

**Pendle Borough Council  
Green Belt Assessment  
Criteria and Methodology Consultation**

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May 2016

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## **0.0 EXECUTIVE SUMMARY**

- 0.1 DLP (Planning) Limited and Liz Lake Associates have been commissioned by Pendle Borough Council to undertake an assessment of the Green Belt within Pendle Borough.
- 0.2 The overall aim of the study is to undertake an independent and comprehensive assessment of the extent to which the land in the Green Belt within the Borough of Pendle performs against the five purposes of Green Belts, as set out in the National Planning Policy Framework (paragraph 80), namely:
1. to check the unrestricted sprawl of large built-up areas;
  2. to prevent neighbouring towns merging into one another;
  3. to assist in safeguarding the countryside from encroachment;
  4. to preserve the setting and special character of historic towns; and
  5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 0.3 The brief also indicates that the study should examine the case for including within the Green Belt any additional areas of land that currently lie outside the designated Green Belt.
- 0.4 The purpose of this work is to provide clear and robust conclusions on the relative value of each identified parcel of land to the Green Belt.
- 0.5 This assessment will form a critical part of the emerging Local Plan evidence base and be used to inform the identification and allocation of sites suitable for development, confirm Green Belt boundaries beyond the plan period and identify potential safeguarded land for potential future development. In addition to this, extending existing Green Belt boundaries in some areas will be considered.

Therefore the assessment must be able to stand up to scrutiny through public consultation and crucially through independent examination.

- 0.6 The purpose of this document is to consult and engage with key stakeholders during the preparation of the criteria and methodology used in under taking the Green Belt assessment for Pendle Borough Council.

## 1.0 INTRODUCTION

### History of the Green Belt in Pendle

- 1.1 The establishment and maintenance of Green Belt around many of the largest urban areas in England has long been part of national planning policy, with the aim being to protect open countryside from the pressure of development by restricting the expansion of towns and villages and thereby inhibiting 'urban sprawl'.
- 1.2 Legislation for the establishment and maintenance of Green Belts was introduced in the Town and Country Planning Act of 1947, then in 1955 through circular 42/55 the principle was extended beyond London.
- 1.3 The North East Lancashire Structure Plan (1979) was the first planning document to identify areas in Pendle Borough for inclusion in the Green Belt:

*Green Belts will be established between or adjacent to the following settlements:*

- (i) *Between... Padiham and Burnley (north of A671), Colne and Trawden, Colne and Foulridge*

- 1.4 The draft Lancashire Structure Plan (1987) identified more specific areas:

*To maintain Green Belts in the following areas:*

- (g) *... between Padiham/Burnley and Barrowford, Nelson and Barrowford, Barrowford and Colne, Colne and Trawden, Colne and Foulridge, Colne and Laneshaw Bridge*

- 1.5 Subsequently the general extent of the Green Belt in Lancashire was finally established in Policy 17 of the Lancashire Structure Plan, approved by the Secretary of State for the Environment in December 1989 which came into effect on 4 January 1990.
- 1.6 It was not until 1999 through the adoption of the Pendle Local Plan that the detailed boundaries for the Green Belt within Pendle were formally designated. There have been no reviews of the general extent of the Green Belt in Pendle since this date.

However through the recently adopted Core Strategy, approximately 30 hectares of land at Wheatley Laith (immediately west of the Lomeshaye Industrial Estate, Nelson) was removed from the Green Belt to provide land for strategic employment needs.

- 1.7 Currently a total of 2,036 hectares of Pendle is currently designated as Green Belt, which is approximately 12% of the Borough.

### **Emerging Local Plan**

- 1.8 The Council's Core Strategy, which was adopted on 17 December 2015 set out the Borough's growth aspirations and spatial development needs. The Council's adopted strategy for the distribution of growth in Pendle sets certain proportions across all settlements.
- 1.9 Within the Core Strategy's Inspector's report, it is stated at paragraph 41 that the general extent to the Green Belt should remain. But that a detailed review of the Green Belt boundary around settlements in the Site Allocations Plan [the emerging plan] is needed to determine if the boundary should change to include additional land for development.
- 1.10 Importantly the Inspector set out that the review should include the Rural Service Centres within the Green Belt (Fence, Fourlridge and Trawden) as 12% of housing should be delivered in Rural Pendle.

*It would appear to me that the Green Belt review will be necessary to ensure that enough land is identified to meet the spatial strategy of the Plan*

### **The Green Belt Assessment Brief**

- 1.11 The brief prepared by Pendle Borough Council splits the assessment of the Green Belt into five stages. We have grouped these together into three elements:
- i. **Stage 1 & 2** – Methodology, Strategic Overview and Land Parcel Identification
  - ii. **Stage 3 & 4** – Detailed Review of the Green Belt and Deliverability Assessment
  - iii. **Stage 5** – Reporting
- 1.12 This document only deals with the first element, Stage 1 and 2. Stages 3, 4 and 5 will be covered in the final Green Belt Assessment report.

### **Stage 1 & 2 – Methodology, Strategic Overview and Land Parcel Identification**

#### *Work done so far*

- 1.13 Following an inception meeting with the Council on 5 April we are currently undertaking a strategic review to establish the context for the Green Belt in Pendle, addressing both the national policy context, and legal interpretations.
- 1.14 This portion of the assessment will set out the context for the study, including the history of the Green Belt and review the methodology and approach of recent studies for neighbouring authorities and national best practice.
- 1.15 Pendle's Green Belt forms part of a much wider Lancashire Green Belt and therefore where appropriate, consideration will be taken of the criteria used to define Green Belt boundaries in other Lancashire authorities.
- 1.16 Working with the Council we have identified a list of key stakeholders, including other Lancashire local planning authorities, and set these out in Table 1.

**Table 1 Key Stakeholders**

| Organisation   | Contact          |
|--|------------------|
| <b>Local Authorities</b>                             |                  |
| Blackburn-with-Darwen Borough Council                | David Procter    |
| Bradford MDC   | Andrew Marshall  |
| Burnley Borough Council                              | Elizabeth Murphy |
| Calderdale MBC                                       | John Houston     |
| Craven District Council                              | Sian Watson      |
| Hyndburn Borough Council                             | Darren Tweed     |
| Lancashire County Council                            | Marcus Hudson    |
| North Yorkshire County Council                       | Carl Bunnage     |
| Ribble Valley District Council                       | Colin Hirst      |
| Rossendale Borough Council                           | Adrian Smith     |
| <b>Key Stakeholders</b>                              |                  |
| Canal & River Trust                                  | Martyn Coy       |
| Country Land & Business Association North            | Dorothy Fairburn |
| CPRE   | Jackie Copley    |
| Environment Agency                                   | Dave Hortin      |
| Fields in Trust                                      | Helen Griffiths  |
| Historic England                                     | Emily Hrycan     |
| Lancashire LEP                                       | Kathryn Molloy   |
| Lancashire LNP                                       | Tim Mitcham      |
| National Trust                                       | Alan Hubbard     |
| Natural England                                      | -                |
| South Pennines LNP                                   | Robin Gray       |
| Sport England  | Fiona Pudge      |
| <b>Pendle Borough Council Officers</b>               |                  |
| Liberata Property Services                           | Sharon Livesey   |
| Housing & Economic Regeneration                      | Julie Whittaker  |
| <b>Party Leaders &amp; Planning Portfolio Holder</b> |                  |
| Planning Portfolio Holder                            | Julie Henderson  |
| Labour Leader  | Mohammed Iqbal   |
| Liberal Democrat Leader                              | Tony Greaves     |
| Conservative Leader                                  | Joe Cooney       |
| <b>Ward Councillors</b>                              |                  |
| <b>Number of Councillors in Ward</b>                 |                  |
| Barrowford   | 3                |
| Blacko & Higherford                                  | 1                |

| Organisation                                | Contact              |
|---|----------------------|
| Boulsworth                                  | 3                    |
| Bradley                                     | 3                    |
| Brierfield                                  | 3                    |
| Foulridge                                   | 1                    |
| Higham & Pendleside                         | 1                    |
| Horsfield                                   | 3                    |
| Old Laund Booth                             | 1                    |
| Reedley                                     | 3                    |
| Vivary Bridge                               | 3                    |
| Waterside                                   | 3                    |
| <b>Parish Councils</b>                      |                      |
| Barrowford Parish Council                   | Iain Lord            |
| Blacko Parish Council                       | Margaret Wood        |
| Colne Town Council                          | Susan Graham         |
| Foulridge Parish Council                    | Jane Killeen         |
| Higham-with-West Close-Booth Parish Council | Patricia Rosthorn    |
| Laneshaw Bridge Parish Council              | Jackie Peden         |
| Old Laund Booth Parish Council              | Rebecca Hay          |
| Reedley Hallows Parish Council              | Hazel G. Dean        |
| Roughlee Booth Parish Council               | Mary Reed            |
| Trawden Forest Parish Council               | Adele Waddington     |
| <b>Neighbourhood Plan Leads</b>             |                      |
| Barrowford                                  | Ken Turner           |
| East Colne & Villages                       | David Cockburn-Price |

#### *Where we are now*

- 1.17 The second part in this element is to establish a methodology and justified, robust and consistent criteria for the:
- Identification of land parcels
  - Appraisal of land parcels against the five purposes of Green Belt set out in the NPPF.
- 1.18 To do this we have prepared a draft set of criteria and methodology for the identification and assessment of land parcels.

- 1.19 The purpose of this document is to present these proposals to the key stakeholders for their consideration and comment.

*Key Stakeholder Workshop*

- 1.20 An integral part of the consultation process will be a Key Stakeholder Presentation/Workshop to facilitate engagement and discussion, full details below.

**Time:** 2.00 – 4.00pm

**Date:** Thursday 26 May 2016

**Venue:**  
Wilson Room  
Town Hall  
Market Street  
Nelson  
BB9 7LG

:

**Car Parking:** There are plentiful long-stay and short-stay car parks in Nelson town centre (see link to map below). Many short-stay car parks employ a disc parking system. Discs are freely available in local shops or can be supplied on request.

**[http://www.pendle.gov.uk/downloads/file/7740/map\\_of\\_nelson\\_with\\_parking](http://www.pendle.gov.uk/downloads/file/7740/map_of_nelson_with_parking)**

**Light refreshments will be available on the day.**

- 1.21 It is important that key stakeholders are involved in the process of preparing Local Plans, so that their views and extensive local knowledge can be taken into consideration early in the preparation of new evidence and to ensure that all known issues are covered.

1.22 The workshop will be particularly beneficial to facilitate any strategic level discussions on the wider purpose of the Green Belt in (East) Lancashire and latterly to demonstrate how the Council has actively engaged with its strategic partners in accordance with the requirements of the Duty to Cooperate.

1.23 **Please confirm your attendance for the workshop to John Halton, Principal Planning Officer (Policy) of Pendle Borough Council, no later than Monday 23 May.**

*Green Belt Consultation*

1.24 The six-week consultation on the Green Belt methodology will run from Monday **9 May to Monday 20 June 2016**. You are able to comment on any aspect of the draft methodology or proposed assessment criteria.

1.25 Comments should be made in writing (letter or email), and sent to:

John Halton  
Principal Planning Officer (Policy)  
Pendle Council  
Planning, Building Control & Licensing  
Town Hall  
Market Street  
Nelson  
BB9 7LG

Email: [ldf@pendle.gov.uk](mailto:ldf@pendle.gov.uk)

## 2.0 IDENTIFICATION OF LAND PARCELS

2.1 The Green Belt will be divided into suitable and clearly defined parcels of land; we will also consider identifying some smaller more focused parcels of land close to the existing settlement boundaries.

2.2 In addition to identifying parcels of land within the Green Belt we will also consider areas beyond the current Green Belt boundary which may fulfil the exceptional circumstances required by the National Planning Policy Framework (NPPF) to be designated as Green Belt. Furthermore, the currently designated Protected Areas as defined on the Proposals Map and within saved Policy 3A Protected Areas of the 'Replacement Pendle Local Plan 2001 - 2016' will also form part of the Green Belt assessment. The policy and supporting text states, at paragraph 3A.2 that:

*It is intended that these areas should remain open during the plan period. They represent areas of choice for possible development to meet future long term requirements and to ensure the protection of the Green Belt. The future of these areas is to be re-examined through subsequent reviews of the Plan. Should long term pressure for development after 2016 prove that the areas will not be required for development, consideration will be given to their inclusion within the Green Belt.*

2.3 The NPPF makes it clear that Green Belt boundaries should be robust and permanent. Therefore strong boundaries, which make sense on the ground, must be used.

2.4 The outline process for the identification of land parcels is set-out below:

- a) The area of Green Belt to which the assessment will be applied will be agreed by the Council.
- b) A draft set of criteria for determining the strong boundaries to be used for the land parcels to be assessed will be prepared. This will be drawn from national policy, best practice and previous experience.
- c) A draft methodology for implementing the assessment criteria will be prepared. The method will consist of a desktop assessment of the Green Belt

using the agreed criteria, followed by site visits to check the land parcel boundaries and provide a final review for consistency.

- d) The draft criteria and methodology will be made available for consultation with key stakeholders and presented for discussion at the workshop.
- e) All reasonable suggestions will be considered, with justified alterations made.
- f) The Council will ratify the assessment criteria and methodology before detailed assessments are carried out.

### Criteria for determining strong boundaries

2.5 Paragraph 85 of the NPPF states that Green Belt boundaries should be clearly defined, using physical features that are readily recognisable and likely to be permanent. Such boundaries are more likely to withstand the passage of time and are therefore appropriate in identifying the boundaries of the parcels within this assessment.

2.6 Our initial view of the criteria to be used is proposed in Table 2.

**Table 2 Criteria for strong boundaries**

| Strong Boundaries   | Moderate to Weak Boundaries                         |
|---|---|
| Motorway<br>Main road, particularly with hedgerow alongside | Minor or private road with open edge to countryside |
| Railway line (in use)                                       | Disused railway lines                               |
| Rivers, streams and canals                                  | Brooks and culverted watercourses                   |
| Protected or dense woodland                                 | Non-protected woodlands, trees and hedges           |
| Protected or tall hedgerows                                 | Field or open space boundaries, not well            |

|   |  |
|---|--|
|   | defined by mature vegetation   |
| Residential, employment or other development with strong established boundaries (such as tall walls, mature vegetation) | Residential, employment or other development with weak or intermediate established boundaries (such as low walls, timber fences, open boundaries or immature vegetation) |
| Prominent topography  | Power lines  |
|   | Public footpath  |

- 2.7 We would welcome your comments on the proposed criteria along with any additional suggestions.

*Cross boundary issues and consultation*

- 2.8 Cross boundary issues will be taken into consideration in several ways; through the consultation process, stakeholder workshop and the review of Green Belt studies in neighbouring authorities.
- 2.9 A particular issue for consideration are the areas of Green Belt which may cross the boundary between Burnley and Pendle and the need to ensure that strong Green Belt boundaries are used for this Green Belt assessment.
- 2.10 We do not consider that administrative boundaries form a strong, robust and defensible boundary to the Green Belt.
- 2.11 Therefore instances may arise where the most defensible boundary, for a Green Belt land parcel, which is predominantly within Pendle, lies within the Burnley local authority area (and vice versa).
- 2.12 We propose that the most defensible boundaries should be used to identify Green Belt land parcels and acknowledge that in some instances this may require the assessment of Green Belt land which lies outside of Pendle's administrative area.
- 2.13 This is an important issue to discuss in order to ensure that Pendle Council has satisfactorily fulfilled its obligations under the Duty to Co-operate. We would welcome your comments on this matter.

**Methodology for implementing the criteria**

- 2.14 Once the criteria for establishing strong boundaries have been finalised, the individual land parcels to be assessed will be identified.

*Stage 1*

- 2.15 All mapping and other relevant information will be brought together into a comprehensive GIS workspace.

*Stage 2*

- 2.16 A desktop based assessment using the agreed criteria to identify suitable land parcels will be carried out by the team. This will form an initial view of the proposed parcels.

*Stage 3*

- 2.17 Using the proposed land parcels, site visits will be undertaken to ensure that the proposed boundaries meet with the defined criteria. Any inconsistency or errors will be identified and changes considered.
- 2.18 We would welcome your comments on the proposed methodology along with any additional suggestions.

### 3.0 APPRAISAL OF LAND PARCELS

- 3.1 It is essential that the appraisal used to assess the land parcels is robust, conforms to national policy and guidance and takes into account best practice. It is important that meaningful conclusions can be reached on the relative value of each land parcel that is assessed. Therefore, a clear and transparent appraisal methodology is essential.
- 3.2 To clarify, the appraisal of land parcels will be carried out on: identified Green Belt parcels, potential areas currently outside of the defined Green Belt and land currently designated as safeguarded land.
- 3.3 The outline methodology for the appraisal of land parcels is as follows:
- a) A draft set of assessment criteria and ranking system has been prepared – this will use the five purposes of Green Belt as set out in the NPPF as a starting point and will draw on best practice and past experience.
  - b) A draft methodology for carrying out the assessment has been prepared: the method will consist of an initial desktop assessment followed by site visits to each land parcel and a final desktop review.
  - c) The draft methodology and draft assessment criteria will be made available for consultation and presented for discussion at the stakeholder workshop.
  - d) All reasonable suggestions will be considered, with justified alterations made.
  - e) The Council will ratify the assessment criteria, assessment matrix and methodology.

#### **Assessment criteria for Green Belt land parcels**

- 3.4 Through other Green Belt assessments and similar pieces of work the project team has previously established the criteria for assessing Green Belt land parcels. A draft set of assessment criteria is proposed in the tables below. These criteria are based upon the five purposes of the Green Belt (NPPF paragraph 80); the objective of preventing urban sprawl by keeping land permanently open (NPPF paragraph 79)

and maintaining the permanence of Green Belts (NPPF paragraph 83). In addition to this, local planning authorities are encouraged to plan positively to enhance the beneficial use of the Green Belt (NPPF paragraph 81).

- 3.5 An assessment matrix will be used to assess how each parcel performs against each of the Green Belt purposes. to help form a preliminary conclusion on their contribution. The definitions set out in Table 3 helped to guide the assessment:

**Table 3 Green Belt Definitions**

| Green Belt Purpose   | Definitions  |
|--|--|
| <b>To check the unrestricted sprawl of large built-up areas</b>    | <p><b>Sprawl</b> – spread out over a large area in an untidy or irregular way (Oxford English Dictionary online).</p> <p><b>Large built-up areas</b> – in the context of this study settlements in the M65 Corridor spatial area.</p>  |
| <b>To prevent neighbouring towns from merging</b>                  | <p><b>Neighbouring Towns</b> – Nelson, Colne, Brierfield and Barrowford.</p> <p><b>Merging</b> – to combine or cause to combine into a single entity (Oxford English Dictionary online). This can be by way of general sprawl (see above); or</p> <p><b>Ribbon development</b> – the building of houses along a main road, especially one leading out of a town or village (Oxford English Dictionary online).</p> |
| <b>To assist in safeguarding the countryside from encroachment</b> | <p><b>Encroachment</b> – a gradual advance beyond usual or acceptable limits (Oxford English Dictionary online).</p> <p><b>Countryside</b> – open land with an absence of built development (R (Lee Valley Regional Park Authority) v Epping Forest DC [2016]), typically characterised by rural land uses including agriculture and forestry.</p>   |
| <b>To preserve the setting and special</b>                         | <p><b>Historic town</b> – a settlement with a market charter and/or a significant grouping of assets, which are protected by</p>   |

|  |   |
|--|---|
| <b>character of historic towns</b>   | historic designations or local policy.  |
| <b>To assist in urban regeneration by encouraging the recycling of derelict and other urban land</b> | <b>Recycling</b> – in this context the re-use of previously developed (Brownfield) land |

- 3.6 We do not propose to assess Green Belt Purpose 5 for each individual land parcel, as it is the overall restrictive nature of the Green Belt that encourages regeneration, not the restriction that it places on specific areas of land. We consider the appropriate basis for the consideration of this purpose is the wider purpose of the Green Belt as a whole and how it may undermine regeneration due to the oversupply of land.
- 3.7 The principal feature of the methodology is the recognition of ‘critical’ Green Belt purposes. These exist where a single purpose is so fundamental to the retention of areas of land in the Green Belt that this purpose alone justifies maintaining its role as Green Belt.
- 3.8 Our previous work has found that it can be extremely difficult to assess specific parcels of land in terms of their performance against the Green Belt purposes; they are simply too generalised, reflecting the strategic nature and aims of Green Belt policy, which is essentially a ‘blunt tool’. To allow more detailed analysis of the way in which land parcels fulfil the Green Belt purposes it is necessary to examine them in further detail.
- 3.9 For each purpose four categories have been defined against which the performance of a particular purpose may be defined for any given parcel of land, based on its ability to accommodate development. These are explained below.

- ‘Critical importance’ to Green Belt Purpose – where land is ‘fundamental’ to the purpose, justifying its continued retention and protection within Green Belt.
- ‘Major importance’ to Green Belt Purpose – where land is of ‘considerable’ importance to the Green Belt purpose, and where development would conflict substantially with it.
- ‘Moderate importance’ to Green Belt Purpose – where land is of ‘modest’ importance to the Green Belt purpose, and where development would conflict significantly with it.
- ‘Slight/Negligible’ importance to Green Belt Purpose – where land is of ‘minor’ importance to the Green Belt purpose, and where development would have limited or no discernible conflict with it.

3.10 The criteria that we propose to use for defining the ‘categories’ within each purpose are outlined in the following sections.

***Purpose 1: To check the unrestricted sprawl of large built-up areas.***

3.11 The sense of permanence provided by Green Belt is fundamental to the limitation of urban sprawl and it is the case that the wholesale restriction that the Green Belt places upon development ensures that the outer expansion of the urban areas remains heavily constrained limiting ‘sprawl’. However, well located and planned urban extensions are unlikely to constitute ‘sprawl’ (a term that is based on negativity suggesting the unplanned, uncontrolled spread of development).

3.12 By virtue of the definition, land that follows the periphery of an urban area is likely to contribute most significantly to this purpose as it is that land that provides the boundary and zone of constraint to urban expansion. The contribution that land makes to this purpose ‘falls away’ progressively with increasing distance from the urban edge.

3.13 Upon examination it may be that the periphery of settlements has areas where the urban area has expanded to boundaries that are poorly defined. Such boundaries give the perception of a ‘poor fit’ within the landscape setting and allows poorly

designed development to have an extensive influence over adjoining land beyond, with consequential effects on landscape character and the perception of the urban area and its setting. Purpose 1 therefore has a direct relationship with Purpose 3 (safeguarding the countryside from encroachment).

- 3.14 Such examination will also identify areas where the urban edge is reasonably well-defined by landscape features which in turn provide containment and thereby reduce or avoid the perception of 'sprawl'. Thus, by an examination of the physical and visual attributes of settlement fringes it is possible to determine whether further peripheral growth will be contained and whether it would accord or conflict with this purpose.
- 3.15 There are also likely to be parts of the Borough where areas of land form a very strong, defined threshold between the edge of the urban area and the outlying countryside beyond. Such thresholds provide strong physical and visual containment of the urban area and protect the land further afield. These areas would be assessed as being 'critical' to the containment of the urban area, where there are no other similar areas that lie further from the urban edge, which could fulfil a similar function in respect of this purpose, if urban expansion were to take place. Because of their (usually) close relationship to existing settlements, such areas may have a variable landscape character. Given the strategic containment that these areas provide, land that lies between them and the urban edge may be considered to be less important to this purpose.
- 3.16 Elsewhere there may be areas where such thresholds are much less well defined but the land nevertheless still provides a good level of containment around the urban edge, ensuring a reasonable 'fit' of the urban area within its landscape context; these areas would be categorised as being of 'major' importance. There may be other locations, further from the urban edge that have the potential to perform a similar function if the urban area were to expand.
- 3.17 The 'moderate' category would apply to land that does provide some containment to the urban area but where the settlement has a poorly defined edge, and urban

related uses may affect the character of the land beyond. There may be other features (such as a major road) that provide an arbitrary boundary (in landscape terms) to the urban edge. In these circumstances the existing Green Belt boundary would not limit the influence of the urban area on adjoining land.

- 3.18 If it is found that the edge of the urban area is poorly contained and has a poorly defined edge in relation to landscape features, or there is a predominance of degraded land, the parcel would be categorised as being of ‘negligible’ importance with respect to this purpose as the perception of ‘sprawl’ is already apparent. In such locations there may be opportunities arising from development that would establish a new Green Belt boundary that provides greater containment, a better ‘fit’ for development, and better respects landscape character. Criteria for the assessment of Purpose 1 are set out in the following table.

|  |                       |   |
|--|-----------------------|---|
| <b>Criteria for Green Belt Purpose 1. To check the unrestricted sprawl of large built-up areas</b>   |                       |   |
| 1) Does the parcel directly abut the outer edge of the defined settlements, or is it very close to it? Is it part of a wider group of parcels that directly act to prevent urban sprawl?<br>2) Does the Green Belt prevent another settlement being absorbed into the large built-up area?<br>3) What is the physical gap between the settlement edge of the parcel and the urban edge of the defined settlements? (I.e. is there a broad gap or is it narrow at this point?)<br>4) What would be the remaining gap if the land is developed?<br>5) Would development represent an outward extension of the urban area, result in a physical connection between urban areas or lead to the danger of a subsequent coalescence between such settlements?<br>6) If released from the Green Belt could enduring long-term settlement boundaries be established? |                       |   |
| <b>Critical importance to Green Belt Purpose</b><br><br>Continued inclusion within Green Belt of paramount importance  | Critical              | Land where development would conflict <b><u>fundamentally</u></b> with Green Belt purpose. <ul style="list-style-type: none"> <li>The land provides a distinct, well-defined threshold between the urban areas within Pendle/other built up area(s) in adjacent districts, and provides strong containment that prevents the perception of 'sprawl'.</li> <li>There are no alternative strong physical/landscape boundaries further from the edge of the urban area that would perform a similar role in containing growth and ensuring a 'good fit' for development - strategic level of development would lead to perception of uncontained growth.</li> <li>The land may/may not be affected already by the existing physical/visual presence of the urban areas and may have a varied character.</li> </ul> |
| <b>Major importance to Green Belt Purpose</b><br><br>Continued inclusion within Green Belt of major importance   | Major                 | Land where development would conflict <b><u>substantially</u></b> with Green Belt purpose. <ul style="list-style-type: none"> <li>The land abuts the urban areas, although its character may be influenced by it.</li> <li>Strategic level of development has potential to create perception of poorly contained growth, although other limited physical/landscape boundaries may exist further from the urban edge that could define and contain growth and prevent the perception of 'sprawl' (although these may require reinforcement to achieve a well-defined limit to development and a new Green Belt boundary).</li> </ul>   |
| <b>Moderate importance to Green Belt Purpose</b><br><br>Continued inclusion within Green Belt of moderate importance   | Moderate              | Land where development would conflict <b><u>significantly</u></b> with Green Belt purpose. <ul style="list-style-type: none"> <li>The land provides some containment of the urban area although it is significantly influenced by its presence and related features/land uses leading to a poorly defined edge, or it may be distant from the urban edge and therefore contribute less to the purpose (other land closer to the urban edge performs the function of containment).</li> </ul>  |
| <b>Slight/Negligible importance to Green Belt Purpose</b><br><br>Continued inclusion within Green Belt of minor/negligible importance  | Slight/<br>Negligible | Land where development would have <b><u>limited</u></b> impact on this purpose of Green Belt. <ul style="list-style-type: none"> <li>The land is physically and visually dominated by/related to the urban areas and already perceived to be part of/or closely related to the built form, giving a poorly defined edge and perception of 'sprawl'.</li> <li>Development may allow opportunities for enhancement of degraded land and the definition of a stronger long-term Green Belt boundary.</li> </ul>  |

**Purpose 2:** *To prevent neighbouring towns from merging into one another*

- 3.19 The primary function of this purpose is clear – it is to prevent towns that are relatively close together from merging. For this strategic assessment we shall assume that all towns in the study area should remain separate with a clear physical and visual distinction between them, such that they retain their separate identities and setting. We shall also work on the basis that, despite the strict definition of the purpose that appears to exclude them, smaller settlements would also be relevant to the purpose, although views from the key stakeholder group would be welcomed. The assessment of the performance of parcels of Green Belt land against this purpose will therefore be informed by landscape and visual assessment to determine the nature and capacity of the intervening land to accommodate a strategic level of development.
- 3.20 In parcels where such development is likely to result in physical coalescence, or at the very least a clearly recognisable perception of merging that would erode the distinct separate identity and character of either/both urban areas, the land would have to be considered ‘critical’ to this purpose and its retention in Green Belt would be regarded as being of paramount importance.
- 3.21 In parcels where there is no significant existing inter-visibility between towns, and where more limited (but not strategic) development may be accommodated without causing merger or the perception of merging, its retention within the Green Belt would be considered to be of ‘major’ importance to this purpose. However, in such areas development may lead to a substantial reduction of the separation between other urban areas, or potential for them to merge.
- 3.22 The performance of the parcels against this purpose will reduce with the increase and/or perception of distance between towns, as not all of the land is likely to be important to maintaining separation. Where a strategic level of development may be accommodated without compromising this purpose the parcels would be categorised as being of ‘moderate’ importance to the purpose. However, other urban areas may be subject to a significant reduction in physical and visual separation, or potential merger as a result of such development.
- 3.23 Where parcels do not lie directly between two towns it would be adjudged as being of ‘Slight/Negligible’ importance, as strategic development could be accommodated

without being in conflict with this purpose. As above, other urban areas could potentially be affected in the same way as the above two categories. Criteria for the assessment of Purpose 2 are set out in the following table:

**Criteria for Green Belt Purpose 2: Prevent Neighbouring Towns from merging into one another**

- 1) Does the parcel lie directly between two towns and form all or part of a gap between them?
- 2) What distance is the gap between the towns?
- 3) Are there intervening settlements or other development on roads that would be affected by release from Green Belt?
- 4) Would development in the parcel appear to result in the merging of towns or compromise the separation of towns physically?
- 5) Would the development of the parcel be a significant step leading towards coalescence of two settlements?

|   |                   |  |
|---|-------------------|--|
| <b>Critical importance to Green Belt Purpose</b><br>Continued inclusion within Green Belt of paramount importance                 | Critical          | Land is <b><u>fundamental</u></b> to physical separation of neighbouring urban areas. <ul style="list-style-type: none"> <li>Any reduction in extent would result in physical coalescence, or a perception of merging that would erode the distinct separate identity and character of either/both settlements.</li> </ul>   |
| <b>Major importance to Green Belt Purpose</b><br>Continued inclusion within Green Belt of major importance                        | Major             | Land provides an <b><u>important</u></b> contribution to separation between neighbouring urban areas <ul style="list-style-type: none"> <li>There is no significant inter-visibility between the urban areas currently.</li> <li>Some limited development may be possible without causing merger or perception of merging, although the area is unlikely to be able to accommodate a strategic level of development (although intervening smaller settlements may be affected substantially by reduction of separation, merger, or inter-visibility).</li> </ul> |
| <b>Moderate importance to Green Belt Purpose</b><br>Continued inclusion within Green Belt of moderate importance                  | Moderate          | Land provides only <b><u>moderate</u></b> contribution to separation between neighbouring urban areas <ul style="list-style-type: none"> <li>Land is part of a substantial gap between neighbouring urban areas with separate identities.</li> <li>Land where well planned strategic levels of development would not result in merger or a perception of merging as a consequence of inter-visibility (although intervening neighbourhoods may be affected significantly by reduction of separation, merger or inter-visibility).</li> </ul>                     |
| <b>Slight/Negligible importance to Green Belt Purpose</b><br>Continued inclusion within Green Belt of minor/negligible importance | Slight/Negligible | Land does not lie between two towns and makes a <b><u>very limited</u></b> contribution to separation. <ul style="list-style-type: none"> <li>Strategic level of development would have no impact on this Green Belt purpose, although other urban areas may be affected by reduction in separation, merger, or inter-visibility depending on their proximity to the urban edge.</li> </ul>  |

**Purpose 3:** *To assist in safeguarding the countryside from encroachment*

- 3.24 Any Green Belt land around the periphery of the urban area may be said to fulfil this purpose. It is the overall restrictive nature of Green Belt policy that protects the surrounding countryside by preventing development and directing it towards existing settlements.
- 3.25 Whilst the quality of the landscape is not a reason for designating land as Green Belt, the search for the most appropriate locations for any significant development should be informed by landscape character assessment. By applying this approach in connection with this purpose it follows that, all other things being equal, parcels that have a stronger rural character should be afforded particular protection via this purpose, in contrast with those parcels that possess a semi-urban character and where encroachment has already occurred.
- 3.26 Such areas may offer the potential for repair and/or enhancement through a well-considered approach to development. Any urban extension may be considered as an 'encroachment' into the Green Belt. This is where consideration of landscape character and the potential ability of the landscape to accommodate change fulfil an important role. The criteria for assessing Purpose 3 and the criteria for the consideration of landscape character and sensitivity to change are set out in the following tables.

### Criteria for Green Belt Purpose 3. To assist in safeguarding the countryside from encroachment

Are there clear strong and robust boundaries to contain development and prevent encroachment in the long term?

- 1) Does the parcel have the character of open countryside? - What is the nature of the land use in the parcel? Is any of the land previously developed?
- 2) Is the parcel partially enclosed by a town or village built up area?
- 3) Has the parcel been affected by a substantial increase in the mass and scale of adjacent urbanising built form?
- 4) Is there any evidence of significant containment by urbanising built form?
- 5) Has there been incremental erosion of the open character of the land on the edge of the settlement (so that it appears as part of the settlement)?
- 6) Does there appear to be a high degree of severance from the adjacent Green Belt?

|   |                       |  |
|---|-----------------------|--|
| <b>Critical importance to Green Belt Purpose</b><br>Continued inclusion within Green Belt of paramount importance                 | Critical              | Retention of the countryside is <b><u>fundamental</u></b> to the purpose of retaining land within Green Belt. <ul style="list-style-type: none"> <li>Land possesses a strong rural character which Green Belt designation protects.</li> <li>There may be no other fundamental constraints to encroachment (such as a strong landscape feature that could assist in fulfilling this purpose by containing development from outlying countryside).</li> </ul> |
| <b>Major importance to Green Belt Purpose</b><br>Continued inclusion within Green Belt of major importance                        | Major                 | Retention of the countryside is of <b><u>major</u></b> importance to the purpose of retaining land within the Green Belt. <ul style="list-style-type: none"> <li>Land possesses a predominantly rural character.</li> <li>There may be other minor constraints (such as a landscape feature) that would limit encroachment but where the Green Belt provides important protection.</li> </ul>  |
| <b>Moderate importance to Green Belt Purpose</b><br>Continued inclusion within Green Belt of moderate importance                  | Moderate              | Retention of the countryside is <b><u>moderately</u></b> important to the purpose of retaining land within the Green Belt. <ul style="list-style-type: none"> <li>Land possesses a semi-rural character and there is already a perception of significant encroachment.</li> <li>There may be other constraints to further encroachment.</li> </ul>   |
| <b>Slight/Negligible importance to Green Belt Purpose</b><br>Continued inclusion within Green Belt of minor/negligible importance | Slight/<br>Negligible | Retention of the land is of <b><u>very limited/no</u></b> importance to the purpose of retaining land within the Green Belt. <ul style="list-style-type: none"> <li>Land possesses a semi-urban character and is no longer perceived to be part of the countryside.</li> <li>It may contain degraded land that provides opportunities for enhancement.</li> </ul>  |

### Landscape Character and Sensitivity to Change Criteria to inform Purpose 3

|   |                      |   |
|---|----------------------|---|
| <b>Little/No Capacity for Change</b><br><br>Landscape highly sensitive to change.                         | <b>Little / None</b> | Land has predominantly <b><u>strong rural character</u></b> that is highly sensitive to change. <ul style="list-style-type: none"> <li>Land consists of an uncontained exposed open area where the impact of development would extend over a wide area, or where there may be little/no potential to mitigate the adverse effects of changes.</li> <li>Strategic level of development likely to have substantial adverse impacts on landscape character and/or substantial adverse impacts on landscape features that are considered to be important to the setting of the town.</li> </ul> |
| <b>Low Capacity for Change</b><br><br>Landscape sensitive to change.                                      | <b>Low</b>           | Land has <b><u>predominantly intact rural character</u></b> and is sensitive to change. <ul style="list-style-type: none"> <li>Land may be a poorly contained area (such as elevated land) where changes could extend over a wide area and there may be limited potential to mitigate the adverse impacts of the changes.</li> <li>Strategic level of development likely to have significant adverse impacts on landscape character and/or significant adverse impacts on landscape features that are considered to be important to the setting of the town.</li> </ul>                     |
| <b>Moderate Capacity for Change</b><br><br>Landscape capable of accepting some change without undue harm. | <b>Moderate</b>      | Land of either <b><u>unexceptional character</u></b> with significant detracting elements, or area with <b><u>stronger character</u></b> that benefits from significant physical/visual containment. <ul style="list-style-type: none"> <li>Land capable of accommodating significant change without undue harm to wider landscape character and/or landscape features that are considered to be important to the setting of the town.</li> <li>There may be potential for some enhancements to landscape character in weaker areas.</li> </ul>   |
| <b>High Capacity for Change</b><br><br>Landscape capable of accommodating substantial change.             | <b>High</b>          | Land with <b><u>weakly defined character/degraded land</u></b> . <ul style="list-style-type: none"> <li>Land capable of accommodating substantial development without adverse impact on wider character and/or landscape features that are considered to be important to the setting of the town.</li> <li>There is likely to be substantial potential for landscape enhancement.</li> </ul>  |

***Purpose 4: To preserve the setting and special character of historic towns***

- 3.27 Any land around a town or urban area may be said to contribute to its setting. However, the intention of this purpose is to protect land that makes a particular contribution to those defining historic features of towns and cities (although many towns have historic origins).
- 3.28 The purpose requires a clear view on what historic features contribute to the special character of the town and which have a direct relationship with the surrounding countryside. The study will need to focus on the relationship between key historical features and their landscape setting to ensure robust result that inform the decision making process.
- 3.29 We will draw on information set out in existing evidence base documents, such as the appraisals and management plans for designated Conservation Areas and historic landscape assessments. This information will help set the context of historic areas within the Borough. The criteria for assessing Purpose 4 are set out in the following table.

**Criteria for Green Belt Purpose 4. To Preserve the Setting and Special Character of Historic Towns** Does the parcel make a positive contribution to the setting of the historic town? Measured in terms of: -

- 1) Can features of the historic town be seen from within the parcel?
- 2) Is the parcel in the foreground of views towards the historic town from public places?
- 3) Is there public access within the parcel?
- 4) Does the parcel form part of an historic landscape that is related to an historic town?
- 5) Does the local landform or landscape form part of the setting of a conservation area or village?
- 6) Does the Parcel form part of an historic Landscape?

|   |                   |  |
|---|-------------------|--|
| <b>Critical importance to Green Belt Purpose</b><br>Continued inclusion within Green Belt of paramount importance                 | Critical          | Land where development would conflict <b><u>fundamentally</u></b> with Green Belt purpose. <ul style="list-style-type: none"> <li>The land clearly forms part of the historic landscape setting of the town or key historic features, and provides a strong contribution to the historic setting.</li> <li>The land may/may not be affected already by the existing physical/visual presence of the urban edge and may have a varied character</li> </ul>  |
| <b>Major importance to Green Belt Purpose</b><br>Continued inclusion within Green Belt of major importance                        | Major             | Land where development would conflict <b><u>substantially</u></b> with Green Belt purpose. <ul style="list-style-type: none"> <li>The land provides a strong contribution to the setting and historical character of the town.</li> <li>Strategic level of development has potential to undermine this character.</li> </ul>   |
| <b>Moderate importance to Green Belt Purpose</b><br>Continued inclusion within Green Belt of moderate importance                  | Moderate          | Land where development would conflict <b><u>significantly</u></b> with Green Belt purpose. <ul style="list-style-type: none"> <li>The land provides some contribution to the historic setting and special character of the town, although it is significantly reduced by the presence of features/land uses that do not form part of the towns character, or it may be distant from the urban edge and therefore contribute less to the purpose (other land closer to the urban edge performs the function of setting).</li> </ul> |
| <b>Slight/Negligible importance to Green Belt Purpose</b><br>Continued inclusion within Green Belt of minor/negligible importance | Slight/Negligible | Land where development would have <b><u>limited</u></b> impact on this purpose of Green Belt. <ul style="list-style-type: none"> <li>The land is physically and visually dominated by the immediate urban edge and has no relationship with key historical feature within the town.</li> <li>Land that is predominately rural away from existing urban areas.</li> </ul>   |

**Purpose 5:** *To assist in urban regeneration, by encouraging the recycling of derelict land*

- 3.30 It is the overall restrictive nature of Green Belt that, through its limitation of the supply of other development opportunities, encourages regeneration and the re-use of previously developed land within existing urban areas. It is therefore impossible to differentiate how any given parcel of land would contribute to the fulfilment of this purpose. However, it may be possible to draw broad conclusions about where the release of Green Belt land for development may assist with, or provide a catalyst to the regeneration of adjoining parts of the urban area (by improving access, or providing improved employment opportunities for example).

**Urban Edge Assessment**

- 3.31 In addition to assessing the five purposes it is important to incorporate an urban edge assessment. This will ensure that the existing Green Belt boundaries are fit for purpose; crucially that they can be drawn to defensible boundaries. This process will be used to highlight areas currently outside of the Green Belt that could be added to it and also areas which could be 'rounded off'. This could potentially release land for development.

**Enhance the beneficial use of the Green Belt**

- 3.32 Further to the Green Belt assessment and in accordance with paragraph 81 of the NPPF, local planning authorities are encouraged to plan positively to enhance the beneficial use of the Green Belt. We will therefore set out what existing beneficial uses and functions Green Belt parcels currently perform.

**Methodology for implementing the assessment**

- 3.33 Once the criteria for the assessment is finalised, the individual land parcels will be appraised.

*Stage 1*

- 3.34 All mapping and other relevant information will be brought together into a comprehensive GIS workspace.

*Stage 2*

- 3.35 A desktop based assessment to appraise land parcels will be carried out by the team. This will form an initial view of the parcels

### Stage 3

- 3.36 Based upon our initial appraisal, site visits will be undertaken to ensure that the appraisal is accurate. Any inconsistency or errors will be identified and changes considered.
- 3.37 Once the appraisals have been completed an assessment matrix will be prepared, an example of this is set out in Table 4. Following this an overall assessment of the parcels will be set out in a thematic map.
- 3.38 We would welcome your comments on the proposed methodology along with any additional suggestions.

**Table 4 Example Assessment Matrix for Green Belt**

| Land Parcel | Purposes of Green Belt |     |       |      | Notes  | Overall Assessment |
|-------------|------------------------|-----|-------|------|--|--------------------|
|             | ONE                    | TWO | THREE | FOUR |  |                    |
| 1           |                        |     |       |      | <p>1. Land separate from urban area; any development would be isolated. Contains McDevitt development; additional development may be perceived as uncontained growth.</p> <p>2. Lies between Village X/ Town Y(2.5km wide); already contains some development; further development would intensify/increase development extent within gap</p> <p>3. Any further development would be seen as further encroachment (some has already occurred with McDevitt development)</p>  | <b>Critical</b>    |
| 2           |                        |     |       |      | <p>1. Land has contained north east extent of town, to well defined edge along B382. Recently approved extension to the McDevitt campus extends into northern part of the parcel (granted on basis of 'exceptional circumstances' – land remains in Green Belt).</p> <p>2. Development extending northwards from urban area would extend parcel towards Town Y, although perception of merging would not arise if development were to be limited to southern part; potential for development to lead to perception of merging with development on McDevitt extension (although woodland may retain physical/visual separation)</p> <p>3. Strong landscape structure contains</p> | <b>Major</b>       |

|   |  |  |  |  |  |          |
|---|--|--|--|--|--|----------|
|   |  |  |  |  | urban area. Development in golf course north of road likely to be contained from wider area by woodland.   |          |
| 3 |  |  |  |  | No conflict with purposes – land is recreational and contained on 3 sides by development; recreational character as opposed to 'countryside'.  | Slight   |
| 4 |  |  |  |  | <p>1. Forms significant tract of land between edge of town and M18, which forms the logical threshold to Town Z beyond (refer parcel 6). Strong containing landscape features provide clear definition between urban edge and attractive countryside. Major developed site in north west corner but well contained from rest of parcel.</p> <p>2. Provides separation between edge of town and M18 (although urban area already extends to M18 to north, although perception of narrowing of gap may be limited by barrier provided by M18.</p> <p>3. Development beyond existing edge likely to be perceived as encroachment into countryside with a strong, attractive character. Boundaries beyond unlikely to provide same containment as existing</p> | Critical |

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