

# Pendle Local Plan Part 2: Site Allocations and Development Policies

## Green Belt Assessment

### 1.0 INTRODUCTION

- 1.1 In 2016 the Strategic Planning Research Unit (SPRU) of DLP (Planning) Ltd and Liz Lake Associates were commissioned by Pendle Borough Council to undertake an assessment of the Green Belt in the Borough.
- 1.2 A Green Belt Assessment (GBA) report was issued to Pendle Borough Council on 9<sup>th</sup> January 2017. This report was made available for public consultation as part of the Council's consultation on the Local Plan Part 2: Site Allocations and Development Policies (Scoping Report and Methodology) draft document and supporting evidence base, which closed on Friday 7<sup>th</sup> April 2017.
- 1.3 The following report includes SPRU's response to representor comments received on the Green Belt Assessment. (N.B. SPRUs comments are shown in *italics* to help distinguish them from responses provided by officers of Pendle Council).
- 1.4 As a general comment, it is reiterated that the purpose of the Green Belt Assessment is to assess the function of land against the five purposes of the Green Belt as set out in the National Planning Policy Framework (NPPF). It is not a report recommending that any particular parcel should or should not be removed, or added to, the Green Belt.
- 1.5 In order to add or remove land from the Green Belt, Pendle Borough Council must take into account a range of information so that the 'exceptional circumstances' required by paragraph 83 of the NPPF can be adequately met.
- 1.6 Some comments were raised about the clarity of maps; whilst it is considered the maps in Appendix 3 may be easily identified when read in conjunction with the large borough maps at Appendix 2, we will consider how a balance may be struck between providing adequate information to locate parcels of land and understanding the results from the assessment.

## Pendle Local Plan Part 2: Site Allocations and Development Policies

### Green Belt Assessment

### Consultation Comments

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C001GB	01235	Mr Malcolm Rochford	<p>I would like to comment on this, having received your recent notification.</p> <p>As an overall comment, I feel that all the green fields/open areas present in Pendle at this time should be protected &amp; only "Brownfield sites" allowed to be developed with an emphasis on mill conversions which I have watched being beautifully carried out on the Leeds/Liverpool canal over recent years.</p> <p>More specifically, living in the Lidgett Triangle, I wish to protect this area absolutely from any changes so the character of area &amp; integrity of the land is maintained.</p>	<p><b>Brownfield First Policy</b> Policy SDP2 of Pendle Local Plan Part 1: Core Strategy (LP1), in line with the core planning principles set out in paragraph 17 of the National Planning Policy Framework (NPPF), encourages the re-use of previously developed (Brownfield) land; provided that it is not of high environmental value. This approach helps to minimise the use of undeveloped (Greenfield) sites for development.</p> <p>Pendle Council successfully applied to be a pilot for the new Brownfield Land Registers, which are intended to ensure that 90% of 'suitable' Brownfield sites have planning permission by 2020. But the Council cannot restrict development to Brownfield sites, if it is to meet the development needs of the borough. LP1 (para 7.25) recognises that <i>"in order to not unduly restrict development ... some Greenfield sites will need to be released for development. Such sites will need to be in sustainable locations which are well related to existing settlements."</i></p> <p><b>Policy Designation @ Lidgett Triangle</b> Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) currently designates the land at Lidgett Triangle as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p>

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				<p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:</p> <p>(1) Designate as Green Belt The Pendle Green Belt Assessment (2016) considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that the Lidgett Triangle (Parcel PA.03) although contributing to the unrestricted sprawl of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the “exceptional circumstances” required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p>
C002GB	00725	Ms Helen Clegg	<p>I am responding to your request for areas to protect within the Green Belt in Pendle.</p> <p>Living in the Lidgett Triangle, I want to ensure that the Triangle, which I have so enjoyed myself, is preserved for future generations &amp; protected from any sort of developments.</p>	Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) currently designates the land at Lidgett Triangle as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given

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				<p>to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p> <p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:</p> <p>(1) Designate as Green Belt The Green Belt Assessment has considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that the Lidgett Triangle (Parcel PA.03) although contributing to the unrestricted sprawl of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the “exceptional circumstances” required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p>

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C003GB	01484	Provizion First Architecture Mr David Moore On behalf of Ms Farah Deebea	<p>Application to remove Parcel P089 from Green Belt</p> <p>On behalf of Ms Farah Deebea, the owner of the above-mentioned plot of land, we wish to formally comment on the Pendle Green Belt Assessment prepared by DLP Planning Ltd.</p> <p>The parcel of Green Belt land with which we are generally concerned is Parcel P041, but more specifically, Parcel P089 which forms part of it.</p> <p>Whilst we have no issues whatsoever with the general assessment of Parcel P041, we feel that Parcel P089 should be removed from the Green Belt in the emerging Local Plan for the reasons set out below:</p> <ul style="list-style-type: none"> <li>• Parcel P089 is a small plot of land off Ball Grove Drive, Colne, some 0.1174 hectares in area, situated at the extreme south-western tip of Parcel P041 and is in private ownership. The site is bounded on three sides by mature trees, with a public right-of-way running close to its north-eastern boundary</li> <li>• Although Parcel P089 technically lies within Green Belt Parcel, it has already been effectively separated from the main parcel by various developments which have taken place around the site over the years. These include the construction of Ball Grove Drive to the north-west of the site, Millbrook Court to the south-west, new housing developments to the south-east, south and south-west, as well as a 90 space car park to the north-east of the Site.</li> <li>• Not only is Parcel P089 located in the Green Belt, but it is also designated as Woodland Open Space (Site WD106) in the Pendle Open Space Audit. For the reasons set out above, however, it has now become detached from the woodland open space of which it was originally part.</li> <li>• Under the “Comments” heading for the Green Belt Purpose 2 relative to Parcel P041 in the Pendle Green Belt Assessment – Appendix 3, it stated that “some limited development may be possible without causing merger or perception of (merger) between the two settlements (Colne and Laneshawbridge). It has also been widely suggested that Pendle Borough Council may have to look at releasing sites outside current settlement boundaries in order (to) meet housing targets. In view of this, we would suggest that Parcel P089 is an ideal location to provide a sustainable, small-scale residential development, which would form a logical completion to the Ball Grove Drive / Millbrook Court settlement, whilst at the same time, because of the physical restraints mentioned previously, would preclude any further incursion into the Green Belt.</li> </ul>	<p>The purpose of the Green Belt Assessment is to assess the function of land against the five purposes of the Green Belt as set out in the National Planning Policy Framework (NPPF). It does not recommend that a particular parcel of land should, or should not, be added to, or removed from, the Green Belt.</p> <p>In order to add or remove land from the Green Belt, Pendle Council must take into account a wide range of information so that the ‘exceptional circumstances’ required by paragraph 83 of the NPPF can be adequately demonstrated.</p> <p>Pendle Council will carry out further work to determine whether smaller plots of land within the Green Belt parcels assessed by our consultants are suitable for, and needed to, accommodate the level of development required for a particular settlement. This will take place prior to the publication of the LP2 Preferred Options Report, which will be made available for public consultation in 2018.</p> <p><i>No comment provided on contents of GBA.</i></p> <p><b>Recommendations: no change to the assessment.</b></p>

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			We respectfully submit that the foregoing suggests that the removal of Parcel P089 would not harm the five purposes of Green Belt, as set out in the National Planning Policy Framework, and request you to give due consideration to our application.	
C004GB	00526	Trawden Forest Parish Council Ms Adele Waddington	<p><b>With reference to the Pendle Green Belt Assessment - Submission from Trawden Parish Council</b></p> <p><b>Parcel P042a, described in the report as:</b></p> <p><b>Comprising agricultural fields, an area of woodland, and built development along Rosley Street, Bright Street, Holme Street, Winewall Road and Trawden Road, the parcel has a semi-rural character. The parcel is contained to the north by Winewall Lane, Rosley Street and Winewall Road, to the west by Colne Water and Trawden Road, and to the south-west by Winewall Lane.</b></p> <p>Trawden Forest Parish Council discussed the recommendation that this parcel be released from the Green Belt at its meeting on 6<sup>th</sup> March. The council voted 4-1 against this change to the Green belt.</p> <p>The Parish Council takes issue with the 2 statements in the report, that:</p> <p><i>The parcel plays no role in the separation of Winewall and Trawden.</i></p> <p>and:</p> <p><i>There would be minimal impact upon the wider role of the Green Belt in the Winewall and Colne area, as the two settlements can already be considered to have merged.</i></p> <p>These statements miss the point that this Parcel forms an important part of the 'Green Wedge' between the settlements of Trawden and Colne (Cottontree/Winewall). Removing it from the Green Belt and allowing development as proposed (application reference P242) would result in the loss of over half of this 'wedge' and bring the settlement boundaries of Colne and Trawden almost to within touching distance.</p> <p>There are attractive long range views of Well Head and the fields within this Parcel, as seen from Cotton Tree Lane and Keighley Road as you leave Colne</p>	<p><i>Parcels P042b and P043 perform the function of separating Winewall and Trawden, not P042a.</i></p> <p><i>In terms of the gap between Trawden and Colne, parcel P042a is already enclosed by existing built form at Winewall and Colne and therefore the gap is already compromised in this location. Development within the parcel would not further erode the gap, which is instead maintained by parcels P042b and P043.</i></p> <p><b>Recommendations: no change to the assessment.</b></p>

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			<p>towards Keighley or Trawden. The variation in styles and types of the houses running along the brow of the hill at Well Head sits particularly well with the green meadows below. This is a classic example of Trawden's landscape character. It would be swamped and lost completely if the meadows were filled with an estate of 75 houses.</p> <p>The Parish Council urges Pendle to not accept the recommendation, and to leave the Parcel P042a within the Green Belt.</p>	
C005GB	00198	Historic England Ms Emily Hrycan	<p>Thank you for consulting Historic England about the above.</p> <p>Historic England is the Government's statutory advisor on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.</p> <p>We do not have any comments to make on this consultation.</p>	It is noted that Historic England has no specific comments to make on the Green Belt Assessment.
C006GB	00250	CPRE Lancashire Ms Jackie Copley	<p><b>Green Belt Assessment</b></p> <p>8. Nationally, CPRE has had a long-standing interest and involvement in the designation, maintenance and use of the Green Belt across the country as a whole.</p> <p>9. CPRE Lancashire makes the case that there is in fact no exceptional circumstance to release Green Belt land. The scale of development should reflect realism and the duty to cooperate with neighbouring authorities must be applied.</p> <p>10. We do acknowledge the need for the Council to tackle issues of deprivation and encourage new forms of economic development to ensure for a prosperous future for Pendle. But, CPRE Lancashire wants to</p>	<p>The Inspector examining the LP1 indicated that a detailed review of the Green Belt boundaries would need to be carried out to determine whether the defined limits need to be altered to allow for the inclusion of additional land for development. The Inspector also noted that a Green Belt Review would be necessary to ensure that enough land is identified to meet the spatial strategy of the plan. Pendle Council will need to carefully consider whether it can demonstrate the "exceptional circumstances" required to remove land from the Green Belt, in order to allow for new development.</p> <p>Evidence prepared in support of LP1 indicated that this was the case.</p>

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			<p>be confident that there really is no alternative to the loss of land currently in the countryside due to adverse impacts on the economic, social and environmental impacts.</p> <p>11. Everything should be done by the Council to focus on the reuse of Brownfield land in urban areas in the first instance in advance of greenfield release. We understand the need to keep rural communities alive and working so accept that new employment may need to be created in rural locations, but we believe that this ought to be as a last resort, as once it is gone, the countryside is gone forever.</p>	<p>LP1 Policy SDP2, in line with the core planning principles set out in paragraph 17 of the National Planning Policy Framework (NPPF), encourages the re-use of previously developed (Brownfield) land; provided that it is not of high environmental value. This approach helps to minimise the use of undeveloped (Greenfield) sites for development.</p> <p>Pendle Council successfully applied to be a pilot for the new Brownfield Land Registers, which are intended to ensure that 90% of 'suitable' Brownfield sites have planning permission by 2020. But the Council cannot restrict development to Brownfield sites, if it is to meet the development needs of the borough. LP1 (para 7.25) recognises that <i>"in order to not unduly restrict development ... some Greenfield sites will need to be released for development. Such sites will need to be in sustainable locations which are well related to existing settlements."</i></p> <p>In the rural areas there are limited opportunities within existing settlement boundaries to provide land for new development. To help sustain local services it may be necessary to allow some sites to come forward on the edge of villages to meet the development requirements in those locations. Any development on a sustainable Greenfield site will need to sensitively developed, in order to respect its immediate surroundings.</p>
C007GB	00749	Friends of Ball Grove Mr Les Cromey	<p>I wish to object with regard to the parcel of land numbered P041 'Ball Grove' that could possibly lose its Green Belt Status under the Pendle Green Belt Planning Review.</p> <p>Ball Grove Nature Reserve &amp; Park play a major role in providing activities such as walking, fishing, play area (swings etc for under sixteens).</p> <p>Picnic areas.</p>	<p>There is currently no proposal to remove Parcel P041 from Green Belt.</p> <p>The Pendle Green Belt Assessment (2016) used an agreed methodology to divide the Green Belt up into a number of separate parcels. It then assessed these parcels against the five purposes of Green Belt, as set out in the NPPF (para 80) to help determine if they still contributed to the primary purpose of the Green Belt in Lancashire, which is</p>



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			<p>Major footpath between Trawden &amp; Wycoller.</p> <p>Holder of a Green Flag for the Standard of the Park / Nature Reserve second year running</p> <p>It has Two lakes one is fished</p> <p>Provides Dog walking areas /paths</p> <p>The historic site of a major Tannery</p> <p>Lots of Wild Life such as Ducks nesting, Deer, Frogs, Fish, various birds, Otter etc</p>	<p>to check unrestricted sprawl and the merger of neighbouring settlements (para 2.13).</p> <p>Parcel P041 covers an area of land to the east of Laneshaw Bridge, immediately south of the A6068 and north of Colne Water. This extensive parcel of land includes part of Ball Grove Park and the Ball Grove Nature Reserve.</p> <p>The Green Belt Assessment concluded (Table 12) that Parcel P041 plays a “major” role in preventing neighbouring towns (and villages) from merging into one another (Purpose 2). Whilst it is acknowledged that this means that the parcel may still be able to accommodate “some limited development” without compromising this role (Table 3, page 21), extensive development is not considered to be an option. Parcel P041 was considered to perform a less important role when considered against the three other purposes of Green Belt that were assessed. The report concluded that Parcel P041 was still integral to the Green Belt and as such it was not included in the list of parcels that are no longer considered to perform a Green Belt function (Table 13).</p> <p>The NPPF (para 83) is clear that “Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.”</p> <p>In preparing LP2 Pendle Council must allocate sufficient land to meet the overall development requirements established in LP1; which has been apportioned by settlement in the LP2 Scoping Report &amp; Methodology (Table 3.11). Whilst detailed site assessments have yet to be completed, there would appear to be sufficient sites not within the Green Belt to meet the identified development needs for Laneshaw Bridge.</p>
C008GB	01497	Ms Lynn Greaves	<p>I object to the possible loss of Ball Grove Nature Reserve &amp; Park from being part of the Green Belt.</p> <p>The council are currently &amp; have been allowing planning permission for houses to be built, just for the builders to put the land in their land banks. If this goes</p>	<p>There is currently no proposal to remove Parcel P041 from Green Belt.</p> <p>The Pendle Green Belt Assessment (2016) used an agreed methodology to divide the Green Belt up into a number of</p>

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			<p>on we will have no green spaces like Ball Grove</p> <p>Ball Grove is full of people walking their dogs kids playing in the park.</p> <p>It is also the main footpath between Colne &amp; Wycoller</p> <p>Ball Grove has for the last two years held the Green Flag for the Standard of the area.</p>	<p>separate parcels. It then assessed these parcels against the five purposes of Green Belt, as set out in the NPPF (para 80) to help determine if they still contributed to the primary purpose of the Green Belt in Lancashire, which is to check unrestricted sprawl and the merger of neighbouring settlements (para 2.13).</p> <p>Parcel P041 covers an area of land to the east of Laneshaw Bridge, immediately south of the A6068 and north of Colne Water. This extensive parcel of land includes part of Ball Grove Park and the Ball Grove Nature Reserve.</p> <p>The Green Belt Assessment concluded (Table 12) that Parcel P041 plays a “major” role in preventing neighbouring towns (and villages) from merging into one another (Purpose 2). Whilst it is acknowledged that this means that the parcel may still be able to accommodate “some limited development” without compromising this role (Table 3, page 21), extensive development is not considered to be an option. Parcel P041 was considered to perform a less important role when considered against the three other purposes of Green Belt that were assessed. The report concluded that Parcel P041 was still integral to the Green Belt and as such it was not included in the list of parcels that are no longer considered to perform a Green Belt function (Table 13).</p> <p>The NPPF (para 83) is clear that “Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.”</p> <p>In preparing LP2 Pendle Council must allocate sufficient land to meet the overall development requirements established in LP1; which has been apportioned by settlement in the LP2 Scoping Report &amp; Methodology (Table 3.11). Whilst detailed site assessments have yet to be completed, there would appear to be sufficient sites not within the Green Belt to meet the identified development needs for Laneshaw Bridge.</p>

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C009GB	00526	Trawden Forest Parish Council Ms Adele Waddington	<p>I write on behalf of Trawden Forest Parish Council who has an interest in the matters relating to Ball Grove.</p> <p>We see that it has been recommended that the area is taken out of the Green Belt following the recent review that has been carried out. The Parish Council feel that this area is an important part of the biodiversity of the Parish as it has a Nature Reserve, lake and wildlife on the site and has been awarded the Green Flag award for 2 years.</p> <p>There are walks and play areas for children which is important for health and wellbeing. The area is very popular with all walks of life and is an important asset to the parish.</p> <p>The Parish Council urges Pendle Borough Council to not accept the recommendation, and to leave the area within the Green Belt.</p>	<p>There is currently no proposal to remove Parcel P041 from Green Belt.</p> <p>The Pendle Green Belt Assessment (2016) used an agreed methodology to divide the Green Belt up into a number of separate parcels. It then assessed these parcels against the five purposes of Green Belt, as set out in the NPPF (para 80) to help determine if they still contributed to the primary purpose of the Green Belt in Lancashire, which is to check unrestricted sprawl and the merger of neighbouring settlements (para 2.13).</p> <p>Parcel P041 covers an area of land to the east of Laneshaw Bridge, immediately south of the A6068 and north of Colne Water. This extensive parcel of land includes part of Ball Grove Park and the Ball Grove Nature Reserve.</p> <p>The Green Belt Assessment concluded (Table 12) that Parcel P041 plays a “major” role in preventing neighbouring towns (and villages) from merging into one another (Purpose 2). Whilst it is acknowledged that this means that the parcel may still be able to accommodate “some limited development” without compromising this role (Table 3, page 21), extensive development is not considered to be an option. Parcel P041 was considered to perform a less important role when considered against the three other purposes of Green Belt that were assessed. The report concluded that Parcel P041 was still integral to the Green Belt and as such it was not included in the list of parcels that are no longer considered to perform a Green Belt function (Table 13).</p> <p>The NPPF (para 83) is clear that “Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.”</p> <p>In preparing LP2 Pendle Council must allocate sufficient land to meet the overall development requirements established in LP1; which has been apportioned by settlement in the LP2 Scoping Report &amp; Methodology</p>

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				(Table 3.11). Whilst detailed site assessments have yet to be completed, there would appear to be sufficient sites not within the Green Belt to meet the identified development needs for Laneshaw Bridge.
C010GB	00040	Barrowford Parish Council Mr Iain Lord	<p><b>Summary of Response Points:</b></p> <ol style="list-style-type: none"> <li><b>1. Quality of mapping in the assessment.</b></li> <li><b>2. Reasons behind the Green Belt Assessment</b></li> <li><b>3. Parcel P021 (off Carr Hall Road) factually incorrect statements and should be reversed.</b></li> <li><b>4. Parcel PA01 (west of Laund Farm) to become Green Belt to protect the setting of the Upper Carr Hall Conservation Area.</b></li> </ol> <p><b>1. Interpretation of Sites through the Included Mapping</b> The consultation document is underpinned by the maps in the appendix to identify the exact locations. The identification of specific parcels of land in relation to the urban core is rendered almost impossible to those unfamiliar with local maps and very difficult to people with some experience of them. The user's difficulty is largely brought about by over emphasis of the parcels of Green Belt and reduction in the definition of the urban content of the maps. The removal of town, ward and major street names from the urban core mapping and the odd inclusion of the word Pendle does not help in identifying specific urban areas.</p> <p>Barrowford Parish Council strongly suggests that more clarity is needed in the maps accompanying any future draft.</p> <p><b>2. Factors Driving the Assessment of the Green Belt</b> This re-assessment of the Green Belt has been forced on Pendle Council not so much in order to strengthen it but as a result of</p> <ul style="list-style-type: none"> <li>the need of the Local Plan to release more greenfield sites for development in more viable locations</li> <li>to address perceived shortages of greenfield sites within certain areas of both the M65 Corridor and the Rural Villages.</li> </ul> <p>This is made clear from the following three paragraphs from the assessment.</p> <p>2.9 The Green Belt within Pendle remains and still has an important planning policy function to play in the control of urban growth. However, it is evident that for Pendle to grow sustainably, areas of Green Belt will need to be released for development.</p> <p>2.10 The principle of Green Belt release to ensure that the current housing</p>	<p><i>Please see comments in the Introduction.</i></p> <p>The purpose of the Green Belt Assessment is to assess the function of land against the five purposes of the Green Belt as set out in the National Planning Policy Framework (NPPF). It does not recommend that a particular parcel of land should, or should not, be added to, or removed from, the Green Belt.</p> <p>In order to add or remove land from the Green Belt, Pendle Council must take into account a wide range of information so that the 'exceptional circumstances' required by paragraph 83 of the NPPF can be adequately demonstrated.</p>

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			<p>and economic needs of Pendle can be met over the current plan period were established through the preparation and examination of the Core Strategy. The Inspector's report and the adopted Core Strategy are clear that areas of Green Belt will need to be released.</p> <p>2.11 It is important that following any release of land from the Green Belt for development, that the new Green Belt boundary will not need to be altered at the end of the plan period, that the boundary is clearly defined and readily recognisable and that the broad areas of Green Belt around Pendle still contribute to the five purposes set out in the NPPF (paragraph 80).</p> <p>The clear inference from these three paragraphs is that the aim is to reduce Green Belt within certain areas of Pendle to allow additional green field sites to come forward.</p> <p>But the test is that exceptional circumstances must be proved to facilitate any removal. In our view:</p> <ul style="list-style-type: none"> <li>in the case of Parcel P021 this is clearly not met there is justification for the inclusion of Parcel PA01 as a new Green Belt addition.</li> </ul> <p><b>3. Identified Parcels of Land P021 and PA01</b></p> <p>Barrowford Parish Council has serious concerns regarding the change of status of these two parcels and would like to see the recommendations for P021 reversed and the upgrading of Protected Status to Green Belt for Parcel PA01.</p> <p><b>P021:</b></p> <p>This is described in the assessment as "largely comprising agricultural fields divided by small wooded areas and hedgerows, and incorporating a small existing residential development along Churchill Road to the north, the parcel has a semi-rural character. It is largely contained to the east and west by urban development, and to the north by the A6068. The A6068 would provide a barrier to further encroachment into the countryside to the north."</p> <p><b>Barrowford Parish Council comment: The description is a fair assessment of what is on the ground, but apart from road numbers and the mention of Churchill Road it does not identify the location of the site or the context of its relationship between different towns and villages within Pendle.</b></p> <p><b>The lack of this clarity over its precise location renders the recommendations in Table 13 as both factually incorrect and the conclusion fatally flawed.</b></p>	<p>Pendle Council will need to carry out further work to determine whether entire Green Belt parcels, or smaller plots of land within them are suitable for, and needed to, accommodate the level of development required for a particular settlement. This work will take place prior to the publication of the LP2 Preferred Options Report, which will be made available for public consultation in 2018.</p> <p><i>Description amended in Table 7 of the GBA to:</i></p> <p><i>"Largely comprising agricultural fields divided by small wooded areas and hedgerows, and incorporating a small existing residential development along Churchill Road to the north, the parcel has a semi-rural character. Located between the Lomeshaye Industrial Estate to the west and Carr Hall Road to the east at Barrowford, it is largely contained by urban development, as well as to the north by the A6068. The A6068 would provide a barrier to further encroachment into the countryside to the north."</i></p>

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			<table><tr><th>Parcel Number</th><th>Retain / Remove</th><th>Commentary</th><th>Impact of Green Belt Release</th></tr><tr><td>P021</td><td>No longer contributes to overall Green Belt Function</td><td><p>The parcel forms an isolated gap to the south of the A6068 between the western residential edge of Nelson and the Lomeshaye Industrial Estate. Development in the parcel would not lead to the perception of urban sprawl.</p><p>The parcel does not lie between two settlements and makes a very limited contribution to visual separation.</p><p>Largely comprising agricultural fields divided by small wooded areas and hedgerows, and incorporating a small existing residential development along Churchill Road to the north, the parcel has a semi-rural character. It benefits from significant containment to the north, east and west. The A6068 may provide a stronger northern Green Belt boundary than that currently provided by Park Avenue.</p></td><td><p>Release of this Green Belt parcel would have minimal impact upon the wider Green Belt within this area of Pendle. The parcel forms an isolated gap between areas of development and therefore plays no role in containing sprawl or the merging of settlements.</p><p>The surrounding Green Belt would not be compromised by this release and it would help to create a stronger boundary to the Green Belt, along the A6068.</p></td></tr></table>	Parcel Number	Retain / Remove	Commentary	Impact of Green Belt Release	P021	No longer contributes to overall Green Belt Function	<p>The parcel forms an isolated gap to the south of the A6068 between the western residential edge of Nelson and the Lomeshaye Industrial Estate. Development in the parcel would not lead to the perception of urban sprawl.</p> <p>The parcel does not lie between two settlements and makes a very limited contribution to visual separation.</p> <p>Largely comprising agricultural fields divided by small wooded areas and hedgerows, and incorporating a small existing residential development along Churchill Road to the north, the parcel has a semi-rural character. It benefits from significant containment to the north, east and west. The A6068 may provide a stronger northern Green Belt boundary than that currently provided by Park Avenue.</p>	<p>Release of this Green Belt parcel would have minimal impact upon the wider Green Belt within this area of Pendle. The parcel forms an isolated gap between areas of development and therefore plays no role in containing sprawl or the merging of settlements.</p> <p>The surrounding Green Belt would not be compromised by this release and it would help to create a stronger boundary to the Green Belt, along the A6068.</p>				
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			<p><b>The commentary in Table 13 contains several factual errors:</b></p> <p>1. Paragraph 1 of the commentary states that the parcel is an isolated gap between the residential edge of Nelson and the Lomeshaye Industrial Estate:</p>				<p><i>The assessment has been undertaken on the basis of the settlement boundaries as set out on the adopted Pendle Borough Policies Map, rather than local administrative</i></p>								

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			<p><b>This is incorrect. The residential edge referred to is the Westerly Edge of Carr Hall, Barrowford.</b></p> <p>2. Paragraph 2 states: Development in the parcel would not lead to the perception of urban sprawl. The parcel does not lie between two settlements and makes a very limited contribution to visual separation.</p> <p><b>This statement would be the case if the whole area was within Nelson but as it is a point of separation between Nelson and Barrowford the Green Belt is relevant. In our opinion field hedgerows and mature trees provide good visual separation from Carr Hall Road to the Lomeshaye Industrial Estate.</b></p> <p>3. Paragraph 4 states: It benefits from significant containment to the north, east and west. The A6068 may provide a stronger northern Green Belt boundary than that currently provided by Park Avenue.</p> <p><b>This again would be materially correct except for the errors that this is the Nelson/Barrowford Boundary and that it is not bordered by Park Avenue but Carr Hall Road, the oldest access route in Carr Hall.</b></p> <p><b>Impact of Green Belt Release</b> This section states: "Release of this Green Belt parcel would have minimal impact upon the wider Green Belt within this area of Pendle. The parcel forms an isolated gap between areas of development and therefore plays no role in containing sprawl or the merging of settlements. The surrounding Green Belt would not be compromised by this release and it would help to create a stronger boundary to the Green Belt, along the A6068."</p> <p><b>This impact assessment is fatally flawed in its conclusion due the inaccuracies in the information assessed.</b></p> <p><b>Parcel No P021 fulfils at least two of the four purposes of the Green Belt purposes highlighted on page 5 of the document.</b></p> <p>1. Check the unrestricted sprawl of large built up areas:</p> <p><b>This Parcel has adequately achieved this and in recent years has provided a buffer zone between the industrial estate and Barrowford.</b></p>	<p><i>boundaries. The Policies Map shows the urban area west of Carr Hall Road as part of Nelson. As such, the conclusions of the original assessment remain valid and no change to the report is recommended.</i></p> <p><i>Park Avenue is the existing Green Belt boundary to the south east. The A6068 would provide a stronger Green Belt boundary in this location than Park Avenue.</i></p> <p><i>Please see comments above.</i></p>

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			<p>2. Prevent neighbouring towns merging into one another.</p> <p><b>Parcel P021 has in recent years prevented the merging of Nelson with Barrowford. This is critical, as for much of the adjoining boundary only the river and Victoria Park have provided separation.</b></p> <p><b>Boundaries:</b></p> <p>This site has strong boundaries on all sides and these are defined as:  <b>Westerly: The curtilage of the existing Lomeshaye Industrial Estate.</b>  <b>Northerly: The A6068 and Churchill Road</b>  <b>Southerly: Park Avenue and the track extending along the riverside to Lomeshaye Road.</b>  <b>Easterly: Carr Hall Road is a strong feature which has remained consistent for over a century.(appendix 1 extract from the 1910 OS Map)</b></p> <p><b>Revision of Designation for P021:</b></p> <p><b>Barrowford Parish Council believe that due the inaccuracies in the described location and the significance of Parcel PO21 as a separation of two distinct townships the conclusions reached in appendix 3 are both flawed and incorrect. We are confident that if the correct information had been used in the assessment then the same conclusions could not have been made. Barrowford Parish Council feels that the onus to prove the exceptional circumstances required to remove Parcel P021 has not been met and that there is no valid reason to remove it from the Green Belt.</b></p> <p><b>Parcel PA01:</b></p> <p>This site is currently listed as Protected land. Along with the adjacent Trough Laithe Strategic Housing Site, the designation of this site has in effect enabled the growth of urban sprawl into what was once farmland and, with the approved business park below, will almost merge the once predominantly working class ward of Newbridge with the affluent mill owning area of Carr Hall Road. Parcel PA01 represents the last opportunity to prevent these two diverse areas merging.</p> <p>Furthermore, Parcel PA01 falls within the designated Higher Carr Hall Conservation area and contains a Grade II listed farmhouse and would meet</p>	<p><i>Please see comments above.</i></p> <p><i>Please see comments above.</i></p> <p><i>This is not an exceptional circumstance to justify inclusion of land within the Green Belt.</i></p>



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			<p>two of the four purposes of the Green Belt.</p> <p>1. Check the unrestricted sprawl of large built up areas:</p> <p><b>This site would prevent unrestricted sprawl.</b></p> <p>2. To preserve the setting and special character of historic towns:</p> <p><b>Barrowford as the second oldest area within the M65 Corridor has significant historic areas worthy of preserving within their current setting and amenity. This is borne out by the fact that Barrowford contains four Conservation Areas, two of which are in Carr Hall and encompass virtually all the older buildings.</b></p> <p><b>The context of the Higher Carr Hall Conservation Area being predominantly large detached dwellings set in significant grounds on the edge of farmland will be significantly diminished if modern housing schemes were allowed to creep up to the rear curtilages of these properties.</b></p> <p><b>Parcel PA01 has good defined boundaries and would fulfil most of the tests for inclusion in the Green Belt. Barrowford Parish Council feels that given its location and potential role in meeting these criteria it should be included in the Green Belt.</b></p>	<p><i>We disagree with this conclusion. Instead it would represent infill development within the settlement envelope.</i></p> <p><i>Protection of heritage assets other than specific designated Historic Towns is not a purpose of the Green Belt.</i></p> <p><i>As part of preparing a robust evidence base for the Local Plan, the Council may undertake an assessment of historic assets and the impact upon them through potential development. In addition the SA/SEA of the plan will cover some of these issues.</i></p> <p><i>Recommendations: amend Table 7 of the GBA to clarify location for P021. No change to the Assessment for PA.01.</i></p>

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			<p><b>Appendix 1</b></p> <p>Carr Hall Road Section of the 1910 OS Map</p>	
C011GB	00564	Wildlife Trust for Lancashire, Manchester & N. Merseyside Mr John Lamb	<p><b>Re: Pendle Green Belt Assessment.</b> I found it confusing that the colour depicting the greatest level of conformity with Green Belt Purpose 1 and 2 (dark green = “Critical” on Maps 1 and 2), is also used to depict the least level of conformity with Green Belt Purpose 3 and 3+ 2 (dark green = “Little” on Maps 3 and 3+).</p> <p><b>Re: P041.</b> The parcel includes Ball Grove Park and Upper Ball Grove Lodge Local Nature Reserve (LNR), which provided water for a leather tannery that was located in the park downstream, hence the comment at the end that it “plays no role in the features or historic assets of Colne” does not recognise</p>	<p><i>The ranking / description of Green Belt purpose 3 and 3+ should be read in context with the assessment methodology and assessment framework (pages 29-31). The description of ‘little / low’ means that the parcel has a low capacity for change (darker green) i.e. stronger Green Belt function. However, we have taken this comment on board and altered the key labels for Maps 3 and the title for Maps 3+ has been amended to provide greater clarity in response to these points. Nevertheless, we do recommend that in order to understand the assessment in full, the maps</i></p>

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			the historical context of the site. The Ferndean Way (a walking trail that follows the route that the Bronte sisters followed to Wycoller Hall) passes through the site and is a promoted route in Pendle and Lancashire. Large areas of the parcel form an important part of the grassland and woodland ecological networks for Pendle and Lancashire and the Wildlife Trust would object to parcel P041 being taken out of Pendle’s Green Belt if this would pave the way for planning applications to develop land within the site.	<p><i>should be read in conjunction with the assessment framework in the Methodology and should not be used in isolation.</i></p> <p><i>Purpose 4 has a very specific purpose in respect of protecting designated Historic Towns, and does not include the protection of other designated heritage assets which are protected by other means such as Listing or planning policies. In this instance, this includes Green Belt which has a specific role to play in the setting of Colne as a historic town in general. P041 is not considered to perform this function.</i></p> <p><b>Recommendations: alterations to Maps 3 and 3+ in Appendix 3. No change to the Assessment for P041.</b></p>																
C012GB	00152	Environment Agency Mrs Liz Locke	<p><b>3. Pendle Green Belt Assessment</b></p> <p>The methodology for the review of Green Belt is outside the remit of the Environment Agency. However, we have reviewed the conclusions of this report, and can provide the following site-specific comments on those sites considered to no longer contribute to overall Green Belt function:</p> <table><tr><th>Site Ref.</th><th>Environment Agency constraints</th></tr><tr><td>P004b</td><td>No constraints</td></tr><tr><td>P016a</td><td>No constraints</td></tr><tr><td>P018c</td><td>No constraints</td></tr><tr><td>P021</td><td>Any future development should take into account Flood Zone 2 which extends along the southern edge of the site.</td></tr><tr><td>P034a,b,c</td><td>No constraints</td></tr><tr><td>P036c</td><td>Any future development should take into account the proximity to Foulridge Reservoir. The planning authority is responsible for coordinating emergency plans for reservoir flooding. The Environment Agency has a regulatory role for reservoir safety. Any development should retain a buffer strip adjacent to the reservoir to preserve the ecological habitat.</td></tr><tr><td>P042a</td><td>Any future development should take into account Flood Zone 2 which extends into the northwest portion of the site.</td></tr></table>	Site Ref.	Environment Agency constraints	P004b	No constraints	P016a	No constraints	P018c	No constraints	P021	Any future development should take into account Flood Zone 2 which extends along the southern edge of the site.	P034a,b,c	No constraints	P036c	Any future development should take into account the proximity to Foulridge Reservoir. The planning authority is responsible for coordinating emergency plans for reservoir flooding. The Environment Agency has a regulatory role for reservoir safety. Any development should retain a buffer strip adjacent to the reservoir to preserve the ecological habitat.	P042a	Any future development should take into account Flood Zone 2 which extends into the northwest portion of the site.	<p>The constraints information provided by the Environment Agency for sites identified as no longer contributing to the overall Green Belt function (LP2 Scoping Report &amp; Methodology, Table 13) is noted.</p> <p>Where “exceptional circumstances” can be shown to exist and any of these sites are recommended for removal from the Green Belt to be allocated for a specific use consideration will be given to this information.</p>
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C013GB	00639	Dr Alison Birkinshaw	<p>Further to my previous email regarding the consultation on the Local Development Framework, I would like to state that the land contained within the Greenbelt Assessment Report as PA03 should be put forward for inclusion in Eastern Colne's Green Belt an assertion strengthened by recent consultation activities and feedback from residents on recent planning applications, and the Planning Inspectors report.</p> <p>I would request that feedback from local residents relating to the proposed recent application to develop the whole of The Rough should be taken into account when taking decisions as to which land should be allocated as green belt.</p> <p>I also believe that the Lidgett Triangle should be similarly protected as valuable green space, crucial for the health of local residents.</p>	<p><b>NOTE: There is an error in Table 9, Table 14 and Appendix 3 of the Pendle Green Belt Assessment; with the commentary for Parcel PA.02 shown against the entry/map for Parcel PA.03 and vice versa.</b></p> <p>Given the description provided in the representation it is evident that the representation refers to Parcel PA.03, the land between Castle Road and Skipton Old Road, which also includes land at the Lidgett Triangle.</p> <p>Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) currently designates Parcel PA02 as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p> <p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:</p> <p>(1) Designate as Green Belt The Pendle Green Belt Assessment (2016) considered</p>

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				<p>both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that the Parcel PA.03 although contributing to the unrestricted sprawl of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the “exceptional circumstances” required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p>
C014GB	01128	Cllr Jonathan Nixon (Horsfield Ward)	<p>I wish to raise my objections to certain parcels of land having been removed within your Local Plan Part 2 Green Belt Designation proposal, namely parcel references:</p> <p>P038A P040 P041 PA03</p> <p>The aforementioned parcels should without question remain within the Green Belt Designation, for reasons briefly outlined below:</p> <p>1. They contain important circular walking routes. 2. The Rough, with its long-range views and footpaths and the Lidgett Triangle lies at the heart of the Lidgett and Bents Conservation Area. It was recently</p>	<p>The purpose of the Green Belt Assessment is to assess the function of land against the five purposes of the Green Belt as set out in the National Planning Policy Framework (NPPF). It does not recommend that a particular parcel of land should, or should not, be added to, or removed from, the Green Belt.</p> <p>In order to add or remove land from the Green Belt, Pendle Council must take into account a wide range of information so that the ‘exceptional circumstances’ required by paragraph 83 of the NPPF can be adequately demonstrated.</p> <p>Pendle Council will need to carry out further work to determine whether entire Green Belt parcels, or smaller plots of land within them are suitable for, and needed to, accommodate the level of development required for a particular settlement. This work will take place prior to the publication of the LP2 Preferred Options Report, which will be made available for public consultation in 2018.</p> <p><i>Purpose 4 has a very specific purpose in respect of protecting designated Historic Towns, and does not include</i></p>

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			<p>recognised by a Planning Inspector in his summary of his decision in regards to the recent application to develop the whole of The Rough following its acquisition by a speculator property company.</p> <p>3. Parcel P038 has a strong historic significance within both The Conservation Area and the town of Colne, as it contains a long line of 200-year-old lime trees which were planted to form the entrance to the Heyroyd Estate. Heyroyd was a former hamlet outside Colne (once rivalling it in size) and now contains a Grade II listed house and associated buildings. These lime trees are a strong landscape feature that were deliberately planted to lead to this historic, former hall house.</p> <p>4. Parcel P041 is a Nature Reserve and former tannery (which was one of Europe's largest).</p> <p>I also wish to point out the fact that the maps provided within the document entitled 'Appendix 3 Individual Site Assessments and Maps' are altogether useless. It is a real struggle to actually identify which areas are being referred to - surely it would have made more sense to use an Ordnance Survey map (or similar) with local place names and landmarks. Even I, as a local councillor, struggle to identify the parcels of land purely by their descriptions, as I am not a cartographer.</p> <p>I hope you take my points into consideration and look forward to your favoured response.</p>	<p><i>the protection of other designated heritage assets which are protected by other means such as Listing or planning policies. In this instance, this includes Green Belt which has a specific role to play in the setting of Colne as a historic town in general. Parcels P038a, P040, P041 and PA.03 are not considered to perform this function.</i></p> <p><b>Recommendations: no change to the assessment.</b></p> <p><i>Please see comments in the Introduction.</i></p>
C015GB	00754	Ms Sharon Dale Mr Jason Heavey	<p>We are absolutely horrified to discover that the top of the Rough, Lidgett Triangle and Ball Grove and the wildlife-rich meadow next to Heyroyd are not to be placed in the green belt and are, instead, to be put forward for development. The government planning inspector made clear the importance of the Rough in his findings recently. This area and Ball Grove are the green lungs of Colne and are very accessible for all. They are part of what makes this town so very special. I.e. Countryside for all within a short walk wherever you are in Colne.</p> <p>As local council tax payers we expect a swift response to this email explaining the reasons why this land has been singled out when there is so much brownfield land ripe for development.</p> <p>It appears at best questionable and at worst suspicious. It throws up many questions as to motives.</p>	<p><b>Land at the Rough/Lidgett Triangle (Parcel PA.03)</b> Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) currently designates Parcel PA.03 as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p> <p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to</p>

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				<p>whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:</p> <p>(1) Designate as Green Belt The Pendle Green Belt Assessment (2016) considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that Parcel PA.03 although contributing to the unrestricted sprawl of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the “exceptional circumstances” required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p> <p><b>Land at Ball Grove (Parcel P041)</b> There is currently no proposal to remove Parcel P041 from Green Belt.</p> <p>The Pendle Green Belt Assessment (2016) used an agreed methodology to divide the Green Belt up into a number of separate parcels. It then assessed these parcels against the five purposes of Green Belt, as set out in the NPPF (para 80) to help determine if they still contributed to the</p>

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				<p>primary purpose of the Green Belt in Lancashire, which is to check unrestricted sprawl and the merger of neighbouring settlements (para 2.13).</p> <p>Parcel P041 covers an area of land to the east of Laneshaw Bridge, immediately south of the A6068 and north of Colne Water. This extensive parcel of land includes part of Ball Grove Park and the Ball Grove Nature Reserve.</p> <p>The Green Belt Assessment concluded (Table 12) that Parcel P041 plays a “major” role in preventing neighbouring towns (and villages) from merging into one another (Purpose 2). Whilst it is acknowledged that this means that the parcel may still be able to accommodate “some limited development” without compromising this role (Table 3, page 21), extensive development is not considered to be an option. Parcel P041 was considered to perform a less important role when considered against the three other purposes of Green Belt that were assessed. The report concluded that Parcel P041 was still integral to the Green Belt and as such it was not included in the list of parcels that are no longer considered to perform a Green Belt function (Table 13).</p> <p>The NPPF (para 83) is clear that “Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.”</p> <p>In preparing LP2 Pendle Council must allocate sufficient land to meet the overall development requirements established in LP1; which has been apportioned by settlement in the LP2 Scoping Report &amp; Methodology (Table 3.11). Whilst detailed site assessments have yet to be completed, there would appear to be sufficient sites not within the Green Belt to meet the identified development needs for Laneshaw Bridge.</p> <p><b>Brownfield First Policy</b> Policy SDP2 of Pendle Local Plan Part 1: Core Strategy (LP1), in line with the core planning principles set out in</p>



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				<p>paragraph 17 of the National Planning Policy Framework (NPPF), encourages the re-use of previously developed (Brownfield) land; provided that it is not of high environmental value. This approach helps to minimise the use of undeveloped (Greenfield) sites for development.</p> <p>Pendle Council successfully applied to be a pilot for the new Brownfield Land Registers, which are intended to ensure that 90% of 'suitable' Brownfield sites have planning permission by 2020. But the Council cannot restrict development to Brownfield sites, if it is to meet the development needs of the borough. LP1 (para 7.25) recognises that <i>"in order to not unduly restrict development ... some Greenfield sites will need to be released for development. Such sites will need to be in sustainable locations which are well related to existing settlements."</i></p>
C016GB	01362	Dr Mark & Mrs Linda Turner	<p>With reference to the above documents my wife and I object most strongly that the proposal that the areas of East Colne including: The upper portion of The Rough and The Lidgett Triangle should retain their status as land protected for development.</p> <p>Having attended the public consultation and received a copy of the consultant's report, it was clearly stated that these areas were inappropriate for development for a number of very significant reasons. The suitability of the upper portion of the Rough for development has been tested up to planning inspector level, who rejected the proposal in Appeal reference APP/E2340/W/15/3131975. The planning inspector stated that the area was of significant benefit to the local community, particularly the network of footpaths; the development of this site would conflict with Pendle's policy ENV1 where it seeks to protect and conserve Heritage assets within the borough, particularly the pre-industrial farming heritage. In addition the area is highly visible, particularly from approaches to Colne, and forms the Green boundary perimeter adjacent to the Conservation area.</p> <p>With respect to the Lidgett Triangle, this site is completely enclosed within the Conservation area with no vehicular access and the above referenced Planning inspector report highlighted the importance of this site as an asset for the community which provides an enclosed and safe space with strong boundaries. The prominent position of the site makes it visible from all</p>	<p><b>Land at the Rough/Lidgett Triangle (Parcel PA.03)</b></p> <p>Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) currently designates Parcel PA.03 as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p> <p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the</p>

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			<p>directions and provides the most accessible green space for the population of the East side of Colne. The site is well used with hundreds of walkers per day using its well-worn footpaths. The site has the richest selection of wildlife in the area with Owls Curlews Woodpeckers and Pheasants amongst the larger birds and Frogs toads Newts and bats amongst the smaller natural population.</p> <p>The possible down grading of other areas on the East side of Colne including sites further up Skipton Old Road and Ball Grove would be another disastrous step amounting to planning vandalism and directly conflicting with the needs and views of the community. Colne has not yet crossed the line where the inappropriate development of sites for un-needed housing destroys the essential character of the town. However, should these sites be developed Colne will fall to the same fate as many towns comprising characterless zones of semi-urban sprawl. In addition it is abundantly clear that the infrastructure cannot support any further population growth with drains that regularly overflow and experience multiple collapses, the schools that are overflowing, and roads that are some of the most congested in Lancashire with NOx emissions that regularly exceed EU legal levels.</p> <p>These inappropriate designations must not be adopted or retained as they directly contradict the recent findings of the Planning Inspector Mike Robins, they adversely affect the Lidgett and Bents Conservation Area and would have a massive negative impact on the quality of life for the residents of Colne. All these zones must retain or acquire Green belt status as recommended in the consultation report.</p>	<p>Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:</p> <p>(1) Designate as Green Belt The Pendle Green Belt Assessment (2016) considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that Parcel PA.03 although contributing to the unrestricted sprawl of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the “exceptional circumstances” required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p>
C017GB	00964	The Howells Family	<p>Yet again we end up at the last minute to make a point AGAINST putting land at the Lidgett, Rough and Ball Grove at risk.</p> <p>They need to remain protected greenbelt as amenities for the people of Colne and surrounding areas.</p> <p>They are a vital green lung for wildlife and flora. Recreation and health should be protected as we loose other built environments.</p> <p>This is a limited response given the poor time constraints to be informed of your intentions.</p> <p>Note we need to protect the land.</p>	<p><b>Public Consultation</b> The guidelines for consultation on planning policy documents are set out in the Statement of Community Involvement (2016).</p> <p>This public consultation took place over a six-week period (24<sup>th</sup> February to 7<sup>th</sup> April), as recommended in the Government regulations. It was widely publicised in the week prior to, and throughout the consultation period by:</p> <ul style="list-style-type: none"> <li>• writing to approximately 1,500 individuals and organisations on the Council’s database via letter or email;</li> <li>• issuing a press release which generated articles in the local press;</li> <li>• placing an advertisement on the homepage of the</li> </ul>

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				<p>Council website, including a link to pages with additional information;</p> <ul style="list-style-type: none"> <li>• issuing regular messages via social media (Facebook, Twitter and LinkedIn);</li> <li>• circulating 690 copies of the Framework newsletter to libraries, council shops, parish councils and other venues (e.g. shops, schools, doctors surgeries, dentists etc.); and</li> <li>• providing 177 posters to 85 venues throughout the borough for public display.</li> </ul> <p>Given this extensive coverage the Council considers that it has done everything reasonably possible, within the limited budget available, to draw the matters under consideration to the attention of local residents and businesses and other interested parties.</p> <p>The Council will be carrying out further informal and statutory public consultations before LP2 is submitted to the Secretary of State for independent examination, in late 2018 or 2019.</p> <p>As someone who has responded to a public consultation on the Local Plan, your details have been added to our database and you will be informed directly by email or letter about these consultations.</p> <p><b>Land at the Rough/Lidgett Triangle (Parcel PA.03)</b>  Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) currently designates Parcel PA.03 as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p>

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				<p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:</p> <p>(1) Designate as Green Belt The Pendle Green Belt Assessment (2016) considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that Parcel PA.03 although contributing to the unrestricted sprawl of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the “exceptional circumstances” required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p> <p><b>Land at Ball Grove (Parcel P041)</b> There is currently no proposal to remove Parcel P041 from Green Belt.</p> <p>The Pendle Green Belt Assessment (2016) used an agreed methodology to divide the Green Belt up into a number of</p>

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				<p>separate parcels. It then assessed these parcels against the five purposes of Green Belt, as set out in the NPPF (para 80) to help determine if they still contributed to the primary purpose of the Green Belt in Lancashire, which is to check unrestricted sprawl and the merger of neighbouring settlements (para 2.13).</p> <p>Parcel P041 covers an area of land to the east of Laneshaw Bridge, immediately south of the A6068 and north of Colne Water. This extensive parcel of land includes part of Ball Grove Park and the Ball Grove Nature Reserve.</p> <p>The Green Belt Assessment concluded (Table 12) that Parcel P041 plays a “major” role in preventing neighbouring towns (and villages) from merging into one another (Purpose 2). Whilst it is acknowledged that this means that the parcel may still be able to accommodate “some limited development” without compromising this role (Table 3, page 21), extensive development is not considered to be an option. Parcel P041 was considered to perform a less important role when considered against the three other purposes of Green Belt that were assessed. The report concluded that Parcel P041 was still integral to the Green Belt and as such it was not included in the list of parcels that are no longer considered to perform a Green Belt function (Table 13).</p> <p>The NPPF (para 83) is clear that “Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.”</p> <p>In preparing LP2 Pendle Council must allocate sufficient land to meet the overall development requirements established in LP1; which has been apportioned by settlement in the LP2 Scoping Report &amp; Methodology (Table 3.11). Whilst detailed site assessments have yet to be completed, there would appear to be sufficient sites not within the Green Belt to meet the identified development needs for Laneshaw Bridge.</p>

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C018GB	01505	Ms Alison Sutcliffe	<p>It has come to my attention that the council is looking at removing the green belt status from Ball Gove Country Park and Nature Reserve, to make the land open for the building of residential homes.</p> <p>While I appreciate that the council has to make a certain amount of land available for planning each year, I'm not sure why it would want to take away from the people of Colne, and indeed the wider area, a much loved reserve that is well used by the people of the area.</p> <p>With the government telling us we must take more exercise and Ball Grove being within easy reach of a large number of people, it is always busy with walkers and families with children enjoying its open space.</p> <p>I would like to object to the proposal for Ball Grove Nature Reserve and Country Park to loose its green belt status, as contributing to the overall downgrading of the health and social welfare of the inhabitants of Rural Pendle.</p>	<p>There is currently no proposal to remove Parcel P041 from Green Belt.</p> <p>The Pendle Green Belt Assessment (2016) used an agreed methodology to divide the Green Belt up into a number of separate parcels. It then assessed these parcels against the five purposes of Green Belt, as set out in the NPPF (para 80) to help determine if they still contributed to the primary purpose of the Green Belt in Lancashire, which is to check unrestricted sprawl and the merger of neighbouring settlements (para 2.13).</p> <p>Parcel P041 covers an area of land to the east of Laneshaw Bridge, immediately south of the A6068 and north of Colne Water. This extensive parcel of land includes part of Ball Grove Park and the Ball Grove Nature Reserve.</p> <p>The Green Belt Assessment concluded (Table 12) that Parcel 041 plays a “major” role in preventing neighbouring towns (and villages) from merging into one another (Purpose 2). Whilst it is acknowledged that this means that the parcel may still be able to accommodate “some limited development” without compromising this role (Table 3, page 21), extensive development is not considered to be an option. Parcel 014 was considered to perform a less important role when considered against the three other purposes of Green Belt that were assessed. The report concluded that Parcel 041 was still integral to the Green Belt and as such it was not included in the list of parcels that are no longer considered to perform a Green Belt function (Table 13).</p> <p>The NPPF (para 83) is clear that “Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.”</p> <p>In preparing LP2 Pendle Council must allocate sufficient land to meet the overall development requirements established in LP1; which has been apportioned by settlement in the LP2 Scoping Report &amp; Methodology</p>

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				(Table 3.11). Whilst detailed site assessments have yet to be completed, there would appear to be sufficient sites not within the Green Belt to meet the identified development needs for Laneshaw Bridge.
C019GB	00640	Mr Chris Birkinshaw	I was astonished to learn that The Rough and the Lidgett Triangle have not been proposed for Green Belt classification. This seems remarkable given the initial conclusions of the various working parties and the outcomes of stakeholder workshops. I wonder what is the point of stakeholder workshops if the clear views of the actual inhabitants in an area are simply ignored in this manner? I suppose this decision has been made as the first step to housing development in the area – please understand that such large scale development will dramatically change the nature of this area and is simply unacceptable to its residents. Of course Pendle Council can insist on this course of action but do not insult the residents by pretending that you are listening to their views.	<p>The Pendle Green Belt Assessment (2016) used an agreed methodology to divide the Green Belt up into a number of separate parcels. It then assessed these parcels against the five purposes of Green Belt, as set out in the NPPF (para 80) to help determine if they still contributed to the primary purpose of the Green Belt in Lancashire, which is to check unrestricted sprawl and the merger of neighbouring settlements (para 2.13).</p> <p>This same methodology was also used to determine if some parcels of land currently outside the Green Belt would be suitable for inclusion within it. One of these parcels was Parcel PA.03, land at “The Rough and Lidgett Triangle”.</p> <p>Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) currently designates Parcel PA.03 as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p> <p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is</p>

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				<p>not possible, the land off Skipton Old Road and at the Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:</p> <p>(1) Designate as Green Belt The Pendle Green Belt Assessment (2016) considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that Parcel PA.03 although contributing to the unrestricted sprawl of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the “exceptional circumstances” required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p>
C020GB	00594	Mr Andrew Ashworth	It is a pity that no consideration has been given to reviewing the green belt extent across the whole borough, with the study only focusing on local tweaking of the current Greenbelt. The extent of the Greenbelt in Pendle largely reflects the original designation of the 1979 North East Lancashire Structure Plan but much has changed across the borough in the nearly 40 years which have subsequently passed. In particular, there has been increasing pressure on greenfield sites around the peripheries of both Nelson and Colne, which presumably led to adoption of more specific greenbelt policy targeting the expansion of Nelson into Barrowford and Colne into Barrowford and Laneshaw Bridge in the 1990 Joint Lancashire Structure plan. However, there was a glaring omission in this 1990 plan which was not been addressed in the subsequent reviews of the 1990s, being that there is no protection to prevent the two largest settlements themselves, Nelson and Colne, from amalgamating. Perhaps amalgamation might have been policy back in the 1980s, but it has been said many, many times by Councillors in both towns,	<p>The Inspector’s Report into the examination of LP1: Core Strategy (2015) indicated that the general extent of the Green Belt in Pendle should remain; so there was no requirement to review the general extent of Green Belt in Pendle. Indeed the general extent of the Green Belt would more usefully be considered across East Lancashire or the county as a whole.</p> <p>The purpose of the Pendle Green Belt Assessment is to consider the extent to which land currently designated as Green Belt continues to perform against the five purposes of including land in Green Belt, as set out in the NPPF (para 80).</p> <p>The assessment also considered a number of land parcels</p>



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			<p>reflecting the views of Colne and Nelson residents, that they have no desire now to amalgamate the two settlements.</p> <p>With the current huge pressure to develop greenfield land, extending the greenbelt from Trawden along the Lenches and then in between Nelson and Colne would be the only way to ensure that Nelson and Colne remain separate communities. Such a provision would clearly meet all five principle aims of greenbelts:-</p> <p>To check the unrestricted urban sprawl of large, built-up areas;  To prevent neighbouring towns from merging into one another;  To preserve the setting and special character of historic towns;  To assist in safeguarding the countryside from encroachment; and  To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</p> <p>All these aims are important in their own right, but the latter is particularly relevant locally as despite the best intentions of the Council's sequential development approach, the reality on the ground is that vast tracts of greenfield land are being built on whilst equally large tracts of derelict, previously developed land are lying undeveloped, abandoned and creating blight on our communities.</p> <p>So I would ask for a more thorough review of greenbelt across the whole borough to be made, specifically with consideration being given to allocation of some Greenbelt land around the east sides of Nelson and Colne. I'm not going to prescribe exactly which parcels of land should be included in such an extension to the Greenbelt, but the fields known as Gib Hill would be essential as this is now about all that is separating Nelson and Colne. Probably Marsden Park Golf Course should be included too, given the uncertainty about its viability: it would be a shame to lose all that green open space to yet more housing. Also the area around Castercliff Fort and some land above the Lenches to link into the current greenbelt South of Trawden would probably be of benefit. Please see the map on the next page: the area outlined in orange is the approximate area which I am proposing and I ask that such areas be assessed against the Greenbelt criteria in the report.</p>	<p>directly adjacent to the existing Green Belt, to determine if they also made a contribution to one or more of the purposes of including land within the Green Belt. Table 15 indicates that four parcels of land, not currently designated as Green Belt, are considered to make a significant contribution to the overall purpose of the Green Belt in Pendle. However, the NPPF is clear that additions to the Green Belt can only be made in exceptional circumstances. This includes setting out whether any major changes in circumstances have made the allocation of additional Green Belt land necessary.</p> <p>Aerial photographs dating from the 1940s and 1960s show that Nelson and Colne had effectively merged due to ribbon development along the A56. Historic mapping confirms that by the 1970s/1980s the White Walls Industrial Estate had expanded to occupy much of the land north of the A56 up to Colne Water. To the south of the A56, with the exception of Boundary Playing Field, public and private sector housing and a secondary school occupied land up to the railway line, with a further secondary school beyond.</p> <p>Policy 1 in the Pendle Local Plan (1999) and the Replacement Pendle Local Plan (2006) has established the settlement boundaries in Pendle. Both plans have been subject to extensive public consultation and independent examination by an inspector appointed by the Secretary of State. In both instances no distinction has been made between the settlement boundary for Colne and Nelson in recognition of the fact that both settlements have effectively merged, although it is acknowledged that they retain distinct characteristics.</p> <p>One of the key characteristics of the Green Belt is its openness. Given that much of the above development was in place, when the general extent of the Green Belt was first established in the North East Lancashire Structure Plan (1979), and certainly by the time the boundaries were formally designated in the Pendle Local Plan (1999), there</p>

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				was in effect no open land separating Colne from Nelson. The designation of Green Belt land therefore focussed on maintaining the separation between Colne and Barrowford to the north.
C021GB	00781	Mr Graham Downey	<p>As a resident of Pendle I wish to make the following comments about the above plan and document.</p> <p>These proposals would change the character and environment for current and future generations.</p> <p>There is insufficient focus on "brownfield land" in urban areas. Pendle has a supply of these areas sufficient to meet housing needs for many many years to come without the dramatic effect on Pendle' green and pleasant land.</p> <p>5.4 of the plan states the objective to minimise the release of greenfield and green belt land. However the reassessment does anything but minimise the release of greenfield and green belt land and should this report be implemented huge amounts of land will disappear.</p> <p>The green belt reassessment carried out by consultants unfamiliar with area and its outstanding beauty have taken no account of</p> <ul style="list-style-type: none"> <li>Flora</li> <li>Fauna</li> <li>Wildlife</li> <li>Walkers / Ramblers.</li> </ul> <p>The consultants report states that many areas play no role in features or historic assets of the green belt area. This is untrue. Many of these sites in all areas of Pendle have their own history. Many of these areas existed long before the development and growth of the urban areas of Colne and Barnoldswick and Nelson This lack of local knowledge and investigation by the consultants calls into question the reasoning behind many of the proposals.</p> <p>These proposals if allowed will result in the continuation of the urban sprawl and leave future generations with a continuation of property from Burnley through Brierfield, Nelson, into Colne and onto Earby without a break in housing or businesses.</p>	<p><b>Brownfield First Policy</b> Policy SDP2 of Pendle Local Plan Part 1: Core Strategy (LP1), in line with the core planning principles set out in paragraph 17 of the National Planning Policy Framework (NPPF), encourages the re-use of previously developed (Brownfield) land; provided that it is not of high environmental value. This approach helps to minimise the use of undeveloped (Greenfield) sites for development.</p> <p>Pendle Council successfully applied to be a pilot for the new Brownfield Land Registers, which are intended to ensure that 90% of 'suitable' Brownfield sites have planning permission by 2020. But the Council cannot restrict development to Brownfield sites, if it is to meet the development needs of the borough. LP1 (para 7.25) recognises that <i>"in order to not unduly restrict development ... some Greenfield sites will need to be released for development. Such sites will need to be in sustainable locations which are well related to existing settlements."</i></p> <p><b>Green Belt Assessment</b> The National Planning Policy Framework (NPPF) sets out five purposes for designating land as Green Belt (para 80). None of these purposes concern the presence of wildlife, the value the land has to the community or for tourism. The consultants have rightly not taken these considerations into account when assessing the Green Belt.</p> <p>Purpose 4 of including land within the Green Belt is "to preserve the setting and special character of historic towns". The consultants have looked at whether the parcels of land contribute to the setting of the historic core of Colne rather than considering the history of the parcel of land.</p>

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			<p>I agree entirely with the comments made by Lidgett and Beyond and look forward to the comments of this influential group being discussed and implemented.</p> <p>I request my and other elected officers of Pendle review and dismiss this report as being not in the best interests of people of Pendle now and in the future.</p>	<p>The Green Belt Assessment provides the evidence base for identifying those parcels of land which could potentially be removed from the Green Belt to accommodate new development. However, the NPPF is clear that Green Belt boundaries should only be altered in “exceptional circumstances”. If the Council was minded to remove land from the Green Belt it will need to provide a clear and robust justification to demonstrate that there are “exceptional circumstances” for doing so.</p> <p><b>Lidgett &amp; Beyond</b> The comments from Lidgett and Beyond are considered under Comment C038GB (below).</p>
C022GB	01507	Mr Neil Smith	<p>I have just read your report in regards to the review of green belt land of the rough and surrounding areas of Colne and my thoughts are that your conclusion is not acceptable. There has been no consideration given to the local community or the wildlife in these areas. The areas that which were agreed last year to be made green belt have now changed which is totally unacceptable and there is now changes to ball grove which is an absolute disgrace. Ball grove is a nature reserve and potentially building on this land will kill our wildlife and seriously impact the character of this area.</p> <p>My request is that there is a review of these decisions by Pendle council and our green belt areas are not changed in Colne and the area. This is our town and community and changes should be agreed by people in the town and community.</p>	<p><b>Green Belt Assessment</b> The National Planning Policy Framework (NPPF) sets out five purposes for designating land as Green Belt (para 80). None of these purposes concern the presence of wildlife, the value the land has to the community or for tourism. The consultants have rightly not taken these considerations into account when assessing the Green Belt.</p> <p><b>Land at the Rough/Lidgett Triangle (Parcel PA.03)</b> Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) currently designates Parcel PA.03 as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p>

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				<p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:</p> <p>(1) Designate as Green Belt The Pendle Green Belt Assessment (2016) considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that Parcel PA.03 although contributing to the unrestricted sprawl of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the “exceptional circumstances” required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p> <p><b>Land at Ball Grove (Parcel P041)</b> There is currently no proposal to remove Parcel P041 from Green Belt.</p> <p>The Pendle Green Belt Assessment (2016) used an agreed methodology to divide the Green Belt up into a number of separate parcels. It then assessed these parcels against the</p>

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				<p>five purposes of Green Belt, as set out in the NPPF (para 80) to help determine if they still contributed to the primary purpose of the Green Belt in Lancashire, which is to check unrestricted sprawl and the merger of neighbouring settlements (para 2.13).</p> <p>Parcel P041 covers an area of land to the east of Laneshaw Bridge, immediately south of the A6068 and north of Colne Water. This extensive parcel of land includes part of Ball Grove Park and the Ball Grove Nature Reserve.</p> <p>The Green Belt Assessment concluded (Table 12) that Parcel P041 plays a “major” role in preventing neighbouring towns (and villages) from merging into one another (Purpose 2). Whilst it is acknowledged that this means that the parcel may still be able to accommodate “some limited development” without compromising this role (Table 3, page 21), extensive development is not considered to be an option. Parcel P041 was considered to perform a less important role when considered against the three other purposes of Green Belt that were assessed. The report concluded that Parcel P041 was still integral to the Green Belt and as such it was not included in the list of parcels that are no longer considered to perform a Green Belt function (Table 13).</p> <p>The NPPF (para 83) is clear that “Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.”</p> <p>In preparing LP2 Pendle Council must allocate sufficient land to meet the overall development requirements established in LP1; which has been apportioned by settlement in the LP2 Scoping Report &amp; Methodology (Table 3.11). Whilst detailed site assessments have yet to be completed, there would appear to be sufficient sites not within the Green Belt to meet the identified development needs for Laneshaw Bridge.</p>
C023GB	00598	Joanne, Bryan, Anthony, and Sarah	We are most concerned that the local council are reviewing the Local Plan Part II and the Greenbelt which will affect the eastern area of Colne, including the	<b>Land at the Rough/Lidgett Triangle (Parcel PA.03)</b> Policy 3a of the Replacement Pendle Local Plan (2001-

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		Atkinson  Mr Ronald Atkinson	<p>Lidgett Triangle, The Rough and The Ball Grove area.</p> <p>The Lidgett and Beyond Group of which we are supporters worked tirelessly last year to prevent 360 houses from being built in this area. This was also opposed by the local council and therefore we cannot understand why the local council would want to go against keeping this area green for the local people of Colne to enjoy. This is disgraceful, given this land went to Appeal only last summer and the Inspector upheld the wishes of local people not to develop all of The Rough. Pendle's Core Strategy should protect and enhance the countryside for the population of Pendle now and in the future.</p> <p>The Pendle Infrastructure Strategy (2014) indicated that Colne, Foulridge and Earby wastewater treatment works were operating at close to capacity. A failure to plan for new development and ensure the timely investment in infrastructure could place pressure on existing treatment facilities resulting in adverse water quality and wider environmental effects.</p> <p>The vast majority of traffic travelling east from the end of the M65 motorway into North and West Yorkshire passes through the North Valley along the busy A6068. With two lanes merging into one, stationary traffic builds up on this stretch of road. Monitoring data indicates that the average level of NO2 in 2015 (21 ppb) exceeded the threshold average set down by Government (20.92 ppb equivalent to 40µg m-3). With more housing planned for Eastern Colne, this diminution in the air quality is only set to increase.</p> <p>The landscape of the area forms an important part of Lancashire's history and cultural identity, with folklore surrounding the Pendle witches, the Leeds and Liverpool Canal which provides rich industrial heritage, and literary connections to the Bronte sisters in the isolated hamlet of Wycoller. These heritage assets, including the rural landscapes within which they are located, ought to be safeguarded for continued benefit of residents and the value of the growing tourism sector of the area.</p> <p>The Council should steer development towards Brownfield land and should proactively use its Brownfield Regeneration Fund to plug viability gaps and this will reinvigorate and regenerate Pendle's towns.</p> <p>We hope that the Council will use common sense in making the decision regarding the beautiful green areas of Colne. The Council <b>should</b> mirror the wishes of the local community as they will be knocking on doors looking for</p>	<p>2016) (RPLP) currently designates Parcel PA.03 as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p> <p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:</p> <p>(1) Designate as Green Belt The Pendle Green Belt Assessment (2016) considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that Parcel PA.03 although contributing to the unrestricted sprawl of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the "exceptional circumstances" required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation The expiry of the Protected Area designation requires</p>

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			votes over the forthcoming weeks.	<p>Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p> <p><b>Site Assessment</b> Any negative issues associated with traffic, landscape impact etc. will be addressed through the site assessment process. The sites recommended for allocation in LP2 will represent what the Council considers to be the most sustainable selection of sites after all factors, including any cumulative impacts that may arise, have been taken into account.</p> <p><b>Brownfield First Policy</b> Policy SDP2 of Pendle Local Plan Part 1: Core Strategy (LP1), in line with the core planning principles set out in paragraph 17 of the National Planning Policy Framework (NPPF), encourages the re-use of previously developed (Brownfield) land; provided that it is not of high environmental value. This approach helps to minimise the use of undeveloped (Greenfield) sites for development.</p> <p>Pendle Council successfully applied to be a pilot for the new Brownfield Land Registers, which are intended to ensure that 90% of 'suitable' Brownfield sites have planning permission by 2020. But the Council cannot restrict development to Brownfield sites, if it is to meet the development needs of the borough. LP1 (para 7.25) recognises that <i>"in order to not unduly restrict development ... some Greenfield sites will need to be released for development. Such sites will need to be in sustainable locations which are well related to existing settlements."</i></p>
C024GB	01512	Mr Dennis Smith	<p>As a matter of strict principle, Greenbelt land must stay precious. Please, no 'developers' and no sell offs anywhere in the confines of this Borough.</p> <p>The 'Lidgett and Beyond' argument will be the same. Suburban sprawl is like a cancer. In an age of incredible population growth, animal and nature</p>	Paragraph 83 of the National Planning Policy Framework (NPPF) is clear that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation of the Local Plan.

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			<p>decimation always follow, and with it, the quality of life. In short, once again, whether it is just a micro capsule on the world stage, you will be contributing your bit to more greenhouse gases, rising sea levels and all the usual attendant problems. We live in the wake of a highly possible major species extinction.</p> <p>Surely alternatives are at hand. I can think of some: green education made central, not peripheral; encourage positive thinking with fewer children as a goal, quickly spring to mind. Central government concerns, I know, but who will take the lead?</p>	<p>In preparing LP2 Pendle Council needs to ensure that sufficient land is allocated to meet the development requirements of the borough. All site options will need to have been discounted before consideration can be given to removing land for the Green Belt for future development.</p> <p>The response to the Lidgett and Beyond representation can be found at comment C038GB (below)</p> <p>Issues regarding green education and birth control are not relevant to this consultation.</p>
C025GB	01513	Cllr Paul White	<p>I write to respond to the Green Belt consultation currently being undertaken in Pendle. I write in my capacity as Borough Councillor for Bouslworth, and County Councillor for Pendle East.</p> <p>It is clear that the area designated as PA03 as "Protected Area" (for development), which includes The Rough and The Lidgett Triangle should have been included as Green Belt designations. The Planning Inspector recently made note of the features of this land in his summary of his decision in regards to the recent application to develop the whole of The Rough by Junction Property. Both these areas have strong boundaries and exhibit many of the favourable characteristics of the Green Belt land. In my opinion this is clear cut.</p> <p>I am particularly concerned about Ball Grove Park, Parcel PO41. It should have stronger classifications. Purpose 1 should be "major" and Purpose 3 should be "critical". It is a historical site. It is critical in separating Colne from the surrounding villages, but is also a fantastic community asset, and should be afforded the highest protection possible.</p> <p>I am very disappointed to see the downgrading of so many pieces of Green Belt land between Foulridge and Colne. The purpose of this Green Belt land in</p>	<p>The land at the Lidgett Triangle is currently designated in the Replacement Pendle Local Plan (2001-2016) as a Protected Area for potential long term future development. The Local Plan Part 2 will need to review this designation and consider whether there is a need for its development or whether an alternative designation would be more appropriate. The Green Belt Assessment indicates that the site does not contribute to the overall function of Green Belt. Therefore even though the site scores moderately well against Purpose 1 and Purpose 3 of including land within the Green Belt it is unlikely that the exceptional circumstances will exist to include the site within the Green Belt. If the Protected Area designation is removed the Council will need to consider whether an alternative designation such as Local Green Space would be appropriate.</p> <p><i>The rating of the parcel is in accordance with the assessment criteria for Purpose 1.</i></p> <p>The purpose of the Green Belt Assessment is to assess the function of land against the five purposes of the Green Belt</p>



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			<p>that location is to keep the area between Foulridge and Colne from urban sprawl. Any deallocation could impede on this aim, and on that basis I urge that these are kept as Green Belt.</p> <p>Finally, Parcel PO38a should be treated as indivisible from PO38. PO38a has a strong historic significance within both The Conservation Area and the town of Colne (Green Belt Purpose 4).</p> <p>I do hope that the consultation takes note of my views.</p>	<p>as set out in the National Planning Policy Framework (NPPF). It does not recommend that a particular parcel of land should, or should not, be added to, or removed from, the Green Belt.</p> <p>In order to add or remove land from the Green Belt, Pendle Council must take into account a wide range of information so that the 'exceptional circumstances' required by paragraph 83 of the NPPF can be adequately demonstrated.</p> <p>Pendle Council will carry out further work to determine whether smaller plots of land within the Green Belt parcels assessed by our consultants are suitable for, and needed to, accommodate the level of development required for a particular settlement. This will take place prior to the publication of the LP2 Preferred Options Report, which will be made available for public consultation in 2018.</p> <p><i>The parcels have strong boundaries between them which facilitated separate assessments which reflect their individual contributions to the function of the Green Belt in this location. The boundaries of P038a followed the existing line of built form at Bents and so it is a logical separate parcel for assessment.</i></p> <p><b>Recommendations: no change to the assessment.</b></p>
C026GB	01514	Mrs Michelle Plimley	<p>I have only today been made aware that there are about to be some changes made to the status of Ball Grove Park/ Nature reserve. Can I express my concerns as a resident that will be most affected by this plan that both myself nor my husband have been consulted on this matter.</p> <p>We live right in the middle of the nature reserve and have only just had this matter brought to our attention by a friend.</p> <p>I am outraged to think that the council can make such decisions without consulting the public and people that are going to be affected by these changes. The local people of Trawden, Laneshawbridge and Ball Grove surrounding areas can vouch for how greatly used the park and nature reserve is used.</p>	<p><b>Land at Ball Grove (Parcel P041)</b></p> <p>There is currently no proposal to remove Parcel P041 from Green Belt.</p> <p>The Pendle Green Belt Assessment (2016) used an agreed methodology to divide the Green Belt up into a number of separate parcels. It then assessed these parcels against the five purposes of Green Belt, as set out in the NPPF (para 80) to help determine if they still contributed to the primary purpose of the Green Belt in Lancashire, which is to check unrestricted sprawl and the merger of neighbouring settlements (para 2.13).</p>

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			<p>I wish to object with regard to the parcel of land numbered P041 'Ball Grove' that could possibly lose its Green Belt Status under the Pendle Green Belt Planning Review.</p> <p>Ball Grove Nature Reserve &amp; Park play a major role in providing activities such as walking, fishing, play area (swings etc for under sixteens).</p> <ul style="list-style-type: none"> <li>• Picnic areas.</li> <li>• Major footpath between Trawden &amp; Wycoller.</li> <li>• Holder of a Green Flag for the Standard of the Park / Nature Reserve second year running.</li> <li>• It has Two lakes one of these is fished.</li> <li>• Provides Dog walking areas /paths for the wider community and vistors.</li> <li>• The historic site of a major Tannery.</li> <li>• Lots of Wild Life such as Ducks nesting, Deer, Frogs, Fish, various birds, Otter etc</li> </ul> <p>Local businesses will be greatly affected by this and also the cafe that is at the centre of the green belt land.</p> <p>I would also like to add that the local community and 'Friends of Ballgrove' spend hours upon hours of their time each year to preserve and look after the land. Before this review takes place I seriously think that you need to consult your public, council tax payers and facility users as this matter should not be made without the views of these people.</p> <p>I await your response.</p>	<p>Parcel P041 covers an area of land to the east of Laneshaw Bridge, immediately south of the A6068 and north of Colne Water. This extensive parcel of land includes part of Ball Grove Park and the Ball Grove Nature Reserve.</p> <p>The Green Belt Assessment concluded (Table 12) that Parcel P041 plays a “major” role in preventing neighbouring towns (and villages) from merging into one another (Purpose 2). Whilst it is acknowledged that this means that the parcel may still be able to accommodate “some limited development” without compromising this role (Table 3, page 21), extensive development is not considered to be an option. Parcel P041 was considered to perform a less important role when considered against the three other purposes of Green Belt that were assessed. The report concluded that Parcel P041 was still integral to the Green Belt and as such it was not included in the list of parcels that are no longer considered to perform a Green Belt function (Table 13).</p> <p>The NPPF (para 83) is clear that “Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.”</p> <p>In preparing LP2 Pendle Council must allocate sufficient land to meet the overall development requirements established in LP1; which has been apportioned by settlement in the LP2 Scoping Report &amp; Methodology (Table 3.11). Whilst detailed site assessments have yet to be completed, there would appear to be sufficient sites not within the Green Belt to meet the identified development needs for Laneshaw Bridge.</p> <p><b>Public Consultation</b> The guidelines for consultation on planning policy documents are set out in the Statement of Community Involvement (2016).</p> <p>This public consultation took place over a six-week period (24<sup>th</sup> February to 7<sup>th</sup> April), as recommended in the</p>

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				<p>Government regulations. It was widely publicised in the week prior to, and throughout the consultation period by:</p> <ul style="list-style-type: none"> <li>• writing to approximately 1,500 individuals and organisations on the Council's database via letter or email;</li> <li>• issuing a press release which generated articles in the local press;</li> <li>• placing an advertisement on the homepage of the Council website, including a link to pages with additional information;</li> <li>• issuing regular messages via social media (Facebook, Twitter and LinkedIn);</li> <li>• circulating 690 copies of the Framework newsletter to libraries, council shops, parish councils and other venues (e.g. shops, schools, doctors surgeries, dentists etc.); and</li> <li>• providing 177 posters to 85 venues throughout the borough for public display.</li> </ul> <p>Given this extensive coverage the Council considers that it has done everything reasonably possible, within the limited budget available, to draw the matters under consideration to the attention of local residents and businesses and other interested parties.</p> <p>The Council will be carrying out further informal and statutory public consultations before LP2 is submitted to the Secretary of State for independent examination, in late 2018 or 2019.</p> <p>As someone who has responded to a public consultation on the Local Plan, your details have been added to our database and you will be informed directly by email or letter about these consultations.</p>
C027GB	01515	Mr Graham Brackley	You seem to think that you can get away with passing more areas for development without people realising. The last meeting I attended an Inspector recommended it be left as Green belt countryside. Well here's one concerned resident that wants you to know that I don't want anyone to spoil the local area that I live in with more houses and residents. The traffic problems, air quality, water quality, Colne's history and there are no school places. There are more people against this than you're aware of, so don't think	<p><b>Green Belt Assessment</b></p> <p>The Inspector examining the LP1 indicated that a detailed review of the Green Belt boundaries would need to be carried out to determine whether the defined limits need to be altered to allow for the inclusion of additional land for development. The Inspector also noted that a Green Belt Review would be necessary to ensure that enough</p>

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			it will be an easy ride. Concerned resident.	<p>land is identified to meet the spatial strategy of the plan. Pendle Council will need to carefully consider whether it can demonstrate the “exceptional circumstances” required to remove land from the Green Belt, in order to allow for new development.</p> <p>The National Planning Policy Framework (NPPF) sets out five purposes for designating land as Green Belt (para 80). Pendle Council appointed independent consultants to assess whether the Green Belt in Pendle continued to fulfil the purposes of including land in Green Belt.</p> <p>The Green Belt Assessment provides the evidence base for identifying those parcels of land which could potentially be removed from the Green Belt to accommodate new development. It employed an agreed methodology to divide the Green Belt up into a number of separate parcels. It then assessed these parcels against the five purposes of Green Belt, as set out in the NPPF (para 80) to help determine if they still contributed to the primary purpose of the Green Belt in Lancashire, which is to check unrestricted sprawl and the merger of neighbouring settlements (para 2.13).</p> <p>The NPPF is clear that Green Belt boundaries should only be altered in “exceptional circumstances”. If the Council is minded to remove land from the Green Belt it will need to provide a clear and robust justification to demonstrate that there are “exceptional circumstances” for doing so.</p> <p><b>Site Allocations</b> The site assessment criteria to be used by Pendle Council are set-out in Appendix 1 of the Local Plan Scoping Report &amp; Methodology. Together with detailed discussions with infrastructure providers they will help to determine whether the existing infrastructure (roads, schools etc.) in the vicinity of a proposed development site is capable accommodating the level of development that is proposed.</p> <p>Where the answer is no, the potential to upgrade capacity</p>

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				<p>by using contributions from developers will be considered. Site allocations will not be made in locations where the evidence demonstrates that the infrastructure cannot accommodate, or be upgraded to cope with, the level of development that is proposed.</p> <p><b>Land at the Rough/Lidgett Triangle (Parcel PA.03)</b>          Whilst the respondent does not state which site he is referring to, from the comments made it would appear to be land at the Rough/Lidgett Triangle (Parcel PA.03).</p> <p>Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) currently designates Parcel PA.03 as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p> <p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:          (1) Designate as Green Belt</p>

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				<p>The Pendle Green Belt Assessment (2016) considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that Parcel PA.03 although contributing to the unrestricted sprawl of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the “exceptional circumstances” required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p>
C028GB	01041	Ms Elizabeth Lane	<p>I see from your policies that yet again the Rough ,Lidgett Triangle and even Ball Grove country Park are under threat again!</p> <p>Surely the fact that the Municipal Hall in Colne and the subsequent hearings were full of locals opposed to this and a ruling from the Secretary of State that no building should go ahead on the Rough. I see the field beyond the rough is also to be taken from its green belt status. Is this not just an easy option for the council?</p> <p>These areas are beginning again to fill with endangered wildlife the Curlew are returning and the thrush both on the endangered list are nesting in the fields of the conservation area around the rough and Lidgett triangle. Kingfishers nesting in the river bank the growing fish population in the river are beginning to flourish down at the country park. Both these areas are well trodden by locals and visitors alike.</p> <p>Further building on these proposed sites will be making our town a large urban sprawl ,we do have many brown sites and areas where demolished houses now lay unbuilt on why are these not included?</p> <p>To make these proposed areas open to building will remove our town from little country town into a large conurbation joined from Briefield to beyond Laneshawbridge. We will no longer be a gate way to the Bronte country,</p>	<p><b>Land at the Rough/Lidgett Triangle (Parcel PA.03)</b> Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) currently designates Parcel PA.03 as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p> <p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the</p>

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			<p>where the Bronte sisters walked from Haworth to Christ Church and on to Colne ,but a large urban sprawl with nothing to offer visitors looking for historic walks or for our own town dwellers.</p> <p>We have already proved we have environmental issues one being pollution, it has been announced this week that traffic and air pollution could cause a greater risk of breast cancer. (published in the journal Breast Cancer Research.) Surely Pendle council are not going to ignore the residents because it's much easier to take green belt or areas laying close by than work at looking for more suitable sites.</p> <p>Short sightedness by past council members have deprived us historic buildings and encroached on green belt. Let us not go down this pathway again. I am against this proposal.</p>	<p>Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:</p> <p>(1) Designate as Green Belt The Pendle Green Belt Assessment (2016) considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that Parcel PA.03 although contributing to the unrestricted sprawl of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the “exceptional circumstances” required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p> <p><b>Land at Ball Grove (Parcel P041)</b> There is currently no proposal to remove Parcel P041 from Green Belt.</p> <p>The Pendle Green Belt Assessment (2016) used an agreed methodology to divide the Green Belt up into a number of separate parcels. It then assessed these parcels against the five purposes of Green Belt, as set out in the NPPF (para 80) to help determine if they still contributed to the primary purpose of the Green Belt in Lancashire, which is to check unrestricted sprawl and the merger of neighbouring settlements (para 2.13).</p> <p>Parcel P041 covers an area of land to the east of Laneshaw Bridge, immediately south of the A6068 and north of Colne</p>

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				<p>Water. This extensive parcel of land includes part of Ball Grove Park and the Ball Grove Nature Reserve.</p> <p>The Green Belt Assessment concluded (Table 12) that Parcel P041 plays a “major” role in preventing neighbouring towns (and villages) from merging into one another (Purpose 2). Whilst it is acknowledged that this means that the parcel may still be able to accommodate “some limited development” without compromising this role (Table 3, page 21), extensive development is not considered to be an option. Parcel P041 was considered to perform a less important role when considered against the three other purposes of Green Belt that were assessed. The report concluded that Parcel P041 was still integral to the Green Belt and as such it was not included in the list of parcels that are no longer considered to perform a Green Belt function (Table 13).</p> <p>The NPPF (para 83) is clear that “Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.”</p> <p>In preparing LP2 Pendle Council must allocate sufficient land to meet the overall development requirements established in LP1; which has been apportioned by settlement in the LP2 Scoping Report &amp; Methodology (Table 3.11). Whilst detailed site assessments have yet to be completed, there would appear to be sufficient sites not within the Green Belt to meet the identified development needs for Laneshaw Bridge.</p>
C029GB	01516	Cllr Jennifer Purcell	<p>I write to respond to the Green Belt consultation currently being undertaken in Pendle. I write in my capacity as a Borough Councillor.</p> <p>The area which includes The Rough and The Lidgett Triangle should have been included as Green Belt designations. The Planning Inspector recently recognised the value of these pieces of land, and has many of the featured of Green Belt.</p>	<p>The land at the Lidgett Triangle is currently designated in the Replacement Pendle Local Plan (2001-2016) as a Protected Area for potential long term future development. The Local Plan Part 2 will need to review this designation and consider whether there is a need for its development or whether an alternative designation would be more appropriate. The Green Belt Assessment indicates</p>



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			<p>Parcel PO41 which includes Ball Grove should have a higher classification. It is critical in separating Colne from surrounding settlements, but also has a huge community benefit.</p> <p>There should not be downgrading of the Green Belt land between Foulridge and Colne. The purpose of this Green Belt land in that location is to protect the area between Foulridge and Colne. Deallocating goes against the very aims of the Green Belt in this area.</p> <p>I hope that my views are taken into account.</p>	<p>that the site does not contribute to the overall function of Green Belt. Therefore even though the site scores moderately well against Purpose 1 and Purpose 3 of including land within the Green Belt it is unlikely that the exceptional circumstances will exist to include the site within the Green Belt. If the Protected Area designation is removed the Council will need to consider whether an alternative designation such as Local Green Space would be appropriate.</p> <p><i>The rating of the parcel is in accordance with the assessment criteria contained in the GBA Methodology. Community benefit is not a criterion for the assessment of Green Belt.</i></p> <p><b>Recommendations: no change to the assessment.</b></p> <p>The purpose of the Green Belt Assessment is to assess the function of land against the five purposes of the Green Belt as set out in the National Planning Policy Framework (NPPF). It does not recommend that a particular parcel of land should, or should not, be added to, or removed from, the Green Belt.</p> <p>In order to add or remove land from the Green Belt, Pendle Council must take into account a wide range of information so that the 'exceptional circumstances' required by paragraph 83 of the NPPF can be adequately demonstrated.</p> <p>Pendle Council will carry out further work to determine whether smaller plots of land within the Green Belt parcels assessed by our consultants are suitable for, and needed to, accommodate the level of development required for a particular settlement. This will take place prior to the publication of the LP2 Preferred Options Report, which will be made available for public consultation in 2018.</p>
C030GB	01122	Mr John Newbould	My family and I are against development of the Rough and Ligett Triangle for the following reasons.	<p><b>Green Belt Assessment</b></p> <p>The National Planning Policy Framework (NPPF) sets out five purposes for designating land as Green Belt (para 80).</p>

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			<ol style="list-style-type: none"> <li>1. It is beautiful unspoilt countryside within walking distance (15 mins) from the town. Great for walking and excising dogs and good to see local wildlife.</li> <li>2. If over 300 houses built it is difficult access to the motorways M66 and M65 which are the other side of town. Colne is less than 10 mph in rush hour.</li> <li>3. With the tourist attractions like the Brontes' at Haworth and the Pendle witches at Newchurch and a lot of picturistic villages in the area tourism will be hit and the area looses its character.</li> <li>4. There will not be enough local schools and doctors to cope with a lot of development</li> <li>5. The walking festival is popular. To use Colne as a base many good walks for people with Pendle Hill, Boulsworth Hill and Noyna Rocks.</li> <li>6. Good farmland, need to be self sufficient in food. Necessary in 2nd world war, convoys and German submarines. With Britain leaving EEC and some parts of world have droughts and monsoons, agriculture is important.</li> </ol>	<p>None of these purposes concern the presence of wildlife, the value the land has to the community or for tourism. The consultants have rightly not taken these considerations into account when assessing the Green Belt.</p> <p><b>Land at the Rough/Lidgett Triangle (Parcel PA.03)</b> Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) currently designates Parcel PA.03 as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p> <p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:</p> <p>(1) Designate as Green Belt The Pendle Green Belt Assessment (2016) considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that Parcel PA.03 although contributing to the unrestricted sprawl</p>

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				<p>of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the “exceptional circumstances” required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p>
C031GB	00719	Mr Mark Chung	<p>I am writing as a local resident and PBC council tax payer, and I wish to comment on the above plan.</p> <p>I broadly support the council's goal of having a local plan that contains and reflects the local resident's input, concerns &amp; comments.</p> <p>Having looked through your proposed plan, I am very concerned that you have included land such as The Lidgett Triangle and The Rough (P005) as <i>Protected Area for Development</i>.</p> <p>Last year the government appointed Planning Inspector totally rejected the developers planning request for housing on The Rough, so why have you included this in a Protected Area for Development? PBC even fought the developers on their appeal!</p> <p>To include The Rough and other green areas of Pendle for development is totally against what the Inspector said and more importantly against the local communities wishes.</p>	<p>Broad support for the preparation of a Local Plan is noted.</p> <p>Agents acting on behalf of the developer and landowners have put Parcels P003 (Lidgett Triangle) and P005 (The Rough) forward for consideration by Pendle Council, as they believe them to be suitable for future development.</p> <p>Pendle Council has included them in this long-list of sites to be considered for possible allocation in Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), as it is required to consider all reasonable alternatives before selecting the most sustainable portfolio of sites for allocation in the draft plan (Preferred Options Report).</p> <p>It is Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) adopted by Pendle Council in May 2016, which designates Parcel PA.03 as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green</p>

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			<p>More emphasis should be placed on brownfield site development of which there are many in the Pendle area, and these should be developed before consideration is given to even look at building on green fields.</p> <p>I cannot understand why the council is even looking at green fields for development whilst there remains over 1,000 empty properties in the Pendle area (figures supplied by local MP less than 1 year ago).</p> <p>I suppose the empty properties are not the 'right type' of housing for developers, who make more profit from new housing.</p>	<p>Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p> <p>When preparing LP2, consideration must be given to whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:</p> <p>(1) Designate as Green Belt The Pendle Green Belt Assessment (2016) considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that Parcel PA.03 although contributing to the unrestricted sprawl of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the “exceptional circumstances” required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p> <p><b>Brownfield First Policy</b> Policy SDP2 of Pendle Local Plan Part 1: Core Strategy (LP1), in line with the core planning principles set out in paragraph 17 of the National Planning Policy Framework</p>

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			<p>Local decisions need to be made by local people, not consultants who know nothing about the local history of an area or the local community's strong views .</p> <p>Negative impacts and the implications on the local community of any developments on green land will last for years and years and years during the construction phase.</p> <p>I respectfully ask you to reject the inclusion of area like The Rough and reassign them to be protected against any type of development.</p>	<p>(NPPF), encourages the re-use of previously developed (Brownfield) land; provided that it is not of high environmental value. This approach helps to minimise the use of undeveloped (Greenfield) sites for development.</p> <p>Pendle Council successfully applied to be a pilot for the new Brownfield Land Registers, which are intended to ensure that 90% of 'suitable' Brownfield sites have planning permission by 2020. But the Council cannot restrict development to Brownfield sites, if it is to meet the development needs of the borough. LP1 (para 7.25) recognises that <i>"in order to not unduly restrict development ... some Greenfield sites will need to be released for development. Such sites will need to be in sustainable locations which are well related to existing settlements."</i></p> <p><b>Empty Homes</b> The number of empty homes in Pendle has seen a significant reduction in recent years, in large part due to initiatives introduced by Pendle Council.</p> <p>The percentage of long-term empty homes is now close to the level that can be reasonably expected in a functioning housing market.</p> <p>A certain number of empty homes are always needed to allow for the free movement of people who wish to relocate.</p> <p>The need to provide new homes not only addresses a need to increase the housing stock, but also to diversify the market by providing different types and tenures.</p>
C032GB	00932	Mr Kevin Hey	<p>I am writing in regard to the Local Plan consultation on Call for Sites, Local Plan Part 2: Site Allocations and Development Policies – Scoping Report and Methodology, Sustainability Appraisal Scoping Report for Local Plan Part 2, and the Green Belt Assessment.</p> <p>One of my many concerns is that the Local Plan is being deliberately steered towards over-allocating greenfield sites (such as those around Colne) contrary</p>	<p>The purpose of the Green Belt Assessment is to assess the function of land against the five purposes of the Green Belt as set out in the National Planning Policy Framework (NPPF). It does not recommend that a particular parcel of land should, or should not, be added to, or removed from, the Green Belt.</p>

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			<p>to the wishes of a vast majority of local people. The prioritisation of greenfield land seriously undermines the economics and market for reusing derelict land, namely brownfield sites, and moreover leads to the loss of more agricultural land in a nation that can supply barely two-thirds of its own food.</p> <p>Greenbelt land should be released for housing development under exceptional circumstances only. By definition exceptional circumstances are exceedingly rare. By the same token, cases should be made for strengthening the greenbelt by including within the designation of greenbelt land that is not currently so designated when the circumstances are warranted.</p> <p>I understand that last September a number of local stakeholders attended a meeting organised by Pendle Borough Council at which sites that should be selected on the grounds that they would support the development of the locality were highlighted. I further understand that these sites have not been prioritised by either the Council or the external consultant. This is extremely disappointing. The whole point of consultation, if genuine, is that residents locally can place views before officials and elected representatives that are given due consideration, and thus actually shape policy and alter outcomes. I fear, very much, that the current consultation amounts to the Council arguing from a conclusion rather than towards a conclusion.</p> <p>Frankly, I was astonished to read that the upper section of The Rough has not been designated for inclusion in Eastern Colne's Green Belt. As you will be aware the land was recently subject to a planning application that went to appeal and the Planning Inspector was persuaded of the rural character of the land and its value to the local community in its current form. Given the strength of local feeling in relation to this land the proposal by the Council to not designate the land for inclusion in greenbelt appears to me to be both caprice and perverse.</p>	<p>In order to add or remove land from the Green Belt, Pendle Council must take into account a wide range of information so that the 'exceptional circumstances' required by paragraph 83 of the NPPF can be adequately demonstrated.</p> <p>Pendle Council will carry out further work to determine whether the Green Belt parcels assessed by our consultants, or smaller plots within them, are suitable for and needed to accommodate the level of development required for a particular settlement. This will take place prior to the publication of the LP2 Preferred Options Report, which will be made available for public consultation in 2018.</p> <p>Due to current economic viability in the area, developers have shown a greater level of interest in sites on the northern periphery of the M65 Corridor. Policy SDP2 of Pendle Local Plan Part 1: Core Strategy (LP1), in line with the core planning principles set out in paragraph 17 of the National Planning Policy Framework (NPPF), encourages the re-use of previously developed (Brownfield) land; provided that it is not of high environmental value. This approach helps to minimise the use of undeveloped (Greenfield) sites for development.</p> <p>Pendle Council has successfully applied to be a pilot for the new Brownfield Land Registers, which are intended to ensure that 90% of 'suitable' Brownfield sites have planning permission by 2020. But the Council cannot restrict development to Brownfield sites, if it is to meet the development needs of the borough. LP1 (para 7.25) recognises that <i>"in order to not unduly restrict development ... some Greenfield sites will need to be released for development. Such sites will need to be in sustainable locations which are well related to existing settlements."</i></p>

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			<p>I would now like to comment on specific land parcels from the documentation:</p> <p>I agree wholeheartedly with the classification of land parcels PO36, PO37, PO37a, PO38, PO39, PO40, PO42 and PO43 as “critical” in Green Belt criteria 1 and 3. In regard to parcel PO36 I support the sub-criteria designation in relation to Landscape Character and Sensitivity to Change Criteria to inform Purpose 3’ as “Little/no”. In relation to Purpose 4 (for PO 36) a designation of “moderate’ rather than ‘slight’ would better reflect the relationship to the historic features of the town. The key point here is that rural character of a well-known defined hill (Nonya Hill) with a number of old farms in a single panoramic setting available for all residents and visitors to enjoy represents a prime example of the typical hinterland of the town. The character of Colne is as much about farming on the rural fringe as the historic old town. Moreover, the southern boundary of the parcel is delineated by development on one–side of Castle Road and this marks a highly visible boundary between urban and rural that is a defining feature of the locality.</p> <p>I would urge you to treat Parcel PO38a as indivisible from PO38 and designated “critical” for both Green Belt Purpose 1 and Purpose 3. Parcel (PO38a) has a strong historic significance within both The Conservation Area and the town of Colne (Green Belt Purpose 4), as it contains a long line of 200-year-old lime trees which were planted to form the entrance to the Heyroyd Estate. Heyroyd was a former hamlet outside Colne (once rivalling it in size) and now contains a Grade II listed house and associated buildings. These lime trees are a defining landscape feature that were deliberately planted to lead to this historic, former hall house. As such, classification 4 for PO38a should be not “not applicable”, but “major”, or even “critical”.</p>	<p><i>The rating of the parcel is in accordance with the assessment criteria contained in the GBA Methodology for Purpose 4.</i></p> <p><i>The parcels have strong boundaries between them which facilitated separate assessments which reflect their individual contributions to the function of the Green Belt in this location. The boundaries of P038a followed the existing line of built form at Bents and so it is a logical separate parcel for assessment. The ratings of these parcels are in accordance with the assessment criteria contained in the GBA Methodology for Purposes 1 and 3.</i></p> <p><i>Purpose 4 has a very specific purpose in respect of protecting designated Historic Towns, and does not include the protection of other designated heritage assets which are protected by other means such as Listing or planning policies. In this instance, this includes Green Belt which has a specific role to play in the setting of Colne as a historic town in general. Parcels P038 and P038a do not lie on key routes into Colne and therefore they are not considered relevant to Purpose 4.</i></p>

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			<p>I fear that parcel PO41 has been misunderstood and that it should have far stronger classifications. The site is a Nature Reserve, and the location of a former tannery, which was once Europe's largest and therefore should have a stronger Purpose 4 classification as a historic site. In my opinion, Purpose 1 should be "major" and Purpose 3 should be "critical". Tree cover around Colne is sparse and this area is an exception. It is my hope that in due course Colne Town Council will recognise Ball Grove Country Park as a defined Open Space worthy of protection.</p> <p>In general one has the feeling that planning policy nationally is being driven to a very great extent by the immense pressures on housing being experienced in London and the South Eastern Crescent of England. The situation in Pendle is, of course, the polar opposite of those circumstances. Housing in Pendle is low priced in nominal terms and affordability in relative terms is nowhere near the crisis levels pertaining elsewhere in the country. Castle Road provides a graphic illustration of the travails of the market. Houses between Skipton Road and Brownhill Lane sell relatively swiftly, beyond Brownhill Lane it is not uncommon for houses to be on the market for many, many months (if not years); and in some cases they have been taken off the market as the vendor has been unable to find a buyer. The current housing target for the Borough of Pendle of 298 new dwellings per year bears no relationship to current reality or likely future demand. Accordingly, I would urge the Council to seek a review of its Housing Target without delay.</p> <p>As you may be aware the area around Colne contains much land that is owned by absent and speculatively landlords who seem to have very little real interest in the well-being of the locality, or the people. In such a situation there is a real danger that local residents are relegated to the role of by-standers and become merely pawns. I am not against new development on the eastern fringes of Colne providing it is undertaken selectively, and on a scale that is appropriate to the locality. In this regard I support wholeheartedly the development of a Colne Neighbourhood Plan as a means of bringing planning closer to the people.</p> <p>I hope that my comments are helpful and will be given the due and serious consideration.</p>	<p><i>The rating of the parcel for P041 is in accordance with the assessment criteria contained in the GBA Methodology for Purpose 1. These issues do not fall within the scope of the Green Belt Assessment as they are protected through other policy measures.</i></p> <p><b>Recommendations: no change to the assessment.</b></p>
C033GB	01519	Mrs Carly Bucknell	<p>I have only today been made aware that there are about to be some changes made to the status of Ball Grove Park/ Nature reserve.</p> <p>The local people of Trawden, Laneshawbridge and Ball Grove surrounding</p>	<p><b>Land at Ball Grove (Parcel P041)</b></p> <p>There is currently no proposal to remove Parcel P041 from Green Belt.</p>



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			<p>areas can vouch for how greatly used the park and nature reserve is used.</p> <p>I wish to object with regard to the parcel of land numbered P041 'Ball Grove' that could possibly lose its Green Belt Status under the Pendle Green Belt Planning Review.</p> <p>Ball Grove Nature Reserve &amp; Park provide activities such as walking, fishing, play area (swings etc for under sixteens) and also a picnic area.</p> <p>The area cannot sustain excess traffic as I feel it will add to the pollution, excess rubbish etc!</p> <p>It is also holder of a Green Flag for the Standard of the Park / Nature Reserve second year running.</p> <p>Lots of Wild Life such as Ducks nesting, Deer, Frogs, Fish, various birds, Otter etc</p>	<p>The Pendle Green Belt Assessment (2016) used an agreed methodology to divide the Green Belt up into a number of separate parcels. It then assessed these parcels against the five purposes of Green Belt, as set out in the NPPF (para 80) to help determine if they still contributed to the primary purpose of the Green Belt in Lancashire, which is to check unrestricted sprawl and the merger of neighbouring settlements (para 2.13).</p> <p>Parcel P041 covers an area of land to the east of Laneshaw Bridge, immediately south of the A6068 and north of Colne Water. This extensive parcel of land includes part of Ball Grove Park and the Ball Grove Nature Reserve.</p> <p>The Green Belt Assessment concluded (Table 12) that Parcel P041 plays a “major” role in preventing neighbouring towns (and villages) from merging into one another (Purpose 2). Whilst it is acknowledged that this means that the parcel may still be able to accommodate “some limited development” without compromising this role (Table 3, page 21), extensive development is not considered to be an option. Parcel P041 was considered to perform a less important role when considered against the three other purposes of Green Belt that were assessed. The report concluded that Parcel P041 was still integral to the Green Belt and as such it was not included in the list of parcels that are no longer considered to perform a Green Belt function (Table 13).</p> <p>The NPPF (para 83) is clear that “Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.”</p> <p>In preparing LP2 Pendle Council must allocate sufficient land to meet the overall development requirements established in LP1; which has been apportioned by settlement in the LP2 Scoping Report &amp; Methodology (Table 3.11). Whilst detailed site assessments have yet to be completed, there would appear to be sufficient sites not within the Green Belt to meet the identified development</p>

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				needs for Laneshaw Bridge.
C034GB	01521	Mr Gareth Plimley	<p>Myself and my wife have only today been made aware that there are about to be some changes made to the status of Ball Grove Park/ Nature reserve.</p> <p>Can I express my concerns as a resident that will be most affected by this plan that both myself nor my wife have been consulted on this matter.</p> <p>We live right in the middle of the nature reserve and have only just had this matter brought to our attention by a friend.</p> <p>We are outraged to think that the council can make such decisions without consulting the public and people that are going to be affected by these changes.</p> <p>The local people of Trawden, Laneshawbridge and Ball Grove surrounding areas can vouch for how greatly used the park and nature reserve is used.</p> <p>I wish to object with regard to the parcel of land numbered P041 'Ball Grove' that could possibly lose its Green Belt Status under the Pendle Green Belt Planning Review.</p> <p>Ball Grove Nature Reserve &amp; Park play a major role in providing activities such as walking, fishing, play area (swings etc for under sixteen's) my children use these facilities every week. Picnic areas. Major footpath between Trawden &amp; Wycoller.</p> <p>Holder of a Green Flag for the Standard of the Park / Nature Reserve second year running.</p> <p>It has Two lakes one of these is fished. Provides Dog walking areas /paths for the wider community and visitors.</p> <p>The historic site of a major Tannery. Lots of Wild Life such as Ducks nesting, Deer, Frogs, Fish, various birds, Otter etc</p> <p>Local businesses will be greatly affected by this and also the cafe that is at the centre of the green belt land.</p> <p>I would also like to add that the local community and 'Friends of Ball grove' spend hours upon hours of their time each year to preserve and look after the</p>	<p><b>Public Consultation</b> The guidelines for consultation on planning policy documents are set out in the Statement of Community Involvement (2016).</p> <p>This public consultation took place over a six-week period (24<sup>th</sup> February to 7<sup>th</sup> April), as recommended in the Government regulations. It was widely publicised in the week prior to, and throughout the consultation period by:</p> <ul style="list-style-type: none"> <li>• writing to approximately 1,500 individuals and organisations on the Council's database via letter or email;</li> <li>• issuing a press release which generated articles in the local press;</li> <li>• placing an advertisement on the homepage of the Council website, including a link to pages with additional information;</li> <li>• issuing regular messages via social media (Facebook, Twitter and LinkedIn);</li> <li>• circulating 690 copies of the Framework newsletter to libraries, council shops, parish councils and other venues (e.g. shops, schools, doctors surgeries, dentists etc.); and</li> <li>• providing 177 posters to 85 venues throughout the borough for public display.</li> </ul> <p>Given this extensive coverage the Council considers that it has done everything reasonably possible, within the limited budget available, to draw the matters under consideration to the attention of local residents and businesses and other interested parties.</p> <p>As there are no specific proposals to develop Parcel P041 at this time (see below) neighbour consultations are not appropriate.</p> <p>The Council will be carrying out further informal and statutory public consultations before LP2 is submitted to the Secretary of State for independent examination, in late 2018 or 2019.</p>

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			<p>land. Before this review takes place I seriously think that you need to consult your public, council tax payers and facility users as this matter should not be made without the views of these people.</p> <p>I await your speedy response</p>	<p>As someone who has responded to a public consultation on the Local Plan, your details have been added to our database and you will be informed directly by email or letter about these consultations.</p> <p><b>Land at Ball Grove (Parcel P041)</b> There is currently no proposal to remove the land at Ball Grove from the Green Belt as part of the preparation of the Local Plan Part 2.</p> <p>The Pendle Green Belt Assessment (2016) provided a comprehensive review of the Green Belt in Pendle. It divided the Green Belt up into a number of individual parcels of land and assessed these against the purposes of including land within the Green Belt as set out in the NPPF.</p> <p>Parcel P041 covers an area of land to the south of the A6068 at Laneshaw Bridge and to the north of Colne Water. This parcel includes land at Ball Grove Nature Reserve and some of the park area. The Assessment Report indicates that this parcel scores Moderate against purpose 1, Major against purpose 2, Slight/Negligible against purpose 3 and Slight against purpose 4. The report does not include this parcel as one which no longer contributes to the overall Green Belt function. Indeed, the scoring of this parcel suggests that it still forms an integral part of the Green Belt.</p> <p>In line with the NPPF, the Council can only alter the Green Belt where it can demonstrate exceptional circumstances. Through the preparation of the Local Plan Part 2 the Council will need to ensure that sufficient land is allocated to meet the development requirements of the borough.</p> <p>The current evidence indicates that there are sufficient sites to meet the needs in Laneshaw Bridge without the need to release land from the Green Belt. It is therefore highly unlikely that the Council will consider any alteration to Green Belt Parcel P041.</p>

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C035GB	01306	Mr Jerry Stanford	<p>It having been indicated that local Councillors had understood that the area known as the Rough and Lidgett Triangle would be recommended as Green belt additions; I am extremely concerned to peruse the documents within the Green belt reassessment plan to find the opposite is true.</p> <p>The Consultants have produced a complex set of papers that local knowledge has not been investigated; having a Master's degree and 55 years of analysing and applying government legislative documents I find this set of documents very difficult to assimilate to the point where they appear to be obfuscation deliberately designed to be incomprehensible. This militates toward acceptance by those who do not spend hours poring over them and will therefore produce a skewed result which is not acceptable. As a consultant myself I would be ashamed to produce such a sub-standard piece of work and I register herewith my disapproval of the process.</p> <p>I concur with and wish to support the comments of Lidgett and Beyond and would make the following additional points:</p>	<p>Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) currently designates Parcel PA.03 as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p> <p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:</p> <p>(1) Designate as Green Belt</p> <p>The Pendle Green Belt Assessment (2016) considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that Parcel PA.03 although contributing to the unrestricted sprawl of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the "exceptional circumstances" required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation</p>

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			<p><b>Parcel PO41</b></p> <p>Purpose 1 &amp; 2 – The so-called elements of development are a small number of historic buildings most of which were built as part of the 19<sup>th</sup> C development of Ball Grove Tannery. These are sufficiently separated to not be considered developments. Critically infilling between these houses would then produce urban sprawl joining Laneshaw Bridge and Colne. It should therefore be recorded as critical.</p> <p>Purpose 3 – PBC Executive have approved the extension of the designated Local Nature Reserve within this parcel to comprise all the green space between Colne Water to the South, Ball Grove Drive Car Park to the west, the A6068 to the north excluding the various existing settlements and the Park. This has yet to be designated but this is only a rubber stamp issue. Ball Grove Park is also within this parcel and makes up most of the rest of the area. How this can be registered slight/negligible is incomprehensible and demonstrates that the Consultants have not exercised due diligence. It is clearly critical.</p> <p>Purpose 4 – This is the site of the aforementioned Ball Grove Tannery, which owned the entire valley right up to the Yorkshire border in order to preserve its water rights. The lake in the LNR was a feeder for the main lake now in the Park and the ironwork connecting them still exists. The Tannery was the largest in Europe in its heyday in the early 1900s. This rating should therefore be Major, not slight.</p> <p><b>PA03, PO38 and PO38A</b> I have to concur with the comments from Lidgett &amp; Beyond and draw attention to the Inspector's comments regarding this area at the Appeal on development land off Windermere Avenue; in these he drew attention to the historic nature of this area and this has not been noted by the Consultants resulting in a lowly rating – again lack of due diligence on matters of huge importance to the Borough.</p> <p>I trust that these comments will be considered and be recognised as a genuine attempt to correct errors in the Green Belt assessment.</p>	<p>The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p> <p><i>The rating of the parcel is in accordance with the assessment criteria contained in the GBA Methodology for Purposes 1 and 2. The existing built form on the south side of the A6068 constitutes development which affects the perception of the Green Belt function in this location.</i></p> <p><i>These issues do not fall within the scope of the Green Belt Assessment as they are issues which can be given protection through other policy measures.</i></p> <p>Comments noted</p>
C036GB	00796	Mr & Mrs Bob & Sue Elliott	Surely Greenbelt land should be only released for housing development under exceptional circumstances.	<b>Brownfield First Policy</b> Policy SDP2 of Pendle Local Plan Part 1: Core Strategy (LP1),

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			<p>In a recent survey it was found that there are sufficient brownfield sites in the area of Colne to fulfil current housing needs.</p> <p>The Rough has long-range views and footpaths that contain important circular walking routes greatly valued by local residents of all ages.</p> <p>Rare birds, including the endangered Curlew and Barn Owl, are nesting on the Rough as I write.</p> <p>The Lidgett Triangle, which lies at the heart of the Lidgett and Bents Conservation Area, was recently recognised by a Planning Inspector in his summary of his decision regarding the recent application to develop the whole of The Rough by Junction Property (Absentee, speculative landlords).</p> <p>Thank you for reading my comments. Please give them your serious consideration.</p>	<p>in line with the core planning principles set out in paragraph 17 of the National Planning Policy Framework (NPPF), encourages the re-use of previously developed (Brownfield) land; provided that it is not of high environmental value. This approach helps to minimise the use of undeveloped (Greenfield) sites for development.</p> <p>Pendle Council successfully applied to be a pilot for the new Brownfield Land Registers, which are intended to ensure that 90% of 'suitable' Brownfield sites have planning permission by 2020. But the Council cannot restrict development to Brownfield sites, if it is to meet the development needs of the borough. LP1 (para 7.25) recognises that <i>"in order to not unduly restrict development ... some Greenfield sites will need to be released for development. Such sites will need to be in sustainable locations which are well related to existing settlements."</i></p> <p><b>Land at the Rough/Lidgett Triangle (Parcel PA.03)</b> Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) currently designates Parcel PA.03 as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p> <p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area</p>

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				<p>(Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:</p> <p>(1) Designate as Green Belt The Pendle Green Belt Assessment (2016) considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that Parcel PA.03 although contributing to the unrestricted sprawl of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the “exceptional circumstances” required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p>
C037GB	00637	Mr John Birchenough	<p>I wish to register that my comments re the above two subjects are in agreement with those made by the local charity Lidgett and Beyond on this matter and as submitted to you.</p> <p>I also wish to make additional comment re the Green Belt Assessment, in particular the consideration of land parcel PA.03</p> <p>After referring to the comments made by the government appointed Planning Inspector when he rejected appeal APP/E2340/W/15/3131975 for up to 270 dwellings on this land I am disappointed and very surprised that this area has not been recommended for inclusion into the Green Belt.</p>	<p><b>Land at the Rough/Lidgett Triangle (Parcel PA.03)</b> Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) currently designates Parcel PA.03 as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p>

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			<p>Purpose 3. It may have degraded field boundaries within it, but the outer boundaries of the area are strong and distinct. I question whether the northern boundary is "urban residential" the residential factor being I believe, one house, with the remaining boundary being open fields and a barn, which give to open country side which itself needs safeguarding from encroachment. Accordingly the rating for this should be higher than the Moderate afforded -</p>	<p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:</p> <p>(1) Designate as Green Belt The Pendle Green Belt Assessment (2016) considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that Parcel PA.03 although contributing to the unrestricted sprawl of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the "exceptional circumstances" required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p> <p><i>The existing Green Belt boundaries at the eastern edge of PA.03 are stronger than those that would be created at its western edge. For the purposes of ensuring the long term protection of the Green Belt, the existing rating is considered appropriate.</i></p>

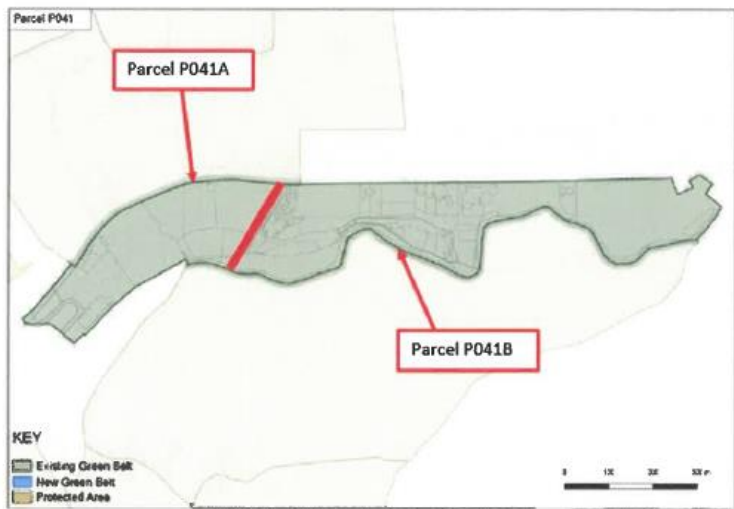


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			<p>Major - more appropriate.</p> <p>Purpose 3. Character and Sensitivity, to rate this Low is missing the point of the value this land gives to the Conservation Area and settlement Character, this again is detailed at length in the above Inspectors report and should lead to Moderate/ Major rating.</p> <p>Purpose 4. To say this is Not Applicable is surely in error, again please consider Setting and Character as at 3 above and as detailed in the Inspectors Appeal hearing report.</p> <p>Please reconsider the allocation of Green Belt status to this land to help and preserve it for the future benefit of all.</p> <p>Is it possible to have further meetings and open discussion regarding this where decision making process and rating matrix can be examined and explained.</p>	<p><i>The assessment against Landscape Character has been clarified to be against the 'Capacity' for Change – the rating of 'Low' therefore remains appropriate as the conclusion is that the parcel has a low capacity for change (and therefore is highly sensitive).</i></p> <p><i>Purpose 4 has a very specific purpose in respect of protecting designated Historic Towns, and does not include the protection of other designated heritage assets which are protected by other means such as Listing or planning policies. The historic significance of PA.03 is protected by a conservation area designation in this instance. The Green Belt has a specific role to play in the setting of Colne as a historic town in general, rather than the Lidgett and Bents conservation area in particular. Parcel PA.03 contribution is to the setting of the conservation area, rather than Colne as a Historic Town in particular, and therefore not relevant to Purpose 4.</i></p> <p><i>Recommendations: clarification of title for Purpose 3+ assessment on Individual Site Assessments and Maps at Appendix 2.</i></p>
C038GB	00294	Lidgett & Beyond Mr David Cockburn-Price	<p><b>(See comment C0294SRM for representation on the Local Plan Part 2: Scoping Report &amp; Methodology)</b></p> <p><b>Green Belt Assessment</b></p> <p>11. Lidgett &amp; Beyond believes that there is in fact no exceptional circumstance to release Green Belt land.</p> <p>12. However, under the parameters chosen by Pendle Council's consultants to rate greenbelt land it was clear, after several of our members attended a Pendle Council Green Belt Workshop, that some Green Belt adjacent to features such as the motorway should now be declassified. This is because the areas adjacent to the Green Belt in those areas had changed, leading to a decrease in their value as Green Belt, given that all tranquillity had been lost. It is for this reason that Lidgett &amp; Beyond</p>	<p><b>Land at the Rough/Lidgett Triangle (Parcel PA.03)</b> Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) currently designates Parcel PA.03 as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p>

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			<p>believes that Greenbelt should be reassessed every couple of decades.</p> <p>13. Our members coloured in maps showing these areas to the West of Colne during the workshop. In recompense of this small-scale declassification, it was also clear that other areas should be considered for classification as Green Belt. Lidgett &amp; Beyond would especially like to highlight the upper section of The Rough, with its long-range views and footpaths and the Lidgett Triangle, which lies at the heart of the Lidgett and Bents Conservation Area and was recently recognised by a Planning Inspector in his summary of his decision in regards to the recent application to develop the whole of The Rough following its acquisition by a speculator property company. Lidgett &amp; Beyond is disappointed and dismayed that neither of these parcels (contained within the Greenbelt Assessment Report as PA03), which its members highlighted during the Green Belt Stakeholder session, has been put forward for inclusion in Eastern Colne's Green Belt. We would welcome the opportunity for further discussion regarding this and restudy of the criteria and decision matrix used. Particular emphasis being put to the various specific points and considerations raised by the below by the Planning Inspectorate Both land parcels have strong boundaries and exhibit many of the characteristics of the Green Belt land outlined during that session. They also contain important circular walking routes. As recorded in the Appeal Decisions report, 28th Sept 16 Para 66, <i>"I do not underestimate the effect on and importance of the footpath 216 which forms part of the Winewall Circular walk"</i>.</p> <p>As the Inspector also said in his Appeal Decisions report:</p> <p>Para 25 - <i>It is a fundamental element of the CA that buildings within it interact directly with agricultural land and reflect their historic development and transition to industrial use and subsequently residential.</i></p> <p>Paras 27 &amp; 28 - <i>On passing the tollhouse at the western end of the CA there is a marked change from the relatively modern urban form and activity surrounding the roundabout to a much quieter and initially more enclosed area at the start of Skipton Old Road ..... Almost immediately the character opens out with views into the Lidgett triangle and then to views up the embankment to the appeal sites. To my mind this clearly roots the houses here in a rural setting, and further along the lane, while somewhat contrasting, the more enclosed and overgrown sunken lane, experienced</i></p>	<p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:</p> <p>(1) Designate as Green Belt The Pendle Green Belt Assessment (2016) considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that Parcel PA.03 although contributing to the unrestricted sprawl of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the "exceptional circumstances" required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p>

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			<p><i>when passing Standroyd, reinforces this rural character.</i></p> <p><i>Para 39 - Appeal B would ... inescapably alter the experience of those leaving or arriving at the CA along these routes. To longer distance views the definition between Lidgett and Bents would be eroded, and the experiences of those within the CA, where views of the development would be achieved, would be of increased enclosure and a lost connection to an important element of the agricultural setting.</i></p> <p><i>Para 42 - It is clear from paragraph 132 of the Framework, that while harm may be considered less than substantial it must still attract great weight, and gives rise to a strong presumption against the grant of planning permission. Thus the harm from both schemes would represent conflict with Policy ENV1, where it seeks conservation of heritage assets within the Borough, and specifically identifies the preindustrial farming heritage and the development of the textile industry, including weaver's cottages.</i></p> <p>Lidgett &amp; Beyond welcomes the classification of land parcel PO36, PO37, PO37a, PO38, PO39, PO40, PO42 and PO43 as "critical" in Green Belt criteria 1 and 3. We firmly believe that parcel PO38a should be treated as indivisible from PO38 and that instead of "moderate" for Green Belt Purpose 1 and "major" for Green Belt Purpose 3, these ratings should both be "critical", as with the adjacent piece of land in the Lidgett and Bents Conservation Area. In addition, this parcel (PO38a) has a strong historic significance within both The Conservation Area and the town of Colne (Green Belt Purpose 4), as it contains a long line of 200-year-old lime trees which were planted to form the entrance to the Heyroyd Estate. Heyroyd was a former hamlet outside Colne (once rivalling it in size) and now contains a Grade II listed house and associated buildings. These lime trees are a strong landscape feature that were deliberately planted to lead to this historic, former hall house. As such, classification 4 for PO38a should be not "not applicable", but "major", or even "critical".</p> <p>We believe PO41 has been misunderstood and that it should have stronger classifications. Not only is it a Nature Reserve, but it is the site of a former tannery, which was once Europe's largest and therefore should have a stronger Purpose 4 classification as a historic site. In addition, Purpose 1 should be "major", in our opinion, and Purpose 3 should be "critical", as this is a biological heritage site and also forms an important</p>	<p><i>The parcels have strong boundaries between them which facilitated separate assessments which reflect their individual contributions to the function of the Green Belt in this location. The boundaries of P038a followed the existing line of built form at Bents and so it is a logical separate parcel for assessment. The ratings are in accordance with the assessment criteria contained in the Assessment Methodology.</i></p> <p><i>The heritage assets affected by these parcels are protected by other policy measures (Listing and Conservation Area). Purpose 4 is specific to the setting of Colne; the historic features of these parcels are specific to the conservation areas and listed buildings.</i></p> <p><i>Similarly, these issues are given protection by other policy measures and are not criteria for the assessment of Green Belt function.</i></p> <p><b>Recommendations: no change to the assessment.</b></p>

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			<p>local walk to Wycoller. Colne has little tree cover and this area is an exception. We will be pressing the Town Council to recognise Ball Grove Country Park as a defined Open Space worthy of protection.</p> <p>14. Everything should be done by the Council to focus on the reuse of Brownfield land in urban areas in the first instance in advance of Greenfield release. We understand the need to keep rural communities alive and working, so accept that new employment may need to be created in rural locations, but we believe that this ought to be as a last resort, as once it is gone, the countryside, which is so attractive to tourism, is gone forever.</p>	<p>Policy SDP2 of Pendle Local Plan Part 1: Core Strategy (LP1), in line with the core planning principles set out in paragraph 17 of the National Planning Policy Framework (NPPF), encourages the re-use of previously developed (Brownfield) land; provided that it is not of high environmental value. This approach helps to minimise the use of undeveloped (Greenfield) sites for development.</p> <p>Pendle Council successfully applied to be a pilot for the new Brownfield Land Registers, which are intended to ensure that 90% of 'suitable' Brownfield sites have planning permission by 2020. But the Council cannot restrict development to Brownfield sites, if it is to meet the development needs of the borough. LP1 (para 7.25) recognises that <i>"in order to not unduly restrict development ... some Greenfield sites will need to be released for development. Such sites will need to be in sustainable locations which are well related to existing settlements."</i></p>
C039GB	01524	Rural Solutions Mr Mike Powell on behalf of: Ribble Estates Mr Tim Webber	<p>Green Belt Assessment</p> <p>A consideration of the site against the Green Belt Assessment (GBA) has been made earlier in this report. However, the GBA itself is also subject to consultation.</p> <p>In respect of the site subject to this representation, Green Belt parcel P041 is relevant. The text acknowledges that 'the parcel has a semi-urban character' and 'it is not perceived to be part of the countryside.' It is also noted that 'the parcel is contained to the north by the A6068, to the south by Caine Water, to the west by residential development along the A6068 and Ball Grove Drive, and to the east by residential development along the A6068 and School Lane.' The site assessment matrix table (extract reproduced below) within the GMA shows that the parcel to which this representation relates has a 'moderate' function of checking the sprawl of large built-up areas, a 'major' function in preventing neighbouring towns from merging, a 'slight' function in assisting encroachment into the countryside, a 'moderate' function in its capacity for</p>	<p>Consideration was given at the parcel identification stage as to whether P041 should be split into multiple parcels, however there were no sufficiently strong boundaries within the site to justify this approach.</p> <p>No justification has been provided by the representor as to why they suggested boundary should be used. There is no reference to the table included within the main report as to how this new boundary fulfils those criteria.</p>

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			<p>change, and a 'slight' function in preserving the setting of historic towns.</p> <p><b>Table 10 Site Assessment Matrix Table – Existing Green Belt</b></p> <table><tr><th>Parcel Number</th><th>Purpose 1 - To check the unrestricted sprawl of large built up areas</th><th>Purpose 2 - Prevent Neighbouring Towns from merging into one another</th><th>Purpose 3 - To assist in safeguarding the countryside from encroachment</th><th>Purpose 3 - To assist in safeguarding the countryside from encroachment, Capacity for change</th><th>Purpose 4 - To Preserve the setting and special character of Historic Towns</th></tr><tr><td>P040</td><td>Critical</td><td>Major</td><td>Critical</td><td>Low</td><td>Slight</td></tr><tr><td>P041</td><td>Moderate</td><td>Major</td><td>Slight</td><td>Moderate</td><td>Slight</td></tr><tr><td>P042</td><td>Critical</td><td>Major</td><td>Critical</td><td>Little/No</td><td>Slight</td></tr><tr><td>P042a</td><td>Slight</td><td>Slight</td><td>Moderate</td><td>Low</td><td>N/A</td></tr><tr><td>P042b</td><td>Critical</td><td>Critical</td><td>Critical</td><td>Little/No</td><td>N/A</td></tr><tr><td>P043</td><td>Critical</td><td>Major</td><td>Critical</td><td>Little/No</td><td>Slight</td></tr></table> <p><i>Extract from the Green Belt Assessment showing the scoring criteria for Green Belt parcel P041</i></p> <p>Given the extent of the parcel, we consider that it should be split into two parcels: the western part appears to serve more of a Green Belt function than the element to the east, which is urbaner in character. An extract of P041I is reproduced below, along with our annotation to illustrate this:</p> <p></p> <p><i>Annotated extract from the Green Belt Assessment showing parcel P041 and our recommendation to split the parcel to form P041A and P041B.</i></p>	Parcel Number	Purpose 1 - To check the unrestricted sprawl of large built up areas	Purpose 2 - Prevent Neighbouring Towns from merging into one another	Purpose 3 - To assist in safeguarding the countryside from encroachment	Purpose 3 - To assist in safeguarding the countryside from encroachment, Capacity for change	Purpose 4 - To Preserve the setting and special character of Historic Towns	P040	Critical	Major	Critical	Low	Slight	P041	Moderate	Major	Slight	Moderate	Slight	P042	Critical	Major	Critical	Little/No	Slight	P042a	Slight	Slight	Moderate	Low	N/A	P042b	Critical	Critical	Critical	Little/No	N/A	P043	Critical	Major	Critical	Little/No	Slight	
Parcel Number	Purpose 1 - To check the unrestricted sprawl of large built up areas	Purpose 2 - Prevent Neighbouring Towns from merging into one another	Purpose 3 - To assist in safeguarding the countryside from encroachment	Purpose 3 - To assist in safeguarding the countryside from encroachment, Capacity for change	Purpose 4 - To Preserve the setting and special character of Historic Towns																																									
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P042a	Slight	Slight	Moderate	Low	N/A																																									
P042b	Critical	Critical	Critical	Little/No	N/A																																									
P043	Critical	Major	Critical	Little/No	Slight																																									

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			<p>Annotated extract from the Green Belt Assessment showing parcel P04 I and our recommendation to split the parcel to form P041 A and P041 B. We consider that the parcel itself does not serve a significant purpose in checking sprawl and preventing towns from merging, given the landscape features (ie the presence of Colne Water) and containment to the north. As such, we suggest that purposes 1 and 2 should be downgraded in the GBA to reflect this.</p> <p>Recommended changes: We strongly object to the grouping of the Green Belt parcel as P041I and recommend that it is split into P041 A and P041 B to reflect the different characteristics of each parcel. We also recommend that the assessment against purposes 1 and 2 are downgraded in the site assessment matrix table.</p> <p>(N.B. Representation submitted twice as part of two site nomination submissions).</p>	<p>The rating accorded to purposes 1 and 2 is in accordance with the criteria set out in the Assessment methodology.</p> <p><b>Recommendations: no change to the assessment.</b></p> <p>Pendle Council will carry out further work to determine whether smaller plots of land within the Green Belt parcels assessed by our consultants are suitable for, and needed to, accommodate the level of development required for a particular settlement. This will take place prior to the publication of the LP2 Preferred Options Report, which will be made available for public consultation in 2018.</p>
C040GB	01526	Cllr Joe Cooney	<p>As a Councillor for Vivary Bridge Ward in Colne and leader of the 24-strong Conservative councillor group, I wish to provide a response to Local Plan Part II and the Green Belt Reassessment. Firstly, I believe the document identified as Appendix 3 Individual Site Assessment to be wholly inadequate to effectively provide detailed comment on the assessments. The document descriptions are extremely vague with poor quality maps to accompany the comments.</p> <p>I'm particularly concerned regarding the proposals for Colne, including area designated as PA03 as "Protected Area" (for development), which includes The Rough and The Lidgett Triangle should have been included as Greenbelt designations. This area has been subject to a recent planning application and public enquiry after which the Planning Inspector recognised the area known as "The Rough" is valued by local residents, while the Lidgett Triangle, which lies at the heart of the Lidgett and Bents Conservation Area, was also recognised. Given the importance of this area, the opposition to any development and the comments of the Planning Inspector, I find difficult to understand that it hasn't been included in the Greenbelt designations.</p> <p>Here are two pertinent extracts:</p> <p>39. Appeal B would ... encompass both footpaths and notwithstanding the potential for future landscaping, would inescapably alter the experience of those leaving or arriving at the CA along these routes. To longer distance views</p>	<p><i>Please refer to comments in the Introduction.</i></p> <p><b>Land at the Rough/Lidgett Triangle (Parcel PA.03)</b> Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) currently designates Parcel PA.03 as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p> <p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to</p>



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			<p>the definition between Lidgett and Bents would be eroded, and the experiences of those within the CA, where views of the development would be achieved, would be of increased enclosure and a lost connection to an important element of the agricultural setting.</p> <p>42. It is clear from paragraph 132 of the Framework, that while harm may be considered less than substantial it must still attract great weight, and gives rise to a strong presumption against the grant of planning permission. Thus the harm from both schemes would represent conflict with Policy ENV1, where it seeks conservation of heritage assets within the Borough, and specifically identifies the preindustrial farming heritage and the development of the textile industry, including weaver's cottages.</p> <p>Pendle Council spent tens of thousands of taxpayers' money defending an appeal (rightly) on a planning application on land contained with PA03 only last summer. Were it to now designate this land and neighbouring plots, such as PO38a as Protected Areas, it is no understatement to write that this would cause uproar.</p> <p>I'm also concerned regarding the area designated as PO32, and the suggestion that as a live application for residential development on the abutting field. If its approved, this Greenbelt Designation should be reviewed. One of the main functions of the Greenbelt policy is to protect the land around larger urban centres from urban sprawl, and maintain the designated area for agriculture, as well as to provide habitat to wildlife. It is <b>not</b> there to be a limit on development only until such a time the development reaches the boundary and the Greenbelt Policy is then relaxed. If it were to be used in this way, the concept of the Greenbelt would be useless.</p>	<p>whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:</p> <p>(1) Designate as Green Belt The Pendle Green Belt Assessment (2016) considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that Parcel PA.03 although contributing to the unrestricted sprawl of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the "exceptional circumstances" required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p> <p><i>The review of Green Belt boundaries is to ensure that strong, defensible and long term boundaries can be achieved. Nevertheless, the development of the field to the east would impact upon the function of this parcel and therefore should that development come forward within the time period for this present review of boundaries, any assessment should take the existing circumstances into account to ensure that the Green Belt boundary is the most appropriate long into the future.</i></p>

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			I sincerely expect that Pendle Councillors will listen to the strong feelings of both councillors and residents on this important matters and that their responses to this consultation will be fed directly into the Green Belt Reassessment, the Local Plan Part II and later on the land allocation phase. In particular, such is the importance of these documents, they should both be brought to Full Council.	<b>Recommendations: no change to the assessment.</b>
C041GB	01527	Cllr Wayne Blackburn	<p>I am writing in regards to the “Green Belt Assessment” document which has been submitted as part of this consultation, and in particular the omission of the area known as “The Rough” in Colne from the Green Belt.</p> <p>As you will be aware the planning stakeholder workshop, Local Plan Part 2 working group, and other meetings have strongly recommended the Lidgett Triangle and The Rough for Green Belt classification, and certainly not as Protected for Development Land. You will also be aware that this area of land went through an appeals process last summer and the Inspector upheld the wishes of local people not to develop all of the Rough.</p> <p>I am deeply concerned that designating this area as a Protected Area for Development could mean that any future decisions could bypass Pendle Council and potentially wouldn’t need to come before Councillors. I am therefore concerned at a lack of democratic oversight over a site that the public have been very clear they do not wish to see developed upon.</p> <p>I hope that any decision on the classification of the Lidgett Triangle and The Rough can be reevaluated before the Local Plan Part 2 and we can ensure that this area can be protected as much as possible.</p>	<p><b>Land at the Rough/Lidgett Triangle (Parcel PA.03)</b> Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) currently designates Parcel PA.03 as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p> <p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council: (1) Designate as Green Belt The Pendle Green Belt Assessment (2016) considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The</p>



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				<p>conclusion, summarised in Table 12, is that Parcel PA.03 although contributing to the unrestricted sprawl of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the “exceptional circumstances” required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p>
C042GB	01236	Mr Mark Rogers	<p>I want to register my objection to the proposals put forward in relation to the land called the rough and the surrounding fields adjacent to Bents. It isn't easy to identify the exact scope of inclusion because the maps that have been used are poor quality and out of date.</p> <p>As you are aware an application for housing on the land called the Rough recently went to appeal and there was an extensive report produced detailing the value of that piece of land to the community and the environment. Then area around Bents is of outstanding beauty and part of a conservation area, additionally it has been widely discussed that the development in this area is not sustainable.</p>	<p><b>Land at the Rough/Lidgett Triangle (Parcel PA.03)</b> Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) currently designates Parcel PA.03 as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p> <p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p>

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				<p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:</p> <p>(1) Designate as Green Belt</p> <p>The Pendle Green Belt Assessment (2016) considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that Parcel PA.03 although contributing to the unrestricted sprawl of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the “exceptional circumstances” required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation</p> <p>The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p>
C043GB	01528	Cllr Margaret Foxley	<p>I am particularly concerned to hear that the recommendation of Green Belt status of the land known as The Lidgett Triangle, The Rough and Ball Grove Nature Reserve is to be removed and instead be put forward as Protected Areas for Development.</p> <p>Having been a resident in Laneshawbridge for eighteen years and a Pendle Borough Councillor for Boulsworth Ward for six years, I feel that my personal views of utter dismay about this reflect the opinions and concerns of most of the residents within Trawden and Laneshaw Bridge. The support for the Appeal, last summer, from local residents, clearly signified an overwhelming importance to them to protect these areas from development and these wishes were upheld, by the Inspector, in relation to the full development of the Rough, in particular. Subsequent planning stakeholder workshops reiterated these conclusions.</p> <p>In relation to Ball Grove Nature Reserve (parcel 041), not protecting Green Belt status here, could lead to lack of continuity of the Green Belt area surrounding it at the Laneshaw Bridge end, not to mention the loss of an increasingly popular recreational space for families and nature enthusiasts,</p>	<p><b>Land at the Rough/Lidgett Triangle (Parcel PA.03)</b></p> <p>Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) currently designates Parcel PA.03 as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p> <p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp;</p>

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			<p>walkers and, ever welcome, visitors, who support local trade.</p> <p>I totally oppose these recommendations.</p>	<p>Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:</p> <p>(1) Designate as Green Belt</p> <p>The Pendle Green Belt Assessment (2016) considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that Parcel PA.03 although contributing to the unrestricted sprawl of the built up area does not make a significant contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the “exceptional circumstances” required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation</p> <p>The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p> <p><b>Land at Ball Grove (Parcel P041)</b></p> <p>There is currently no proposal to remove Parcel P041 from Green Belt.</p> <p>The Pendle Green Belt Assessment (2016) used an agreed methodology to divide the Green Belt up into a number of separate parcels. It then assessed these parcels against the five purposes of Green Belt, as set out in the NPPF (para 80) to help determine if they still contributed to the primary purpose of the Green Belt in Lancashire, which is to check unrestricted sprawl and the merger of</p>

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				<p>neighbouring settlements (para 2.13).</p> <p>Parcel P041 covers an area of land to the east of Laneshaw Bridge, immediately south of the A6068 and north of Colne Water. This extensive parcel of land includes part of Ball Grove Park and the Ball Grove Nature Reserve.</p> <p>The Green Belt Assessment concluded (Table 12) that Parcel P041 plays a “major” role in preventing neighbouring towns (and villages) from merging into one another (Purpose 2). Whilst it is acknowledged that this means that the parcel may still be able to accommodate “some limited development” without compromising this role (Table 3, page 21), extensive development is not considered to be an option. Parcel P041 was considered to perform a less important role when considered against the three other purposes of Green Belt that were assessed. The report concluded that Parcel P041 was still integral to the Green Belt and as such it was not included in the list of parcels that are no longer considered to perform a Green Belt function (Table 13).</p> <p>The NPPF (para 83) is clear that “Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.”</p> <p>In preparing LP2 Pendle Council must allocate sufficient land to meet the overall development requirements established in LP1; which has been apportioned by settlement in the LP2 Scoping Report &amp; Methodology (Table 3.11). Whilst detailed site assessments have yet to be completed, there would appear to be sufficient sites not within the Green Belt to meet the identified development needs for Laneshaw Bridge.</p>
C044GB	01453	Mr Paul Foxley	<p>I write in response to Pendle Borough Council's consultations on the following documents:</p> <ul style="list-style-type: none"> <li>• Local Plan Part 2: Site Allocations and Development Policies – Scoping Report and Methodology</li> <li>• The Local Plan Part 2: Site Allocations and Development Policies (LP2)</li> <li>• Sustainability Appraisal Scoping Report</li> </ul>	Comments noted.

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			<ul style="list-style-type: none"> <li>Green Belt Assessment</li> </ul> <p>Colne lost a great deal of its town centre density as a result of redevelopments carried out in the 1960's /70's. At the eastern end of town, where closely-knit three-storey building once lined the high street, there are now in many instances either no buildings at all or else lower density single or two storey premises. That Colne also lost important heritage assets at the same time is not the issue here, but the 'hollowing out' of the town's once vibrant, tightly-knit centre is a classic consequence of ill-advised redevelopment coupled with the growth of out-of-centre retail developments. Another result is that Colne has an unusually high number of town centre car parks, where cleared (brownfield) sites have remained undeveloped.</p> <p>There are numerous buildings in Colne for which owners struggle to find any truly beneficial use. The original market (Kippax) building and the Town Hall Annexe on New Market Street are but two examples. They are generally located beyond the high street but many are with the town centre. As the popularity of Colne's high street continues to grow, there is scope for a ripple effect to occur, bringing these peripheral properties back into beneficial uses - including housing. This is unlikely to happen however unless the right conditions exist. One of the factors here is the maintenance of the Green Belt as a constraint to the uncontrolled outward expansion of the town.</p> <p>Purpose 4 of the Green Belt is to preserve the special character of historic towns and Colne is undoubtedly one of those towns. With sufficient foresight and the judicious use of planning policy, its remaining historic character could not only be preserved but enhanced by appropriate brownfield development, redevelopment and refurbishment of existing buildings within the town centre.</p> <p>Increasing the number of residents living within the town centre is undoubtedly the most sustainable solution to the provision of additional housing in the Colne area. Easy walking distance to bus and rail transport is a key factor of that and all the more so as the infrastructure of these modes of transport improves. Reinstatement of the rail network through to Skipton and the building of a Colne bypass are both firmly on the agenda in relation to the Northern Powerhouse. The latter would alleviate congestion caused by through traffic in the town centre, increasing the town's attraction to businesses and residents alike.</p>	

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			<p>It is argued by some that there is already an adequate supply of housing in Colne. However, it is important to look beyond the numbers. There is a difference between a unit of residential accommodation as a statistic and a decent home where one would want to live. It is neither sufficient to dismiss existing empty housing stock as irrelevant or to claim they are the same as newly built homes on greenfield sites.</p> <p>Others are calling for an increase in the use of off-site construction methods to speed up the delivery of housing. Since such methods are best suited to newbuild, this acts as a further disincentive to the refurbishment and conversion of existing buildings where there are pressures to boost house building statistics. <i>This makes maintenance of the integrity of the Green Belt even more critical.</i></p> <p><b>Green Belt Assessment</b></p> <p><i>I support the declassification of the minor parcels of land which have been identified as no longer serving Green Belt purposes. Their removal does not affect the integrity of the Green Belt as a whole. However I cannot agree with some of the assessments and have the following detailed comments:</i></p> <p><i>Parcel P041: This parcel might best be considered as two separate parcels, one extending west and the other east from the eastern boundary of Croft House, opposite Vernon Road. To the east of this line the parcel has a much more rural character and is grazed farmland with only one building within its boundaries. The western portion has a slightly less rural character with a variety of residential development within its boundaries and is closer to the urban area of Colne. Designation of the Purpose 1 and 3 classifications of this parcel as anything less than Major is inconsistent with other classifications and leaves a potential weakness in the Green Belt, damaging its integrity as a whole for these purposes. It would no longer be a belt at all if it had a gap in it.</i></p> <p><i>Parcel P038a: The classification of this parcel under Purpose 4 should in my view be at least Major due to its historical significance to Colne.</i></p>	<p><i>Consideration was given at the parcel identification stage as to whether P041 should be split into multiple parcels, however there were no sufficiently strong boundaries within the site to justify this approach.</i></p> <p><i>The rating of the parcel is in accordance with the criteria contained in the Green Belt Methodology for Purposes 1 and 3.</i></p> <p><i>The heritage assets of P041 are protected by other policy means than the Green Belt. It does not lie on a major route into Colne which is integral to the setting of the town, and therefore the rating is in accordance with the assessment criteria.</i></p> <p><b>Recommendations: no change to the assessment.</b></p>

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C045GB	00943	Mrs Sue Hirons	<p>I am extremely disappointed to learn today that the above areas have been put forward for future development as a result of the Green Belt areas being reassessed.</p> <p>I do not understand in any way how the Rough can be destroyed by development, when it is only last year when the Inspector decided the second development should not go ahead.</p> <p>Developing these areas would not be sustainable.... increased traffic would further affect air quality by an increase in traffic, potential impact on our water quality, and destroy our wonderful circular walks in this historic area of Colne.</p> <p>One very important consideration also... where are the children who will live in these developments go to school? All local schools are over subscribed.</p> <p>Please consider this email as a strong opposition to any plans to develop these beautiful areas.</p>	<p><b>Land at the Rough/Lidgett Triangle (Parcel PA.03)</b></p> <p>Whilst the respondent does not state which site he is referring to, from the comments made it would appear to be land at the Rough/Lidgett Triangle (Parcel PA.03).</p> <p>Policy 3a of the Replacement Pendle Local Plan (2001-2016) (RPLP) currently designates Parcel PA.03 as a Protected Area. This requires the future of the land to be reviewed during the preparation of a new local Plan to determine if it will be required for development post 2016. If it is not required, consideration is to be given to its inclusion within the Green Belt.</p> <p>The Green Belt Assessment (Table 12) recognises that Parcel PA.03 demonstrates some of the attributes of Green Belt, but concludes that these are not strong enough to warrant potential inclusion within a revised Green Belt boundary (Table 14).</p> <p>When preparing Pendle Local Plan Part 2: Site Allocations &amp; Development Policies (LP2), consideration must be given to whether the housing requirement of 513 homes for Colne up to 2030 (see Table 3.11 of the LP2 Scoping Report &amp; Methodology) can be accommodated on sites that are not currently designated in the RPLP as either a Protected Area (Policy 3A) or as part of the Green Belt (Policy 3). If this is not possible, the land off Skipton Old Road and at the Lidgett Triangle must be carefully considered against all other reasonable alternatives to determine if it represents a sustainable option for future development.</p> <p>If the site is not allocated for development in LP2, two options are potentially open to Pendle Council:</p> <p>(1) Designate as Green Belt</p> <p>The Pendle Green Belt Assessment (2016) considered both existing and potential Green Belt land against the five purposes listed in the NPPF (para 80). The conclusion, summarised in Table 12, is that Parcel PA.03 although contributing to the unrestricted sprawl of the built up area does not make a significant</p>

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				<p>contribution to the other purposes of Green Belt. It is therefore unlikely that the Council will be able to demonstrate the “exceptional circumstances” required to include the site within the Green Belt.</p> <p>(2) Other Policy Designation The expiry of the Protected Area designation requires Pendle Council to consider whether the site should be given an alternative policy designation, to protect it from development during the lifetime of the plan. Again this will be carefully considered in the coming months.</p> <p><b>Site Allocations</b> The site assessment criteria to be used by Pendle Council are set-out in Appendix 1 of the Local Plan Scoping Report &amp; Methodology. Together with detailed discussions with infrastructure providers they will help to determine whether the existing infrastructure (roads, schools etc.) in the vicinity of a proposed development site is capable accommodating the level of development that is proposed.</p> <p>Where the answer is no, the potential to upgrade capacity by using contributions from developers will be considered. Site allocations will not be made in locations where the evidence demonstrates that the infrastructure cannot accommodate, or be upgraded to cope with, the level of development that is proposed.</p>
C046GB	00238	Barton Wilmore Mr Ian Gilbert on behalf of: Junction Properties Ltd	<p>This is an extensive representation, which can be viewed in full online. The following is a summary of the key points raised and these are addressed in the Officer / Council Response:</p> <p>Para. 3.86 “The aim of the GBA is to provide the Council with an objective, evidence based and independent assessment of how the Green Belt contributes to the five purposes of the Green Belt, as set out in paragraph 80 of the NPPF. For the main part the Green Belt Assessment considers the Green Belt function of logically defined parcels of land rather than individual sites. The GBA then seeks to advise on the suitability or potential of land in the borough for release or inclusion of land within the Green Belt. As set out above, this is simply not considered to be an acceptable application of the tests for reviewing the Green Belt; the extent of exceptional circumstances, if</p>	<p><i>The Assessment is clear (para. 6.1) that whilst we consider that some parcels of land may be removed from the Green Belt, this is only if the Council can prepare further evidence that supports the necessary exceptional circumstances required.</i></p> <p><b>Recommendations: no change to the assessment.</b></p>



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			any, must be established for that balancing exercise to be undertaken.”	
			See attached representation.	
			<p><i>Para 4.15 “Paragraph 5.4 of the GBA concludes that parcel PA.03 (which includes Site B) continues to perform a Green Belt function. This is not the case, Site B is not part of the Green Belt and indeed, Inspectors in examining previous Local Plans have refuted previous attempts to designate the Site as Green Belt.</i></p>	<p><i>It is acknowledged that the wording of this paragraph was not clear in its meaning.</i></p> <p><b>Recommendations: Text of paragraph 5.4 of the GBA to be amended to:</b></p> <p><b><i>“The assessment reveals that the vast majority of parcels of land continue to contribute to the intended function of the general extent of Green Belt in Pendle. Additionally parcel PA.03, safeguarded land, is also considered to perform a Green Belt function despite not being Green Belt land.”</i></b></p>
			<p>See paragraphs 4.28 – 4.35</p> <p>Purpose 1</p> <p>The GBA considers that the parcel has a ‘major’ contribution to this purpose. However, it is unclear as to how the GBA has reached this conclusion insofar as it notes the parcel contains the urban area and its character is influenced by it, in particular to the south and south east section of the parcel which is surrounded by development. The GBA also notes that there are potentially other boundaries beyond which could define and contain growth.</p> <p>Purpose 3</p> <p>The GBA considers that the parcel contributed moderately to assisting in safeguarding the countryside from encroachment. As set out above, the Site is not within the Green Belt and therefore cannot perform a Green Belt function. Nonetheless, we acknowledge as a greenfield site that Site B would comprise the development of land within the open countryside. Nevertheless, the Site is considered to be suitable for development and would comprise the loss of countryside to any extent greater than the loss of any other greenfield land which, as a matter of fact, the Local Plan accepts will need to occur for the Council to meet its development requirements.</p> <p>Further to the above, we agree with the GBA that the Site benefits from significant containment to the north and south. In addition, with the development of Site A that containment extends to the west of Site B also. We agree with the GBA assessment that the Site should therefore be considered</p>	<p>The western boundary forms the closest strong boundary to the settlement edge and meets the criteria for ‘Major’ as set out in the Assessment methodology.</p> <p>An error in the report, which switched the descriptions and assessments for Purpose 3 for parcels PA.02 and PA.03 in Appendix 3 and Tables 9 and 14, has been rectified.</p> <p><b>Recommendations: correction of error which switched assessments for PA.02 and PA.03. No other changes to the assessment.</b></p>

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			as having a 'low' rating with regard to landscape character and sensitivity to change.	
C047GB	01476	Steven Abbott Associates LLP Mr Steven Abbott on behalf of: James Begley & Sons Mr & Mrs J & B Begley	<p>This is an extensive representation, which can be viewed in full online. The following is a summary of the key points raised and these are addressed in the Officer / Council Response:</p> <p><b>Parcel P022 (see paragraphs 5.1-5.15):</b></p> <ul style="list-style-type: none"> <li>Parcel is not critical to Purpose 1 as loss of openness would not be perceivable between the two settlements because of the site specifics in context. A well located and planned urban extension would be unlikely to constitute 'sprawl' if designed carefully.</li> <li>Parcel is not critical to Purpose 2 as the release of the site would not cause or lead to Barrowford's merger with Nelson or Colne.</li> <li>On Purpose 3, DLP concluded that the parcel is 'not perceived to be part of the countryside', as it is degraded by restricted view and noise from the adjacent M65. They say it has a moderate rating consequently. As it is not perceived as 'countryside' we question how the exclusion of it from the Green Belt would constitute encroachment into the countryside.</li> </ul>	<p><i>Purpose 1: it is true that 'a well located and planned urban extension would be unlikely to constitute 'sprawl' if designed carefully', however this could apply to any such urban extension and cannot in itself be used to reduce a parcel's contribution to Purpose 1. The value of P022 to Purpose 1 is in its conjunction with other parcels that lie between Nelson/Colne and Barrowford, which directly act to contain the urban edge of these settlements from reducing the narrow gap between the settlements. Retain rating as 'Critical'.</i></p> <p><i>Purpose 2: it is not only the merging of settlements but the perception of merging which is important to Purpose 2. Although the development of P022 by itself would not lead to the physical merger of Barrowford and Nelson/Colne, it would significantly increase the perception of merging of these settlements. Retain rating as 'Critical'.</i></p> <p><i>Purpose 3: the parcel is still considered to be countryside, it is just that the perception of this has reduced, hence the parcel only scores 'moderate' against Purpose 3. Its description as 'semi-rural' reflects this. However, development of the parcel would still constitute encroachment into the countryside. Retain rating as 'Moderate'.</i></p> <p><i>Concluding comments: the value of P022 partly arises from its relationship, within a strategic context, to other parcels between Nelson/Colne and Barrowford. The existing Green Belt boundary at the urban edge of Barrowford is very strong as it is formed by Pendle Water. Although the M65 would also be a strong boundary to the east if P022 and P022a were to be released, the northern Green Belt boundary would be the B6247 (Colne Road). Although the road has a moderately strong hedgerow/tree line, it remains that it would not be as strong as the existing boundary.</i></p> <p><b>Recommendations: no change to the assessment.</b></p>

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			<p><b>Parcel P022a (see paragraphs 5.1-5.15):</b></p> <p>We respectfully disagree with DLP on purposes 1 and 2 given the context explained above [in P022]. We note too their highly significant conclusions on purpose 3 i.e. that encroachment into the countryside is slight/negligible and the landscape sensitivity to change is moderate. We believe this further strengthens the case for excluding Parcel 022 from the Green Belt given the juxtaposition of the respective parcels... we have flagged P022a up too as the Council need to consider the best line for any potential new boundaries. There is certainly a respectable argument to exclude both parcels as a matter of common sense. It is worth noting that the release of P022 would not set a precedent or building on P022a as it contains established, well used open land uses – playing pitches/cricket ground and hard infrastructure including buildings albeit they are a function of the adjacent urban areas and are contained by the elevated M65.</p>	<p><i>See response to Parcel P022 comments (above).</i></p> <p><i>Parcel P022a's contribution to Purposes 1 and 2 lies in its relationship with other parcels between Nelson/Colne and Barrowford. Development solely in P022a would weaken the Green Belt boundary in the wider area as Pendle Water forms a stronger northern boundary than the tree line at the boundary of P022a.</i></p> <p><b>Recommendations: no change to the assessment.</b></p>
			<p><b>PA004b (Table 1):</b></p> <p>Garden land – which would not materially enhance the supply of housing land.</p>	<p><i>In this instance DLP's conclusions related to the rationalisation of the Green Belt boundary in this location to exclude residential curtilage.</i></p> <p><b>Recommendations: no change to the assessment.</b></p>
			<p><b>P016a (Table 1):</b></p> <p>The site is not in the M65 Corridor Settlements or West Craven Towns Settlements. It is therefore in a relatively unsustainable location in terms of 'sustainable growth', it is a relatively large site in proportion to the rural settlement it would round off. 'Access appears to the problematic as it is landlocked apart from the busy and fast A6068. It is heavily constrained by overlooking from existing high density development. Poor compared to the subject site.</p>	<p><i>Not relevant to the Assessment which does not make recommendations for land use allocations.</i></p> <p><b>Recommendations: no change to the assessment.</b></p>
			<p><b>P018a(Table 1):</b></p> <p>The site is not in the M65 Corridor Settlements or West Craven Town Settlements. It is therefore in a relatively unsustainable location in terms of 'sustainable growth'. It is a very open site in a rural area on a hill side. Access relies on relatively narrow streets and country lanes – like the above site it is remote from main community facilities. Poor compared to the subject site and questionable whether it should either be removed from the Green Belt or developed at all. The scale of the development is disproportionate given the status of Fence.</p>	<p><i>Not relevant to the Assessment which does not make recommendations for land use allocations.</i></p> <p><b>Recommendations: no change to the assessment.</b></p>
			<p><b>P021 (Table 1):</b></p> <p>[...] The land in question forms part of an important strategic gap between the northwest and Nelson/Lomeshaye Industrial Estate and what will become the</p>	<p><i>The gap is not between settlements and therefore would not lead to the merging of settlements.</i></p>

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			west end of Barrowford given the impact of the Trough Laithe Farm Strategic Site and the Protected site PA01 east of Carr Hall Road. The strategic gap has coherence historically as limbs both sides of the A6068 reflect the estate park land history and are important as a designated heritage asset. The site contains numerous trees reflecting ponds which were notable part of the original park. It also has significant access constraints appearing to require major infrastructure changes locally which themselves are likely to affect the setting of the conservation area. [...]	<b>Recommendations: no change to the assessment</b>
			<b>PA01:</b> The site is also open land deliberately chosen to be in the conservation area, a designated heritage asset, and will, if released, result in the merger of the Newbridge and Carr Hall suburbs north of the A6068, given the adjoining Trough Laithe Farm commitment. It is on the periphery of Nelson and Barrowford and some distance from town centre facilities. Although likely to happen it is in a less sustainable location with a greater impact on a cherished conservation area than the subject site which is in a more sustainable location and does not adversely affect any conservation areas.	<i>Not relevant to the Assessment which does not make recommendations for land use allocations.</i>  <b>Recommendations: no change to the assessment.</b>
			<b>P034a (Table 1):</b> This site performs the role of providing an attractive rural setting for Foulridge and a valuable role as part of a coherent wider undulating countryside. It is in active use for sheep grazing and does not have a degraded appearance. We question that it would be rounding off. We do not believe that it 'contains' the urban area. Access is via very torturous country lanes (one including a hazardous ford) or via the tight network of streets in Foulridge emerging at a junction on to the busy A56 which is difficult to enter even outside peak hours.  We note that the site sits above the Foulridge (Leeds and Liverpool Canal) Tunnel but are unclear if that is a constraint.  In any event we respectfully disagree with DLP's conclusions about the purpose of the land in the Green Belt. We think its development would severely encroach on to attractive countryside. The scale of the site is disproportionate to a rural settlement like Foulridge which has very limited community facilities compared to Barrowford.  It is a less sustainable site than the subject one and would have much greater impact – notwithstanding practical problems. It is poor compared to the subject site.	<i>The parcel benefits from strong boundaries which mean that any development in the parcel would be well contained and not constitute sprawl. Although the parcel is in an agricultural use, its character is influenced by the adjacent urban area and is distinct from the surrounding Green Belt to the south west which is more rural in character. Development in this parcel could come forward without undue harm to the wider character of the countryside</i>  <i>Again, please note that the purpose of the Green Belt Assessment is not to comment or assess the suitability or sustainability credentials of potential site allocations.</i>  <b>Recommendations: no change to the assessment.</b>
			<b>P034b (Table 1):</b> This is a small area which would not materially enhance the land availability	<i>In this instance DLP's conclusions related to the rationalisation of the Green Belt boundary in this location.</i>

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			supply.	<b>Recommendations: no change to the assessment.</b>
			<b>P034c (Table 1):</b> This only relates to garden land and makes no contribution to the supply of housing sites	<i>In this instance DLP's conclusions related to the rationalisation of the Green Belt boundary in this location to exclude residential curtilage.</i>  <b>Recommendations: no change to the assessment.</b>
			<b>P036b (Table 1):</b> This only relates to garden land and makes no contribution to the supply of housing sites	<i>In this instance DLP's conclusions related to the rationalisation of the Green Belt boundary in this location to exclude residential curtilage.</i>  <b>Recommendations: no change to the assessment.</b>
			<b>PA.02 (Table 1):</b> It is acknowledged that this site is on the edge of Colne. However, it does not have strong boundaries to separate it from the Green Belt as is required by the Framework. The local road network east is problematic to say the least due to narrow lanes and relatively intensive use as rat runs. It is a relatively prominent site.  Whilst a better location than some of the others and is a Protected Site (not Green Belt) it is some distance from town centre facilities and in a less sustainable location than the subject site with a greater impact and apparent infrastructure constraints.	<i>An error in the report, which switched the descriptions and assessments for Purpose 3 for parcels PA.02 and PA.03 in Appendix 3 and Tables 9 and 14, has been rectified.</i>  <b>Recommendations: switch descriptions and Purpose 3 assessments of PA.02 and PA.03 in Appendix 3 and Tables 9 and 14. No other change to the assessment.</b>
			<b>P042a (Table 1) :</b> We are very surprised that the site is considered to have lost its Green Belt purpose. It sits outside the defined settlement boundary within the extensive Winewall/Cotton Tree conservation area to the south west of Colne. This is a very hilly area and the hillside setting of Winewall on the south is a key characteristic. There is apparently no conservation area appraisal for Winewall/Cotton Tree. However, our opinion is that the land is key to its hillside character and important both from within it and as a setting for the hill side buildings in the conservation area. Development of the site would certainly result in encroachment into the countryside in any event and we think it would result in the dilution of a very important area of Green Belt between Colne and Trawden. It is very important to note that Winewall is not recognised at any level within the settlement hierarchy. Thus, a release of the land for development in this location would constitute the creation of consolidated development in the countryside contrary to the Core Strategy and the NPPF. Notwithstanding those strategic and local impact issues we wonder about the	<i>The assessment does not say that the parcel has lost its Green Belt purpose. Whilst it has been rated as 'slight' against purposes 1 and 2, in respect of Purpose 3 it has been assessed as having a 'moderate' contribution. This is due to its rural character, recognising that the parcel feels like a continuation of the surrounding countryside.</i>  <i>Again note, the purpose of the Green Belt Assessment is not to comment or assess the suitability or sustainability credentials of potential site allocations.</i>  <b>Recommendations: no change to the assessment.</b>

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			<p>access and drainage practicalities which are likely to be problematic given a combination of road network aspects, slopes, drainage and trees. The site is remote from town centre facilities.</p> <p>It is a surprising inclusion for review and compared to our client's site given its location and constraints. Again, we point out the sustainable location of the subject site and its lack of constraints including no material impact on local conservation areas or any other interest of acknowledged importance.</p>	
C048GB	01185	Dr J D & Mrs A M Plackett	<p>The constraints put on the Green Belt Assessment survey, of allowing only the existing Green Belt land parcels to be assessed to rate their viability to the Green Belt Purposes criteria, are unable to demonstrate and deny the necessity, or otherwise, for Green Belt across the borough. This is unsustainable in principle and <b>presumes</b> there is no need for Green Belt designation elsewhere in the borough.</p> <p>The first Green Belt in Pendle was established in 1979, then eleven years later in 1990 a second belt was designated. These two Green Belt designations protected greenfield land to the north and east of the M65 corridor. At the same time the Joint Lancashire Structure Plan directed development along the M65 corridor making no provision to protect green field areas to the south side of this corridor. It was self evident that developmental pressures would impact on greenfield land in this 'sacrificial' area and so it has proved with the loss of a parcel of land of Special Landscape Character and Local Natural Importance. In the intervening seventeen years no Green Belt designation has been afforded to the south side of the M65 corridor, in line with comparable areas already designated. As Green Belt boundary changes can only be made through the preparation or review of the Local Plan and currently with great pressure to develop greenfield land amid all the changes encountered, a comprehensive review of the Green Belt should be carried out.</p> <p>We request that a comprehensive review of the borough's Green Belt boundaries should be urgently considered for the developing Local Plan, to prevent unnecessary loss of potential Green Belt land to the pressures from which it is subject.</p>	<p>The Inspector's Report into the examination of LP1: Core Strategy (2015) indicated that the general extent of the Green Belt in Pendle should remain; so there was no requirement to review the general extent of Green Belt in Pendle. Indeed the general extent of the Green Belt would more usefully be considered across East Lancashire or the county as a whole.</p> <p>The purpose of the Pendle Green Belt Assessment is to consider the extent to which land currently designated as Green Belt continues to perform against the five purposes of including land in Green Belt, as set out in the NPPF (para 80).</p> <p>The assessment also considered a number of land parcels directly adjacent to the existing Green Belt, to determine if they also made a contribution to one or more of the purposes of including land within the Green Belt. Table 15 indicates that four parcels of land, not currently designated as Green Belt, are considered to make a significant contribution to the overall purpose of the Green Belt in Pendle. However, the NPPF is clear that additions to the Green Belt can only be made in exceptional circumstances. This includes setting out whether any major changes in circumstances have made the allocation of additional Green Belt land necessary.</p>