Space Consultation Comments and Response Summary

Comments in Table 1 are organised by site. Not all sites nominated received feedback through the public consultation.

Many of the responses received to the public consultation raised repeated issues. For brevity, responses provided below are not set by representation but focus on the issues raised. The Council must emphasise that it is not the number of comments received that determine which sites should be Local Green Space and which should not, rather it is the weight of the argument made as supported by evidence which demonstrates how a site responds to national planning policy/guidance.

Table 1: Summary of Comments, Responses and Modifications in Relation to the Local Green Space and Methodology Report

Issue	Response	Modifications to Recommendations
LGS/LP4/DM12/001: Land at Applegarth, Barnoldswick		
The Town Council supports designation as Local Green Space.	The site is comprised of green space located within settlement boundary with limited public accessibility or viewing, and limited features of note. The site is not 'demonstrably special' and no evidence has been submitted to support the Town Council's case to designate the site as Local Green Space.	No change.
LGS/LP4/DM12/002: Land at Stock Beck, Barnoldswick		
The Town Council supports designation as Local Green Space. Running along Stock Beck, this land forms part of a wildlife corridor between the industrial Bankfield Site and the 'green desert' of Victory Park, and forms part of green corridor through the built up area. Vegetation is largely composed on nature plants with some invasive species. It includes wetland plants in a pond created by Rolls-Royce Employees. The land is part of a circular high quality route for people in wheelchairs and cyclists and the path is well used on a daily basis.	The site provides a linear green corridor linking Victory Park and Greenberfield Lane. The site forms a car free environment for walking, running or cycling. It is well used. The site has limited environmental quality and the sense of tranquillity disrupted by the site's proximity to Roll Royce's Bankfield site. The site is not 'demonstrably special' and should not be designated as local green space, however the site is not currently subject to any designation and should, noting its local value, be designated as public open space to protect it from loss.	No change.

Issue	Response	Modifications to Recommendations
LGS/LP4/DM12/003: Land at Ghyll Lane and Skipton Road, Barnoldswick		
The Town Council accepts designation as Amenity Greenspace and protection through Policy ENV1.	Comments noted.	No change.
LGS/LP4/DM12/004: Land at Greenberfield Locks, Barnoldswick		
The Town Council supports designation as Local Green Space and the description in the appraisal.	Comments noted.	No change.
The proposed Local Green Space designation could threaten the ability of the Trust to undertake works on land in its ownership necessary for public benefit and to support active and thriving waterways. The designation would conflict with Policy DM45 of the emerging plan, specifically the aims of Part 1 (e) of the policy. Whilst the Trust benefits from permitted development rights, the designation of the land as Local Green Space may restrict proposals which are outside the scope of PD rights but are nonetheless in accordance with our charitable aims of providing wider public benefit.	Comments noted. Whilst Green Belt policy applies significant restriction to development that are a number of exceptions allowed through the policy including those set out in Paragraphs 149 and 150 of the NPPF including engineering works associated with maintenance of the Leeds and Liverpool Canal. It should be noted that Barrowford Locks (similar in character) is located within the designated Green Belt. This designation does not prevent the maintenance of this water infrastructure and helps to safeguard the natural, historical and recreational qualities of the canal corridor.	No change.
The site is within the open countryside. Noting the restrictions of draft policy applicable to this designation, it is questionable what public benefit would arising from the site being designated as Local Green Space.	Comments noted. The designation of the site as local green space would afford the site more significant protection ensuring that the current character and features of the site are protected and that it can endure in its role for the community in the longer term. It also demonstrates the importance of the site to the local community. The Council therefore considers that the site passes this test.	No change.

Issue	Response	Modifications to Recommendations
The site includes a café and car parking which would not fall within the definition 'green areas' as outlined in PPG.	<p>The site provides a recreational space, forming part of the green infrastructure of the borough. The Council considers these spaces to meet the definition outlined in the NPPF.</p> <p>The contribution made by the car park towards the designation and the purpose of this designation is however noted to be limited and as such should be removed from the proposed designation.</p>	The boundary of the proposed designation is to be redrawn to exclude the area of parking at Greenberfield Locks. The remained of the site will be designated as Local Green Space.
The site is not within an easy walking distance of Barnoldswick. There are no existing footpaths between the site and closest residential areas. Connections via the canal towpath extend over 1.2km. The presence of a large car parking area on site provides further evidence that a significant proportion of users travel from a wider area, and that local community use may be limited. Due to the degree of separation of the site from Barnoldswick we do not believe that the green space at Greenberfield Locks serves a particular local community in the manner that the designation of Local Green Spaces was designed by the NPPF or emerging Local Policy.	The Council disagrees. It is a short walk from the settlement boundary to the site and the canal towpath. There are numerous routes from the town to the locks at Greenberfield Lane. The canal is a popular recreational asset to residents of this part of Barnoldswick.	No change.
LGS/LP4/DM12/005: Silentnight Woods and Land at Clifford Street, Barnoldswick		
The Town Council supports designation as Local Green Space subject to the removal of a triangular area to the south west of the land (the boundary to be in line with Clifford Street). The land is well used for informal recreation, with an extensive network of footpaths through the	The qualities of the space are noted however the local education authority (landowner) has objected to the proposal to designate the space as Local Green Space noting that the space is being held to meet education needs should this be required. The site is not formally designated for this purpose through the Local Plan and the	The site should not be designated as Local Green Space and will not be included within the final draft of the Local Plan.

Issue	Response	Modifications to Recommendations
wood and grassland. The land forms a green wedge between residential and industrial areas.	site sits outside the settlement boundary in the open countryside, however Paragraph 105 of the NPPF makes clear that the designation of land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Whilst this land may not be required to meet education needs at present, it could be in the future. Local Green Spaces should be capable of enduring beyond the current plan period. The designation of this land as Local Green Space would therefore remove this possibility and could therefore unduly constrain the future development and growth of the settlement and the capacity of local services to meet the needs of its residents. The Council therefore agrees that the site should not be designated as Local Green Space.	
Part of this land is held by the county council for existing and future education needs. The rectangular shaped area of land adjoining Clifford Street is detached played field for a Primary School and the remainder of LCC owned land is held for future education needs. The County Council object to this land being designated as Local Green Space.	<p>Objection noted.</p> <p>The Council agrees that the designation of this land as Local Green Space would be inconsistent with Paragraph 105 of the NPPF on the basis of the constraining effect caused to the future provision of infrastructure needed to support the growth of the town and to meet the needs of its residents. The Council therefore agrees that the site should not be designated as Local Green Space.</p>	The site should not be designated as Local Green Space and will not be included within the final draft of the Local Plan.
LGS/LP4/DM12/006 Land off Station Road and Fernlea Avenue		
The Town Council accepts designation as Amenity Greenspace.	Comment noted.	No change.

Issue	Response	Modifications to Recommendations
LGS/LP4/DM12/007 Land at Skipton Road and Fernlea Avenue		
The Town Council accepts designation as Amenity Greenspace.	Comment noted.	No change.
LGS/LP4/DM12/008 Land fronting Holy Trinity Church		
The Town Council accepts designation as Amenity Greenspace.	Comment noted.	No change.
LGS/LP4/DM12/009: Land at Cornmill Place, Barnoldswick		
The Town Council supports designation as Local Green Space. The land forms part of a green corridor through built-up Barnoldswick alongside Stock Beck. Vegetation is largely comprised of native plants which have been nurtured by Barnoldswick in Bloom activists and local residents and school children. Important recreational value for the local community. Part of the setting of the historic Cornmill on the opposite side of Stock Beck.	The site provides an area of local amenity space valued by residents at Cornmill Place (a cul-de-sac). The space has very limited wider value noting the site's limited range of features or accessibility. The site is not 'demonstrably special' and no evidence has been submitted to support the site's designation as local green space.	No change.
The site is not within the ownership of the Crown.	Comment noted.	No change.
LGS/LP4/DM12/010: Allotment North of Richmond Avenue, Barnoldswick		
The Town Council supports the designation as a Local Green Space. This land forms an island of greenery in an otherwise built up area and is demonstrably special as a consequence.	The site is an allotment set within a densely populated area of Barnoldswick. The role of the site in breaking up the dense pattern of development is acknowledged within the assessment however the role and value of the site is limited to a localised area (due to its size and nature of its use). The site is currently of good quality however its maintenance is reliant on its upkeep by plot holders. Allotments are an important but relatively common feature within	No change.

Issue	Response	Modifications to Recommendations
	built up environments. No evidence has been submitted to demonstrate the specific qualities of the site which would necessity the site's designation as Local Green Space. As such the tests required of national planning policy have not been met.	
LGS/LP4/DM12/011: Land at Priory Way, Barnoldswick		
The Town Council supports designation as Local Green Space. Important area of recreational space created as a consequence of the development of Priory Way and well used for informal recreation.	The site comprises of an edge of settlement local amenity space sitting outside of the settlement boundary. The site has limited features of note. The site is not 'demonstrably special'. The Council considers that the proposed designation of the site as public open space offers proportionate protection.	No change.
LGS/LP4/DM12/012: Pickles Hippings, Barnoldswick		
The Town Council supports designation as Local Green Space for the reasons set out in the appraisal.	Comments noted.	No change.
LGS/LP4/DM12/013: Land at King Street, Barnoldswick		
The Town Council supports designation as Local Green Space. The land is a tranquil space, providing a glimpse of greenery in an otherwise built-up urban area.	The site is located within the Barnoldswick Conservation Area. It features a mature tree and pocket of open space adjacent to an existing car park. There is little evidence to demonstrate that the site is 'demonstrably special'. The site (and existing tree) benefits from protection by its location within the Conservation Area.	No change.
LGS/LP4/DM12/014: Land off Carr Hall Road, Barrowford		
Fields meet the definition of designated green spaces. They are distinctive to the community, and vistas provided feature within the Carr Hall Conservation Area Appraisal. The fields, boundaries and water features provide rich	No information provided as to how the site is 'demonstrably special' to the wider community and should therefore benefit from being designated as Local Green Space.	No change.

Issue	Response	Modifications to Recommendations
habitats for a diversity of species. They provide relief from the urbanised form surrounding them.		
At a loss as to why the report authors fail to understand the importance of the fields for the community.	Comments noted. There is little available evidence to support this viewpoint.	No change.
Beauty – Yes, within the consideration area and referenced within the area appraisal. Ancient oak trees are the only features from the Carr Hall Estate. Vistas granted by fields provide an important amenity and key feature of the conservation area. The small lake remains and is seasonally filled.	The role the site has as part of the Carr Hall Conservation helping to reveal its significance is noted within the assessment. This is not however sufficient to indicate that the site is 'demonstrably special' on its own merits.	No change.
Historic significance – Fields are a vital aspect of the conservation area. Report is completely wrong about the lake and show lack of knowledge of area. Oak trees found within the fields were planted nearly 150 years ago to mark an anniversary of the battle of Waterloo.	The assessment is based on available mapping data, desk based research of historic documents, and observations made during a site visit. The large fish pond is no longer present on site, however surface water does collect on the site after significant rainfall events. The oak trees referred to are located beyond the site boundary.	No change.
Recreational value – Grazed by horses used in equestrian businesses.	The site is in private ownership and used for grazing. There are no public rights of way within the site. The recreational value of the site is limited. There is no evidence of wider community use.	No change.
Tranquillity – Views provided by the fields are enjoyed by the community and provide a break in urban development.	The views identified are of local significance and are protected through existing policy. The break in development is of planning policy significance and is safeguarded by the site's designation as Green Belt.	No change.
Richness of Wildlife – Report is wrong about the site's ecology. Wildlife found across the site. A variety of bats roost in taller trees. 4 species of	The site shares many of the same characteristics as the neighbouring fields. The site is already designated as Green Belt and forms part of a	No change.

Issue	Response	Modifications to Recommendations
bat use the site along with Tawny Owls and Barn Owls. Mallards, herons, and kingfishers are regular visitors to the lake feeding on insects and invertebrates that live there. Roe and Red Deer are seen in small herds. Small mammals and bird species are abundant in number and variety. Further, one of the fields is earmarked for tree planting by the Council.	wider conservation area. Existing policies provide the space with proportionate protection.	
The fields form important buffers to residential and industrial development and prevent urban sprawl.	This reflects the site's role within the Green Belt. It does not justify designating the site as Local Green Space.	No change.
The land is already green belt. Having failed the initial test, the site should not have been assessed for Local Green Space Assessment according to the decision tree.	All nominated sites have been assessed.	No change.
The site forms part of the wider countryside with no special characteristics contributing to local identity, character or sense of place. The site makes no contribution to the form or layout of the settlement.	It is agreed that the site shares characteristics of open countryside located to the west. The site does however form part of the setting of the settlement as underlined by the site's location within the Carr Hall Conservation Area.	No change.
The site holds no historic significance. It will be surrounded on three sides by development once Lomeshaye Phase 2 is built.	The site is part of the Carr Hall Conservation Area and forms part of its setting. Elements within the site point to the site's former role within the Carr Hall Estate. The site therefore makes a positive contribution to the Conservation Area.	No change.
Bounded by Public Right of Ways but the site holds no formal role for recreation.	Comment noted.	No change.
Land is bound by existing development and a busy trunk road with no opportunity for its tranquil enjoyment.	The break in development offers some level of tranquillity but this is due to its context rather than the specific characteristics of the site itself.	No change.

Issue	Response	Modifications to Recommendations
According to DEFRA, there appear to be no protected species or priority areas on the land, with no specific wildlife designations present.	Comment noted.	No change.
The land is not local in extent, comprising on several fields with a seemingly arbitrary cut off.	See assessment.	No change.
The land is private and rented for the grazing of horses. It is not publicly accessible.	Depending on the characteristics of the site and its role in responding to LGS criteria, the lack of accessibility does not prevent the designation of the site for local green space.	No change.
LGS/LP4/DM12/018: Land off Halifax Road, Nelson		
The loss of this site to a cemetery is ridiculous.	The Council has identified a shortfall of cemetery provision in Nelson. A new site is required because the existing site at Walton Lane cannot be expanded. The suitability of a cemetery at the site will be assessed through the planning application process.	No change.
Submissions made regarding the suitability of the site for a cemetery and the impact of a cemetery on the wider area.	The consultation does not relate to proposals to develop a cemetery at the site.	No change.
It is our last green space between Nelson and Brierfield. It is one a few that is accessible and suitable for a wide range of users in this densely populated area. An extensive footpath network crosses the site.	Hard Platts and playing fields at Marsden Heights School form further areas of open space located on the boundary of Nelson and Brierfield. Both sites are protected by their designation as Public Open Space. The limited range and access to open green spaces within the urban area (particularly at Halifax Road) is acknowledged by the assessment. Open fields at Little Tom's farm the south and footpath provision across Nelson Golf Course are however easily accessible from Kings Causeway and regularly used by its residents.	No change.

Issue	Response	Modifications to Recommendations
The site provides an important break in urban development giving surrounding communities important local access to the natural environment.	The break in development provided by the site is noted within the assessment.	No change.
The site is regularly used for recreation purposes by the community for generations. It has strong amenity value and is important for mental health. It provides the opportunity for social interactions.	The value and use of the site by the community is noted within the assessment.	No change.
The land has rewilded. It is important for wildlife including deer, badger, voles, pheasants, frogs, kestrels, sparrow hawks, bullfinch, shrews, buzzards, short eared owls and barn owls. It makes an important contribution to the preservation of the environment, containing habitat which is used for foraging. Bullfinch and short eared owls are on the Amber List of Conservation Concern. Barn Owls are also a schedule 1 species. It provides an important wildlife corridor.	The value of the site for wildlife is noted within the assessment.	No change.
The untouched oasis provided by the site adds to its enjoyment and sense of tranquillity, enabling nature to thrive right on your doorstep.	The physical characteristics of the site and the contribution this makes to the local area is noted within the assessment.	No change.
The site is too wet for development. Only the current land uses are suitable.	The consultation relates only to the assessment of sites nominated for designation as Local Green Space.	No change.
Any development on the site would threaten its current ecosystem. This provides justification for seeking the site's protection.	There is no evidence to support this comment. It should also be noted that developments are now required, by law, to provide an increase in biodiversity.	No change.
The fields are historically significance in the role they have played in our community and	The value of the site and its role for the surrounding community is noted within the assessment.	No change.

Issue	Response	Modifications to Recommendations
recreational opportunity and value provided to generations.		
Notes proposals for a cemetery at the site, however what would happen if a cemetery could not be developed at the site, could the site be designated as Local Green Space if this proposal did not occur?	Local Green Spaces can only be designated through the plan making process. If the site is not designated as Local Green Space through the emerging Local Plan, the site would be considered 'white land' – a site with no designation located within the settlement boundary.	No change.
Designating the land as Local Green Space when just purchased for the siting of a new cemetery would represent an enormous waste of tax payer money and would still leave the problem of how to meet burial needs.	The Council has identified a shortfall of cemetery provision in Nelson. A new site is required because the existing site at Walton Lane cannot be expanded. The suitability of a cemetery at the site will be assessed through the planning application process.	No change.
The delivery of a large space for Ashes Interment at the site would provide a good opportunity for a large peaceful garden to be included at the site allowing quiet reflection.	The consultation does not relate to proposals to develop a cemetery at the site.	No change.
LGS/LP4/DM12/19: Land at Clay Farm, Edge End Avenue, Brierfield		
It provides for far reaching views across Pendle.	Views afforded from the site are noted within the assessment.	No change.
It is our last green space between Nelson and Brierfield. It is one a few in this densely populated area.	Hard Platts and playing fields at Marsden Heights School form a further area of open space between Nelson and Brierfield. Both sites are protected by their designation as Public Open Space. The limited range and access to open green spaces within the urban area (particularly at Halifax Road) is acknowledged by the assessment. Open fields at Little Tom's farm to the south, and footpath provision across Nelson	No change.

Issue	Response	Modifications to Recommendations
	Golf Course are however easily accessible from Kings Causeway and regularly used by residents.	
The site provides an important break in urban development giving surrounding communities important local access to the natural environment.	The break in development provided by the site is noted within the assessment.	No change.
The land has rewilded. It is important for wildlife including deer, badger, voles, pheasants, frogs, kestrels, sparrow hawks, bullfinch, shrews, buzzards, short eared owls and barn owls. It makes an important contribution to the preservation of the environment, containing habitat which is used for foraging. Bullfinch and short eared owls are on the Amber List of Conservation Concern. Barn Owls are also a schedule 1 species. It provides an important wildlife corridor.	The value of the site for wildlife is noted within the assessment.	No changes.
The untouched oasis provided by the site adds to its enjoyment and sense of tranquillity, enabling nature to thrive right on your doorstep.	The role of the site for the local community is noted within the assessment.	No change.
Any development on the site would threaten its current ecosystem. This provides justification for seeking the site's protection.	There is no evidence to support this comment. It should also be noted that developments are now required, by law, to provide an increase in biodiversity.	No change.
The site is too wet for development. Only the current land uses are suitable.	The consultation relates only to the assessment of sites nominated for designation as Local Green Space.	No change.
The fields are historically significance in the role they have played in our community and recreational opportunity and value provided to generations.	The importance of the site for the local community is noted within the assessment.	No change.

Issue	Response	Modifications to Recommendations
The site is not special to the community at all and is barren. Some residents openly empty their garden waste onto it.	Comments noted. It is clear from the response provided by members of the community that the site is valued locally.	No change.
There is no historical significance other than the land being within the same family ownership for over 90 years.	The land forms part of the setting of the Grade II Listed Clay Farm Cottage.	No change.
There is no recreational value as the site is not publicly accessible.	Recreational value is not necessarily provided by access.	No change.
The site is used by wildlife for feeding but they do not live there. The nearby golf course provides the cover they need. Our field has five trees.	No evidence submitted to support comments made. Even if demonstrated the site nevertheless maintains a role in supporting the needs and activities of local wildlife.	No change.
There are numerous beautiful green spaces within 500 yards including Halt Platts, Nelson Golf Course and Waidhouse Quarry.	Proximity to other green spaces does not necessarily mean a site should not be designated as Local Green Space.	No change.
LGS/LP4/DM12/018 functions more strongly as local green space given that use for walking.	It is noted within the assessment that the site on its own does not form a Local Green Space but the site contributes to the qualities of the wider landscape.	No change.
LGS/LP4/DM12/020: Land rear of Kings Causeway, Brierfield		
It provides for far reaching views across Pendle.	Views afforded from the site are noted by the assessment.	No change.
It is our last green space between Nelson and Brierfield. It is one a few in this densely populated area.	Hard Platts and playing fields at Marsden Heights School form a further area of open space between Nelson and Brierfield. Both sites are protected by their designation as Public Open Space. The limited range and access to open green spaces within the urban area (particularly at Halifax Road) is acknowledged by the assessment. Open fields at Little Tom's farm, and footpath provision across Nelson Golf Course are	No change.

Issue	Response	Modifications to Recommendations
	however accessible from Kings Causeway and regularly used by residents.	
The site provides an important break in urban development giving surrounding communities important local access to the natural environment.	The break in development provided by the site is noted within the assessment.	No change.
The land has rewilded. It is important for wildlife including deer, badger, voles, pheasants, frogs, kestrels, sparrow hawks, bullfinch, shrews, buzzards, short eared owls and barn owls. It makes an important contribution to the preservation of the environment, containing habitat which is used for foraging. Bullfinch and short eared owls are on the Amber List of Conservation Concern. Barn Owls are also a schedule 1 species. It provides an important wildlife corridor.	The role of the site for wildlife is noted within the assessment.	No change.
The untouched oasis provided by the site adds to its enjoyment and sense of tranquillity, enabling nature to thrive right on your doorstep.	The importance of the site to the community is noted within the assessment.	No change.
Any development on the site would threaten its current ecosystem. This provides justification for seeking the site's protection.	There is no evidence to support the claim made through this comment noting that developments are now required, by law, to provide an increase in biodiversity.	No change.
The fields are historically significance in the role they have played in our community and recreational opportunity and value provided to generations.	The importance of the site to the community is noted within the assessment.	No change.
The site is too wet for development. Only the current land uses are suitable.	The consultation relates only to the assessment of sites nominated for designation as Local Green Space.	No change.

Issue	Response	Modifications to Recommendations
The site is not special to the community at all and is barren. Some residents openly empty their garden waste onto it.	Comments noted. It is clear from the response provided by members of the community that the site is valued locally.	No change.
There is no historical significance other than the land being within the same family ownership for over 90 years.	The land forms part of the setting of the Grade II Listed Clay Farm Cottage.	No change.
There is no recreational value as the site is not publicly accessible.	Recreational value is not necessarily provided by access.	No change.
The site is used by wildlife for feeding but they do not live there. The nearby golf course provides the cover they need. Our field has five trees.	No evidence submitted to support comments made. Even if demonstrated the site nevertheless maintains a role in supporting the needs and activities of local wildlife.	No change.
There are numerous beautiful green spaces within 500 yards including Halt Platts, Nelson Golf Course and Waidhouse Quarry.	Proximity to other green spaces does not necessarily mean a site should not be designated as Local Green Space.	No change.
LGS/LP4/DM12/018 functions more strongly as local green space given that use for walking.	It is noted within the assessment that the site on its own does not form a Local Green Space but the site contributes to the qualities of the wider landscape.	No change.
LGS/LP4/DM12/021: Land between Kings Causeway and Halifax Road		
The loss of this site to a cemetery is ridiculous.	The Council has identified a shortfall of cemetery provision in Nelson. A new site is required because the existing site at Walton Lane cannot be expanded. The suitability of a cemetery at the site will be assessed through the planning application process.	No change.
Submissions made regarding the suitability of the site for a cemetery and the impact of a cemetery on the wider area.	The consultation does not relate to proposals to develop a cemetery.	No change.
It provides for far reaching views across Pendle.	Views afforded from the site are noted by the assessment.	No change.

Issue	Response	Modifications to Recommendations
It is our last green space between Nelson and Brierfield. It is one a few that is accessible and suitable for a wide range of users in this densely populated area. Other areas are not easily reached by the elderly.	Hard Platts and playing fields at Marsden Heights School form a further area of open space between Nelson and Brierfield. Both sites are protected by their designation as Public Open Space. The limited range and access to open green spaces within the urban area (particularly at Halifax Road) is acknowledged by the assessment. Open fields at Little Tom's farm, and footpath provision across Nelson Golf Course are however easily accessible from Kings Causeway and regularly used by residents.	No change.
The site is too wet for development. Only the current land uses are suitable.	The consultation relates only to the assessment of sites nominated for designation as Local Green Space.	No change.
The site provides an important break in urban development giving surrounding communities important local access to the natural environment.	The break in development provided by the site is noted within the assessment.	No change.
The site is regularly used for recreation purposes by the community for generations. It has strong amenity value and is important for mental health. It provides the opportunity for social interactions.	The value and use of the site by the community is noted within the assessment.	No change.
The land has rewilded. It is important for wildlife including deer, badger, voles, pheasants, frogs, kestrels, sparrow hawks, bullfinch, shrews, buzzards, short eared owls and barn owls. It makes an important contribution to the preservation of the environment, containing habitat which is used for foraging. Bullfinch and short eared owls are on the Amber List of Conservation Concern. Barn Owls are also a	The role of the site for local wildlife is noted within the assessment.	No change.

Issue	Response	Modifications to Recommendations
schedule 1 species. It provides an important wildlife corridor.		
The untouched oasis provided by the site adds to its enjoyment and sense of tranquillity, enabling nature to thrive right on your doorstep. Natural springs further add to this sense of tranquillity.	The role of the site for the community is noted within the assessment.	No change.
Any development on the site would threaten its current ecosystem. This provides justification for seeking the site's protection.	There is no evidence to support this comment. It should also be noted that developments are now required, by law, to provide an increase in biodiversity.	No change.
The fields are historically significance in the role they have played in our community and recreational opportunity and value provided to generations.	The role of the site for the community is noted within the assessment.	No change.
We need to retain our natural environments for the contribution they make to tackling Climate Change.	Climate change is a significant issue and is a core theme of the draft Local Plan. Climate change, and the role a site plays in relation to it, is not one of the criteria set for the designation of Local Green Space.	No change.
LGS/LP4/DM12/022: Land at the Former Brierfield Waste Water Treatment Works, Brierfield		
Concerned by the diminishing greenfield sites in the area necessary to maintain our local wildlife.	The Council has been successful in steering development towards the urban area and brownfield sites helping to safeguard the countryside from development.	No change.
It is a benefit to the community to walk through these sites and enjoy our local nature.	The site is not publicly accessible, though can be enjoyed from adjacent footpaths.	No change.
Previously established trees which have been ripped out have not yet been replaced by replanting.	The restocking order is noted within the assessment.	No change.

Issue	Response	Modifications to Recommendations
Opportunities should be taken to link the site with LGS/LP4/DM12/023.	The consultation relates to the designation of sites rather than improvements to pedestrian connectivity.	No change.
The site is not suitable for housing.	The consultation relates to the designation of sites as local green space rather the suitability of sites or locations for housing.	No change.
It is one of the few sites for wildlife to the east of the M65.	The Leeds and Liverpool Canal is an important wildlife corridor and is found adjacent to the site. The Canal links a number of existing designated sites found to the north and south of the site including at Round Wood.	No change.
The site plays a role in managing flood risk.	Flood risk and drainage does not form part of the criteria for assessing sites for local green space.	No change.
If we can make sensible use of a site, then it should be left alone. A few suggestions for the parts of the site include: <ul style="list-style-type: none"> - A picnic site adjacent to the canal - A child's play area accessed from Quakers View. 	The consultation relates to the designation of sites as local green space rather than its land use. The site is in private ownership and is not available for public use.	No change.
Proximity is diminished as the site is not accessible to the public.	Accessibility isn't the only factor for determining proximity. The site closely relates to the existing urban area and can be appreciated by residents using the adjacent footpath network. The lack of public access of the site is acknowledged elsewhere within the assessment.	No change.
The site is not publicly accessible and as such its designation as Local Green Space would be contrary to advice within PPG which clearly states that public access is a key factor.	This is an incorrect interpretation of PPG. PPG confirms that accessibility and its role in determining LGS is dependent on the site and how it responds to LGS criteria. PPG 37-017-20140306 is clear that sites which may be valued because of their wildlife, historic significance or	No change.

Issue	Response	Modifications to Recommendations
	beauty may be considered for designation even if there is no designation.	
The lack of access means that the site does not play fulfil a role for recreation.	Comment noted.	No change.
The site has been used as a water treatment works and council depot. It is not therefore historically significant.	Comment noted.	No change.
The site cannot be enjoyed directly owing to its lack of accessibility. Views into the site are limited.	Comment noted. The site forms part of the setting of these transient routes.	No change.
The site is overgrown and features a number of invasive species.	Comment noted.	No change.
The beauty of the site is limited, due to limited visibility. The overgrown nature of the site masks its former industrial uses, and extensive concrete found on the site.	Comment noted.	Assessment altered to acknowledge the brownfield condition of the site, and the continued presence of hard standing and infrastructure associated with the former water treatment works.
At 6.4 hectares the site can only be regarded as extensive.	No evidence provided to support this comment. Noting the site's containment and definable boundaries, the Council maintain the view that the site does not represent an extensive tract of land.	No change.
LGS/LP4/DM12/023: Land to the rear of Chatburn Park Drive, Brierfield		
It should be noted that not all criteria (a) to (e) need to be fulfilled for it to be Local Green Space.	Agreed. It is noted that any one characteristic can qualify a site for LGS designation. However LGS should not be blanketly designated and is only suitable where a site is demonstrably special. As such the Council has applied a high bar for designation based on the special characteristics of a site itself and its relationship and contribution made to its surroundings. The	No change.

Issue	Response	Modifications to Recommendations
	Council is looking for features and characteristics which set sites apart from other greenfield land adjacent or close to the settlement boundary.	
The assessor has demonstrated that the site meets these criteria. Richness of wildlife – the field offers a number of habitats and makes a positive contribution to wider surrounding wildlife corridors acting as a stepping stone between the canal and Pendle water.	The assessment notes the contribution made by the site to wildlife and habitats found. The site however is not ‘demonstrably special’ many of the qualities referred to in the submissions made in relation to this site are a result of the site’s location close to the Leeds and Liverpool Canal which is an important green infrastructure, wildlife and recreational corridor within the borough. There is little evidence to support the designation of the site as Local Green Space on its own merits.	No change.
Historic significance – Chamber Hill exists and is still walked today. The field exists within the farmhouse gardens and its associated buildings. Even the pumping house is called Chamber Hill. This history of Brierfield should be promoted not eroded.	The rural character of the area has been lost to urban sprawl which has heavily influences land located to the east of the M65 motorway. There are few features of historic significance remaining at the site which would illustrate that it is ‘demonstrably special’.	No change.
Field is seen as the gateway to the open countryside.	The field provides access between adjacent residential areas, the Leeds and Liverpool Canal and Pendle Water. Alternative routes also exist which may be more accessible to a greater range of people. There is little evidence of extensive use within the site which is in private ownership. The wider significance of the site is therefore limited. The field is adjoined to the motorway and has little relationship to the land beyond this with the motorway cutting the site off.	No change.

Issue	Response	Modifications to Recommendations
Concerned by the diminishing green spaces within the area.	The consultation relates to Local Green Spaces. Monitoring conducted by the Council shows that the Core Strategy has been successful in directing new development towards urban areas. The emerging Local Plan seeks to continue this strategy.	No change.
Valued natural space which has been allowed to rewild. One of the few accessible to residents in Brierfield in one of its most deprived communities. It is an important greenspace to the community. It is frequently used by residents, for walking and play, to learn about the environment, and provides connectivity to wider spaces, including the canal, and a circular walk ideal for families and the elderly.	The value attached to the site to local residents is noted, however there is limited evidence of the site's wider significance. The site cannot be said to 'demonstrably special'.	No change.
The assessment does not reflect the views of those who live nearby or those who use the field. It does not represent the views of the 350+ who signed a petition say it is demonstrably special.	The Council's assessment takes into account national planning policy and guidance which sets a high bar for local green space sites. The Council must be consistent in the approach applied.	No change.
Shots of the field, woods and park are regularly used in Council reports and Northlight Advertisements to demonstrate the positive attributes of the area.	Referenced aerial views cover large areas of Brierfield and its surrounding countryside. The photo showing the site relates to a paragraph within the publication which notes the proximity of the M65 motorway and demonstrates the accessibility of the regeneration site to the motorway network. Imagery of the site used within these publications does not illustrate that it is 'demonstrably special'.	No change.
The Super Slow Way see the potential that the field has and the role it has for the wider community. This helps to illustrate that the site is demonstrably special.	The decision not to designate the site as local green space would not affect its use by the Super Slow Way. The use of the site for Super Slow Way projects does not justify the site's designated as	No change.

Issue	Response	Modifications to Recommendations
	Local Green Space. The site is in private ownership and the inclusion of the site as part of this project would require the consent of the landowner. Should the Super Slow Way make greater use of the site, it is possible that the role, condition and features could be enhanced increasing its significance for the wider community.	
Noise of the motorway does not affect residents or the wildlife that use the site.	As set out within the assessment, the noise of the motorway is very obvious when visiting the site and erodes the sense of tranquillity gained at the site.	No change.
The overgrown condition of the site makes for amazing hunting ground and support system for wildlife. They live in relative peace from disturbance due to the site's secluded location. Beauty can be untamed wilderness which changes through the seasons.	The site is adjacent to a key wildlife corridor provided by the Leeds and Liverpool Canal and associated green infrastructure. The site's proximity to the M65 motorway erodes any sense of tranquillity. It is acknowledged that the green backdrop that the site provides to homes on Chatburn Park Drive will be highly important to these residents however this does not justify the site's designation as Local Green Space.	No change.
The site shares similar characteristics to other Local Green Spaces such as LGS/BNDP07/005 and LGS/BNDP07/010.	Conclusions made at one site do not automatically carry to another and it is important that each site is assessed separately according to its merits. The evidence which was used to support the preparation of the Barrowford Neighbourhood Plan is not relied upon by the Council to prepare the Local Plan. The assessment is made noting the higher tests applied to Local Plans through the examination process and the requirements of the NPPF.	No change.

Issue	Response	Modifications to Recommendations
The field forms links to many areas and walks within Brierfield including access to the industrial estate and new bridlepath as demonstrated by LCC's nomination for the field to form part of their active travel plans.	Connectivity provided by footpath links do not in themselves make the site demonstrably special to the local community. The site is not a destination of wider significance.	No change.
The site is a haven for wildlife, including deer, foxes, field mice, squirrels, bats, rabbits, butterfly, dragonfly, toads, badgers, frogs and birds including buzzards, owls	Wildlife is noted at the site, however the site is connected to the Leeds and Liverpool Canal corridor which is noted for its role for wildlife on a county wide basis. This is not justification for designating the site as Local Green Space.	No change.
Provides a tranquil environment, important for health and wellbeing.	The field may be valued for the green back drop provided to existing residents however the tranquillity provided is limited by its proximity to the M65 motorway.	No change.
Provides a quality environment which changes with the seasons and is full of wild flowers in summer months with buttercups, chickweed, clover, sorrel, plantain, thistle, dock and daisy. In the autumn there are brambles and blackberries.	Biodiversity is noted at the site however the site is connected to the Leeds and Liverpool Canal corridor which is noted for its role within the borough's green infrastructure network.	No change.
I object to proposals to build on this land.	The Council is not proposing the development of the site. As drafted, the Local Plan does not propose development at this site and it will remain within the open countryside. The consultation only considers the merits of designating the land as local green space.	No change.
There are other, more suitable opportunities for development such as at Lomeshaye Industrial Estate and the former Coloroll Site.	The consultation considers the merits of designating the land as local green space.	No change.
Opportunities should be taken to link the site with LGS/LP4/DM12/022	The consultation relates to the designation of sites rather than improvements to pedestrian connectivity.	No change.

Issue	Response	Modifications to Recommendations
It is not very tranquil which makes it unsuitable for anything else. The motorway is very loud but this doesn't seem to bother the wildlife.	The Council agrees that the proximity of the site to the motorway degrades the wider value and significance of the site both in terms of its affects on the ambience of the site but also in terms of its wider role for the community, wildlife and recreation.	No change.
The site is not suitable for housing due to noise from the motorway.	The consultation considers the merits of designating the land as local green space only.	No change.
LGS/LP4/DM12/024: Land to the south of South Valley Drive, Colne		
The space assessed differs from that submitted. The Council have got confused with the SHLAA submission for the site P001. Extended boundaries are shown within the submitted representation.	Comment noted.	Site plan to be updated.
The revised site has strong boundaries and is distinct from adjoining land and uses. Housing and residential gardens are located to the north and east (including Knotts Farm). The southern boundary is defined by a hedgerow and farm track with broadleaved plantation to the south, The western boundary is defined by the route of a stream, stock fencing, and hedgerow. Beyond this land is used as conifer plantation (NW) and upland bog habitat (SW) used for grazing. Both areas are distinctly different in appearance and use to the proposal area.	Comment noted. The assessment has been updated to reflect the revised boundary. The Council agrees that the site does not represent a significant tract of land taking this submission into account.	Assessment revised.
The site is accessible to the local community.	The Council agree that the site is close to the community it serves. This is reflected within the site assessment.	No change.
Long history of use following the loss of the Tum Hill Recreation Ground in 1940. The community used these fields for organised activities such as	There is little evidence that the attached significance given to the site continues to this day following its erosion by modern development.	No change.

Issue	Response	Modifications to Recommendations
church meetings and summer fayres. There is clear social and cultural history and meaning of the site to the community, derived from the experience and connection to the plan.		
The series of footpaths created across the site, together with a proposed (but never completed) bridleway/nature trail reflects the importance of the site to the community. Actions and decisions made by Pendle Borough Council further recognise the need for public open space within the area and the role of the site in this.	The presence of footpaths through the site and the role it has in connecting residents with wider open countryside is acknowledged within the assessment but this is not in itself a reason to justify its designation as Local Green Space. It does not make the site 'demonstrably special' especially taking into account the wide range of footpath links available within the borough.	No change.
It should be noted that not all criteria (a) to (e) need to be fulfilled for it to be Local Green Space.	Agreed. It is noted that any one characteristic can qualify a site for LGS designation. However noting the significance of LGS and its implication for decision making it should not be blanketly designated. It is only suitable where a site is 'demonstrably special'. As such the Council has applied a high bar for designation based on the special characteristics of a site itself and its relationship and contribution made to its surroundings. The Council is looking for features and characteristics which set sites apart from other greenfield land adjacent or close to the settlement boundary.	No change.
Circular argument used by the Council to lessen aspects of the site's appeal. Development has lessened this and so more development can take place.	The assessment doesn't consider the merits of the site for development. It is assessing whether the characteristics of the site meet the criteria for a site to be designated as Local Green Space. The assessment notes that the site formed part of a wider area which has been eroded by development over time and now is much smaller	No change.

Issue	Response	Modifications to Recommendations
	than it was originally reducing its significance, use and value. This factor is relevant when considering the merits of this site for LGS designation in determining the role and value of the site as part of the wider rural landscape.	
It is unclear what is meant by 'the quality of the site itself is limited'	The site is unmanaged and overgrown. It is not considered to have any special features which would justify the designation of Local Green Space. It is not 'demonstrably special'	No change.
It is confusing what 'the site is prominent within the landscape but seen in the context of neighbouring modern development'	This notes that views gained of the site from wider vantage points are read within a wider landscape and the close relationship the site has with modern development found adjacent to it. This proximity limits its beauty and environmental quality.	No change.
The site appraisal implies that view obtained from the site are unimportant. Tranquillity is subjective. I find the site in its current condition tranquil.	It is agreed that tranquillity is a subjective matter, as are other criteria set out in the guidance. The assessed outcome are based on available evidence and professional judgement noting the high bar required in national planning policy for the designation of land as Local Green Space. The assessment notes that in this instance the tranquillity and sense of isolation felt at the site is not due to the special characteristics of the site itself but due to the view afforded (granted by topography) and its undeveloped condition (characteristic of all greenfield sites). There must be evidence to show special character or features which makes it stand out from other areas of undeveloped land in Pendle to justify the application of this exceptional designation (i.e. Local Green Space).	No change.

Issue	Response	Modifications to Recommendations
Submit that if adjacent 'local' land has 'similar characteristics' then the proposed site must be local in character. It does not have to be unique in character, just local in character, in other words, clearly similar.	The assessment has been amended following the submission of another representation. The Council accepts that the site is local in character.	See updated assessment.
Not aware of grazing having ever taken place at the site / occasional grazing of cattle helps with wild flowers, pollinators and biodiversity.	Contradictory comments made nevertheless it is not important as to whether a site has or has not be grazed in the context of determining whether a site is 'demonstrably special' and therefore the designation of the land as Local Green Space is justified.	No change.
The site should be made into a woodland and/or allow rewilding to continue.	The site is in private ownership. The Council cannot therefore control the management or access to this land.	No change.
Designating the site would help meet the goals of the Green Infrastructure Assessment.	The designation is a planning policy tool only. It is used for determining planning applications. It does not affect site management or access.	No change.
The site is home a wide range of wildlife including hedgehogs, weasels, bats, foxes, hares, field mice, deer, frogs, and newts, and birds including pheasants, robin, blue tit, grey tit, owls, kestrels, curlews, sparrow hawks, woodpecker and buzzards. The site features native trees, hedgerows and wildflowers.	The site is not 'demonstrably special' in this regard.	No change.
A Preliminary Ecology Assessment of South Valley Fields, including field survey, was undertaken for the community in May 2021. The survey confirms that the site falls outside the Lancashire Ecological Network. The site predominantly features semi-improved neutral grassland and provides opportunities for various species, particularly badger, bats, birds, reptiles,	Comments noted. The ecological interest will be protected by the site's location outside the settlement boundary in the open countryside. The Council considers the site's current designation to offer proportionate protection to the site in its current condition.	No change.

Issue	Response	Modifications to Recommendations
amphibians and invertebrates. The site is well connected to grassland and woodland habitats to the south and east and is adjacent to grassland stepping stone habitat. The site has potential to meet BHS selection criteria and Lowland Hay Meadow Priority Habitat subject to careful management.		
The site affords breath taking views of the wider area. It provides a safe haven for recreation including walking, sledging and has health and wellbeing benefits. It is a very peaceful and tranquil site. It is used extensively.	The site is not 'demonstrably special' in this regard with characteristics shared by many sites within the south of Pendle.	No change.
It is our only accessible greenspace. It is too far to other fields/parks.	Accessibility to wider greenspace is not a criteria for assessing Local Green Space. The site is assessed on its merits though it is noted that there are other spaces accessible within the wider area.	No change.
It is used regularly by the community for recreation activity such as walking, dog walking, exercise, play, bird watching, nature photography and sledging.	Comments noted and acknowledged within the site assessment. These activities however can be undertaken on land elsewhere in the locality and are not specific to the site itself.	No change.
There is a large prehistoric ring enclosure near the stile at the bottom of the field identified using LIDAR scanning, within it 3 smaller rings indicative of round houses. This information is known and valued by the community, not only by the material record this provides for history of the community but also the connection it provides, providing a sense of place and cultural identity. The prehistoric ring is part of or associated with the Castercliffe Enclosure.	Submission noted, however the potential for archaeological interest alone isn't sufficient to justify the site's designation as Local Green Space.	No change.

Issue	Response	Modifications to Recommendations
The site is not suitable for development and is unsafe due to mine workings / landfill. Traffic is heavy in the area and people speed. Walking is unsafe for children. Insufficient service infrastructure. Landscape impacts on the setting of Colne. Issues with flooding and drainage.	The Council is not proposing the development of the site. As drafted, the Local Plan does not propose development at this site. The consultation considers the merits of designating the land as local green space only and not the building of housing.	No change.
Surprised that this designation is being considered given the previous position taken by the Council that the site represents a suitable location for housing development.	The assessment made follows the site's nomination by a member of the public during the consultation on the draft Local Plan. The context for the assessment is set out clearly within the Local Green Space Assessment Methodology Report.	No change.
Demonstrably special represents a 'high bar'.. and it is unclear how this can be reached at a site formerly allocated for housing within a development plan document.	Comments noted. The character of a site and its attributes can alter over time and as such it is a worthwhile exercise. Note for example, Gib Hill (Colne/Nelson) which was previously designated for housing (through the replacement 2006 Local Plan) and is now a Local Nature Reserve.	No change.
Considerable weight is applied within the assessment to the site's bird population. Maro has not seen evidence of this and request sight of it, to consider and evaluate this. Noting the species listed, this is not special in contrast to those found more widely around Colne and as such the weight applied through the assessment is questionable.	Comment noted. The comments made refer to the submission made through the nomination of the site. The Council's assessment is in the right hand column.	No change.
Use of land over time does not justify a site being considered as 'demonstrably special' as indeed most undeveloped land has been.	Comment noted. The comment made is directed to the submission made by members of the public and not the Council's assessment. The Council's assessment is in the right hand column.	No change.
The term 'invaluable' is an exaggeration. There is an abundance of open space and open	Comment noted. The comment made is directed to the submission made by members of the	No change.

Issue	Response	Modifications to Recommendations
countryside around Colne. It is unclear how the site has greater value. If this is the case then why did the Council allocate the site for housing.	public and not the Council's assessment. The Council's assessment is in the right hand column.	
Use of a site for 'dog walking' does not elevate a site to 'demonstrably special'. There are plenty of accessible locations for dog walking around Colne.	Comment noted. The comment made is directed to the submission made by members of the public and not the Council's assessment. The Council's assessment is in the right hand column.	No change.
Use of the site for winter sledging is hardly uncommon for hills near to towns in Lancashire.	Comment noted. The comment made is directed to the submission made by members of the public and not the Council's assessment. The Council's assessment is in the right hand column.	No change.
Recreation use is not as heavy as implied. Reference to a singular event at a point of history does not demonstrate this. The Council should not place considerable weight onto such a one-off event (details of which are unclear).	Comment noted. The comment made is directed to the submission made by members of the public and not the Council's assessment. The Council's assessment is in the right hand column.	No change.
Reference is made to connections to Gib Hill, Lenches and Castercliff however this remain intact irrespective of the site's designation. PPG makes clear that LGS designations should not be used to protect right of way corridors.	Comment noted. The comment made is directed to the submission made by members of the public and not the Council's assessment. The Council's assessment is in the right hand column. PPG does not explicitly prevent the designation of public right of way corridors.	No change.
Reference is more to extensive views, however these are not particularly extensive or unusual in Colne.	Comment noted. The comment made is directed to the submission made by members of the public and not the Council's assessment. The Council's assessment is in the right hand column.	No change.
Reference to the site being regular used for collecting holly is tenuous and does not elevate the land to be 'demonstrably special'. The site is hardly unique in its ability to grow holly noting that holly is commonly found in the UK.	Comment noted. The comment made is directed to the submission made by members of the public and not the Council's assessment. The Council's assessment is in the right hand column.	No change.

Issue	Response	Modifications to Recommendations
Agree with the Council's conclusion that the site is not local in character noting that the site is not fully contained.	Comment noted. A revised boundary has been submitted in response to the consultation and the Council's assessment has altered on the basis of this submission.	Assessment revised to confirm the Council's update view that the site is local in character.
Cryptic and non-conclusive response to question of whether the site's attributes can endure in the long term. 'occasionally grazed' is of little relevance to the criterion and does not demonstrate that the site is 'demonstrably special'.	Comment noted. The comment made is directed to the submission made by members of the public and not the Council's assessment. The Council's assessment is in the right hand column.	No change.
The Council's assessment correctly points out that the site is promoting the site for housing. It does not go as far as acknowledging that the site has, in the past, allocated the site for housing and issued positive pre-application advice regarding the scope for housing at the site.	A site's previous designation as little relevance to its long term future. Local planning policy has shifted since, most notably with the adoption of the Colne Neighbourhood Plan.	No change.
We contend that the site is not particularly beautiful and is no different to the rural fringe surrounding Colne. It is not unduly distinctive, but rather typical of the wider landscape.	Comments noted.	No change.
We do not believe that the land possesses any feature of historical or archaeological value.	Comments noted.	No change.
Little evidence of special use. Details of past events are limited. The site is not 'demonstrably special' for its recreational value.	Comments noted.	No change.
We suggest that the land is no more tranquil than other rural fringe land on the edge of Colne.	Comments noted.	No change.
There is no evidence to suggest that the site is 'demonstrably special' for its ecological value.	Comments noted.	No change.
Designation of the site would be short sighted particularly given the need to review the plan in 5-years' time. The supply of sites suitable for	Comments noted. The Council considers that housing requirement can be met by the committed supply, sites identified within the	No change.

Issue	Response	Modifications to Recommendations
housing is in short supply. Having previously been accepted for housing, the site would make a good candidate at which to meet housing need. The suitability of the site for housing has indeed been noted by a independent Inspector.	draft version of the emerging local plan and sites allocated within made neighbourhood plans and windfall development within settlement boundaries.	
Maro Developments wish to develop the northern part of the site for 15-years with the southern part being given over to the community in perpetuity.	The consultation relates to the assessment made by the Council of nominated sites and how these sites respond to criteria for Local Green Space designation. The consultation does not relate to the merits of a site for development.	No change.
LGS/LP4/DM12/025: Upper Rough, Colne		
Site originally included within the Colne Neighbourhood Plan and was found to meet the criteria for LGS by the appointed examiner.	It is necessary for the Council to undertake its own assessment of the site as part of the plan preparation process. The examiners observations are considered through the assessment.	No change.
Housing needs in Colne can be met <u>without</u> developing the site. The examiner of the Colne Neighbourhood Plan could not say whether the site would endure beyond 2030 because of ongoing plan making by Pendle Council. However it is clear based on the draft plan that there is sufficient scope to meet housing needs elsewhere and the site is not needed.	Based on the proposed requirement of 148 dpa there is no need to develop the site for housing.	No change.
The site is not a suitable or sustainable location for housing.	The Council is not proposing the development of the site. As drafted, the Local Plan does not propose development at this site. The consultation considers the merits of designating the land as local green space.	No change.
Even should there be established need, why would the Upper Rough be selected when it is proven to meet the criteria for Local Green Space.	The Council maintains the position that the site is not needed to meet housing need.	No change.

Issue	Response	Modifications to Recommendations
The final criteria should be updated to reflect the refusal of the planning application at the site.	The assessment was undertaken following the refusal of the application. The uncertainty highlighted recognises the unaltered position that the landowner wishes to see the site developed for housing.	No change.
The special features of the Upper Rough are not adequately recognised within the report. The vegetation is diverse and uncultivated. It serves as a contrast to neighbouring fields and provides an environment where nature can thrive.	The Council considers that sufficient weight is given to the natural features and biodiversity found at the site through the site assessment.	No change.
The report should be updated to reflect the sheer scale and degree of feeling shown by the community against the site's development through the recent planning application. It is clear that with such local support the site can endure through the longer term.	The site is in private ownership and the landowner has indicated that they wish to see the site developed. The risk remains that the site could be developed even with the recent refusal issued by the Council.	No change.
The pressure for development at the site is justification for its designation.	This is not one of the criteria for LGS designation.	No change.
The site regularly used by local people for recreation. This is demonstrated by the number of footpaths which cross the site.	The use and value of the site for the local community is noted by the assessment.	No change.
It is important for nature. It is one of the few locations where curlew reliably nest. It is an important site for lapwing. There are important actions that can be taken to protect this habitat. Site notices at the site encourage dog owners to keep dogs on their lead during breeding season.	The role of the site for nature is recognised by the assessment.	No change.
An important view from within Colne and locations outside of Colne to the south.	The site is visible from a number of vantage points within the town and to the south. The role that site fulfils as part of the wider townscape and the setting of the town is noted by the assessment.	Assessment amended to acknowledge the site's visibility from within the town itself.

Issue	Response	Modifications to Recommendations
The importance of the Upper Rough to the community is demonstrated by the active campaign set up by the community to protect it. Lidgett and Beyond, value the site highly, and promote the use and value of the site through regular newsletters, social media posts and notices.	The value of the site to the community is noted by the assessment.	No change.
The environmental qualities and its importance in the historic environment are demonstrated by the dismissed appeal and refusal of the second application at the site.	Comments noted. The environmental and historical qualities of the site are acknowledged within the site assessment.	No change.
The site's designation as Local Green Space would increase what could be done to support and protect the species that use the site.	Local Green Space is a planning designation. It does not affect management or access to a site or provide access to funding. It is for decision making purposes only for determining planning applications.	No change.
The Upper Rough has endured its current condition for decades. The only reason why its attributes would not survive is a result of unelected council officials and their disregard for the feelings of local constituents.	The site is in private ownership and is being promoted for housing by the landowner. The Council does not control site wide access and land management regimes.	No change.
The site requires only a low level of maintenance which has been successful for decades and encouraged wildlife. There is no reason why grazing cannot continue at the site with the site's designation as Local Green Space.	The site is in private ownership and is being promoted for housing by the landowner. The Council does not control site wide access and land management regimes.	No change.
It is perplexing that questions of endurance arise for the Upper Rough when it shares the same position as the Lidgett Triangle which was included within the Colne Neighbourhood Plan.	There are notable differences between the Upper Rough and the Lidgett Triangle. Firstly, the Upper Rough is being actively promoted for development and the Lidgett Triangle is not. Secondly, the Lidgett Triangle is wholly within the Lidgett and Bents Conservation Area and is	No change.

Issue	Response	Modifications to Recommendations
	integral to this conservation area. Whilst the Upper Rough is partly within the conservation area and not all of the site is within its setting.	
The topography of the land as an important local feature is underplayed by the assessment. Views from the Upper Rough are remarkable, but additionally the Upper Rough is prominent from wider viewpoints, particularly from the south such as the Mire Ridge, Trawden and Boulsworth. Any housing would dominate the area.	Views granted to and from the site are noted within the assessment.	No change.
It is significant that one of the reasons for refusal of the latest planning applications at the site was that the proposal would 'result in the unacceptable loss of a prominent greenfield site.. that currently makes a significant contribution to the landscape character and quality of the area'	The prominence of the site and contribution the site makes to local landscape quality, the setting of Colne and the conservation area are noted by the assessment.	No change.
The site should not have been reconsidered so soon after the conclusion of the NP Examiner who discounted the site as a site for Local Green Space.	The Council disagrees. The Local Plan Fourth Edition will set development needs and update planning policies for the borough to 2040. It is therefore within the scope of the Local Plan to consider the case for LGS designation across the borough as a whole. The timing of plan preparation soon after that of the Colne Neighbourhood Plan is not ideal but unavoidable given the need to prepare a new local plan for Pendle after the Local Plan Part 2 was abandoned.	No change.
Accepted that the site is in reasonably close proximity to the community it serves as found by the examiner.	Comments noted.	No change.
Whether or not a site is demonstrably special to the local community and holds a particular local	Comments noted. The Council consider that the site is demonstrably special and has local	No change.

Issue	Response	Modifications to Recommendations
<p>significance is subjective and difficult to assess objectively. Paragraph 7.78 of the examiner's report concludes that 'the site offers opportunities for informal recreation and provides habitat for red-listed curlews.' There is no reference here to beauty or historic significance, and the said opportunities for informal recreation must be considered in the context of the site's private landownership. The examiner stops short of explicitly agreeing that the site is demonstrably special to the community or holds a particular local significance.</p>	<p>significance for the reasons set out in its assessment. It should be noted that not all (a) to (e) need to be demonstrated for a site to be designated as Local Green Space. The site's private landownership has been considered through the assessment. It is however confirmed in PPG that sites do not necessarily need to be publicly accessible to be designated as Local Green Space. Subjective or not, the approach used for the assessment of Local Green Spaces is set out in the NPPF.</p>	
<p>Maddox submitted for Little Cloud an evidence-based document which addressed conclusions reached elsewhere on what constitutes an extensive tract of land. We are of the view that the site does form an extensive tract of land and should not be included as a proposed Local Green Space designation.</p>	<p>Comments noted. The evidence provided by Maddox Planning was discussed at length during the hearing session of the Colne Neighbourhood Plan. It was concluded by the examiner that on balance the site is local in character and not an extensive tract of land (see paragraph 7.80 of the examiner report). The examiner's report has been accepted and endorsed by the Council. Noting the absence of any changes in material circumstances which have occurred since this time, the Council has carried forward this conclusion to this assessment.</p>	<p>No change.</p>
<p>The reasoning applied by the examiner at Paragraph 7.93 of his report about how designation of the Upper Rough as Local Green Space would not be consistent with the local delivery of sustainable development is equally applicable now as it was in May 2023.</p>	<p>The Council has resolved that the housing requirement will be 148dpa to support local demographic needs. As demonstrated by the housing trajectory the site is not needed to ensure the full delivery of the housing requirement.</p>	<p>No change.</p>

Issue	Response	Modifications to Recommendations
<p>Given that there is no detailed assurance that the proposed Upper Rough LGS could endure beyond the end of the NDP period, it must also be the case that there can be no detailed assurance that the proposed Upper Rough LGS could endure beyond the end of the emerging Local Plan period (2040).</p>	<p>The Colne Neighbourhood Plan was prepared in the context of the Pendle Core Strategy and relates to its plan period ending in 2030. The housing requirement of the Core Strategy is out of date and will be updated with the adoption of the emerging Local Plan. This plan covers the period to 2040 and has been prepared in accordance with national planning policy and up-to-date evidence. This shows that the housing needs of Pendle are now less than adopted through the Core Strategy. The resultant housing supply needs are less. This process (whilst not yet concluded) confirms to the Council that the site will not be required to meet housing needs. Future housing requirements beyond that set by the Pendle Local Plan Fourth Edition are not within the scope of this plan preparation process.</p>	<p>No change.</p>
<p>The submissions made by the local planning authority at the Colne Neighbourhood Plan examination give a clear indication that officers consider the designation of the Upper Rough as LGS to be contrary to the provisions of sustainable development. The inference that Little Cloud took away from the NDP Examination was that officers felt that difficult decisions would need to be made if Pendle is to plan for and meet its future housing requirements and provide for sufficient homes locally in Colne.</p>	<p>The submission made by Council reflects the circumstances of the time. The examination of the Colne Neighbourhood Plan took place prior to the consultation of the draft Local Plan. It was unclear at this time what approach the emerging Local Plan would take towards development needs in response to evidence. The Local Green Space Assessment Methodology Report was produced following the consultation on the draft plan, enabling the proposals and policies of this plan to be taken into account.</p>	<p>No change.</p>
<p>LGS/LP4/DM12/026: Land at Lenches Road and Knotts Lane, Colne</p>		
<p>Paragraph 101 of the NPPF states that the designation of land as local green space allows communities to identify and protect areas of</p>	<p>Comments noted.</p>	<p>The Council has resolved to designate Land at Lenches Road and Knotts Lane, Colne as Local Green Space. The assessment made together</p>

Issue	Response	Modifications to Recommendations
particular importance of them. We feel that the level of public support which is evident during the preparation of this and previous plans as well as the response to the planning application demonstrates this, including the submission of a number of supporting petitions.		with Statement of Significance will be updated accordingly.
We have provided strong evidence to demonstrate that the Lenches meets all the criteria at Paragraph 102 of the NPPF. In respect of criterion (b) the requirement is for land to hold particular local significance. It then goes on to list several examples. Local Green Spaces are not required to meet all of these examples to be designated. Nevertheless our evidence shows how the site meets all of these.	Comments noted.	The Council has resolved to designate Land at Lenches Road and Knotts Lane, Colne as Local Green Space. The assessment made together with Statement of Significance will be updated accordingly.
The assessment made is inconsistent with other sites of similar characteristics or demonstrably more limited response to LGS criteria than Lenches accepted as Local Green Space sites.	Each site has been considered on its own merits.	No change.
Residents have a strong connection to natural features found within Lenches with trees named after local residents and personalities, and vice versa.	Comments noted. The assessment acknowledges the value attributed to the site by the local community.	No change.
Lenches is an important community amenity, used daily by residents. It is important for exercise, picnics, play and mental wellbeing. Organised community groups use the space. It has been used and valued for generations. It is in particularly important for those residents whom have no garden.	Comments noted. The assessment acknowledges the use of the use by the local community.	No change.
Lenches is peaceful and secluded. The restorative value of the site is important to the community,	The tranquil qualities of the site are noted within the assessment.	No change.

Issue	Response	Modifications to Recommendations
particularly for maintaining their health and wellbeing.		
Waterside is one the most 10% deprived communities in the country. It is noted to have insufficient access to open space and many of the terraces found within the community do not have their own garden.	The role of the site in providing access to open space in one of the most deprived wards of Pendle is noted within the assessment.	No change.
There are few sites in a natural condition which are accessible within the local area.	Comment noted, however the area is accessible to a range of different open spaces and public footpaths connecting local communities to the wider open countryside.	No change.
There is a network of well use footpaths covering the site. Lancashire County Council has added these to their map, but as this is a legal process they have informed the community that it will be years until they can be formally made public rights of way.	Comment noted.	No change.
The importance of Lenches to the community is demonstrated by the active campaign set up by the community to protect it with some having campaigned for its protection for decades.	Comment noted.	No change.
Lenches really lies centrally between several smaller communities; the Knotts Lane settlement, the Birchenlee and Upper Lenches Road settlement or hamlet, the lower Lenches Road community, and the Daisy, Short Street and Spring Gardens community and feels integral to each.	The assessment acknowledges that whilst the site is detached from the settlement boundary, it is nevertheless accessible to local communities.	No change.
Lenches contains a rich tapestry of habitats. It is an important site for wildlife. Including an abundance of rare mosses, lichens and bryophytes. The grassland contains early purple	The varied biodiversity found on site is acknowledged within the assessment.	No change.

Issue	Response	Modifications to Recommendations
<p>orchids, red campion, jacob's ladder, and harebells. The marshy area has sedges, rushes and yellow flat irons. Shelter for stoats, weasels and hedgehogs. Deer live in the field year round. Buzzards, Kestrels, barn owls, tawny owls, chaffinch, finches, song thrushes, common whitethroat and Herons use the field. The two large ponds such great crested newts, fresh water oysters, damsel and dragonflies. The ancient woodlands feature native bluebells in the spring and provide shelter for bats. Ancient hedges include holly, hawthorn and wild honeysuckle.</p>		
<p>A preliminary ecological survey has been prepared on behalf of local residents groups and submitted to the Council. The ecological survey finds that the site is currently largely covered by semi-improved grassland and is well connected to grassland and woodland habitat located to the south and east. Priority habitats found at Lenches include hedgerow, lowland mixed deciduous woodland and woodland stepping stone habitat. The site has been assessed as providing potentially suitable habitat for protected species however no evidence of use was observed during a site walk over. There is potential for the site to be designated as BHS subject to careful and targeted management in relation to grasslands.</p>	<p>Comments noted.</p>	<p>No change.</p>
<p>The reservoirs (which now provide an important water environment for wildlife) feature on 19th century maps of Colne and recorded on the Historic Environment Record. They were used in the production of bricks at the old brick works on</p>	<p>Historical features found within the site are acknowledged but not considered significant enough to show that the site is 'demonstrably special'</p>	<p>No change.</p>

Issue	Response	Modifications to Recommendations
Knotts Lane. These are now used for fishing and are maintained by local angling clubs. Mounds and dips around the area point to Colne's mining legacy. An old stone trough is present in the centre of the site. On the northern boundary there are the remains of an old bothy and well. An image of this is captured on a postcard of Colne from 1900.		
The area was used for mining. Several cottages in the area are characteristic of this period. The area is important in understanding Colne's history and industrial development.	Comment noted. These features are however found outside of the site's boundaries.	No change.
Original stone flats still visible in places form part of the route from Colne to Castercliff and the Tum Hill Recreation Ground. The stone flags are still present but buried by overgrown vegetation. The site has been used for generations, and was a popular place to visit after church on a Sunday.	The role of the site for the local community is acknowledged through the site assessment.	No change.
There is a steep ancient drystone wall embankment to the east along Lenches Road, which denotes the great ages of the land and hints of an ancient sunken lane or Holloway.	Comment noted. Lenches Road is not located within the site but does form one of its boundaries.	No change.
The site is accessed via five different points and therefore lies at the heart of the community. Hundreds of families within a 5-10 minute walk of the site.	The accessibility of the site to the local community is acknowledged within the assessment.	No change.
Maintains an important role in the town's setting and provides important views of the town as well as Pendle Hill, Blacko Tower and Boulsworth Hill. Lenches can be seen from within the town centre and Holt House. The site features TPO because of the significance that existing trees have on the	Views gained from the site and the site's role in maintaining the rural setting of Colne are both noted within the assessment.	No change.

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landscape. Views of this landscape from the site have been captured in paintings including one hung in the Town Hall.		
The site is not extensive in scale because it is smaller than other land included which is larger in size.	The scale of a site is not only determined by its size but also its character, how it is viewed within the landscape, its boundaries and site features, and its relationship with wider land uses. Conclusions made at one site do not automatically carry to another and it is important that each site is assessed separately according to its merits.	The Council has resolved to designate Land at Lenches Road and Knotts Lane, Colne as Local Green Space. The assessment made together with statement of significance will be updated accordingly.
The site is not an extensive tract of land being bordered to the north distinctively abrupt interface of milltown Pennine vernacular architecture juxtaposed with wild countryside. Lenches has more sporadic trees, mature woodland, wooded clough and a spinney below, which makes Lenches identifiably different to the wider countryside. Other areas on the hillside south of Colne are grazed or farmed, so Lenches has a unique quality. It is very well demarcated, triangular in sharp bound by two roads.	Comments noted.	The Council has resolved to designate Land at Lenches Road and Knotts Lane, Colne as Local Green Space. The assessment made together with statement of significance will be updated accordingly.
The site has clear boundaries. The southern boundary has a line of mature trees, hedgerow, and dry stone wall to Knotts Lane. The eastern boundary has the same features to Lenches Road. The western boundary has trees and hedgerows leading to Dewhurst Street and the lower part has clear fencing, hedging and scattered trees leading to a small holding. The northern boundary has a copse of trees, and clear fencing and hedgerow leading on to a	Comments noted.	The Council has resolved to designate Land at Lenches Road and Knotts Lane, Colne as Local Green Space. The assessment made together with statement of significance will be updated accordingly.

Issue	Response	Modifications to Recommendations
residential caravan park and a smaller area with strong fencing and hedgerows leading onto a small holding.		
The assessment made is not consistent or fair and that different rules are being applied to those used through the Colne Neighbourhood Plan	The Council must ensure that the Local Plan and its policies are consistent with national planning policy in order for the plan to be found sound. The tests that the Local Plan is subjected to are stronger than those applied to examine Neighbourhood Plans. As such the Council cannot rely on evidence produced in support of the Colne Neighbourhood Plan. Regard has been had to conclusions made by the examiner of the Colne Neighbourhood Plan as suitable. It is however important to note that conclusions made at one site do not automatically carry to another and it is important that each site is assessed separately according to its merits. Whilst evidence based and produced adopting a methodological approach many of the conclusions made form a subjective view informed by professional judgement. This consultation provides the opportunity to influence that judgement through the submission of clear and convincing evidence and/or corrections of matters of fact.	No change.
Castercliff Hill Fort has not been excavated properly and is situated nearby to the site. The Lenches effectively forms part of this site but is not recognised despite the Council and Archaeologists being aware of this fact.	No evidence has been submitted to support this comment.	No change.
The name 'Lenches' is believed to be derived from the term 'Lynchets' denoting terraced fields	Comments noted.	No change.

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along the face of the hill believed to have been made by Britons when they cultivated the slope to arrest the effects of erosion (mid iron age 400BC). The name Lenches is first record in 1473. Significant archaeological remains have been found nearby. Therefore, these historical features should be preserved until they can properly be investigated.		
I object to proposals to build on this land.	The Council is not proposing the development of the site. The consultation considers the merits of designating the land as local green space.	No change.
The site is not suitable for housing.	The consultation considers the merits of designating the land as local green space not the development of housing at the site.	No change.
Development of the site will result in a blot on the landscape.	The consultation considers the merits of designating the land as local green space not the development of housing at the site.	No change.
The designation of the site as Local Green Space will secure the future of the site and remove uncertainty currently faced as a result of development pressure.	This is not a reason to designate a site as Local Green Space.	No change.
The attributes of the site have endured for many centuries and can be safeguarded. Waterside Warriors Group takes a keen interest in Lenches and is considering ways in which they may be able to help to manage and maintain the site.	Comments noted. The site is in private ownership. The Council cannot control its use or access other than those available through the planning system. Local Green Space is a policy designation it does not relate to the management of or access to land.	No change.
Issue of whether the site should be LGS shouldn't have been revisited so soon given that it was assessed and dismissed through the preparation of the Colne Neighbourhood Plan.	The Local Plan Fourth Edition will set development needs and update planning policies for the borough to 2040. It is therefore within the scope of the Local Plan to consider the case for LGS designation across the borough as a whole.	No changes.

Issue	Response	Modifications to Recommendations
	The timing of plan preparation soon after that of the Colne Neighbourhood Plan is not ideal but unavoidable given the need to prepare a new local plan for Pendle after the Local Plan Part 2 was abandoned.	
<p>LGS is an exceptional designation and not suitable for most open space or open spaces. The threshold for designation is purposefully high as it reflects the severe policy implications arising from Local Green Space (i.e. policies for managing such land should be consistent with those for Green Belt. The PPG also emphasizes the point that LGS may be designated where those spaces are demonstrably special (paragraph 37-009).</p> <p>Mendip Local Plan Inspector's Report: 'The Council has worked hard in preparing the proposed LGS designations in the submitted plan. However, unlike a 'call for sites', which local planning authorities are encouraged to do in the interests of maximising opportunities for housing development to meet local housing needs, national policy in relation to LGS designation is completely different. Rather, it sets a very high bar for LGS designation. The opening sentence of Paragraph 77 of the Framework, which can be described as the 'headline' message, states: "Local Green Space designation will not be appropriate for most green areas or open space". It therefore follows from national policy that LGS designation should be the exception rather than the rule. One good reason for national policy</p>	Comments noted. The Council considers the Local Green Space Report and Methodology to be consistent with the NPPF in the approach taken towards the assessment and consideration of sites nominated for Local Green Space.	No change.

Issue	Response	Modifications to Recommendations
<p>setting this high bar is explained in paragraph 78 of the Framework, which states that local policy for managing development within LGS should be consistent with Green Belt policy (para. 193)."</p> <p>"I recognise that many if not all LGS designations are important to local communities however, this is a lower bar than being 'demonstrably special' and of 'particular local significance (para. 201)."</p>		
<p>The site's designation as part of the open countryside means that designation as Local Green Space would add no additional benefit.</p>	<p>The Council disagrees, if the site was designated LGS, it would benefit from stronger policy protection. Further, the designation of the site as LGS would signify the importance of the site to the local community.</p>	<p>No change.</p>
<p>The site is in private ownership and is not accessible to the public beyond access granted by the north-south public right of way. The designation of the site as LGS would not change this, and there is no prospect of this changing in the near or medium term.</p>	<p>The private ownership of the site is noted within the assessment. The Council however disagrees with the assertion made, as set out in PPG, public accessibility (depending on the role and use of the space) is not a defining factor in determining whether a site is or isn't suitable for designation as Local Green Space. There would be clear benefits if the site was designated as noted in the response above.</p>	<p>No change.</p>
<p>The site has never previously been identified by the Council for any type of 'public value' or non-statutory or statutory heritage or ecological designation. This reflects the limited value of the site in terms of beauty, richness in wildlife and historic significance. The Open Space Audit identifies only a small part of the site which would meet the definition of 'open space' (defined through the NPPF as – 'all open space of public value, including not just land but also</p>	<p>These reasons do not provide justification as to whether a site should or shouldn't be local green space and indeed the Council rejects this assertion. Local green space is a unique policy designation and one which has not previously been applied at a borough wide level. The NPPF and PPG does not set out that Local Green Space sites need to be designated for a different purpose/in response to a different issue in order to be considered and to meet the criteria set. If</p>	<p>No change.</p>

Issue	Response	Modifications to Recommendations
<p>areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity'). It would be highly surprising if the Council were to conclude the site is now demonstrably special, a far higher threshold than the public value test.</p>	<p>this was required in national policy or guidance it would say so.</p>	
<p>The site was assessed and dismissed as a candidate for Local Green Space through the Colne Neighbourhood Plan and this has now been made by the Council.</p>	<p>The evidence used to underpin the Colne Neighbourhood Plan is not being relied upon by the Council for the preparation of the Local Plan Fourth Edition. Regard however has been given to the policies of the Colne Neighbourhood Plan through the plan preparation process.</p>	<p>No change.</p>
<p>The site is physically detached from Colne as noted within the reason for refusal for the previous application at the site. The assessment of the site for LGS must be made within this context and the site's current accessibility which is formally limited to the north – south route. The Council cannot conclude that the site does not represent a sustainable location and then conclude that it is reasonable close proximity to the community served. Furthermore it should be noted:</p> <ul style="list-style-type: none"> - Access via Knotts Lane via the Public Right of Way is only accessible from the open fields to the south and the reality is that it is of interest to ramblers rather than it serving 'everyday needs' of the community of Colne. There is currently no safe and dedicated footway along 	<p>The site's detached location is noted within the assessment. The merits of accessibility of a site for the development of housing in contrast to a site for local green space should not be confused. There are very important differences to be taken into account and so they are not comparable. The Council maintains the view that the site is reasonably close to the community served within the Waterside ward. The Council is unclear where it is stated that a Local Green Space must meet the 'everyday needs' of a community noting the range of criteria which can be demonstrated in order for a site to be designated as Local Green Space.</p>	<p>No change.</p>

Issue	Response	Modifications to Recommendations
<p>Knotts Lane between the PROW access and the built-up area of Colne.</p> <ul style="list-style-type: none"> - Access via Lenches Road is via a industrial yard which is actively used by HGVs and commercial vehicles. It is not safe or desirable. The access onto the PROW from this site is not obvious. It does not serve the 'everyday needs' of the community of Colne. 		
<p>No definitive guidance as to what might constitute extensive tracts of land however it is noted that a threshold of 5ha was adopted and endorsed by the Inspector of the South Derbyshire Local Plan.</p>	<p>The Council has not adopted a specific upper threshold for the size of local green space. Whether a site forms an extensive tract of land or not depends on its character and context, including how it relates to the existing community, its value and function. This is determined on a case by case basis on the merits of the proposal. This position was confirmed by the examiner for the Colne Neighbourhood Plan.</p>	<p>No change.</p>
<p>Similar conclusions could be drawn regarding the site as those made within the Chapel-en-le-Frith Neighbourhood Plan 2015 in relation to fields between Homestead Way and Ashbourne Lane: 'These are fields on the edge of the built up area with public access via a footpath. I realise that they provide a green backdrop. However, so does a considerable amount of surrounding countryside. I realise that the footpath is used by local residents. However, I do not consider there to be robust justifiable evidence to show that this site is demonstrably special to a local community or holds a particular local significance. Thus, I do</p>	<p>Comments and case study noted however each site must be assessed on its own merits.</p>	<p>No change.</p>

Issue	Response	Modifications to Recommendations
not consider that this site meets the criteria for designation as Local Green Space.”		
Evidenced recreational value of the site falls far short of what is required to be demonstrably special for the purposes of Paragraph 102 of the Framework.	No justification is provided to reach this conclusion.	The Council has resolved to designate Land at Lenches Road and Knotts Lane, Colne as Local Green Space. The assessment made together with statement of significance will be updated accordingly.
The Colne Heritage Impact Assessment does not identify any designated or non-designated heritage assets within influencing distance to the site. The Council was satisfied that site could accommodate over 100 dwellings without any harm to historic significance (21/0947/FUL).	Not all criterion set in national planning policy need to be met in order to justify the designation of a site as Local Green Space.	No change.
Detailed ecological reports have been carried out recently and submitted to the authority. The findings are informed by desk study, biological records search, and extended surveys by suitably qualified ecologists. The report concludes that the site is of relatively low biodiversity value. The Council was satisfied that site could accommodate over 100 dwellings without undue harm to biodiversity (21/0947/FUL).	Not all criterion set in national planning policy need to be met in order to justify the designation of a site as Local Green Space.	No change.
The site clearly has some visual and landscape interest as a green space at the edge of Colne but the same can be said of land adjoining the settlement – reflective of the position within the previous cited Chapel-en-le-Frith Neighbourhood Plan. The land has never been identified by the Council for any statutory or non-statutory landscape designation. The Colne Neighbourhood Plan identified part of the land as within an ‘important viewpoint’ although these	Each case must be assessed on its own merits and as such the case of Chapel-en-le-Frith Neighbourhood Plan is not directly transferable to Colne. The site is acknowledged to form part of a green backdrop to Colne and there are important views noted to and from the site within the Colne Neighbourhood Plan and the Albert Road Conservation Area Appraisal. The rural landscape provided by the site provides a distinctive rural setting to Colne important in	The Council has resolved to designate Land at Lenches Road and Knotts Lane, Colne as Local Green Space. The assessment made together with statement of significance will be updated accordingly.

Issue	Response	Modifications to Recommendations
cover extensive areas of land to the edge of the settlement and is not 'demonstrably special'. The Landscape and Visual Impact Assessment prepared in support of the recent application concluded that the site could accommodate over 100 dwellings without any significant adverse visual and landscape harm.	framing and defining the settlement's unique settlement pattern and character. It offers an important rural background to an otherwise densely populated area.	
The site benefits from some tranquillity however this is not unique to the site. Tranquillity is limited by noise and disturbance from Lenches Road Industrial Park, visual intrusion and general noise from Prospect Farm Residential Park. Visual intrusion from the built-up edge of Colne that includes residential properties on Knotts Lane and Dewhurst Street and other uses such as the adjacent equestrian complex. The built-up area of Colne and adjacent industrial units are highly visible from all parts of the site. Noise from traffic using Knotts Lane and Lenches Road.	The Council disagrees with noted elements considered to disrupt tranquillity. The site of a sufficient scale and of varied character to ensure that surrounding uses and features have negligible effects on the site in terms of noise, nuisance or pollution.	The Council has resolved to designate Land at Lenches Road and Knotts Lane, Colne as Local Green Space. The assessment made together with statement of significance will be updated accordingly.
The site has the potential to respond to development needs identified to 2040.	The Council is satisfied that the housing requirement can be delivered in full by the site allocations and policy measures set out within the Local Plan.	No change.
<p>Even if not required by 2040, designation of the site as Local Green Space would not endure beyond 2040 noting:</p> <ul style="list-style-type: none"> - The need to review plan's every 5 years and the status the site has within the SHLAA. - The site's private ownership and its availability for housing. 	The information available demonstrates that the Council can meet its housing requirement and there are further opportunities within the borough to meet housing needs beyond the candidate site. It is for the next plan process to consider the housing requirement and capacity to meet this requirement.	No change.

Issue	Response	Modifications to Recommendations
LGS/LP4/DM12/027: Briercliffe Avenue, Colne		
Protected woodland area and therefore should meet the criteria. If it is special enough to already be protected then it surely should be designated as Local Green Space. Preserving green space at Briercliffe Avenue, Colne is crucial for several reasons. Green spaces contribute to health and wellbeing owing to the recreational and amenity value granted by the spaces. The space provides an important space for younger children to play within sight of their homes.	The site is designated as Public Open Space and therefore benefits from protections afforded by Policy ENV1 of the Pendle Core Strategy. Local Green Space offers special protection to the most unique and valued spaces. These spaces must be 'demonstrably special'. The arguments put forward for this site could be applied to any greenspace within the borough. The site does not therefore display the qualities or characteristics required for this designation.	No change.
LGS/LP4/DM12/028: Dewhurst Street Community Space, Colne		
The space is regularly used and is well maintained year round by the Friends of Dewhurst Street. It features planters, and a bench to rest on offering views of Pendle Hill. People use the space to meet and socialise. Deer have been known to visit the site. The site is important for insects and birds.	Comments noted. The site is already protected being designated as public open space. The Council maintains the view that whilst the site is evidently well cared for and is important to the community, it is not demonstrably special and as such does not meet the threshold required for a higher level of protection.	No change.
The space is central to the community and regularly used. It is relied upon by nearby residents whom do not have their own private garden space. It is meticulously cared for and won an award at Colne in Bloom last year. The space has been used as part of events such as Easter Egg Hunts and the Trawden Tractor Run. The quality of the space sets it aside from other spaces in Pendle.	The Council acknowledge that the space is clearly valued and is well looked after by the local community. The space however is not 'demonstrably special'. The site is designated as public open space and therefore benefits from the protections afforded by Policy ENV1.	No change.
Noting that none of the sites nominated in Colne are 100% endorsed it would appear that the bar used within the assessment is significantly higher	The Council must ensure that the Local Plan and its policies are consistent with national planning policy in order for the plan to be found sound. The tests that the Local Plan is subjected to are	No change.

Issue	Response	Modifications to Recommendations
than the one used through the Colne Neighbourhood Plan.	stronger than those applied to examine Neighbourhood Plans. As such the Council cannot rely on evidence produced in support of the Colne Neighbourhood Plan. Regard has been had to conclusions made by the examiner of the Colne Neighbourhood Plan as suitable. It is however important to note that conclusions made at one site do not automatically carry to another and it is important that each site is assessed separately according to its merits. Whilst evidence based and produced adopting a methodological approach many of the conclusions made form a subjective view informed by professional judgement. This consultation provides the opportunity to influence that judgement through the submission of clear and convincing evidence and/or corrections of matters of fact.	
Disagree with the language used within the report. It could be more positively written.	The Local Green Space Assessment and Methodology report forms part of the evidence base to underpin the Local Plan. It has been made as accurately as possible based on available evidence and professional judgement. The report adopts a consistent approach across all sites assessed. Designation of land as Local Green Space requires the application of a high test, such sites are exceptional noting the significance of the designation and weight of policy applied in decision making.	No change.
The assessment fails to acknowledge views gained from the seating area within the site.	Views can be had of Pendle hill from the site. This is not unique to the site and commonly shared widely within the borough. Whilst important to	No change.

Issue	Response	Modifications to Recommendations
	the local community, the site's wider significance and value is limited. The site is not therefore demonstrably special as required by the NPPF.	
The assessment downplays the role that community has in maintaining the site.	The role of the community in maintaining the site is noted, however the site's wider significance for the community in context of tests required by the NPPF to justify the designation of the site as Local Green Space are limited. The site is not 'demonstrably special' though does offer high quality public open space.	No change.
LGS/LP4/DM12/032: Earby Waterfalls Park		
The Town Council endorses proposals to designate this area as a Local Green Space.	Comment noted.	No change.
LGS/LP4/DM12/033: Higham Park		
The Parish Council support the park being a designation green space.	Comment noted.	No change.
LGS/LP4/DM12/038: Salterforth Railway Embankment		
Object to my land being designated as Local Green Space.	Comment noted.	No change.
Noted from the Council's assessment that LGS designation would not provide additional local benefits given that the site is already in the open countryside and Local Geodiversity Site. I share the view that existing designations offer sufficient protection of the land.	Comment noted.	No change.
It is noted that the Council does not consider the site to fulfil the three criteria set out in the NPPF for LGS designation.	Comment noted.	No change.
The site is not reasonably close proximity to the community served being part of our agricultural land away from the built up areas of Barnoldswick and Salterforth.	Comment noted.	No change.

Issue	Response	Modifications to Recommendations
<p>Against the five assessed factors:</p> <ul style="list-style-type: none"> a) (beauty) The site is not beautiful it is a former railway embankment. b) (historic significance) the site is not a heritage asset. c) (recreational value) There is no public access onto the site. The site is not used for activities or events. The site offers no recreational value. d) (tranquillity) Somewhat affected from canal activities though not problematic. e) (richness of wildlife) Part of a working farm. The current designation is sufficient. 	Comments noted.	No change.
Own the site and its surroundings. Site characterised by woodland area. Public access would result in difficulties for farming operations, and health and safety issues. It is noted that the Council consider the site to represent an isolated location within the open countryside and we are of the same opinion.	Comments noted. Local Green Space is a planning designation only. It does not affect the accessibility or management of the site if designated.	No change.
LGS/LP4/DM12/039: Land at Roughs Barn, Salterforth		
I own part of the site and my comments relate to this (most western parcel only). The character and nature of the site is different to those pictured through the assessment. The area is totally private with no public accessibility.	Comments noted. As noted within PPG, access to sites may not be a reason for Local Green Space Designation depending on the role and character of the candidate site.	No change.
The submission made is an attempt to prevent any development at the site, as residents do not wish to see the site developed. There is clear bias	Comments noted. The site does not have planning permission and is located within the open countryside. The consultation does not	No change.

Issue	Response	Modifications to Recommendations
in the submission as demonstrated by activities undertaken against previous proposals for housing at the site when an application was submitted. Housing is much needed at the site.	relate to the merits of whether a site is suitable or not for development and relates only to how the site meets criteria for Local Green Space designation.	
The site is not visually attractive and does not make a positive contribution to the village. Flora and fauna are not distinctive or special in any way. There are limited habitats present on site. There is nothing historical or archaeological. The site is waterlogged and does not offer any recreational value, with alternative better quality provision accessible nearby. The site is not tranquil due to being overlooked by neighbouring housing.	Comments noted.	No change.
LGS/LP4/DM12/040: Land off Dean Street, Trawden		
Object to my land being designated as Local Green Space.	Objection noted.	No change.
The site is in private ownership and does not serve the community in any way. It is neither beautiful, has no historic significance, no recreational value, nor is it tranquil and there is no richness of its wildlife. Nor is it local in character. The field is almost surrounded by homes with permission for further housing recently granted.	The site is undeveloped and situated on the edge of the settlement. Its qualities are principally provided by its openness and the green corridor it affords into the heart of the village helping to maintain Trawden's rural setting. It is not however 'demonstrably special' and as such is not recommended as Local Green Space.	No change.
LGS/LP4/DM12/041: Land off Back Lane, Trawden		
I object to my land being designated as Local Green Space	Objection noted.	No change.
We wish this site to be removed as a candidate for Local Green Space.	Objection noted.	No change.

Issue	Response	Modifications to Recommendations
LGS/LP4/DM12/050: East View Allotments, Trawden		
Tranquillity is limited due to traffic movements at the site.	Comments noted.	No change.
The site's existing policy designations afford the site sufficient protection. LGS designation is not therefore necessary.	Comments noted.	No change.
Access to the site is limited to tenants. Parts of the site have been neglected. It is not the only allotments in the area. The site is not of special significance.	Sites are assessed according to their merits. The restrictions of the site's use is recognised by the assessment but equally the site nevertheless holds amenity value for adjacent residents. The Council acknowledges that allotments are not uncommon in the area.	No change.
LGS would be overly restrictive for planning purposes. Site also includes garages, car ports and parking spaces. Future upgrades would not be allowed and would place restrictions on parking provision provided at the site.	The designation of the site as local green space would necessitate the need to apply national green belt policy through the decision making process.	No change.
General Comments		
We must not build on our green sites. These are Pendle's most valuable assets and should not be sacrificed to development.	The consultation relates to the designation of local green space only.	No change.
Our Green Belts need protecting from excessive development which could result in there being none left.	The consultation relates to the designation of local green space only.	No change.
Supports the principle of recognising and protecting green spaces for the benefit of the community where appropriate.	Comments noted.	No change.
All applications for local green space designation consulted on through the document should be considered favourably. We simply do not have enough green spaces within Pendle and those	Candidate sites are assessed on their merits against established criteria. They must be demonstrably special in order to be designated as Local Green Space. Adopting a different	No change.

Issue	Response	Modifications to Recommendations
that we do have seem to be under constant threat from development.	approach would not be consistent with national planning policy.	
The consultation has not been sufficiently publicised. Leaflets detailing the consultation should be dropped at each house in the borough.	The Council does not have the resources necessary to undertake a borough wide leaflet drop for each public consultation. Details of the extensive measures used to publicise this consultation, and those relating to the draft version of the Local Plan are set out within the Consultation Statement. The Council is satisfied that a proportionate approach has been taken. Interest in the consultation has been higher than that undertaken in relation to the draft Local Plan conducted in Summer 2023.	No change.
It is noted that many of the site include water and wastewater infrastructure in the form of United Utilities water supply and sewer networks. United Utilities plans to invest £13.7 billion in water and waste water infrastructure over the period 2025 – 2030 in response to the Environment Act 2021. This may necessitate investment at constrained locations such as at land designated as local green space. Consistent with meeting this obligation, United Utilities requires that the development plan policy includes support for investment in water and waste water infrastructure that is ultimately beneficial for the environment, biodiversity and our watercourses so they can be delivered in a timely and effective manner. Specifically, we request that policy supports investment in our infrastructure in local green spaces and other	<p>The consultation relates to the Council’s assessment of specific locations previously put forward for consideration as Local Green Space rather than the approach of Policy. Opportunity to comment on policy was provided in response to proposals for the draft version of the Local Plan.</p> <p>Policy DM11 of the draft plan is clear that proposals submitted on land designated as Local Green Space would be considered in accordance with national green belt policy. This is consistent with the NPPF. It should be noted that ‘engineering operations’ is listed as a form of development which is not inappropriate in the Green Belt provided proposals preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. Each scheme would need to be considered on</p>	No change.

Issue	Response	Modifications to Recommendations
constrained locations such as open countryside and green belt.	their merits but it may be suitable to apply this exception through the decision making process where planning permission is required and it is justified by the nature of the proposal.	
The assessment methodology and specifically the site assessment questions set out at paragraph 2.7 of the LGS report make no reference to the expectation that any Local Green Space is consistent with the local planning of sustainable development. It is considered an oversight that the site assessment methodology fails to include a consideration of implications for sustainable development.	This has been assessed for each site within the site assessment proforma and considered in three ways under the heading 'will designation as LGS prevent planned development?' in terms of 'Is the site allocated for development in a DPD?' – which also considers the emerging local plan. 'Is there an extant planning permission on the site?' and 'Is the permission likely to be implemented'.	No change.
Additional Site – Brook Shed, Earby (P052)		
The former mill site should be designated as a green space. There is a lot of wildlife already established there. This includes bats in the engine shed. This building was supposed to have a protection order on it due to its historical value. The engine shed and chimney are the last ones in Earby. Spring Mill has recently been demolished which was home to generations of bats. Barnfield Construction have been reported for wildlife crime. Brook Mill site is in the middle of the town and a green space for wildlife and people is essential in Earby. Plus the historic value of the remaining building and chimney.	<p>The Council is not accepting submissions for further Local Green Space sites in addition to those consulted on.</p> <p>Brook Shed has planning permission for housing (see 22/0577/FUL) and is under construction. The site does not therefore meet the established criteria for Local Green Space (i.e. will it prevent planned development?).</p>	No change.
Additional sites – Colne Neighbourhood Plan CNDP6/1, CNDP6/5 and CNDP6/6		
These sites are important to the community for the access they grant to open space within a deprived community which have below the amount of recommended accessible green space.	The Council is not accepting submissions for further Local Green Space sites in addition to those consulted on.	No change.

Issue	Response	Modifications to Recommendations
<p>The sites provide health and wellbeing benefits. They show unique historical connections to Colne's past. They fulfil a strong role in providing a green environment to the heart of Colne which extends through the South Valley and helps to mitigate climate change.</p>	<p>The three sites in question are allocated for housing through the Colne Neighbourhood Plan. The Colne Neighbourhood Plan has been found to meet the 'basic conditions' by an appointed independent examiner. It has been successful at referendum and now forms part of the statutory development plan. As such, the sites do not meet the established criteria for Local Green Space (i.e. 'will it prevent planned development?').</p>	
Additional site – Village Green, Aspen Lane, Earby		
<p>The Town Council has recently acquired the Village Green, Aspen Lane, Earby from Pendle Borough Council. We acknowledge it is now too late to include this as Local Green Space but would be interested in designating this land if possible.</p>	<p>The Council is not accepting submissions for further Local Green Space sites in addition to those consulted on.</p> <p>It should be noted that 'Village Green, Aspen Lane' is already protected as Public Open Space (Site reference AG268).</p>	<p>No change.</p>