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Rossendale Green Belt Review

FINAL REPORT - CONFIDENTIAL

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1 Introduction

Background to the Study

- 1.1 LUC was commissioned on behalf of the Rossendale Borough Council to undertake a review of the Green Belt within the Borough. This report presents the findings of this study.
- 1.2 The broad extent of the Green Belt in Rossendale was established in the 1979 North East Lancashire Structure Plan and the Lancashire Structure Plan of 1990. The Rossendale Local Plan (1995) defined detailed boundaries and only very minor boundary amendments have been made since then.
- 1.3 As part of the preparation of former Local Plan Part 2, the Council undertook an analysis of some Green Belt sites and how Green Belt boundaries should be defined. This review however only looked at small scale changes to the Green Belt, as agreed at the Core Strategy Examination (where the Inspector recommended that the Council should undertake an early boundary review).
- 1.4 The Council is in the process of producing a Local Plan following formal withdrawal of the Site Allocations and Development Management Policies DPD (the Local Plan Part 2) in February 2016, due to matters relating to housing numbers and the Objectively Assessed Need (OAN). Consultation on the Draft Plan will take place in November /December 2016. The Local Plan will review the Core Strategy policies (especially in relation to the Borough's development needs), and identify site allocations and development management policies. This will be followed by consultation on a Publication Version in June/July 2017.
- 1.5 To inform the preparation of the Draft Plan, LUC were commissioned to undertake an independent and comprehensive review of the performance of the Green Belt within the Borough. It assesses the extent to which the land within the Rossendale Green Belt performs the purposes of Green Belts, as set out in paragraph 80 of the National Planning Policy Framework (NPPF):
 - to check the unrestricted sprawl of large built up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 1.6 The NPPF attaches great importance to Green Belts and stresses that their essential characteristics are 'openness and permanence'. It also advises that, once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of a local plan.
- 1.7 Identification of land parcels as potentially suitable for release in 'Green Belt' terms within this Study does not mean that they will be automatically allocated for development. This Green Belt Review forms one piece of the evidence base for the Local Plan complementing separate studies on housing capacity, employment land, retail capacity, and infrastructure needs. The recommended removal or addition of any parcel of land from or to the Green Belt, will, if appropriate, be included in the proposals set out in the Local Plan and subject to the plan-making process and public consultation.

Study Aims

- 1.8 The key aims of the study were to:
 - Appraise the whole of the Green Belt within Rossendale against the five nationally defined purposes of the Green Belt as set out in the NPPF, ensuring consistency with neighbouring Green Belt assessments such as the Greater Manchester GB assessment.
 - Identify land outside but adjoining the Green Belt boundaries that could be suitable for inclusion within the Green Belt.
 - Provide clear conclusions on the relative performance of Green Belt which will enable Rossendale Borough Council to consider whether there are 'exceptional circumstances' (under paragraph 83, NPPF) to justify altering Green Belt boundaries through the Local Plan process, i.e. to enable existing Green Belt land to contribute to meeting Rossendale's housing needs.
 - Outline what 'design principles' should be applied to those parcels of land that have been identified as potentially suitable for release in Green Belt terms (i.e. to minimise potential harm to the wider Green Belt).

Report structure

- 1.9 This chapter has introduced the Rossendale Green Belt review and described the background to and aims of the project. The remainder of the report is structured as follows:
 - **Chapter 2** sets out the context to the Study, in terms of planning policy and the evolution of the Rossendale Green Belt.
 - **Chapter 3** describes the Study methodology, including the criteria used to assess the Green Belt against the NPPF purposes.
 - **Chapter 4** reports the findings of the Study.
 - **Chapter 5** sets out the study conclusions and recommended next steps.

2 Context

2.1 This chapter sets out the context for the study in terms of National Green Belt policy and practice guidance which has shaped the approach to the assessment. A summary is also provided of the existing local planning policy context and the evolution and extent of the Rossendale Green Belt.

National Green Belt policy

- 2.2 The principle of maintaining a ring of open country around cities can be traced back to the 16th century when Elizabeth I forbade any building on new sites within three miles of the city gates of London. This was motivated by public health reasons, to prevent the spread of the plague, and to ensure a constant supply of food for the metropolis.
- 2.3 The importance of these considerations was later recognised by Ebenezer Howard, a pioneer of British town planning, in his book of 1898 Tomorrow: a Peaceful Path to Real Reform in which he referred to 'an attractive setting within the town could develop and which would maintain, close at hand, the fresh delights of the countryside field, hedgerow and woodland'.
- 2.4 The only mechanism available at the time to realise this vision, however, was the acquisition of land by public authorities. In 1935 the London County Council Regional Planning Committee therefore put forward a scheme 'to provide a reserve supply of public open spaces and of recreational areas and to establish a Green Belt or girdle of open space lands, not necessarily continuous, but as readily accessible from the completely urbanised area of London as practicable'. This arrangement was formalised by the 1938 Green Belt (London and Home Counties) Act.
- 2.5 In 1955, Government Circular 42/55 codified Green Belt provisions and extended the principle beyond London. This was replaced by Planning Policy Guidance 2 in 1988 and in 2012, the Government replaced PPG2 with paragraphs 79–92 of a new National Planning Policy Framework (NPPF). This has since been supplemented by relevant National Planning Policy Guidance (NPPG).
- 2.6 Paragraph 79 of the NPPF states that 'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'. This is elaborated in NPPF paragraph 80, which states that Green Belts should serve five purposes, as set out below. The NPPF does not infer that any differential weighting should be applied to the five purposes.

The purposes of Green Belt

- 1. To check the unrestricted sprawl of large built up areas.
- 2. To prevent neighbouring towns merging into one another.
- 3. To assist in safeguarding the countryside from encroachment.
- 4. To preserve the setting and special character of historic towns.
- 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 2.7 The NPPF emphasises in paragraph 83 that local planning authorities should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. It goes on to state that 'once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period'.
- 2.8 Paragraph 85 of the NPPF suggests that Local Planning Authorities may wish to identify areas of 'safeguarded land' between the urban area and the Green Belt to accommodate long-term development needs well beyond the plan period. New boundaries must have regard for the permanence of the designation by redefining boundaries which endure beyond the Local Plan period. New boundaries should be defined clearly, using readily recognisable, permanent physical features.
- 2.9 Paragraph 82 of the NPPF indicates that, if proposing a new Green Belt, local planning authorities should:
 - demonstrate why normal planning and development management policies would not be adequate;
 - set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
 - show what the consequences of the proposal would be for sustainable development;
 - demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
 - show how the Green Belt would meet the other objectives of the Framework.
- 2.10 Current guidance therefore makes it clear that the Green Belt is a strategic planning tool designed primarily to prevent the spread of development and the coalescence of urban areas. To this end, land should be designated because of its position, rather than its landscape quality or recreational use. However, the NPPF states that "local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land" (Paragraph 81).

Existing Local Plan Policy

- 2.11 A number of policies in the adopted Rossendale Core Strategy (2011) directly address the Green Belt within the Borough. One of the Key Issues the Local Plan sets out to address through its policies is "*safeguarding the extent and openness of the designated Green Belt"*.
- 2.12 Policy 1 (General Development Locations and Principles) contains direct reference to the Green Belt and Countryside in Rossendale. This policy highlights that development proposals outside of the urban boundary will be decided with regard for national and local policy. The policy also highlights that any change to the existing Green Belt boundaries is to be made in "exceptional circumstances" and should take into account the following criteria:
 - "Effect on openness.
 - The overall integrity of the Green Belt.
 - Checking the unrestricted sprawl of large built up areas and other settlements.
 - The significance of local and longer distance views into and out of the site.
 - Preventing neighbouring towns and villages merging into one another.
 - The maintenance of an appreciable open zone around and between built up areas.
 - The safeguarding of the countryside from encroachment.
 - To preserve the setting and special character of historic towns and settlements.

- Whether it assists urban regeneration by encouraging the recycling of derelict and other urban land.
- Where small scale selective rounding off of Green Belt boundaries would promote sustainable development opportunities."
- 2.13 Policy 1 has also identified the former Rossendale Hospital site, off Haslingden Road as a Major Developed Site in the Green Belt. Any development which is to take place at this location should take the footprint of the existing buildings at this location as the starting point for an appropriate proposal.
- 2.14 Policy 17 (Rossendale's Green Infrastructure) seeks to protect, enhance and expand the existing Green Infrastructure network in the Borough. The Green Belt in Rossendale is included for appropriate management and enhancement along with other elements of Green infrastructure in this policy.
- 2.15 Policy 21 (Supporting the Rural Economy and its Communities) seeks to support the rural economy and environment by restricting development to existing rural settlement boundaries and identified major developed sites. Proposals which are promoted outside of these areas are required to demonstrate "*the social and/or economic needs/benefits for the local rural community".* Specific consideration is also to be given to the potential impact this type of development might have on the countryside and/or Green Belt in these scenarios.
- 2.16 Policy AV4 (Strategy for Rawtenstall, Crawshawbooth, Goodshaw and Loveclough) highlights the former Rossendale Hospital Site as a designated Major Developed Site in the Green Belt. It identifies that the site is to be used for mixed use projects (to include market and supported housing, live-work units or office) unless it can be demonstrated that such development has been investigated and is to be unviable. [This site has obtained planning permission (Ref: 2012/0162) for housing (135 homes) and is currently in the process of being built out.]
- 2.17 The Core Strategy document also identified the Site Allocations DPD as appropriate to undertake small scale local boundary changes to the Green Belt. This would only be appropriate where amendments would not:
 - adversely affect the openness of the Green Belt;
 - increase urban sprawl; and
 - impact detrimentally upon local recreational opportunities
- 2.18 In February 2016, the Council took the decision to withdraw the draft Site Allocations and Development Management Policies Plan Document before it was adopted. The Council is instead opting to prepare a completely new Local Plan and will prepare a single updated document.

Green Belt guidance and case law

- 2.19 Neither the NPPF nor National Planning Practice Guidance provides guidance on how to undertake Green Belt reviews. A recent Planning Advisory Service (PAS) Advice Note¹ and another produced by the Planning Officers Society² provide useful discussion of some of the key issues associated with assessing Green Belt.
- 2.20 The PAS Guidance² considers the way in which the five purpose of Green Belt should be addressed, as follows:
 - **Purpose 1: To Check the Unrestricted Sprawl of large built up areas** this should consider the meaning of the term 'sprawl' and how this has changed from the 1930s when Green Belt was conceived.
 - **Purpose 2: To Prevent Neighbouring Towns from merging into one another** assessment of this purpose will be different in each case and a 'scale rule' approach should be avoided. The identity of a settlement is not determined just by the distance to another

¹ Planning on the Doorstep: The Big Issues – Green Belt, Peter Brett for Planning Advisory Service (February 2015).

² Approach to Review of the Green Belt, Planning Officers Society (March 2015).

settlement; instead the character of the place and the land between settlements must be acknowledged. Landscape Character Assessment is therefore a useful analytical tool to use in undertaking this purpose.

- **Purpose 3: To assist in safeguarding the countryside from encroachment** the most useful approach for this purpose is to look at the difference between the urban fringe and open countryside. As all Green Belt has a role in achieving this purpose, it is difficult to apply this purpose and distinguish the contribution of different areas.
- **Purpose 4: Preserving the Setting and Special Character of Historic Towns** this applies to very few places within the country and very few settlements in practice. In most towns, there are already more recent development between the historic core and the countryside.
- **Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land** – the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. The value of various land parcels is unlikely to be distinguished by the application of this purpose.
- 2.21 It also states that the assessment of the performance of Green Belt should be restricted to the Green Belt purposes and not consider other planning considerations, such as landscape, which should be considered in their own right as part of the appraisal and identification of sustainable patterns of development.
- 2.22 The Planning Advisory Service also update their 'Plan Making Question and Answer' advice with regard to the assessment of Green Belt within Local Plans³. The service advises that Green Belt Reviews should be considered in the context of its strategic role. This indicates that Green Belts should not necessarily be just reviewed for each authority, and could include a joint methodology. Ideally, the Green Belt study should be comprehensive and strategic.
- 2.23 The Planning Officers Society guidance³ states:
 - As per Paragraph 79 of the NPPF "the essential characteristics of Green Belts are their openness and their permanence". Although Green Belts will contain land which is of high quality in terms of valued landscapes its purpose is not to protect such features but to keep land within that designation permanently open. The guidance identifies that openness within the Green Belt should not be confused with landscape character of that area.
 - Parcels of land around the inner edge of the Green Belt should be identified and delineated for assessment. To the greatest extent possible, each should have clearly defined boundaries using recognisable features.
 - Any review of the Green Belt should be taken in line with the aims of the NPPF with specific emphasis on the delivery of sustainable development and supportive infrastructure. Any land which is removed from the Green Belt for development will be in locations in which the case for sustainable development outweighs the assessment of this land in terms of the five Green Belt purposes. Sustainability of these areas will need to be addressed in terms of social (e.g. local open space provisions), economic (e.g. transport capacity) and environmental (e.g. impacts on biodiversity and efficient land use) considerations. From the consideration of these elements a new Green Belt area will emerge and this may require expansions of the original established boundaries of the designation to compensation for any development sites which are released.
- 2.24 It is also considered appropriate that relevant Inspector's reports (from the Independent Examination of Local Plans) and case law should be used to inform the approach used to a Green Belt Review or Assessment. For example, Inspectors have commented that:
 - Green Belt studies should be "fair, comprehensive and consistent with the Core Strategy's aim of directing development to the most sustainable locations". Green Belt reviews should be 'comprehensive' rather than 'selective'.4

³ http://www.pas.gov.uk/pm-q-a-green-belt#Q: When should you carry out a Green Belt review?

⁴ Inspector's report (A Thickett) to Leeds City Council (September 2014).

- Green Belt studies should make clear "how the assessment of 'importance to Green Belt' has been derived" from assessments against the individual purposes of Green Belt.5 Such assessments against the purpose should form the basis of any justification for releasing land from the Green Belt.6
- In reviewing land against the purposes, Green Belt studies should consider the reasons for a Green Belt's designation as they are related to the purposes.7
- Green Belt studies should "take account of the need to promote sustainable patterns of development, as required by paragraph 85 of the NPPF [even if] such an exercise would be carried out through the SEA/SA process."8
- 2.25 Meanwhile, case law confirms that Green Belt alterations require 'exceptional circumstances' to be demonstrated by the local planning authority. The relevant legal principles established in IM Properties Development Ltd v Lichfield DC [2015] EWHC 2077, are particularly as follows:

"In Gallagher Homes Ltd v Solihull Metropolitan Borough Council [2014] JPL 1117, para 125, Hickinbottom J helpfully gathered together a number of the relevant principles regarding the Green Belt.

Firstly, the test for redefining a Green Belt boundary has not been changed by the NPPF.

Secondly, the mere process of preparing a new local plan is not in itself to be regarded as an exceptional circumstance justifying an alternative to a Green Belt boundary.

Thirdly, the test for redefinition of a Green Belt under the NPPF remains what it was previously: exceptional circumstances are required which necessitate a revision of the boundary. That is a simple composite test because, for this purpose, circumstances are not exceptional unless they necessitate a revision of a boundary.

Fourthly, whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if it fails to adopt a lawful approach to exceptional circumstances.

Fifthly, once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration. Hickinbottom J's fifth point was endorsed on appeal: the Gallagher Homes case [2015] JPL 713, paras 33 and 36."

The Rossendale Green Belt

Origins and evolution of the Rossendale Green Belt

- 2.26 In 1955 the Government established (though Circular 42/55) the first clear policy on the need for Green Belts in areas outside of London. The North East Lancashire Structure Plan which was adopted in November 1979 designated land as within the Green Belt. For Rossendale this was particularly between Rawtenstall and Haslingden, within the south west of the Borough and around Whitworth. The 1982 Local Plan designated more detailed boundaries for the Green Belt in Rossendale. Minor changes were made to the Green Belt in the 1995 Rossendale District Local Plan.
- 2.27 The Structure Plan of 1979 identified the main role of the Green Belt as being to protect settlements from coalescing, to manage urban sprawl and to create recreational opportunities. The Rossendale Core Strategy 2011⁹ highlighted that, although the pressures for development in the Borough are high, the original purposes of the Green Belt have remained the same.

⁵ Inspectors' Letter (L Graham) to Cambridge City and South Cambridgeshire Councils (May 2015).

⁶ Inspector's interim findings (H Stephens) to Durham City Council (November 2014).

⁷ Inspector's interim findings (H Stephens) to Durham City Council (November 2014).

⁸ Inspectors' Letter (L Graham) to Cambridge City and South Cambridgeshire Councils (May 2015).

⁹ Rossendale Borough Council (2011), Core Strategy Development Plan Document.

Extent of Rossendale Green Belt

- 2.28 According to the Green Belt statistics published by the Department of Communities and Local Government, in 2014/15 Rossendale Borough Council contained around 3,180 hectares of Green Belt land. This represents approximately 23% of the total area of the Borough which is 13,800 hectares. There was no reported change in the amount of land designated as Green Belt in the Borough between the reporting periods 2013/14 and 2014/15. In 2014/15 the County of Lancashire within which Rossendale falls, contained around 79,440 hectares of Green Belt Land which accounts for approximately 25% of total land area of the County. This accounted for approximately 4.9% of the England total.
- 2.29 The Green Belt within Rossendale forms part of the larger Green Belt designation within the North of England. The larger Green Belt designation in the North West of England covers a total of 262,190 hectares. In Rossendale the Green Belt extends mostly around the valley settlements, from the south and south east northerly towards the larger towns of Haslingden and Bacup taking in land surrounding the settlements of Whitworth, Shawforth, Britannia, Edenfield, Stubbins and Helmshore.
- 2.30 A smaller part of the Green Belt in Rossendale extends from the north west towards Acre and a small disconnected pocket of Green Belt land also lies centrally between the villages of Waterfoot and Stacksteads.
- 2.31 Beyond the boundaries of the Borough and Lancashire Green Belt land surrounds the urban areas of Greater Manchester, as well as the Potteries conurbations also taking in land in Merseyside and Cheshire. The Green Belt extends towards the Pennines into Harrogate at its most northerly point. In the east the Green Belt's boundaries extend into Selby and Doncaster and to the south as far as North East Derbyshire, Cheshire East, Cheshire West and Chester. The Green Belt in the North West of England extends to the western coast at the Irish Sea and into Wirral, Sefton and West Lancashire.
- 2.32 The Green Belt in Lancashire since 2011 has been subject to several reviews through the Local Plan process. As such the Districts of Hyndburn and West Lancashire have released land from the Green Belt within their boundaries and future reviews are proposed for South Ribble and Blackburn.
- 2.33 **Figure 2.1** shows the extent of the Green Belt in Rossendale Borough and the neighbouring authorities. **Appendix 2.1** provides a summary of the character of the Green Belt within Rossendale.

Figure 2.1: Extent of Green Belt within Rossendale



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CB:Green_C EB:Green_C LUCLON xxxx-01_000_GB_Context 03/05/2016 Source: DCLG

3 Methodology

3.1 **Figure 3.1** below provides a summary of the overall methodology used to undertake the Green Belt Review. This is described in more detail in the following chapter. The study was divided into three main parts: Part 1 - defining the assessment approach, Part 2 – undertaking the detailed assessments and site visits and Part 3 – completing the analysis and reporting.





Part 1

Assessment Approach

- 3.2 Most Green Belt studies have the following common elements:
 - Land is divided into parcels for assessment purposes.
 - The definition of assessment criteria is structured around the five Green Belt purposes set out in the NPPF.
 - `Large built up areas', `towns' and `historic towns' are defined.
 - Ratings and supporting text are provided for each of the five purposes, with no weighting applied to any of the five (in accordance with the NPPF's lack of inference in this respect).
- 3.3 Variations in approach come in:
 - The size of assessment parcels and the type of features used to define them, and the way in which assessments are phased.
 - The application of settlement type definitions.
 - The specific criteria used to make the assessment against each of the five purposes.
 - The way in which ratings are given, and translated into an overall assessment.
- 3.4 The following section sets out the key considerations in LUC's approach for the Rossendale GB study including how the assessment parcels were defined and the assessment criteria used.

Definition of Assessment Parcels

- 3.5 Given the overall size of the Green Belt, it was necessary to divide it into appropriate parcels for assessment. Green Belt assessments are sometimes carried out as a two-stage process, in which large parcels are defined and assessed in the first stage and the results of that assessment used to inform the definition of smaller second stage parcels, covering more limited geographical areas. Such an approach can be effective, but there are risks that the 'stage two' assessment will omit smaller areas which might not have been judged to make a strong contribution to Green Belt purposes but which were excluded because they formed part of a larger parcel assessed at 'stage one' as making a strong contribution.
- 3.6 In order to provide assessment output that usefully identifies different levels of contribution to Green Belt purposes it is desirable, to define relatively small assessment parcels adjacent to the interface between Green Belt and defined settlements.
- 3.7 The NPPF states that when defining boundaries, local planning authorities should "*define* boundaries clearly, using physical features that are readily recognisable and likely to be permanent."
- 3.8 The parcels for this Green Belt review have been defined using GIS maps (based on Ordnance Survey and Mastermap), and aerial images. The aim was to define parcels that contain land of the same or very similar land use or character, bounded by recognisable features including:
 - Natural features; for example, substantial watercourses and water bodies.
 - Man-made features; for example, A and B roads and railway lines.
- 3.9 Less prominent features such as stone walls, woodland, hedgerows, tree lines, streams and ditches may also be considered to be recognisable but less permanent boundaries. Where no other suitable boundary exists, these were used to define the land parcel boundaries.

- 3.10 Two types of land parcel were identified:
 - a) **Areas adjacent to built up areas.** These comprise relatively small parcels of land adjacent to built up areas. Identifying land parcels at the edge of the Green Belt is important as it is these areas which are most likely to be considered for either inclusion or removal from the Green Belt. It also provides a means of identifying the differing characteristics and performance of the Green Belt along the urban edge.
 - b) Broad areas of Green Belt that may be more remote from large built up areas and main settlements.
- 3.11 No standard maximum and minimum sizes for the land parcels were set as outlined above, they were defined according to recognisable boundaries. If, as part of the detailed assessment process, it is observed that a parcel of land has very distinct attributes within different sections of the parcel, the parcel was divided to reflect this.

Assessment Criteria

- 3.12 A key part of the method involves the development of an assessment framework based on the five purposes of Green Belts set out in the NPPF. A set of assessment criteria was drawn-up based on LUC's extensive experience of undertaking Green Belt reviews and good practice gleaned from elsewhere.
- 3.13 For each Green Belt purpose, a description of the rationale for the assessment criteria is provided followed by a table (**Tables 2.1- 2.4**) summarising the proposed criteria and the ratings that have been applied to each criterion. The five Green Belt purposes are set out in **Box 2.1**:

Box 2.1: The purposes of Green Belt (Paragraph 80 of the NPPF)

- To check the unrestricted sprawl of large built up areas.
- To prevent neighbouring towns merging into one another.
- To assist in safeguarding the countryside from encroachment.
- To preserve the setting and special character of historic towns.
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 3.14 For Green Belt Purposes 1-4, the tables set out:
 - a) The NPPF Green Belt **Purpose.**
 - b) The **key issue**(s) considered.
 - c) The assessment criteria used.
 - d) The **ratings** that were applied to each criterion.
 - e) **General comments** on the assessment method. This provides further detail about how each criterion / rating was interpreted. This helped ensure consistency was achieved throughout the assessment of the land parcels.
- 3.15 The ratings that were applied to each criterion were as follows.

Parcel Ratings

Strong Parcel performs strong against this Purpose.		
Moderate Parcel performs moderately well.		
Weak	Parcel performs poorly.	
No Contribution	Parcel makes no contribution.	
Not Applicable	It is not applicable to make an assessment. (This is particularly relevant to P1a and 1b and whether the parcel is adjacent to the large built up area or not)	

3.16 In addition to the five purposes of Green Belt, the NPPF also refers to two 'essential characteristics'; openness and permanence. Comments on each of these are made in the paragraphs below as they are applicable to all the assessment criteria.

Openness

- 3.17 Openness in a Green Belt sense relates to lack of built development more than visual openness, although the two often go hand in hand. The key distinction is that, where vegetation provides visual enclosure, this does not reduce Green Belt openness; even though it might in practice mean that development would have less visual impact¹⁰.
- 3.18 Openness as a characteristic can be considered in terms of the scale and density of development. The extent and form of existing development affects the degree to which a parcel can be considered to be part of the countryside rather than an extension of the urban/settled area, or a built up area in its own right.

Permanence

3.19 The concept of permanence is a planning consideration rather than a physical one, but it is recognised that there are benefits in using features which are clearly defined and which also play a physical and/or visual role in separating town and countryside to act as Green Belt boundaries.

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

3.20 It is possible to argue that all Green Belt prevents the unrestricted sprawl of large built up urban areas, because that is its principal purpose as a strategic planning designation. However, the Study requires one area (or parcel) to be distinguished from another in terms of the extent to which they perform this purpose. This requires a detailed, site specific assessment against this strategic purpose.

Rossendale's 'Large Built Up' Area

3.21 There is no definition provided in the NPPF or a standard definition for a 'large built up area.' The Office for National Statistics defines a 'large' built up area as a settlement with between 0.5-1 million people. As none of the towns within Rossendale falls within this definition, it was necessary to decide what constitutes the 'large built up area' for the purposes of the study.

In the Greater Manchester Green Belt Study, it is noted that the original purpose of the Manchester Green Belt was partly to prevent the sprawl of Manchester into the surrounding countryside. The large built up area was therefore defined as the visible continuous urban mass that stretches across all of the 10 metropolitan authority areas. All settlements within this main urban area were therefore included in the assessment of purpose 1a and 1b as they fall under the definition of the 'large built up area'. As Rossendale does not have a large built up area, it is only those parcels within Rossendale that abut the 'large built up area' of Greater Manchester have been considered under purpose 1 for this study. This includes parcels that lie adjacent to the built up areas of Stubbins, Edenfield and Whitworth. The Green Belt lying adjacent to other towns within the Rossendale Green Belt such as Rawtenstall, Bacup and Haslingden have not been

¹⁰ This point is made in paragraph 22 of the judgement in *Heath & Hampsted Society v London Borough of Camden* [2007] EWHC 977 (Admin) (3rd April 2007).

assessed against purpose 1 as they do not form part of a 'large built up area'. Consideration was also given to the relationship of Rising Bridge with Baxenden and whether Accrington which is connected to Baxenden could be described as large built up area. It was concluded as part of the field work that there is a sufficient gap between Baxenden and Rising Bridge for Rising Bridge not to be considered as part of the large built up area of Accrington/ Baxenden. Within the assessment of this purpose 1, those parcels that do not abut part of the large built up area such as Rawtenstall, Bacup and Haslingden, have been given the scoring of *Not Applicable*. As a consequence neighbouring parcels may have substantially different soring depending on their relationship to edge of the built up area.

Definition of 'Sprawl'

3.22 There is no clear definition of what constitutes urban sprawl. The PAS guidance¹¹ states in relation to purpose 1:

"The terminology of 'sprawl' comes from the 1930s when Green Belt was conceived. Has this term changed in meaning since then? For example, is development that is planned positively through a local plan, and well designed with good masterplanning, sprawl?"

3.23 The guidance emphasises the variable nature of the term 'sprawl' and questions whether positively planned development constitutes 'sprawl'. The RTPI Research Briefing No. 9 (2015) on Urban Form and Sustainability is also not definitive on the meaning of sprawl:

"As an urban form, sprawl has been described as the opposite of the desirable compact city, with high density, centralised development and a mixture of functions. However, what is considered to be sprawl ranges along a continuum of more compact to completely dispersed development. A variety of urban forms have been covered by the term 'urban sprawl', ranging from contiguous suburban growth, linear patterns of strip development, leapfrog and scattered development."

3.24 For the purpose of this Study, urban sprawl has been defined according the Oxford Dictionary as "*spreading out of built form over a large area in an untidy or irregular way*". Given this definition, land immediately adjacent to the large built up area is likely to contribute to this purpose, as it provides the boundary and zone of constraint to urban expansion. Nevertheless it should be recognised that sprawl as described can be equally damaging to the overall integrity of the Green Belt, wherever it may arise.

Definition of methods for assessing the role of the Green Belt in maintaining openness around the 'large built up area'

- 3.25 Criterion 1a considers whether land has **already been affected** by sprawl and whether it retains an open character. Parcels which have already been compromised by urban sprawl as a result of urbanising influences may be considered to make a weaker contribution to purpose 1 than those parcels where the Green Belt is more open in character. It is important to note that a high rating against criterion 1a does not necessarily imply that Green Belt is performing a more valuable role. The remaining open land in a parcel significantly affected by sprawl could be considered more valuable in preventing further incursions, or less valuable because it has already been compromised.
- 3.26 Equally important in assessing the role of Green Belt in checking unrestricted sprawl is the extent to which the land parcel has the **potential** for urban sprawl to occur in the future. Criterion 1b considers the role of the following in affecting the potential for urban sprawl to occur in the absence of a Green Belt designation:
 - **The strength of boundary features** i.e. where there is a very strong and defensible boundary such as a river or railway line which may prevent urban sprawl from occurring.
 - **The nature of the settlement form** i.e. an urban edge that is uneven, rather than 'rounded off', is more vulnerable to urban sprawl. This vulnerability is evidenced by the number of the developer proposals to 'round off' and 'fill gaps', even though this may not be desirable from a wider planning perspective, or to create a 'better edge' to the urban area.

¹¹ Planning on the Doorstep: The Big Issues – Green Belt, Planning Advisor Service (2015).

- **The presence of roads** i.e. roads allow for greater opportunities for urban sprawl to occur, because of the potential for ribbon development and the wider access they provide. These roads considered under this criterion are also distinct from those identified as boundary features as they will not form part of the existing settlement edge.
- **Potential for sprawl to occur beyond the parcel boundary** in some cases a parcel may be at risk of urban sprawl within the parcel itself but there is little or no potential for sprawl to occur beyond the parcel– therefore the overall extent of the potential for urban sprawl is limited. Where this is relevant this is taken into account. (e.g. where a parcel is surrounded by existing built development on all sides, or is bounded by existing urban development and a strong a durable barrier preventing sprawl occurring beyond the parcel).

Definition of boundary features considered able to check the sprawl of the 'large built up area'

- 3.27 While all boundary features can play some role in preventing urban sprawl, only major roads and motorways, railway tracks and rivers adjacent to the existing urban edge, which have not been breached by the large built up area within the immediate vicinity of a parcel and are therefore demonstrably strong and defensible, are considered to be significant in relation to purpose 1.
- 3.28 Other boundaries, such as streams, and lesser roads are not for the purposes of this Study considered to be strong enough to prevent urban sprawl. However, such boundary features may form an important part of the landscape and/or pose a physical barrier to unplanned sprawl, albeit one that can more easily be breached. Floodplains are a major factor in restricting development; however the presence of environmental constraints such SSSIs and floodplains is not being considered. That is a matter for subsequent analysis beyond the remit of this Study. **Table 2.1** summarises the proposed criteria that have been used for the assessment of purpose 1 in the study.

Table 2.1: Purpose 1 Assessment Criteria

) NPPF Green elt Purposes	b) co) Issue(s) for onsideration	c) Criteria	d) Ratings		e) Comments on assessment
1	To check the unrestricted sprawl of large built up areas.	а	Protection of open land from urban sprawl.	Does the parcel exhibit evidence of existing urban sprawl and consequent loss of openness?	Strong	Adjacent to large built up area and land parcel contains no or very limited urban sprawl and has a strong sense of openness.	Urban sprawl is the spread of urban areas into the neighbouring countryside. Parcels which have already been compromised by urban sprawl, as a result of urbanising influences, will generally play a weaker role than those where the Green Belt is more open in character. It is
					Moderate	Adjacent to large built up area and land parcel contains limited urban sprawl and has a relatively strong sense of openness.	however noted that in some cases parcels which have been compromised by sprawl may play a stronger role in the sense of ensuring that no further spread or urbanising influence into the countryside takes place. Development means any built structure or land use that does not
					Weak	Adjacent to large built up area and land parcel already contains urban sprawl compromising the sense of openness.	keep land open. This does not include pylons as these are features of both rural and urban environments or other forms of 'appropriate development' within the Green Belt which keep the land open.
					No Contribution	Adjacent to large built up area but land parcel makes no contribution to preventing urban sprawl.	
					Not Applicable	Parcel does not lie adjacent to large built up area.	
1		b		Does the parcel protect open land from the potential for urban sprawl to occur?	Strong	Adjacent to large built up area and land parcel has a high potential for urban sprawl to occur.	The features that that are considered relevant to the assessment of potential include: Significant and durable boundary features - Readily
					Moderate	Adjacent to large built up area and land parcel has moderate potential for urban sprawl to occur.	recognisable and permanent features are used to define the borders of Green Belt parcels. The presence of features which contain development and prevent urban sprawl can, in certain limited locations, reduce the potential role of a Green Belt parcel in performing this purpose. The significance of a boundary in
					Weak	Adjacent to large built up area and land parcel has low potential for urban sprawl to occur.	preventing urban sprawl is judged based on its relative proximity to the existing urban edge of a settlement and its nature. Only dual carriageways, railway lines and rivers which have not been breached within the relevant land parcel, or close by, are considered to constitute a very significant and durable boundary
					No Contribution	Land parcel makes no contribution to preventing urban sprawl.	The nature of the settlement form - An urban edge that is

a) NPPF Green Belt Purposes	b) Issue(s) for consideration	c) Criteria	d) Ratings		e) Comments on assessment
					uneven, rather than 'rounded off', is more vulnerable to urban sprawl.
					 Presence of roads – the presence of roads (apart from dual carriageways) allows for greater opportunities for urban sprawl to occur, because of the potential for ribbon development and the wider access they provide. Where such roads exist, the Green Belt is considered to play a strong role in preventing urban sprawl. These roads are distinct from those considered as boundary features as they will not form part of the existing settlement edge. Potential for sprawl beyond the parcel boundary – in some cases a parcel may be at risk of urban sprawl within the parcel itself but there is little or no potential for sprawl to occur beyond the parcel – therefore the overall extent of the potential for urban sprawl is limited. Where this is relevant this is taken into account. (e.g. where a parcel is surrounded by existing built development on all sides, or is bounded by existing urban development and a
					strong a durable barrier preventing sprawl occurring beyond the parcel).
					Professional judgement is applied to reach an overall rating when taking account of the above considerations.
			Not Applicable	Parcel does not lie adjacent to large built up area.	

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

- 3.29 As set out in paragraph 80 of the NPPF, purpose 2 aims to 'prevent neighbouring towns merging into one another'. For the purpose of this assessment, 'towns' include the Tier 1, 2 and 3 settlements as defined in the adopted Core Strategy (2011) as follows:
 - Tier 1 Settlements
 - Rawtenstall

Tier 2 Settlements

- Haslingden Whitworth
- Bacup

Tier 3 Settlements

- Stubbins
- Edenfield
- Rising Bridge
- Shawforth
- Stacksteads
- Helmshore
- Waterfoot
- 3.30 The additional Tier 2 settlements of Loveclough, Goodshaw, Crawshawbooth and Water have not been included in this assessment as they are located away from the Green Belt.
- 3.31 It is acknowledged that in several cases there is little, if any separation between some of the settlements (e.g. Haslingden and Helmshore) but this is considered in the assessment where relevant. The assessment also considers settlements in adjacent neighbouring authorities such as Ramsbottom/Shuttleworth in Bury, Baxenden in Hyndburn and Healey in Rochdale.
- 3.32 A parcel by parcel assessment was undertaken assessing the extent to which the Green Belt is playing a role preventing the merging of these neighbouring towns. The NPPF specifically refers to preventing the merger of towns, not the merger of towns with smaller settlements, or the merger of small settlements with each other. However, it is recognised that the perceived gaps between towns will in turn be affected by the size of gaps associated with smaller, intervening settlements.
- 3.33 The detailed commentary therefore considers the role that the Green Belt plays in preventing the coalescence of smaller settlements such as Irwell Vale, Ewood Bridge and Acre, and 'washed over' settlements such as Chatterton and Turn, as it is acknowledged that the Green Belt does play a role in preventing the merging of these smaller settlements. The role the Green Belt plays in preventing the merger of these smaller hamlets does not, however, contribute towards the ratings given in the assessment as they do not constitute large enough settlements to be considered as 'towns'.
- 3.34 Rather than simply measuring the size of the gap between settlements, the assessment considers both the physical and visual role that parcels of land play in preventing the merging of settlements. This accords with the PAS guidance which states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another.
- 3.35 A parcel that represents all or most of the physical gap between towns will clearly play an important role in preventing coalescence, so parcel location and size are significant factors with regard to this purpose. However, the nature of the land between two towns the role of landform and land cover in connecting or separating them visually or in terms of the character of their settings and also the character of the settlements themselves does affect the extent to which the closing of a physical gap between them is perceived as reducing settlement separation.
- 3.36 **Table 2.2** summarises the criteria that have been used for the assessment of purpose 2 in the study.

Table 2.2 Assessment Criteria for Purpose 2

a B) NPPF Green elt Purposes	b) Issue(s) for consideration	c) Criteria	d) Ratings		e) Comments on assessment
2	To prevent neighbouring towns merging into one another.	Reduction in visual or physical gaps between settlements.	Does the parcel prevent the merging or erosion of the visual or physical gap between neighbouring settlements?	Strong	The parcel plays an essential role in preventing the merging or erosion of the visual or physical gap between settlements. Loss of openness would cause visual or physical coalescence or substantially reduce the gap.	This purpose seeks to prevent settlements from merging to form larger settlements. The PAS guidance states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another. Two key elements are therefore used – the extent of a) the visual and b) the physical gap. This may also include consideration of perceptual issues.
				Moderate	The parcel plays some role in preventing the reduction of the visual or physical distances between settlements. Loss of openness would, or would be perceived as, reducing the gap between settlements.	
				Weak	The parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between settlements. Loss of openness would not be perceived as reducing the gap between settlements.	
				No Contribution	Land parcel makes no contribution to preventing the merging or erosion of the visual or physical gap between settlements.	
				Not Applicable	It is not applicable to make an assessment.	

Purpose 3: To assist in safeguarding the countryside from encroachment

- 3.37 The contribution a parcel makes to safeguarding the countryside from encroachment can be considered in terms of the extent to which it displays the characteristics of countryside i.e. lack of development and land uses which are associated with countryside rather than urban land and the extent to which it relates to the adjacent settlement and to the wider countryside.
- 3.38 Urbanising influences are considered to include any features that compromise the countryside character, such as roads lined with street lighting and pavements, large areas of hard standing, floodlit sports fields, roads etc. They do not include development which is commonly found within the countryside, e.g. agricultural or forestry related development, isolated dwellings, historic schools and churches. In line with the Manchester Green Belt study, electricity pylons will not considered to be urbanising features as they are present in both rural and urban settings.
- 3.39 The PAS guidance states that:

"The most useful approach is to look at the difference between urban fringe – land under the influence of the urban area - and open countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved."

- 3.40 The criterion differs from Criterion 1a as it focuses on the extent to which the countryside characteristics of the Green Belt have been compromised by encroachment from urbanising influences or the extent to which the parcel displays the characteristics of the countryside.
- 3.41 It is important to recognise that Green Belt does not function as a series of isolated parcels: the assessment of a defined parcel reflects the nature of landscape elements or characteristics within that parcel but also reflects its relationship with the wider Green Belt. **Table 2.3** summarises the criteria that have been used for the assessment of purpose 3 in the study.

Table 2.3: Assessment Criteria for Purpose 3

a) NPPF Green Belt Purposes	b) Issue(s) for consideration	c) Criteria	d) Ratings		e) Comments on assessment
3 To assist in safeguarding the countryside from encroachment	Significance of existing urbanising influences and sense of openness. ¹²	Does the parcel have the characteristics of countryside and/or connect to land with the characteristics of countryside? Has the parcel already been affected by encroachment of urbanised built development?	Strong Moderate Weak	The land parcel contains the characteristics of countryside, has no or very little urbanising development, and is open. The land parcel contains the characteristics of countryside, has limited urbanising development, and is relatively open. Land parcel does not contain the characteristics and/or is not connected to land with the characteristics of countryside, or contains urbanising development that compromises openness.	 Encroachment from urbanising influences is the intrusion / gradual advance of buildings and urbanised land beyond an acceptable or established limit. Urbanising influences include any features that compromise 'openness', such as roads lined with street lighting and pavements, large areas of hard standing, floodlit sports fields, roads etc. They do not include development which is commonly found within the countryside, e.g. agricultural or forestry related development, isolated dwellings, historic schools and churches or other forms of 'appropriate development' within the Green Belt which keep the land open Countryside is land/scenery which is rural in character, i.e. a relatively open natural, semi-natural or farmed landscape.
			NO Contribution	Parcel makes no contribution to safeguarding the countryside from encroachment.	
			Not Applicable	It is not applicable to make an assessment.	

¹² The significance of existing urbanising influences has a direct influence over the relative openness of Green Belt parcels. We have therefore used the presence of urbanising influences as a proxy for assessing the degree of openness within the parcel.

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

- 3.42 The fourth Green Belt purpose focuses on the role of the Green Belt in preserving the setting and special character of historic towns.
- 3.43 To ensure that the Rossendale Green Belt Review takes full account of this purpose, it is necessary to define what constitutes an historic town and set out how the role of the Green Belt in preserving setting and special character has been assessed.

Definition of historic towns

- 3.44 Green Belt assessments have adopted a range of approaches to the definition of historic towns. These typically focus on the presence of designated Conservation Areas, but in some cases have considered whether settlements were recorded as far back as the Domesday Book (e.g. North East Cheshire Green Belt Study).
- 3.45 For the Rossendale Green Belt study, Conservation Areas have been used a proxy for identifying the historic towns. As a cross check, reference has also been made to the Historic Core Urban Landscape Type defined within the Lancashire Landscape Character Assessment (A Landscape Strategy for Lancashire, December 2000). The historic towns assess under purpose 4 have been identified by selecting Conservation Areas that are located within settlements included in the assessment of Green Belt purpose 2 and that are within a maximum distance of 5km from the Green Belt parcels. This also included any Conservation Areas located within towns in neighbouring local authorities. Conservation Areas not within a purpose 2 settlement, for instance the Chatterton/ Strongstry Conservation Area, Irwell Vale Conservation Area, or Goodshawfold Conservation Area, have not been identified as a historic town for the purpose of the Green Belt assessment.

Assessing the role of Green Belt in preserving setting and special character

- 3.46 To inform our understanding of the role that Green Belt provides in preserving the setting of historic towns, we undertook an intervisibility analysis as part of the desk based assessment. In essence, this identified the extent to which each Green Belt parcel is visually connected with one or more historic town or settlement.
- 3.47 The process by which this analysis was undertaken was as follows:
 - a digital ground model of the study area was constructed using OS digital contour data;
 - the current conservation areas/ historic cores were overlaid;
 - a notional building height was applied to these areas;
 - digital analysis was used to identify which Green Belt parcels are intervisible with these urban areas within an agreed radius (suggest 5km).
- 3.48 This is a theoretical analysis based on standard building height and 'bare ground topography' (i.e. not taking account of the screening effect of intervening structures or land cover such as trees and woodland). The desk analysis identified those land parcels which could have the potential to form an important part of the setting of an historic settlement, considering the extent of intervisibility and the distance at which it occurs. The field survey then explored this on the ground, considering in particular:
 - the strength of the visual relationship (e.g. the influence of screening or intervening features / development, the presence of key views and vistas);
 - the balance between historic and more recent development;
 - the prominence of key historic features such as mill buildings, chimneys, churches etc.;
 - the presence of any obvious functional relationships between the historic town and the Green Belt parcel (e.g. railway lines);
 - where appropriate, views out from settlements as well as views of urban areas from the Green Belt.

3.49 This enabled us to prepare a commentary on the role of a given land parcel in contributing to the setting of the historic town and in reflecting and preserving its special character. **Table 2.4** summarises the criteria that have been used for the assessment of purpose 4 in the study.

Table 2.4: Assessment Criteria for Purpose 4

A) NPPF Green Belt Purposes	B) Issue(s) for consideration	C) Criteria	D) Ratings		E) Comments on assessment
4 To preserve the setting and special character of historic towns.	Significance of historical and/or visual setting to the historic town.	Does the parcel contribute to the setting and 'special character' of a historic town (s)?	Strong	The parcel plays a major role in the setting and or special character of historic towns in terms of its physical extent and degree of visibility and/or its significant contribution to special character.	Topographic mapping, Zone of theoretical visibility (ZTV) analysis and site visits were used to inform judgements regarding intervisibility between the historic towns and their open surroundings.
			Moderate	The parcel plays a moderate role in the setting of historic towns in terms of its physical extent and degree of visibility and/or its contribution to special character.	
			Weak	The parcel plays a minor role as it lacks any direct visual relationship with historic towns, and is not visible in the context of views to it. It does however contribute in some way to the wider setting	
			No Contribution	Parcel makes no contribution – i.e. does not form part of the setting or contribute to the special character of historic towns.	
			Not Applicable	It is not applicable to make an assessment.	

Purpose 5: to assist in urban regeneration by encouraging the recycling of derelict and other urban land

- 3.50 Supporting urban regeneration has been a longstanding objective of Green Belt in the UK. By preventing development within areas designated as Green Belt, the aim is to steer development to urban locations. A constrained land supply should also help make the recycling of derelict and other urban land more viable.
- 3.51 Measuring accurately the extent to which individual parcels contribute to this process of recycling of derelict and other urban land is problematic. While it would be possible to undertake a spatial analysis of the supply of brownfield land relative Green Belt parcels (at conurbation, authority, settlement, Housing Market Area or Strategic Green Belt Areas scales), there are significant concerns about the validity of any judgements based on the results:
 - It is not possible to identify and measure a causal link between the policy restraint in a particular Green Belt parcel and the recycling of urban land elsewhere, in part reflecting the complexity of the development process, the locational requirements of different types of development and variations in the property market over time.
 - The complexity of Rossendale's urban form and Green Belt, and the relationship with neighbouring urban areas mean that spatial analysis based on the supply of brownfield land relative to the locations of individual Green Belt parcels would either be overly simplistic or would be based on significant assumptions such as to place the results in significant doubt.
 - While brownfield land does provide one measure of the supply of land for recycling, it does not take account of the re-use of existing buildings and enhancement of existing urban areas.
- 3.52 Similar issues have influenced Green Belt assessments elsewhere. Many do not assess individual parcels against purpose 5, and either do not rate them or rate them all equally, on the grounds that it is difficult to support arguments that one parcel of land makes a higher contribution to encouraging re-use of urban land than another. Where local authorities have detailed information on the extent of such sites, an argument could be made that Green Belt parcels around a settlement with a smaller area of unused urban land contribute more than parcels around a settlement with less 'pressure' on surrounding Green Belt, but it is very debatable as to whether development pressures operate at such a localised level.
- 3.53 This Study therefore acknowledges that purpose 5 is important and should be afforded equal weight with Purposes 1-4 but that is not possible to assess the performance of purpose 5 in a parcel-by-parcel assessment.

Overall assessment ratings

- 3.54 The assessment of parcels and broad areas against each of the purposes 1-4 cannot apply any predetermined weighting to any of the four factors. Given that there is no guidance on what constitutes an overall 'strong' contribution to Green Belt, LUC considers that there can be no presumptions as to how multiple lower ratings equate to single high ratings. Individual parcel assessments have not therefore included a totalling of ratings.
- 3.55 However, it would not be unreasonable to assume that a parcel that rates highly against a number of different purposes potentially has more value in Green Belt terms than one which rates highly against only one purpose. Mapping has therefore been included in **Chapter 4** which illustrates this, showing parcels coloured according to the highest strength of contribution and shaded according to the number of purposes making that strength of contribution. This approach was used as a tool, but not a definitive statement on the potential harm to of the Green Belt if the parcels were to be release.

Part 2

Desk Based Assessment

- 3.56 Following agreement of the method statement, LUC carried out a preliminary desk-based evaluation of the Green Belt and adjacent areas. This provided emerging findings which were then tested and refined during the field survey stage of the work. Each land parcel was assessed using OS maps, aerial images, Google Street View and relevant GIS data to gain an initial understanding of how each parcel performs against the Green Belt purposes set out in the NPPF. While we acknowledge and map the presence of key constraints widely acknowledged as 'showstoppers' to development, such as Flood Zone 3b, SSSIs, Scheduled Monuments and Registered Parks and Gardens etc., these designations would only inform parcel boundaries but not the assessment scores against the Purposes.
- 3.57 The results of the assessment were entered into the Access database and commentary included on the reasoning behind each judgement. This was linked to GIS shape files, providing a digital baseline for checking, supplementing and refining the judgements in the field.

Field Work

- 3.58 Following the desk based assessment, each parcel was visited to check and verify the judgements and conclusions reached in the desk-based assessment, to carry out the assessment for criteria which could not be included within the desk based exercise and to check and verify the boundaries of the land parcels where necessary. The site visits were used to collect georeferenced photographs illustrating the overall character and appearance of the Green Belt parcel in question, together with any key issues such as strength of boundaries, land uses or visual prominence of adjoining settlements.
- 3.59 In order to ensure that the assessment is robust **all** of the proposed Green Belt parcels were visited.
- 3.60 The information obtained during the site visits was input directly into the Access database with clear commentary provided on the judgements reached.

<u>Part 3</u>

Analysis

- 3.61 The assessment findings were analysed to draw out key findings. The NPPF does not require all the purposes of Green Belt to be met simultaneously. Indeed, parcels of land can make a significant contribution to the Green Belt purposes without performing all of the purposes of Green Belt at the same time. Therefore, each parcel's score against each of the Green Belt purposes was carefully recorded so that the contribution of all parcels against all purposes can be examined. Scores were rigorously cross-checked and reviewed to ensure consistency, clarity and transparency in all judgements.
- 3.62 The findings of the assessment are contained within **Chapter 4** and **Figures 4.1.1 to 4.5.5** and **Appendix 4.1.**
- 3.63 In addition to the assessment of how the parcels performed against the Green Belt purposes, we also analysed the findings to aid decisions on where the Green Belt could potentially be amended to accommodate future development (should exceptional circumstances be found to justify the release of Green Belt land and subject to the consideration of other constraints).

- 3.64 It is important to note that the relatively poor performance of land against Green Belt purposes is not, in itself, an exceptional circumstance that would justify release of the land from the Green Belt. Equally, even if an area of Green Belt scores strongly against one or more purposes, the NPPF does not suggest that a review of its boundaries would not be appropriate, if 'exceptional circumstances' are demonstrated. If decisions are made to remove land from the Green Belt, the local authority should seek to minimise any harm to the remainder of the Green Belt. This will include careful masterplanning of development to ensure that harm is minimised, ensuring Green Belt boundaries are defined, and that positive uses for the wider Green Belt are secured. Where appropriate, guidance is provided on these issues in **Chapter 5 and 6**. This includes a commentary on:
 - a) the need to **enhance the beneficial use of the Green Belt**, i.e. to provide access and recreation opportunities; to retain and enhance landscapes, enhance visual amenity and biodiversity; or to improve damaged and derelict land.
 - b) what '**design principles'** should be applied to those parcels of land that have been identified as potentially suitable for release from the Green Belt (i.e. to minimise potential harm to the Green Belt).

Consultation

- 3.65 As with other elements of work involved in the preparation of the new Local Plan, a key element of this Review has involved stakeholder engagement with the Duty to Co-operate partners, the neighbouring authorities of Rossendale. These include Hyndburn, Burnley, Calderdale, Rochdale, Bury, and Blackburn. A clear record of stakeholder engagement is necessary to demonstrate that the requirements of the duty to co-operate have been met, as described in Section 110 of the Localism Act (2011). The duty:
 - Relates to sustainable development or use of land that would have a significant impact on at least two local planning areas.
 - Requires that councils and public bodies 'engage constructively, actively and on an on-going basis' to develop strategic policies to address such issues.
 - Requires councils to consider joint approaches to plan making.
- 3.66 Paragraph 156 of the NPPF sets out the strategic issues where co-operation might be appropriate, and includes a number of cross boundary issues that are closely linked to Green Belt (such as the provision of homes and jobs etc.).
- 3.67 Consultation with the neighbouring Duty to Co-operate authorities was undertaken on the methodology used for the Green Belt Assessment. Responses were received from Bury, Rochdale, Hyndburn and Burnley. There was general agreement with the proposed methodology and with the exception of Bury, no specific comments were made. The response from Bury included comments on the parcel boundaries near Bury, the treatment of Whitworth as part of the continuous large built-up area of Manchester and consistency with the Greater Manchester Study in terms of identifying potential harm to the Green Belt (which was not assessed in the Manchester study). These comments were discussed with Rossendale Borough Council and amendments made where necessary.

4 Findings

Introduction

- 4.1 This section of the report sets out the findings in relation to the assessment of Rossendale's Green Belt. It combines the outputs of the following processes:
 - dividing the Green Belt into coherent land parcels;
 - desk-based analysis of the likely contribution of each parcel to the five purposes of Green Belt;
 - field verification of contributions of the parcels to the five purposes;
 - comparative analysis of the parcels' scores;
 - identification of parcels that may be least harmful in Green Belt terms, were they to be released for development.
- 4.2 As noted in the project submission, NPPF does not require all purposes of Green Belt to be met simultaneously and parcels of land can make a significant contribution to the Green Belt purposes without performing all of the purposes of the Green Belt at the same time. Each of the land parcels were assessed against the assessment criteria, however not all of the criteria are relevant to all parcels. This commonly reflects their location at the outer edge of the Green Belt, for example where the contribution to separation of towns does not apply or where they do not lie adjacent to a large built up area i.e. under purpose 1.

Overall Findings

- A total of 80 parcels of Green Belt land were defined in the Study area, including five broad areas. A series of maps present the overall results of the assessment for the broad areas and smaller parcels for each of the assessed Green Belt purposes (i.e. Purposes 1a, 1b, 2, 3 and 4) see
 Figures 4.1.1-4.5.5 in this chapter. A summary of the parcel ratings is also provided in Table 4.1.
- 4.4 **Appendix 4.2** contains all the assessment sheets for the broad areas and parcels for each authority area. The assessment sheets contain the detailed judgements behind the ratings against each Green Belt purpose. It is essential that the detailed commentaries on the parcels (as set out in Appendix4.1) are read alongside Figures 4.1.1-4.5.5 and the summary table in this chapter.

Parcel ref	Purpose 1a	Purpose 1b	Purpose 2	Purpose 3	Purpose 4
01	Not Applicable	Not Applicable	Strong	Moderate	No Contribution
02	Not Applicable	Not Applicable	Strong	Weak	No Contribution
03	Not Applicable	Not Applicable	No Contribution	Weak	No Contribution
04	Not Applicable	Not Applicable	No Contribution	Moderate	No Contribution
05	Not Applicable	Not Applicable	Moderate	Strong	No Contribution
06	Not Applicable	Not Applicable	Moderate	Weak	No Contribution
07	Not Applicable	Not Applicable	Strong	Moderate	No Contribution
08	Not Applicable	Not Applicable	Strong	Moderate	No Contribution

Table 4.1: Assessment ratings for parcels within the Green Belt in Rossendale

Parcel ref	Purpose 1a	Purpose 1b	Purpose 2	Purpose 3	Purpose 4
09	Not Applicable	Not Applicable	Strong	Moderate	No Contribution
10	Not Applicable	Not Applicable	Strong	Weak	No Contribution
11	Not Applicable	Not Applicable	Strong	Moderate	Moderate
12	Not Applicable	Not Applicable	Strong	Weak	Weak
13	Not Applicable	Not Applicable	Strong	Moderate	Moderate
14	Not Applicable	Not Applicable	Strong	Weak	No Contribution
15	Not Applicable	Not Applicable	Strong	Moderate	Weak
16	Not Applicable	Not Applicable	Strong	Moderate	No Contribution
17	Not Applicable	Not Applicable	Moderate	Weak	Weak
18	Not Applicable	Not Applicable	Strong	Moderate	Weak
19	Not Applicable	Not Applicable	Strong	Moderate	No Contribution
20	Not Applicable	Not Applicable	Strong	Weak	No Contribution
21	Not Applicable	Not Applicable	Weak	Weak	No Contribution
22	Not Applicable	Not Applicable	Moderate	Weak	No Contribution
23	Not Applicable	Not Applicable	Strong	Moderate	No Contribution
24	Not Applicable	Not Applicable	Strong	Moderate	No Contribution
25	Strong	Strong	Strong	Strong	No Contribution
26	Not Applicable	Not Applicable	Moderate	Moderate	No Contribution
27	Not Applicable	Not Applicable	Moderate	Moderate	No Contribution
28	Not Applicable	Not Applicable	Moderate	Weak	No Contribution
29	Not Applicable	Not Applicable	Moderate	Weak	No Contribution
30	Not Applicable	Not Applicable	Weak	Moderate	No Contribution
31	Not Applicable	Not Applicable	Weak	Moderate	No Contribution
32	Not Applicable	Not Applicable	Moderate	Weak	No Contribution
33	Not Applicable	Not Applicable	Weak	Weak	No Contribution
34	Moderate	Moderate	Weak	Moderate	No Contribution
35	Not Applicable	Not Applicable	Weak	Moderate	No Contribution
36	Not Applicable	Not Applicable	Moderate	Strong	No Contribution
37	Strong	Strong	Weak	Moderate	No Contribution
38	Moderate	Strong	Weak	Moderate	No Contribution
39	Moderate	Moderate	Weak	Moderate	No Contribution
40	Not Applicable	Not Applicable	Moderate	Strong	Moderate
41	Strong	Strong	Weak	Moderate	No Contribution
42	Not Applicable	Not Applicable	Moderate	Strong	Weak
43	Moderate	Moderate	Weak	Moderate	No Contribution
44	Moderate	Moderate	Weak	Weak	No Contribution
45	Not Applicable	Not Applicable	Moderate	Strong	Weak
46	Moderate	Moderate	Strong	Moderate	No Contribution
47	Strong	Strong	Weak	Moderate	Weak
48	Strong	Strong	No Contribution	Moderate	Weak
49	Moderate	Moderate	Strong	Weak	No Contribution
50	Moderate	Moderate	Strong	Weak	No Contribution
51	Strong	Strong	Weak	Strong	Moderate

Parcel ref	Purpose 1a	Purpose 1b	Purpose 2	Purpose 3	Purpose 4
52	Not Applicable	Not Applicable	No Contribution	Strong	Strong
53	Not Applicable	Not Applicable	Strong	Moderate	No Contribution
54	Not Applicable	Not Applicable	Strong	Moderate	No Contribution
55	Not Applicable	Not Applicable	Strong	Strong	Weak
56	Not Applicable	Not Applicable	Weak	Strong	Weak
57	Not Applicable	Not Applicable	No Contribution	Moderate	Weak
58	Not Applicable	Not Applicable	Strong	Moderate	No Contribution
59	Not Applicable	Not Applicable	Strong	Moderate	No Contribution
60	Not Applicable	Not Applicable	Weak	Weak	No Contribution
61	Not Applicable	Not Applicable	Strong	Strong	Weak
62	Not Applicable	Not Applicable	Weak	Moderate	No Contribution
63	Not Applicable	Not Applicable	No Contribution	Moderate	No Contribution
64	Not Applicable	Not Applicable	No Contribution	Moderate	No Contribution
65	Not Applicable	Not Applicable	Weak	Moderate	No Contribution
66	Not Applicable	Not Applicable	Strong	Strong	Strong
67	Strong	Strong	Strong	Moderate	No Contribution
68	Strong	Strong	Weak	Moderate	No Contribution
69	Moderate	Moderate	No Contribution	Weak	Weak
70	Strong	Strong	No Contribution	Strong	No Contribution
71	Not Applicable	Not Applicable	No Contribution	Strong	Moderate
72	Strong	Strong	No Contribution	Strong	Moderate
73	Strong	Strong	No Contribution	Strong	Strong
74	Strong	Strong	No Contribution	Strong	Moderate
75	Strong	Strong	No Contribution	Strong	Strong
76	Moderate	Strong	Strong	Weak	No Contribution
77	Strong	Strong	No Contribution	Moderate	Weak
78	Strong	Strong	Strong	Strong	Weak
79	Strong	Strong	Strong	Weak	No Contribution
80	Strong	Strong	Strong	Strong	No Contribution

Analysis of Findings

- 4.5 A key aim of the study was to identify areas that would be least harmful in Green Belt terms, were they to be released for development. As noted in **Chapter 2**, the NPPF requires changes to the Green Belt to be made through the Local Plan process. This should include:
 - i. demonstration of exceptional circumstances, such as unmet housing or employment land needs, that cannot be met elsewhere; and
 - ii. consideration of the need to promote sustainable patterns of development, considering a range of local, regional and national issues such as economic growth, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience, as well as an assessment against Green Belt purposes.
- 4.6 This study only considers the relative performance of the Green Belt; it does not consider the exceptional circumstances required to demonstrate the need for Green Belt

release, or the range of other constraints that may inhibit sustainable development e.g. ecological, archaeological, infrastructure, social and economic constraints.

- 4.7 As noted earlier, the NPPF does not require all the purposes of Green Belt to be met simultaneously and a strong rating against any Green Belt purpose could be sufficient, on its own, to indicate an important contribution. That said, there is a direct relationship between the contribution of a parcel to Green Belt purposes and the extent of harm to the Green Belt that would be caused by its release. In other words, if a parcel achieves a stronger rating against a particular purpose, this implies greater harm to the Green Belt should the land be released.
- 4.1 The framework shown in **Table 4.2** was used to aid the analysis of the degree of harm to the Green Belt if land within that parcel were to be released through the Local Plan, so as to potentially accommodate new development. **Figure 4.6** provides a summary of the overall degree of harm for all the Green Belt Parcels using the framework outlined in **Table 4.2**. Please note that **Figure 4.6** just provides an indication of the potential degree of harm based on the parcel ratings. A more detailed analysis of the suitability of the parcel for release in Green Belt terms is provided in **Table 4.4** and this concludes in some instances that where there is a medium risk of potential harm, the parcel is not suitable for consideration for potential release (in Green Belt terms).

Table 4.2 Framework for assessing harm

Stage 2 assessment of parcels	Potential harm caused by release of parcel
Makes a STRONG contribution to one or more GB purposes.	High
Makes a MODERATE contribution to one or more GB purposes. No strong contribution to any purpose.	Medium
Makes a WEAK contribution to one or more GB purposes. No strong, or moderate contribution to any purpose.	Low
Makes NO contribution to any GB purposes. No strong, relatively strong, moderate, relatively weak or weak contribution to any purpose.	None

4.2 **Table 4.3** provides a summary of those parcels where the potential harm to the Green Belt caused by release of parcel is medium or less. In addition, where a high or medium degree of potential harm was identified, consideration was given to whether any sub-areas within the parcel could be identified that may have less harm to the Green Belt (if the sub-areas were released) and these parcels are also listed in the table below. Any parcels where there is the potential for a high degree of harm, and for which a sub-area was not identified, have not been considered further in the assessment.

Table 4.3: Degree of potential harm to the Green Belt

Parcel ref	Purpose 1a Rating	Purpose 1b Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Degree of Harm	Sub-area Identified
01	Not Applicable	Not Applicable	Strong	Moderate	No Contribution	High	Yes
03	Not Applicable	Not Applicable	No Contribution	Weak	No Contribution	Low	
04	Not Applicable	Not Applicable	No Contribution	Moderate	No Contribution	Medium	
06	Not Applicable	Not Applicable	Moderate	Weak	No Contribution	Medium	Yes
08	Not Applicable	Not Applicable	Strong	Moderate	No Contribution	High	Yes
17	Not Applicable	Not Applicable	Moderate	Weak	Weak	Medium	
21	Not Applicable	Not Applicable	Weak	Weak	No Contribution	Low	
22	Not Applicable	Not Applicable	Moderate	Weak	No Contribution	Medium	Yes
26	Not Applicable	Not Applicable	Moderate	Moderate	No Contribution	Medium	
27	Not Applicable	Not Applicable	Moderate	Moderate	No Contribution	Medium	
28	Not Applicable	Not Applicable	Moderate	Weak	No Contribution	Medium	

Parcel ref	Purpose 1a Rating	Purpose 1b Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Degree of Harm	Sub-area Identified
29	Not Applicable	Not Applicable	Moderate	Weak	No Contribution	Medium	
30	Not Applicable	Not Applicable	Weak	Moderate	No Contribution	Medium	Yes
31	Not Applicable	Not Applicable	Weak	Moderate	No Contribution	Medium	Yes
32	Not Applicable	Not Applicable	Moderate	Weak	No Contribution	Medium	
33	Not Applicable	Not Applicable	Weak	Weak	No Contribution	Low	
34	Moderate	Moderate	Weak	Moderate	No Contribution	Medium	
35	Not Applicable	Not Applicable	Weak	Moderate	No Contribution	Medium	
36	Not Applicable	Not Applicable	Moderate	Strong	No Contribution	High	
39	Moderate	Moderate	Weak	Moderate	No Contribution	Medium	
43	Moderate	Moderate	Weak	Moderate	No Contribution	Medium	
44	Moderate	Moderate	Weak	Weak	No Contribution	Medium	
57	Not Applicable	Not Applicable	No Contribution	Moderate	Weak	Medium	
60	Not Applicable	Not Applicable	Weak	Weak	No Contribution	Low	
62	Not Applicable	Not Applicable	Weak	Moderate	No Contribution	Medium	Yes
63	Not Applicable	Not Applicable	No Contribution	Moderate	No Contribution	Medium	
64	Not Applicable	Not Applicable	No Contribution	Moderate	No Contribution	Medium	
65	Not Applicable	Not Applicable	Weak	Moderate	No Contribution	Medium	
69	Moderate	Moderate	No Contribution	Weak	Weak	Medium	
74	Strong	Strong	No Contribution	Strong	Weak	High	Yes

- 4.3 Each of the parcels and sub-areas identified in the **Table 4.3** above were reviewed in detail and a commentary is provided in **Table 4.4** on:
 - How they generally perform against the Green Belt purposes. More detailed commentary for each purpose rating is provided in **Appendix 4.1**
 - The potential implications of removing the parcel or sub-parcel from the Green Belt on neighbouring parcels and the integrity of the wider Green Belt.
 - Any boundary issues associated with the removal of the land from the Green Belt.
- 4.4 The table concludes with recommendations on whether the parcel/sub-area should be retained as Green Belt or could potentially be considered for release (in Green Belt terms only). Figures
 4.7.1 to 4.7.5.show the location of the parcels that have been identified as potentially suitable for release (in GB terms).
- 4.5 As outlined above, the table does not include those parcels that perform strongly against at least one of the Green Belt purposes, and for which a sub-area has not been identified.
| Parcel
ref | Degree
of
Harm | Parcel (and sub-parcel where relevant) map | Commentary on Green Belt Performance | Potential for
release
(GB terms only) |
|---------------|--|--|---|---|
| 01 | High | Green Beit Parcel | This parcel of Green Belt land does not lie adjacent to the defined 'large built up
area' as considered under Purpose 1, therefore it is rated as not applicable against
purpose 1a and 1b. The parcel performs strongly against purpose 2, moderately
against purpose 3 and makes no contribution to purpose 4. The key function of
this parcel in Green Belt terms is to prevent neighbouring settlements of Rising
Bridge and Higher Baxendem (part of Accrington) merging into one another.
Release of this parcel from the Green Belt would compromise the physical, visual
separation between the two settlements by significantly reducing the existing area
of open Green Belt between them. Its release would also negatively affect the
performance of the Green Belt to the north-west (located within Hyndburn district)
in providing physical and perceptual separation between the two neighbouring
towns. A secondary issue would be the effect that releasing the parcel would have
on the large area of open countryside that adjoins to the north. This area is not
designated as Green Belt therefore the release of the parcel could leave it
vulnerable to urban encroachment. | |
| | A small sub-area within this parcel has been identified along the settlement ed
to the north of Back Lane. The sub-area performs less-well under purpose 2 as
does not lie directly between Rising Bridge and Higher Baxenden, therefore its
release is unlikely to lead to perceptions of the two settlements merging. The sa
area also performs less-well under purpose 3 as it is a relatively small pastoral
field that is strongly influenced by the adjoining settlement edge and lacks a
strong and intact rural character. Furthermore the sub-area is contained by
woodland and the site of a disused quarry and is relatively disconnected to the
remaining land within the parcel. It is considered that releasing the sub-area is
unlikely to have a detrimental effect on the integrity of the wider Green Belt,
however it should be noted that its realise may lead to uneven settlement edge | | | |

Table 4.4: Assessment of parcels/ sub-parcels identified for review

Parcel ref		Parcel (and sub-parcel where relevant) map	Commentary on Green Belt Performance	Potential for release (GB terms only)
03	Low	Crem Bet Parce Sub-area with potential for release Crem Bet Crem	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it is rated as not applicable against purpose 1a and 1b. The parcel performs weakly against purpose 3 and makes no contribution to purpose 2 and purpose 4. Releasing this parcel from the Green Belt would have a very limited effect on the performance of neighbouring Green Belt parcels, and is considered unlikely to have a detrimental effect on the integrity of the wider Green Belt.	Yes
04	Medium	Crown cognyptie and database regist 2010 Distances Survey(10021284	This parcel of Green Belt land does not lie adjacent to a defined 'large built up area', therefore it is rated as not applicable against purpose 1a and 1b. The parcel rates moderately against purpose 3 as there is a sense encroachment caused by the bounding A56 dual-carriageway and settlement located within it. It makes no contribution to purpose 2 or purpose 4. If released from the Green Belt a key issue would be the detrimental effect to the large area of open countryside that adjoins the parcel to the east. This area of countryside is not designated as Green Belt, therefore releasing the parcel would leave it vulnerable to encroachment. It is therefore concluded that releasing the parcel will have a detrimental effect on integrity of the wider Green Belt by reducing its ability to safeguard the countryside from encroachment.	No

Parcel ref	Degree of Harm	Parcel (and sub-parcel where relevant) map	Commentary on Green Belt Performance	Potential for release (GB terms only)
06	Medium	Come compute and statulate rights 2016. Orderander Surver, 1002/2144	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it rates as not applicable against purpose 1a and 1b. The parcel performs moderately against purpose 2, weakly against purpose 3 and makes no contribution to purpose 4. It is considered that, due its visual prominence, particularly on the higher ground, releasing the entire parcel may have a detrimental effect on neighbouring parcels by creating a sense of encroachment and reducing the sense of openness. A sub-area has been identified along the western boundary, this is a lower-lying area that is less visible from neighbouring Green Belt areas. Releasing this area is less likely to lead to a sense of encroachment on neighbouring areas of Green Belt and will not have a significant detrimental effect on the integrity of the wider Green Belt.	Yes (sub-area)
08	High	Crom cognypt and database rytes 2016 0 mdmone Surve s00022244	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it is rated as not applicable against purpose 1a and 1b. The parcel performs strongly against purpose 2, moderately against purpose 3 and makes no contribution to purpose 4. The key function of the southern area of this parcel in Green Belt terms is to prevent neighbouring settlements of Rising Bridge and Haslingden merging into one another. Releasing the entire parcel from the Green Belt would compromise the physical and perceptual separation between the two settlements by significantly reducing the existing area of open Green Belt between them. Its release would also negatively affect the performance of neighbouring parcels P09 and P10 under purpose 2. Additionally releasing the parcel would have a detrimental on the large area of open countryside that adjoins to the east. This area is not designated as Green Belt therefore releasing the parcel could leave it vulnerable to urban encroachment. A smaller sub-area within this parcel has been identified that encompasses a car park and an area of hardstanding associated with Winfields Mill Shop. The sub- area performs less-well under purpose 2 as it does not lie directly between the settlements of Rising Bridge and Higher Baxenden; therefore its release is unlikely	Yes (sub-area)

Parcel ref		Parcel (and sub-parcel where relevant) map	Commentary on Green Belt Performance	Potential for release (GB terms only)
			to lead to perception of the two settlements merging. The sub-area is almost entirely developed and lacks rural character, consequently its release would not be considered an encroachment of the countryside. Releasing the sub-area is unlikely to have a detrimental effect on the integrity of the wider Green Belt.	
17	Medium	Toren let Parce Green let De concept and database rights 2016 Dimanos Survey(002316).	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it is rated as not applicable against purpose 1a and 1b. The parcel performs moderately against purpose 2, and weakly against purpose 3 and purpose 4. If released from the Green Belt a key issue would be the possible reduction of the physical gap between the settlements of Haslingden and Rawtenstall. However, due to the parcels relatively small size and position, it is not considered its release would have a substantial negative affect of the performance of the neighbouring parcels or integrity of wider Green Belt in providing separation between the two towns.	Yes

Parcel ref	Degree of Harm	Parcel (and sub-parcel where relevant) map	Commentary on Green Belt Performance	Potential for release (GB terms only)
21	Low	Comercepted and database right 2010 Ordinance Survey.100021344	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it is rated as not applicable against purpose 1a and 1b. The parcel performs weakly against purpose 2 and purpose 3 and makes no contribution to purpose 4. The parcel does not perform strongly against any of the Green Belt purposes; and its removal from the Green Belt is not likely to have a substantial negative effect on neighbouring parcels or the integrity of the wider Green Belt.	Yes
22	Medium	C form computed database rigits 2016 Octowork Survey10023244	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it rates as not applicable against purpose 1a and 1b. The parcel performs moderately against purpose 2, weakly against purpose 3 and makes no contribution to purpose 4. Removal of the entire parcel from the Green Belt would compromise the physical separation between Haslingden/Helmshore and Rawtenstall as well as Haslingden/Helmshore and Edenfield. Its release is also likely to increase the importance of the neighbouring P23 parcel under purpose 2. The west of the parcel contains the built development of Haslingden High School and Broadway Primary School, whereas the east remains open. Further development within the parcel, particularly the area of woodland along the eastern boundary, is likely to have a substantial adverse effect on the openness of the neighbouring P23 parcel. A subarea has been identified within the far north-eastern extent of the parcel. This small sub-area consist of amenity grassland and a children's play area, it is enclosed by woodland to the south, settlement to the north and west and school buildings to the east. The sub-area performs less-well under purpose 2 and purpose 3, its release from the Green Belt is considered unlikely to have a substantial negative effect on the performance of neighbouring parcels or the integrity of the wider Green Belt.	Yes (sub-area)

Parcel ref	Degree of Harm	Parcel (and sub-parcel where relevant) map	Commentary on Green Belt Performance	Potential for release (GB terms only)
26	Medium	Green Belt Parcel Green Belt Cover copyright and database rights 2018 Ordenance Supervill0021294	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it rates as not applicable against purpose 1a and 1b. The parcel performs moderately against purpose 2 and purpose 3, and makes no contribution to purpose 4. Removal of this parcel from the Green Belt is likely to compromise the physical and perceptual separation between Haslingden/Helmshore and Rawtenstall. However, the parcel does not lie within the critical gap directly between the towns and does not adjoin the settlement edge. Therefore any new development within the parcel will not be perceived as the growth of one town leading it to merge into another. The release of this parcel will increase the importance of the neighbouring parcel P24, and to a lesser degree parcels P23 and P19, under purpose 2. If P26 was to be released, retaining the openness of P24 would be critical in preventing the perception of Haslingden/Helmshore and Rawtenstall merging. Additionally P26 has a strong visual connection with P24 therefore its release is likely to weaken the rural character of this neighbouring parcel and adversely affect its performance under purpose 3. However, this parcel is already affected by the visual influence of the A56, consequently the effect of releasing P26 is likely to be relatively limited. Parcel P26 is contained by the strong boundaries of the A56 dual-carriageway to the north, a railway line to the east, and the River Irwell to the west. There are no strong boundary features to the south. Consequently the releasing this parcel would provide an opportunity to create a stronger boundary to the Green Belt. It is considered that releasing this parcel is unlikely to have a substantial detrimental effect on the integrity of the wider Green Belt.	Yes

Parcel ref	Degree of Harm	Parcel (and sub-parcel where relevant) map	Commentary on Green Belt Performance	Potential for release (GB terms only)
27	Medium	Concernant and database rights 2016 Offence Survey/2003184	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it rates as not applicable against purpose 1a and 1b. The parcel performs moderately against purpose 2 and purpose 3, and makes no contribution to purpose 4. This is relatively large parcel and occupies a good proportion of the settlement gap between Helmshore and Rawtenstall, and Helmshore and Edenfield, and Helmshore and Stubbins. The parcel does not from part of a critical gap between these settlements; however its removal would substantially increase the importance of surrounding parcels P23, P24, P36 and P45 under purpose 2. The release of this parcel would also lead to the perception of Helmshore merging with the small settlement of Irwell Vale, although Irwell Vale is not considered a town under purpose 2 (this has not therefore had a bearing on the conclusions reached). Additionally, releasing the parcel is likely to adversely affect the openness of the neighbouring P23, P36 and P30 parcels and their function as Green Belt under purpose 3. It is considered that realising this parcel from the Green Belt would have a substantial adverse effect on the integrity of the wider Green Belt.	No
28	Medium	Crons cognigate and database rights 2018 Offenere Survey 10023234	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it rates as not applicable against purpose 1a and 1b. The parcel performs moderately against purpose 2, weakly against purpose 3, and makes no contribution to purpose 4. Removal of this parcel from the Green Belt is likely to compromise the physical and perceptual separation between Haslingden/Helmshore and Rawtenstall, and Helmshore and Edenfield. The parcel does not from part of a critical gap between the towns and does not adjoin the settlement edge. However due to its close proximity any new development within the parcel may be perceived as the growth of Edenfield, reducing the gap between Edenfield and the small settlement of Ewood Bridge, however Ewood Bridge is not considered a town assessed under purpose 2. The release of this parcel would increase the importance of the neighbouring P26 and nearby P23 and P24 parcels under purpose 3. It is considered that releasing this parcel is likely to have a substantial detrimental effect on the integrity of the wider Green Belt.	No

Parcel ref	Degree of Harm	Parcel (and sub-parcel where relevant) map	Commentary on Green Belt Performance	Potential for release (GB terms only)
29	Medium	Cent competial distaise rpts 2018 Optimes Survey(00212)4	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it rates as not applicable against purpose 1a and 1b. The parcel performs moderately against purpose 2, weakly against purpose 3, and makes no contribution to purpose 4. Removal of this parcel from the Green Belt may compromise the physical and perceptual separation between Haslingden/Helmshore and Rawtenstall, and Helmshore and Edenfield. However, the parcel does not from part of a critical gap between the towns and does not adjoin the settlement edge. Therefore any new development within the parcel will not be perceived as the growth of one town causing it to merge into the other. It is a small parcel is occupied by a football club and a derelict building; it does not perform strongly against any of the Green Belt purposes. The removal of the parcel from the Green Belt is not considered to have a substantial negative effect on neighbouring parcels or the integrity of the wider Green Belt.	Yes
30	Medium	Green Belt Parcel	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it rates as not applicable against purpose 1a and 1b. The parcel performs weakly against purpose 2, moderately against purpose 3, and makes no contribution to purpose 4. The north of this parcel contains built development and is affected by urban encroachment whereas the south is relatively free of development and displays a rural character. Removing the entirety of this parcel from the Green Belt would weaken the rural character of the neighbouring P42 parcel and would have a negative effect on its function as Green Belt under purpose 3. A sub-area has been identified in the north-east of this parcel. The sub-area performs less-well under purpose 3 as it is affected by urban encroachment; its release from the Green Belt is considered unlikely to have a substantial negative effect on the performance of neighbouring parcels or the integrity of the wider Green Belt. However it should be noted there are no strong boundaries containing this sub-area from the remaining Green Belt land within the parcel.	Yes (sub-area)

Parcel ref	Degree of Harm	Parcel (and sub-parcel where relevant) map	Commentary on Green Belt Performance	Potential for release (GB terms only)
31	Medium	Come agregate and statesare rights 2016 Optigence Surveys (2002)284	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it rates as not applicable against purpose 1a and 1b. The parcel performs weakly against purpose 2, moderately against purpose 3, and makes no contribution to purpose 4. The north and west this parcel contains rows of housing, equestrian facilities and a densely packed block of allotments; whereas the south and east are relatively free of development and display characteristics of the open countryside. Removal of the entirety of this parcel from the Green Belt would weaken rural character of the neighbouring P42 parcel and its function as Green Belt under purpose 3. However, releasing the identified sub-area within the west of the parcel is unlikely to have a substantial negative effect on neighbouring parcels or the integrity of the wider Green Belt. It should be noted there are no strong boundaries containing this sub-area from the remaining Green Belt land within the parcel.	Yes (sub-area)
32	Medium	Characterization and a statement rights 2018 Ordensee Sover; (1002124)	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it rates as not applicable against purpose 1a and 1b. The parcel performs moderately against purpose 2, weakly against purpose 3, and makes no contribution to purpose 4. Removal of this parcel from the Green Belt may compromise the physical and perceptual separation between Haslingden/Helmshore and Rawtenstall, and Helmshore and Edenfield. However, the parcel does not from part of a critical gap between the settlements and does not adjoin the edges of these settlements. Therefore any new development within the parcel will not be perceived as the growth of one town causing it to merge into another. Furthermore the parcel is fully developed, containing a large water treatment works, consequently any new development is unlikely have a substantial negative effect on the performance of neighbouring parcels under purpose 3. This parcel does not perform strongly against any of the Green Belt purposes, its removal from the Green Belt is not considered to have a substantial negative effect the integrity of the wider Green Belt.	Yes

Parcel ref	Degree of Harm	Parcel (and sub-parcel where relevant) map	Commentary on Green Belt Performance	Potential for release (GB terms only)
33	Low		This small parcel of land does not lie adjacent to the defined 'large built up area', therefore it rates as not applicable against purpose 1a and 1b. The parcel performs weakly against purpose 2 and purpose 3, and makes no contribution to purpose 4. This parcel does not perform strongly against any of the Green Belt purposes. Although not considered a strong defensible barrier, the line of trees along the eastern boundary of the parcel plays important role in separating it from the larger area of open Green Belt to the east (P27). It is considered that the removal of parcel P33 from the Green Belt is not likely to have a substantial negative effect on neighbouring parcels or the integrity of the wider Green Belt.	Yes
34	Medium		This parcel is adjacent to Edenfield which forms part of the large built up area of Ramsbottom/Bury. The parcel performs moderately against purpose 1a and 1b, weakly against purpose 2, moderately against purpose 3 and makes no contribution to purpose 4. Release of this parcel from the Green Belt would push development further north which would not relate well or form a coherent extension to the current settlement edge. Development within the north of the parcel would introduce an element of sprawl and would negatively impact on the openness of the neighbouring parcel of P25. Removal of this parcel from the Green Belt would make the neighbouring P25 vulnerable to further ribbon development along Bury Road as developers may wish to 'fill in' the gap between the northern tip of the parcel and the road. Releasing this parcel is likely to have a negative effect on the performance of neighbouring parcels and the integrity of the wider Green Belt.	No

Parcel ref		Parcel (and sub-parcel where relevant) map	Commentary on Green Belt Performance	Potential for release (GB terms only)
35	Medium	C Crean conjugat and statuteur rights 2016 Optimumer Surveys100012044	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it rates as not applicable against purpose 1a and 1b. The parcel performs weakly against purpose 2, moderately against purpose 3, and makes no contribution to purpose 4. This parcel contains little urban development, but has a weakened rural character as it is surrounded by built development and a rail line. This parcel does not perform strongly against any of the Green Belt purposes, its removal from the Green Belt is not considered to have a substantial negative effect neighbouring parcels or the integrity of the wider Green Belt.	Yes
36	High	C tran compate and constance regits 2016 Dreament Scriver (2022)24	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it rates as not applicable against purpose 1a and 1b. The parcel performs moderately against purpose 2, strongly against purpose 3, and makes no contribution to purpose 4. The parcel contains little urban development and has a strong rural character. Releasing the entire parcel would have a negative impact on the neighbouring P42 and P45 by weakening their rural character and functions as Green Belt under purpose 3. Its release is considered to substantially compromise the integrity of the wider Green Belt.	No

Parcel ref	Degree of Harm	Parcel (and sub-parcel where relevant) map	Commentary on Green Belt Performance	Potential for release (GB terms only)
39	Medium	Connectional and database mptir 2015 Offederer Survey (0021294	This parcel is adjacent to Edenfield which forms part of the large built up area of Ramsbottom/Bury. The parcel performs moderately against purpose 1a and 1b, weakly against purpose 2, moderately against purpose 3 and makes no contribution to purpose 4. Although this parcel does not perform strongly against purpose 1, its release would not relate well to the existing settlement form and would introduce an element of sprawl to the north-western edge of Edenfield and along the B6527 (Blackburn Road). However, it is considered that the strategic release of the neighbouring parcels P44 and P43 to the south, before parcel P39 may not be perceived as sprawl as the development would be contained by a strong boundary (the A56), which would limit the potential for future sprawl. The planned release of parcel P44, P43 and P39, in that order, could be perceived as the main block of settlement within Edenfield growing incrementally north and filling the gap between the A56 and the linear settlement along Market Street. This could create a stronger Green belt boundary and settlement edge.	Yes
43	Medium	Crem corypit and stateser right 2016 Ordnance Survey (0002394	This parcel is adjacent to Edenfield which forms part of the large built up area of Ramsbottom/Bury. The parcel performs moderately against purpose 1a and 1b, weakly against purpose 2, moderately against purpose 3 and makes no contribution to purpose 4. Although this parcel does not perform strongly against purpose 1, its release would not relate well to the existing settlement form and would introduce an element of sprawl to the north-western edge of Edenfield. However, it is considered that the strategic release of the neighbouring parcels P44 to the south, before parcel P43 may not be perceived as sprawl as the development would be contained by a strong boundary (the A56), which would limit the potential for future sprawl. The planned release of parcel P44 and then P43 would be perceived as the main block of settlement within Edenfield growing incrementally north and filling the gap between the A56 and the linear settlement along Market Street. This could create a stronger Green belt boundary and settlement edge.	Yes

Parcel ref	Degree of Harm	Parcel (and sub-parcel where relevant) map	Commentary on Green Belt Performance	Potential for release (GB terms only)
44	Medium	C com cognyth and database right 2016 Diseases Survey L0023294	This parcel is adjacent to Edenfield which forms part of the large built up area of Ramsbottom/Bury. The parcel performs moderately against purpose 1a and 1b, weakly against purpose 2 and purpose 3 and makes no contribution to purpose 4. The A56 dual-carriageway defines the western boundary forms a strong barrier feature to prevent to prevent the possible outward sprawl of development. The northern boundary of the parcel comprises an access road and dry stone wall and does not from a strong defensible barrier to prevent the outward sprawl of development. The parcel contains little urban development, although the presence of the A56 and adjacent urban edge has weakened it the rural character. Its release is unlikely to have substantial negative effect on the function of neighbouring parcels under purpose 3. Releasing this parcel is unlikely to have a substantial negative effect on the integrity of the wider Green Belt.	Yes
57	Medium	Chancebrand database rights 2010 Drighance Survey (2002)294	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it rates as not applicable against purpose 1a and 1b. The parcel makes no contribution to purpose 2, performs moderately against purpose 3, and weakly against purpose 4. The parcel contains areas of open pastoral land; it displays characteristics of the open countryside but has a weak rural character. Releasing the parcel would have a negative impact on the neighbouring P61 by weakening its rural character and functions as Green Belt under purpose 3. Releasing this parcel is likely to have a negative effect on the integrity of the wider Green Belt.	No

Parcel ref	Degree of Harm	Parcel (and sub-parcel where relevant) map	Commentary on Green Belt Performance	Potential for release (GB terms only)
60	Low	Crem beit Parce Green beit Green beit G	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it rates as not applicable against purpose 1a and 1b. The parcel makes no contribution to purpose 2, performs weak against purpose 3 (as it contains hard standing and a steep bank of disturbed ground), and weak against purpose 4. The parcel contains areas of open pastoral land and displays some characteristics of the open countryside, but has a weakened rural character. Releasing the parcel would have a negative impact on the neighbouring P59, P63 and P66 by weakening their rural character and functions as Green Belt under purpose 3. Releasing this parcel is also likely to have a negative effect on the integrity of the wider Green Belt.	No
62	Medium	C com cogruppe and database rayses 2016 Ordinarie Survey (2022)24	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it rates as not applicable against purpose 1a and 1b. The parcel performs weakly against purpose 2, moderately against purpose 3 and makes no contribution to purpose 4. Releasing the entire parcel would have a negative impact on the neighbouring P61 by weakening its rural character and functions as Green Belt under purpose 3. A small sub-area within this parcel has been identified on the settlement edge to the south, adjacent to properties along Old Lane. Releasing this sub-area is unlikely to have a substantial negative effect on neighbouring parcels or the integrity of the wider Green Belt.	Yes (sub-area)

Parcel ref	Degree of Harm	Parcel (and sub-parcel where relevant) map	Commentary on Green Belt Performance	Potential for release (GB terms only)
63	Medium	Crem computed database rights 2016. Ordnance Survey. (0002324	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it rates as not applicable against purpose 1a and 1b. The parcel makes no contribution to purpose 2, performs moderately against purpose 3, and makes no contribution to purpose 4. Releasing this parcel from the Green Belt would push development further east which would not relate well to the current linear settlement from. Development within the parcel would not from a coherent extension to the current settlement edge and would introduce an element of sprawl which would negatively impact on the neighbouring parcels P64 and P66. The parcel contains areas of open pastoral land; it displays characteristics of the open countryside but has a somewhat weakened rural character. Releasing the parcel would have a negative impact on the neighbouring P64 and P66 by weakening their rural character and functions as Green Belt under purpose 3. Releasing this parcel is likely to have a negative effect on the integrity of the wider Green Belt.	No
64	Medium	C rom complet and statutes regites 2018.0 romones Survey (1002)254.	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it rates as not applicable against purpose 1a and 1b. The parcel makes no contribution to purpose 2, performs moderately against purpose 3, and makes no contribution to purpose 4. The parcel contains areas of open pastoral land and displays characteristics of the open countryside, but has a somewhat weakened rural character, however its releasing would have a negative impact neighbouring parcels P63 and P66 by weakening their rural character and functions as Green Belt under purpose 3. It is considered that releasing the parcel is likely to have a substantial negative impact the integrity of the wider Green Belt.	No

Parcel ref		Parcel (and sub-parcel where relevant) map	Commentary on Green Belt Performance	Potential for release (GB terms only)
65	Medium	Creen Bet Parce	This parcel of Green Belt land does not lie adjacent to the defined 'large built up area', therefore it rates as not applicable against purpose 1a and 1b. The parcel performs weakly against purpose 2, moderately against purpose 3 and makes no contribution to purpose 4. This parcel contains little urban development, but it is a narrow parcel comprising steep land with areas of open green space and semi-mature woodland; it displays some of the characteristic of the open countryside but lacks an intact and strong rural character. It is considered that releasing the parcel is unlikely to have a substantial negative impact on the neighbouring parcels or the integrity of the wider Green Belt.	Yes
69	Medium	C com ogenjet en daalaar rijet 2016 Detanos Surrey (2002)24	This parcel is adjacent to Whitworth which forms part of the large built up area of Rochdale. The parcel performs moderately against purpose 1a and 1b, makes no contribution to purpose 2, and performs weakly against purpose 3 and purpose 4. This parcel contains the dam wall of the Cowm Reservoir and other associated infrastructure, it does not perform strongly against any of the Green Belt purposes, its removal from the Green Belt is not considered to have a substantial negative effect neighbouring parcels or the integrity of the wider Green Belt.	Yes

Parcel ref	Degree of Harm	Parcel (and sub-parcel where relevant) map			
74	High		This parcel is adjacent to Whitworth which forms part of the large built up area of Rochdale. The parcel performs strongly against purpose 1a and 1b, makes no contribution to purpose 2, performs strongly against purpose 3 moderately against purpose 4. Releasing the entire parcel from the Green Belt would push development further west which would not relate well to the current linear settlement from. Development within the parcel would not form a coherent extension to the current settlement edge and would introduce an element of sprawl. The parcel contains areas of open pastoral land and displays strong characteristics of the open countryside and has a relatively intact rural character. Releasing the entire parcel would have a negative impact on the neighbouring P71 parcel by weakening its rural character and functions as Green Belt under purpose 3. Releasing the entire of parcel and a subsequent loss of openness would also negatively affect the setting of the historic settlement of Whitworth Square. A sub- area within the parcel has been identified along the settlement edge of Hallfold in the north. Releasing this sub-area is unlikely to have a substantial negative effect on neighbouring parcels the historic settlment or the integrity of the wider Green Belt.	Yes (sun-area)	

Mitigation

- 4.6 For those parcels identified as being potentially suitable for release in Green Belt terms, a summary of the potential mitigation measures that could be applied to minimise effects on the wider Green Belt designation (if the sites were to be released) is provided in **Table 4.5** below. The suggested mitigation measures take account of landscape considerations as these strongly influence the effect of development on the openness of the Green Belt. Mitigation measures include advice on scale, density, style and type of development; screening; retention of existing tree cover; limiting development within certain areas of the parcel (sub-areas); and defining new boundaries.
- 4.7 Generic mitigation principles:
 - Any development site should seek to enhance the existing or create a new boundary along the neighbouring Green Belt edge.
 - Seek to reduce the scale and density of development along the edge of the Green Belt in order to minimise the impact on the openness of neighbouring Green Belt.
 - For those parcels identified as having a sub-area, development should only be allowed within that sub-area (apart from appropriate Green Belt development).
 - Development adjacent to a historic town should correspond well with the characteristics of the historic town and its immediate setting

Table 4.5: Potential mitigation measures

Parcel ref	Potential Mitigation			
01	 Existing blocks of woodland that adjoin the sub-area to the north-west and north-east should be retained in order to screen off any new development from the surrounding Green Belt land and wider open countryside. Development within the sub-area should be restricted to appropriate and attractive small scale housing. New properties should be a maximum of two storeys to minimise the impact on the openness on the adjacent Green Belt land and views from the wider landscape. Existing dry stone wall located along the access track which defines the northern and eastern boundary of the sub-area should be retained and enhanced. 			
03	 Existing trees and hedgerow bounding the site to the north should be protected and retained in order to screen any new development from Northfield Road. Tree line along the eastern boundary should be protected and retained to preserve the visual screen of the A56. 			
06	 Development within the sub-area should be restricted to appropriate small scale attractive housing or small scale commercial development. Existing banks of woodland along the eastern boundary of the parcel should be retained in order to preserve the visual screen of the A56 and help screen any new development from Green Belt land to the east. Should avoid developing on the small hill to the south of the church due to its visual prominence from the surrounding Green Belt Land and settlement. The existing dry stone walls should be retained and enhanced as boundaries. Any new development should use dry stone walls along the frontage with Rising Bridge Road. 			
08	 Development within the sub-area should be restricted to appropriate small scale attractive housing or small scale commercial development. The existing line of woodland along the western boundary of the sub-area should be retained in order to screen any new development from Blackburn Road. The existing hedgerow and hedgerow trees along the northern boundary of the parcel should be retained and enhanced in order to soften the appearance of any development from Green Belt land to the north. A robust framework of planting along the eastern boundary of the sub-area should be developed to soften the appearance of any new development from the adjacent areas of 			

Parcel ref	Potential Mitigation	
	open countryside.	
17	 Developing the east of the site should be favoured. The existing tree line along the southern boundary of the parcel should be retained in order to preserve the visual screening of the A682. The woodland along the northern boundary should be retained in order to screen or soften the appearance of any development from neighbouring properties and the A681. Development within the parcel should be restricted to appropriate small scale and low density housing shames. New properties should be a maximum of two stories to minimise the impact on the setting of the nearby Conservation Area. 	
21	 Development within the sub-area should be restricted to appropriate and attractive small scale housing. The existing trees and hedgerow along Duckworth Lane should be retained and enhanced to screen any new development from Green Belt land to the south. 	
22	 Development within the sub-area should be restricted to appropriate and attractive small scale housing. The existing block of trees adjoining the southern boundary of the sub-area should be retained and enhanced. 	
26	• A robust framework of planting along the eastern and western boundaries of the parcel should be developed in order soften the appearance of any new development and reduce negative effect on the openness of the surrounding Green Belt.	
29	The line of trees and hedgerow along the B6527 should be retained and enhanced. Development within the parcel should be restricted to appropriate and attractive small scale housing and low-density housing schemes. New properties should be a maximum of two storeys to minimise the impact on the openness on the adjacent Green Belt land and views from the wider landscape.	
30	Development within the parcel sub-area should be restricted to appropriate and attractive small scale and low-density housing, preferably detached dwellings. New properties should be a maximum of two storeys to minimise the impact on the openness on the adjacent Green Belt.	
31	 Development within the parcel should be restricted to appropriate and attractive small scale and low-density housing. New properties should be a maximum of two storeys to minimise the impact on the openness on the adjacent Green Belt land and views from the wider landscape. 	
32	 Existing trees and hedgerows that bound the parcel should be retained and enhanced. Development within the parcel should be restricted to appropriate small scale housing or small scale industrial/commercial schemes 	
33	 The existing line of trees along the northern boundary of the parcel should be retained and enhanced to help screen any new development from neighbouring Green Belt land. Development within the parcel should be restricted to appropriate and attractive small scale housing. New properties should be a maximum of two storeys to minimise the impact on the openness on the adjacent Green Belt land and views from the wider landscape. 	
35	 The existing line of trees along the southern and eastern boundary of the parcel should be retained and enhanced to screen any new development for the surrounding Green Belt land. Development within the parcel should be restricted to appropriate and attractive small scale and low-density housing. New properties should be a maximum of two storeys to minimise the impact on the openness of the adjacent Green Belt land and views from the wider landscape. 	
39	 The strategic release of the neighbouring parcels P44 and P43 to the south should be undertaken before parcel 39 in order to prevent development being perceived as sprawl. Development within the parcel should be restricted to appropriate small scale and low-density housing. New properties should be a maximum of two storeys to minimise the negative impact on the openness of neighbouring Green Belt land 	

Parcel ref	Potential Mitigation	
	 Dry stone walls that mark the boundary between the parcel and Blackburn Road (B6529) should be retained and enhanced. 	
43	 The strategic release of the neighbouring parcel P44 to the south should be undertaken before parcel P43 in order to prevent development being perceived as sprawl. Development within the parcel should be restricted to appropriate small scale and low-density housing. New properties should be a maximum of two storeys to minimise the negative impact on the openness of neighbouring Green Belt land. 	
44	Development within the parcel should be restricted to appropriate and attractive small scale and low-density housing. New properties should be a maximum of two storeys to minimise the negative impact on the openness of the adjacent Green Belt land. The belt of mature woodland along the western boundary of the parcel should be retained and enhanced to preserve the visual screen of the A56 and to help screen any new development from Green Belt land to the west. The existing line of trees should be retained and a framework of new planting along the northern boundary should be developed to soften the appearance of any development from the adjacent Green Belt land to the north. A new dry stone wall should be built along the minor road which defines part of the northern boundary of the parcel.	
62	Development within the parcel should be restricted to appropriate and attractive small scale and low-density housing. New properties should be a maximum of two storeys to minimise the negative impact on the openness of adjacent Green Belt land. Should build a new dry stone boundary wall along the northern boundary of the sub- parcel and develop a framework of boundary planting in order to soften the appearance of any new development.	
65	 Development within the parcel should be restricted to appropriate and attractive small scale housing, preferable a small number of detached dwellings. New properties should be a maximum of two storeys to minimise the negative impact on the openness of the adjacent Green Belt land and views from the wider landscape. 	
69	 Development within the parcel should be restricted to appropriate and attractive small scale low-density housing. New properties should be a maximum of two storeys to minimise the negative impact on the openness of the adjacent Green Belt land. The mature woodland located on the southern boundary of the parcel should be retained. A framework of boundary planting should be developed in order to soften the appearance of any new development from the surrounding Green Belt land. 	
74	 Development within the sub-area should be restricted to appropriate and attractive small scale and low-density housing. New properties should be a maximum of two storeys to minimise the negative impact on the openness of the adjacent Green Belt land and views from the wider landscape. The dry stone walls that bound the sub-area should be rebuilt and enhanced. A framework of boundary planting should be developed in order soften the appearance of any new development and reduce the negative effect on the openness of the neighbouring Green Belt land. 	

Assessment of land not currently in the Green Belt

4.8 The Study brief required an assessment of whether any land not currently within the Green Belt fulfils Green Belt purposes and whether there is justification for including new areas within the Green Belt. Discussions with the Council identified two parcels of land which are not currently in the Green Belt but which were assessed against the criteria (parcels 81 and 82) on the edge of Whitworth.

- 4.9 It is important to note that the NPPF has a requirement that new Green Belt boundaries must have regard for the permanence of the designation by redefining boundaries which endure beyond the Local Plan period. In addition, new Green Belt should only be established in exceptional circumstances (para. 82), and subject to various criteria such as:
 - demonstrating why normal planning and development management policies would not be adequate;
 - setting out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
 - showing what the consequences of the proposal would be for sustainable development;
 - demonstrating the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
 - showing how the Green Belt would meet the other objectives of the Framework.
- 4.10 **Tables 4.6 and 4.7** provide a summary of the assessment findings for the non-Green Belt parcels of land with a more

Parcel ref	Purpose 1a	Purpose 1b	Purpose 2	Purpose 3	-	Potentially Suitable for Inclusion in GB
81	Strong	Strong	No Contribution	Moderate	No Contribution	Yes
82	Strong	Strong	No Contribution	Moderate	Weak	Yes

Table 4.6: Assessment ratings for parcels outside of the Green Belt in Rossendale

Parcel ref	Commentary on Green Belt Performance		
81	This parcel is adjacent to Whitworth which forms part of the large built up area of Rochdale. The parcel performs strongly against purpose 1a and 1b, makes no contribution to purpose 2, performs moderately against purpose 3 and makes no contribution to purpose 4. Any development within this parcel would push the settlement edge of Whitworth further to the east, which would create a more uneven urban edge and would not relate well to the existing settlement edge. There are no strong boundary features along the outer edge of the parcel, consequently developing this parcel may lead to the neighbouring parcel P70 being more vulnerable to sprawl. Additionally, developing this parcel would lead to a higher degree of visual encroachment on parcel P70 and weaken its rural character and performance under purpose 3. It is considered that developing this parcel would have a detrimental effect on the integrity of the wider Green Belt. NB: This parcel was formerly included in the Green Belt but was removed within the Adopted Local Plan 1995 as a potentially suitable site for housing. The site has not been		
	developed due to access difficulties.		
82	This parcel is adjacent to Whitworth which forms part of the large built up area of Rochdale. The parcel performs strongly against purpose 1a and 1b, makes no contribution to purpose 2, performs moderately against purpose 3 and makes no contribution 4. Any development within this parcel would push the settlement edge of Whitworth further to the west, which would create an uneven urban edge and would not relate well to the existing settlement edge. There are no strong boundary features along the outer edge of the parcel, consequently developing this parcel may lead to the neighbouring open area of countryside vulnerable to encroachment. Additionally, developing this area of higher ground would lead to a higher degree of visual encroachment to surrounding areas of Green Belt weaken its rural character and performance under purpose 3. It is considered that developing this parcel would have a detrimental effect on the integrity of the wider Green Belt. Designation of this area of land as Green Belt would help to protect the potential westward sprawl of Whitworth.		

Table 4.7: Commentary on performance of parcels not currently designated as Green Belt

5 Conclusions and Next Steps

5.1 This final section draws overall conclusions from the study and suggests some next steps, in terms of how Rossendale might use the findings in the Local Plan preparation process.

Overall performance of the Green Belt

- 5.2 This study has demonstrated that the majority of the Green Belt within Rossendale does contribute well to one or more Green Belt purposes. In particular it helps to maintain the openness of the countryside and protect the separate identity of settlements.
- 5.3 As set out in Section 4, there are variations in the contribution that different parts of the Borough make to Green Belt purposes 1, 2, 3 and 4. In terms of purpose 5 (encouraging the recycling of urban land), it is concluded that the entire Green Belt helps to meet this purpose and will continue to do so.
- 5.4 Analysis of the study findings has identified 13 parcels and eight parcel sub-areas which would cause less harm to the Green Belt should the land be released. It is important to note that the conclusions reached in this study, do not state that the parcels identified should be released from the Green Belt; as the consideration of further constraints by the Council will be required to ensure that any development is sustainable. It is also recommended that any identified land parcels are considered as part of the wider work undertaken by the Council to identify key housing and employment sites and land and tested through the Sustainability Appraisal process, as part of a robust approach to develop the future development strategy for Rossendale.

Making changes to the Green Belt

Helping to meet development requirements

- 5.5 As noted in Section 4, the NPPF requires changes to the Green Belt to be made through the Local Plan process. This should include:
 - i. demonstration of exceptional circumstances, such as unmet housing or employment land needs, that cannot be met elsewhere; and
 - ii. consideration of the need to promote sustainable patterns of development, considering a range of local, regional and national issues such as economic growth, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience, as well as an assessment against Green Belt purposes.
- 5.6 A common interpretation of the policy position is that, where necessitated by development requirements, plans should identify the most sustainable locations, unless outweighed by adverse effects on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt based around the five purposes¹³.
- 5.7 In other words, the relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt. Should the Borough decide to release land from the Green Belt, we recommend that outline policy guidance or masterplans are prepared as part of the Local Plan process. These would indicate development areas and new defensible Green Belt boundaries (existing or new features). Such an

¹³ Planning on the Doorstep: The Big Issues – Green Belt, Planning Advisory Service (PAS), 2015: <u>http://www.pas.gov.uk/documents/332612/1099309/Planning+on+Your+Doorstep+-++The+Big+Issues+Green+Belt.pdf/bb5fcd90-</u>

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approach, together with specific policies for the development of the land, would help to engender public confidence and support, as well as mitigate harm to the remaining Green Belt.

Encouraging positive use of land in the Green Belt

- 5.8 A Borough-level Green Corridor study is currently being undertaken for the Borough. This will identify key environmental corridors that need to be preserved and enhanced within the Borough. The objectives of this study are to:
 - identify the key components contributing to the definition of environmental corridors;
 - identify where these corridors are and where there are any significant gaps in networks and how these can be addressed;
 - identify the key functions played by different individual components as well as corridors for biodiversity, flood alleviation, carbon storage and recreation including where multiple benefits occur.
 - present clear, comprehensive and fully justified conclusions including advice on policy development.
- 5.9 It will be important that the findings of the Green Corridor study are considered alongside the findings of this study to ensure that the Local Plan recognises and supports the role of the Green Belt as green infrastructure. In this way developer contributions could be sought to take forward specific initiatives.
- 5.10 Key strategic objectives could include:
 - To promote positive uses that realise the potential to improve the quality and accessibility of the land whilst maintaining the purposes of the Green Belt.
 - To improve the quality of life local residents and visitors through enhanced access to the countryside.
 - To conserve and enhance the biodiversity value.
 - To improve the linkages between existing and potential accessible open land for people and wildlife.
 - To create attractive destinations for daytrips and holidays, for visitors, tourists and the local population.
 - To support initiatives that contribute to sustainable development, including renewable energy, floodwater retention and water gathering areas.

Safeguarded land

- 5.11 Paragraph 85 of the NPPF indicates that, when defining Green Belt boundaries, local planning authorities should, <u>where necessary</u>, identify areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. No further guidance is provided on the circumstances where safeguarded land may be necessary
- 5.12 On the basis of current trends, if there are likely to be unmet housing needs beyond the plan period, then land could be safeguarded. We recommend that Rossendale considers the need for safeguarded land. Where areas of the Green Belt are identified as being suitable for release in this plan period, parts of them may be retained as safeguarded land. The location of such areas should be informed by this study and other evidence.

APPENDIX 2.1: The character of the Rossendale Green Belt

5.13 The following appendix provides a summary of the character of the Rossendale Green Belt. The approach to the assessment of Green Belt parcels, has, in accordance with good practice, not had regard to environmental, policy or land-use constraints and designations that may exist within Rossendale, such as landscape areas, SSSIs, and floodplains etc. The following section is included to provide background contextual information alone.

Landscape

- 5.14 The landscape in the Borough of Rossendale falls almost entirely within one National Character Area. All but the most southerly part of the Green Belt which is located on the rolling hills to the north east of Bury are found within the NCA 36 Southern Pennines.
- 5.15 NCA 36 is north of Bolton, Bury and Rochdale where the sweeping moorlands are formed within part of the Pennine ridge of hills. Here pastures are enclosed mostly by drystone walls and the narrow valleys contain gritstone settlements. To the south of NCA 36 Manchester Pennine Fringe (NCA 54) takes in a very small portion of the Rossendale Green Belt and is a transitional zone between open moorlands of the Southern Pennines and the Dark Peak which extends to the east. Although NCA54 takes in the industrial settlements as such Bury, Bolton, Rochdale, Oldham, Dukinfield and Glossop, the part of the Green Belt in Rossendale which falls within this National Character is not located in close proximity of these settlements and therefore is influenced only to a limited extent by development at these locations .

Biodiversity designations

- 5.16 There are three identified areas of ancient woodland in the Borough of Rossendale and these are located within the Green Belt. These areas are located partially within Lumb Wood, Great Hey Wood and Ox Hey Wood. All identified areas of ancient woodland are located in the west of the Borough in relatively close proximity of the A56. Ancient woodland makes up a very small of area land cover in the Borough, given that the largest of these sites at Lumb Wood is 2.20 hectares in size.
- 5.17 Two of the Borough's three Sites of Special Scientific Interest (SSSIs) are located within the boundaries of the Green Belt. These are both towards the western part of the Borough by the A56 and are Hodge Clough and Lower Red Lees Pasture. Both sites are in favourable condition.
- 5.18 There is only one Local Nature Reserve (LNR) within the Borough. Healey Dell LNR falls partially within Rossendale at its south eastern boundary and partially within Rochdale. The LNR site is managed by a group led by Rochdale Metropolitan Borough Council. The site takes in the woodland and nature trail areas surrounding the river Spodden and disused railway between Rochdale town centre to the south and Whitworth and Bacup to the north. Large parts of this are within the Green Belt.

Historic environment

5.19 There are 276 Listed Buildings in Rossendale, most of which are located in the more developed settlements particularly at Haslingden, Rawtenstall and Bacup. Many of these heritage assets are thus outside of the Green Belt. Green Belt surrounding the A671 to the east which passes through Whitworth, and surrounding the A56 and railway line which passes close to Edenfield, contain many of the local heritage assets. The Borough's only Registered Park and Garden is also located within the Green Belt at Whitworth Cemetery. This site is Grade II. The Borough only has two Scheduled monuments however these are located outside of the boundaries of the Green Belt.

5.20 There are a total of nine Conservation Areas designated with Conservation Area Appraisals within Rossendale. Only two of these areas (Whitworth Square Conservation Area and Irwell Conservation Area) lie within or in very close proximity to the Green Belt. The Green Belt can play a key role in terms of preserving the setting and special character of these areas and historic settlements more generally. This is picked up in the study in the assessment of purpose 4.

Hydrology

5.21 The Green Belt in Rossendale includes two main rivers and their tributaries. To the west the River Irwell runs from Bacup southerly changing course through Waterfoot to Edenfield. There are significant areas of Flood Zone 3 with some limited areas of Flood Zone 2 along its course. Areas of Stubbins to the north east and east are protected by flood defences. Towards the eastern section of the Borough, the River Spodden runs northerly from Rochdale towards Whitworth. There are some areas of flood risk (Flood Zone 2 and 3) along the course of the river and flood defences are in place within the village of Whitworth. Cowm Reservoir has also been identified as a potential area of flood risk.

Access

- 5.22 Within the Green Belt significant routes include the A671 to the east and A56 to the west. The A671 connects the Borough to Rochdale to the south and passes through Whitworth in the Green Belt before leading to Bacup further to the north. The A56 feeds into the M66 on the route towards Bury to the south passing by the village of Edenfield within the Green Belt connecting the larger settlements of Rawtenstall and Haslingden outside of the Green Belt to Greater Manchester to the south. This route also connects to the M65 much further to the north. The central disconnected portion of the Green Belt is traversed by the A681 from west to east between Rawtenstall and Bacup respectively. The East Lancashire Railway also runs through the western portion of the Green Belt in Rossendale with a station at Irwell Vale in close proximity to the Green Belt.
- 5.23 Multiple public rights of way run through the Green Belt in Rossendale. These include a number of Sustrans National Cycle Network routes. The western portion of the Green Belt within Rossendale contains parts of Sustrans Route 6 which follows much of the route of the East Lancashire Railway from Ramsbottom through Stubbins towards Haslingden via Irwell Vale. Sustrans Route 91 follows the very western edge of the Green Belt within the Borough from south to north via Ramsbottom before travelling to the east towards Rawtenstall. In the east Sustrans Route 92 follows much of the length of the A671 from south to north through Whitworth and Shawforth towards Britannia.

APPENDIX 4.1: Detailed Green Belt Assessment