

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

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## Contents

## Page

<b>0.0</b>	<b>EXECUTIVE SUMMARY</b>	<b>5</b>
<b>1.0</b>	<b>Green Belt Assessment Methodology Consultation</b>	<b>7</b>
	Green Belt Consultation	7
<b>2.0</b>	<b>Summary of Consultation Responses</b>	<b>8</b>
	Consultation responses received	8

## **0.0 EXECUTIVE SUMMARY**

- 0.1 DLP (Planning) Limited and Liz Lake Associates have been commissioned by Pendle Council to undertake an assessment of the Green Belt within the borough.
- 0.2 The overall aim of the study is to undertake an independent and comprehensive assessment of the extent to which Green Belt land within the borough performs against the five purposes of Green Belt, 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 boundary.
- 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 will 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, the potential to extend 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 summarise the consultation undertaken with key stakeholders to allow them to consider the proposed criteria and methodology to be used in carrying out the Green Belt assessment for Pendle Council.

## 1.0 GREEN BELT ASSESSMENT METHODOLOGY CONSULTATION

### Green Belt Consultation

- 1.1 The six-week consultation on the Green Belt methodology ran from **Monday 9 May to Monday 20 June 2016** and was organised by the Council; who contacted key stakeholders directly and placed the draft documents on their website.
- 1.2 A workshop event was held on 2 June 2016 and attended by 15 people (table1). At the workshop the methodology of the Green Belt assessment was presented and then discussion moved onto specific land parcels, with participants presenting their suggestions on suitable boundaries for these. The comments we received will be used when identifying the individual land parcels that will form the basis for the assessment.

**Table 1 Workshop Attendees**

Organisation	Contact
<b>Local Authority Officers</b>	
Burnley Borough Council	Pete Milward
Lancashire County Council	Marcus Hudson
<b>Key Stakeholders</b>	
National Trust	Claire Walters
<b>Pendle Borough Council Officers</b>	
Housing & Economic Regeneration	Julie Whittaker
<b>Parish Councils</b>	
Barrowford Parish Council	Robert Oliver
Barrowford Parish Council	Iain Lord
Blacko Parish Council	Neil Hodgson
Colne Town Council	see below
Higham-with-West Close-Booth Parish Council	Robin Willoughby
Trawden Forest Parish Council	Barry Hodgson
Trawden Forest Parish Council	Adrian Foulkes
<b>Neighbourhood Plan Leads</b>	
Barrowford ( also Barrowford Ward Councillor)	Ken Turner
<b>Other Groups</b>	
Lidgett & Beyond Group	John Birchenough
Lidgett & Beyond Group	Mark Turner
Lidgett & Beyond Group (also Boulsworth Ward Councillor and Colne Town Council)	Sarah Cockburn-Price

## **2.0 SUMMARY OF CONSULTATION RESPONSES**

### **Consultation responses received**

2.1 A total of four (4) consultation responses were received from the following organisations (see Appendix 1 of this document for the full responses):

- Historic England
- Campaign to Protect Rural England (CPRE)
- National Trust
- Lidgett & Beyond Group -(a local interest group concerned with development proposals to the east of Colne)

2.2 The consultation responses received were in some cases expansive and covered several topic areas not directly related to this Green Belt assessment. Table 2 summarises only those comments that relate to matters that will be considered in the Green Belt assessment. Table 2 also sets out the actions that DLP and the Council will take to further consider, or amend the methodology.

2.3 Some comments were made on particular land parcels and these will be considered, alongside those made at the workshop, when identifying the individual Green Belt land parcels.



**Table 2**                      **Summary of Consultation Responses**

Organisation	Comment	Response	Action
Historic England	No comments made	N/A	N/A
Campaign to Protect Rural England	Paragraph 15 of their letter. <i>“CPRE does not agree that ‘aspiration for future growth’ constitutes an exceptional circumstance in itself, as economic growth is a perennial and constant desired outcome of public policy. The ‘need’ for future growth has always underpinned the purported case for exceptional circumstances”</i>	It is for the local planning authority (Pendle Council) to establish the exceptional circumstances for Green Belt release.  The purpose of the Green Belt Assessment is to reach an evidenced and justified view on the purpose of the Green Belt in Pendle. The assessment will be used in conjunction with other evidence base documents prepared by the Council, for them to reach a ‘planning judgement’ as to which areas of Green Belt, if any, may be released for possible future development.	None
Campaign to Protect	Summary of	We acknowledge that	None

Rural England	<p>paragraph 25 of their letter.</p> <p>Do not release land from the Green Belt through the 'rounding off' process. Exceptional circumstances need to exist.</p>	<p>the National Planning Policy Framework (NPPF) requires the Council to demonstrate "exceptional circumstances" for Green Belt release in a review of its Local Plan. It is also important to consider the permanence of the Green Belt and to ensure that strong boundaries exist on the ground. (Para 83).</p>	
Campaign to Protect Rural England	<p>Summary of paragraph 26 of their letter.</p> <p>The review should establish how beneficial uses can be delivered across the study area.</p>	<p>We acknowledge that the NPPF encourages local planning authorities to plan positively to enhance the positive use of the Green Belt, by providing opportunities for access, outdoor sport and recreation etc. (Para 81). The brief for the Pendle Green Belt Assessment does not cover this aspect of the Green</p>	None

		Belt, but the Council will explore this through other parts of their evidence base (i.e. the Green Infrastructure Strategy).	
Campaign to Protect Rural England	<p>Summary of paragraph 27 of their letter.</p> <p>Undesignated Green Belt in the countryside should be considered for Green Belt extensions to offset loss of Green Belt in other areas.</p>	<p>There is no requirement within the NPPF to 'balance' Green Belt losses with gains.</p> <p>The NPPF is clear how new Green Belt should be designated and this is something the assessment will address. Each land parcel will be considered on its own merits and not with the objective to make Green Belt gains if areas are to be removed.</p>	None
National Trust	Padiham should be identified as a historic town for the purposes of assessing Green Belt purpose 4. The town is within	We welcome the National Trusts comments and will consider identifying Padiham as an historic town.	We will consult with Burnley Council to establish the approach taken to Padiham in their Green Belt

	<p>Burnley's administrative area, has a conservation area, a number of special features, buildings of special architectural and historic interest. To the east of Padiham lies Gawthorpe Hall a Grade 1 listed building.</p>	<p>However, this would be predicated on the on-going Green Belt assessment for Burnley. To maintain consistency, we would need to treat Padiham in the same way that Burnley Council has done in its Green Belt Review.</p> <p>Gawthorpe Hall lies outside of the urban area of Padiham and is a separate entity. We do not consider that the Hall constitutes a town or settlement.</p>	<p>assessment.</p> <p>If Padiham is treated as a historic town in the Burnley Green Belt Review, we will consider it in this context within the Pendle Green Belt Assessment.</p> <p>The following is noted at paragraph 2.37 of the Burnley Green Belt Review (prepared by LUC) mentions Padiham and Gawthorpe.</p> <p>However, Table 4.1 shows that Criterion 4(a), which considers impact on the historic environment was only considered on two parcels of land to the west of Padiham (47 and 57a).</p>
National Trust	Other attributes (flood risk, ecology) that may preclude development should be considered.	We agree with the Trust, however it is not for the Green Belt assessment to consider 'other	None

		attributes' as these will be considered through a different evidence base document; in this case the Strategic Flood Risk Assessment.	
Lidgett and Beyond	Consider on a case by case basis that minor roads with hedgerow or dry stone wall as a strong boundary.	We acknowledge that it can be a difficult process to determine what types of boundary are strong or weak. This is why the process we have outlined for determining land parcels is a two stage process: firstly desk based, then site visits.	We will take the Group's comments on board. When considering the boundaries for land parcels. Any particularly strong boundaries which fall into these categories will be used, if they are considered to be the most appropriate boundary for that parcel.
	Consider on a case by case basis brooks and culverted watercourses as a strong boundary.	We acknowledge that it can be a difficult process to determine what types of boundary are strong or weak. This is why the process we have outlined for determining land parcels is a two stage	We will take the Group's comments on board. When considering the boundaries for land parcels. Any particularly strong boundaries which are formed by a stream or brook will be used,

		process: firstly desk based, then site visits.	if it is considered to be the most appropriate boundary for that parcel. The use of a culverted watercourse as a strong boundary is highly unlikely to be appropriate as it is doubtful that a distinctive surface feature will be associated with this.
	Use landownership as a boundary criterion	Green Belt parcels need to be defensible and identifiable on the ground. Land ownership does not meet either of these criteria.	None
	L&B made several comments (paragraph 24 to 26) in their response, regarding the appraisal of land parcels. In summary they requested that any parcel which performs well against any of the Green Belt purposes should be	This assessment is concerned with the contribution each parcel of land identified in the report makes towards the five purposes of Green Belt identified in the NPPF. It is for the Council to decide through the preparation of its	None

	removed from the site allocations document.	Local Plan whether a particular land parcel should be released for future development, when taking into consideration the findings of this assessment and other evidence base documents used in plan preparation. In short, this Green Belt assessment should not be used in isolation to remove potential sites from consideration, but should be used alongside other evidence base documents in order to reach a planning judgement on each site.	
	Purpose 4 should include conservation areas	Purpose 4 concerns the setting of historic towns. We have considered this purpose and expanded it to include all 'settlements' as defined in Policy	None

		SDP2 of Local Plan Part 1: Core Strategy (December 2015). Specific conservation areas do not fit within purpose 4, but may be a consideration.	
	Other assessment criteria are not reflected in the Green Belt assessment, such as; sustainability, flood risk, agricultural land quality (BMV), geology.	The Council will need to consider these relevant factors in the preparation of other evidence base documents.  As set out at the workshop, the Green Belt assessment is to assess how well parcels of land perform against the purposes of the Green Belt. It is not intended, nor would we recommended to the Council, that other factors such as those listed by L&B be included in a Green Belt assessment.	None





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