

SCHEDULE OF ACTIONS MATTER 8:
APPROACH TO SITE ALLOCATIONS AND GREEN BELT RELEASE (Action 8.5)

Sensitivity Checking the Removal of Purpose 4 from the Green Belt Assessment

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| 8.5 | Sensitivity check the removal of Purpose 4 from the Green Belt study and see whether this makes a difference to the outcome of the assessment |
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1.1 The note overleaf provides the response to Action 8.5, which relates to the Rossendale Green Belt Review and particularly whether the removal of an assessment of Purpose 4 of the Green Belt (“to preserve the setting and special character of historic towns”) makes a difference to the conclusions reached for each Green Belt parcel.

1.2 The purposes of the Green Belt are set out in paragraph 134 of the National Planning Policy Framework (NPPF) as follows:

Green Belt serves five purposes:

- 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.

1.3 The Council asked Land Use Consultants to undertake this additional sensitivity testing as they had been commissioned to undertake the 2016 Green Belt Review, which informed the emerging Local Plan.

1.4 Land Use Consultant’s Additional Update concludes that the removal of Purpose 4 from the assessments does not make any difference to final assessment of the Green Belt parcels, for both those which were and were not recommended for release.

Rossendale Borough Council

Rossendale Green Belt Study

Local Plan Examination: Green Belt Actions

Draft report

Prepared by LUC

January 2020



Rossendale Borough Council

Rossendale Green Belt Study Local Plan Examination: Green Belt Actions

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| Assessment of harm of release of H71, H72 and H73 - see Actions 14.2, 14.3iii, 14.3iv, 14.49 | |

Chapter 1

Introduction

1.1 LUC were commissioned in 2016 to undertake a Green Belt Study for the Borough of Rossendale. The two main aims of this 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.
- Provide clear conclusions on the relative performance of Green Belt which will enable Rossendale Borough Council to consider, alongside other issues, whether there are 'exceptional circumstances' to justify altering Green Belt boundaries through the Local Plan process.

1.2 The findings of this assessment were set out in the Rossendale Green Belt Review (November 2016). Following the Rossendale Local Plan Examination held in October 2019, LUC were asked to provide the following additional information in relation to Green Belt issues.

1. Sensitivity check of the NPPF Green Belt Purpose 4: To preserve the setting and special character of historic towns. The purpose of this is to check whether the outcome of the Green Belt assessment would be different, if it was assumed there are no historic towns within Rossendale or neighbouring areas.
2. Assessment of potential harm to the Green Belt of releasing for development Allocation H71 - Land east of Market Street, Edenfield.
3. Assessment of potential harm to the Green Belt of releasing for development Allocation H72 - Land west of Market Street, Edenfield, in particular the cumulative harm of the three Green Belt parcels that make up H72 (these were assessed separately in the Green Belt Study (2016).
4. Assessment of potential harm to the Green Belt of extending Edenfield Church of England Primary School .
5. Assessment of the potential harm to the Green Belt of releasing for development Allocation H73 - Edenwood Mill, Edenfield.

1.3 This report sets out the findings of the findings of these additional assessments. The sensitivity testing of purpose 4 is set out in **Chapter 2** and the assessments of harm to the Green Belt of the proposed allocations H71, 72, Edenfield School Extension and 73 are set out in **Chapter 3**.

Chapter 1

Introduction

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1.4 This report does not repeat the methodology for undertaking the Green Belt study as that is contained in full the original Green Belt Study 2016 and should be read in conjunction with this report.

Chapter 2

Sensitivity Testing Purpose 4

2.1 During the course of the Local Plan Examination, the inspector requested a sensitivity testing of Purpose 4 (P4). The NPPF states that there are five purposes of Green Belt with Purpose 4 concerned with '*Preserving the setting or special character of historic towns*'.

2.2 The original Green Belt Study (2016) stated that Green Belt assessments have adopted a range of approaches to the definition of historic towns and that there is no universally agreed methodology. A common approach however is that Green Belt studies have focused on the presence of designated Conservation Areas, and used these as a proxy for identifying historic towns. In other studies, assessors have considered whether settlements were recorded as far back as the Domesday Book (e.g. East Cheshire Green Belt Study).

2.3 More recently, some Green Belt studies have taken a more restrictive approach to the definition of what is deemed to be an historic town and Historic England have commented in consultation responses to some Green Belt studies (eg Blackburn and Darwen Green Belt Study) that Purpose 4 is of special importance to the Green Belt around the following six historic cities: Bath, Cambridge, Chester, Oxford, Durham and York¹.

2.4 For the Rossendale Green Belt study, Conservation Areas were used a proxy for identifying historic towns. The historic towns assessed under purpose 4 were identified by selecting Conservation Areas that are located within settlements included in the assessment of Green Belt Purpose 2 – Preventing Neighbouring Towns from merging into one another. As a cross check, reference was also made to the Historic Core Urban Landscape Type defined within the Lancashire Landscape Character Assessment (A Landscape Strategy for Lancashire, December 2000). This also included any Conservation Areas located within towns in neighbouring local authorities.

2.5 If it is assumed that there are no qualifying 'historic towns' in Rossendale or relevant areas of neighbouring authorities, no areas within the Green Belt in Rossendale could contribute towards this purpose. A sensitivity check has

¹ Extract from Hansard in 1988: The Secretary of State for the Environment clarified in answer to a parliamentary question that the purpose of preserving the special character of historic towns is especially relevant to the Green Belts of York, Chester, Bath, Oxford and Cambridge. Durham has since been added to this list.

therefore been undertaken of the impact on the Study findings assuming that there are 'no' historic towns in Rossendale.

2.6 There were 26 parcels that were assessed against P4 in the 2016 Green Belt Study. Of these, 15 of these were rated as making a weak contribution to P4, seven a moderate contribution and four a strong contribution. A summary of those assessed for P4 is set out in the Table 1 below,

2.7 Of the 26 parcels that were assessed for P4, only four of these were considered further in the assessment of harm (set out in Tables 4.3 and 4.4 of the Green Belt report). These included parcels 17, 57, 69 and 74. Of these 17, 69 and a sub area within 69 were proposed for release (see parcels marked in red text in Table 1 below). Parcel 57 was not proposed for release due to the potential impact on the adjacent Green Belt.

2.8 The two key questions that were considered in checking the impact of the assessment of Purpose 4 on the study findings were:

- **Would any of the three parcels suggested for release, not have been proposed for release if the ratings for P4 were discounted?** The answer to this is no, as all three of these parcels only made 'weak' contribution to P4 and if the assessment was changed to assume that these parcels made 'no contribution' to P4, this would not increase the potential harm of release.
- **Would any of the remaining 23 parcels not proposed for release have been recommended for release if P4 had been discounted?** As shown in the final column of **Table 1** below, of the 23 not proposed for release, 12 of these rated weakly for P4 and therefore P4 was not a factor in determining whether the parcel was suitable for release. Of the remaining 11, four were rated as making a strong contribution to P4 (Parcels 52, 66, 73 and 75), but in all cases these parcels also made a strong contribution to at least one other purpose. Having reviewed these parcels, we are content that the study would still have concluded they were not suitable for release. Of the seven that scored moderately against P4 (11, 13, 40, 51, 71, 72 and 74) and were not proposed for release, in all cases the parcels made a strong contribution to at least one Green Belt purpose and again, having reviewed these parcels, we can confirm that the study would still have concluded they were not suitable for release.

2.9 Commentary is provided in the final column of **Table 1** setting out the conclusions of the assessment of harm, assuming that the parcel does not make a contribution to Purpose 4.

Table 1: Consideration of Impact of Purpose 4 on Assessment Findings.

| Parcel ref | Purpose 1a | Purpose 1b | Purpose 2 | Purpose 3 | Purpose 4 | Comments |
|------------|----------------|----------------|-----------|-----------|-----------|---|
| 11 | Not Applicable | Not Applicable | Strong | Moderate | Moderate | Parcel 11 makes a moderate contribution to Purpose 3 and a strong contribution to Purpose 2 due to its openness and the essential role it plays in preventing the erosion of the physical and visual gap between Haslingden and Rawtensall. This parcel is part an area of elevated land between the two settlements that helps to maintain their sense of separation. If it is assumed that the parcel makes no contribution to Purpose 4, it would still not be identified as being suitable for release (in Green Belt terms). |
| 12 | Not Applicable | Not Applicable | Strong | Weak | Weak | Parcel 12 makes a strong contribution to Purpose 2 due to the essential role it plays in preventing the erosion of the physical and visual gap between Haslingden and Rawtensall. This parcel is part an area of elevated land that forms a significant feature between the two settlements that helps to maintain their sense of separation. If it is assumed that the parcel makes no contribution to Purpose 4, the parcel would still not be identified as being suitable for release (in Green Belt terms). |
| 13 | Not Applicable | Not Applicable | Strong | Moderate | Moderate | Parcel 13 makes a moderate contribution to Purpose 3 and a strong contribution to Purpose 2 due to its openness and role in preventing the erosion of the physical visual gap between Haslingden and Rawtensall. This parcel is part an area of elevated land that forms a significant feature between the two settlements that helps to maintain their sense of separation. If it is assumed that the parcel makes no contribution to Purpose 4, the parcel would still not be identified as being suitable for release (in Green Belt terms). |
| 15 | Not Applicable | Not Applicable | Strong | Moderate | Weak | Parcel 15 makes a moderate contribution to Purpose 3 and a strong contribution to Purpose 2 due to its openness and the essential role it plays in preventing the erosion of the physical and visual gap between Haslingden and Rawtensall. This parcel is part an area of elevated land between the two settlements that helps to maintain their sense of separation. If it is assumed that the parcel makes no contribution to Purpose 4, the parcel would still not be identified as being suitable for release (in Green Belt terms). |
| 17 | Not Applicable | Not Applicable | Moderate | Weak | Weak | Parcel 17 makes a weak contribution to Purpose 4 and therefore if it is assumed that the parcel makes no contribution to Purpose 4, it would still be identified as suitable for release (in Green Belt terms). |
| 18 | Not Applicable | Not Applicable | Strong | Moderate | Weak | Parcel 18 makes a moderate contribution to Purpose 3 and a strong contribution to Purpose 2 due to its openness and the essential role it plays in preventing the erosion of the physical and visual gap between Haslingden and Rawtensall. If it is assumed that the parcel makes no contribution to Purpose 4, the parcel would still not be identified as being suitable for release (in Green Belt terms). |
| 40 | Not Applicable | Not Applicable | Moderate | Strong | Moderate | Parcel 40 makes a moderate contribution to Purpose 2 and a strong contribution Purpose 3 due to its openness and lack of urbanising development. The parcel makes a moderate contribution to purpose 4, given the visibility from nearby Ramsbottom and Rawtenstall town centres. However, If it is assumed that the parcel makes no contribution to Purpose 4, the strong contribution to Purpose 3 means that the parcel would still not be identified as being suitable for release (in Green Belt terms). |
| 42 | Not | Not | Moderate | Strong | Weak | Parcel 42 makes a moderate contribution to Purpose 2 and a strong contribution to Purpose 3 due to its openness and |

Chapter 2

Sensitivity Testing Purpose 4

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| | Applicable | Applicable | | | | lack of urbanising development. The parcel makes a weak contribution to Purpose 4 and as such, if it is assumed that the parcel makes no contribution to Purpose 4, the strong contribution to Purpose 3 means that the parcel would still not be identified as being suitable for release (in Green Belt terms). |
| 45 | Not Applicable | Not Applicable | Moderate | Strong | Weak | Parcel 45 makes a moderate contribution to Purpose 2 and a strong contribution to Purpose 3 due to the role it plays separating Edenfield and Helmshore and its openness and lack of urbanising development. The parcel makes a weak contribution to Purpose 4 and as such, if it is assumed that the parcel makes no contribution to Purpose 4, the strong contribution to Purpose 3 means that the parcel would still not be identified as being suitable for release (in Green Belt terms). |
| 47 | Strong | Strong | Weak | Moderate | Weak | Parcel 47 makes a moderate contribution to Purpose 3 and a strong contribution to Purpose 1, given its openness and location on the eastern edge of Edenfield which forms part of the large built up area of Ramsbottom/Bury. The land plays a key role preventing the further eastward expansion of the large built up area. The parcel makes a weak contribution to Purpose 4 and as such, if it is assumed that the parcel makes no contribution to Purpose 4, the strong contribution to Purpose 1 means that the parcel would still not be identified as being suitable for release (in Green Belt terms). |
| 48 | Strong | Strong | No Contribution | Moderate | Weak | Parcel 48 makes a moderate contribution to Purpose 3 and a strong contribution to Purpose 1, given its openness and location on the eastern edge of Edenfield, part of the large built up area of Ramsbottom/Bury. The land plays a key role preventing the further eastward expansion of the large built up area. The parcel makes a weak contribution to Purpose 4 and as such, if it is assumed that the parcel makes no contribution to Purpose 4, the strong contribution to Purpose 1 means that the parcel would still not be identified as being suitable for release (in Green Belt terms). |
| 51 | Strong | Strong | Weak | Strong | Moderate | Parcel 51 makes a strong contribution to Purpose 1, given its location on the western edge of Stubbins which forms part of the large built up area of Ramsbottom/Bury. It also makes a strong contribution to Purpose 3, due to its openness and lack of urbanising development. The parcel makes a moderate contribution to Purpose 4 within the existing assessment study, given the visibility from nearby Ramsbottom and Rawtenstall town centres. However, if it is assumed that the parcel makes no contribution to Purpose 4, the strong contribution to Purposes 1 and 3 means that the parcel would still not be identified as being suitable for release (in Green Belt terms). |
| 52 | Not Applicable | Not Applicable | No Contribution | Strong | Strong | Parcel 52 makes a strong contribution to Purpose 3 as it forms a large area of predominantly open rural countryside. The parcel makes a strong contribution to purpose 4 within the existing assessment method, given the contribution it makes to the setting of the settlement of Ramsbottom. However, if it is assumed that the parcel makes no contribution to Purpose 4, the strong contribution to Purpose 3 means that the parcel would still not be identified as being suitable for release (in Green Belt terms). |

Chapter 2

Sensitivity Testing Purpose 4

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| 55 | Not Applicable | Not Applicable | Strong | Strong | Weak | Parcel 55 makes a strong contribution to Purposes 2 and 3. It forms part of the critical gap between the settlements of Rawtenstall/Waterfoot and Stackstead, and is open. The parcel makes a weak contribution to Purpose 4 and as such, if it is assumed that the parcel makes no contribution to Purpose 4, the strong contribution to Purposes 2 and 3 means that the parcel would still not be identified as being suitable for release (in Green Belt terms). |
| 56 | Not Applicable | Not Applicable | Weak | Strong | Weak | Parcel 56 makes a strong contribution to Purpose 3, due to openness and lack of urbanising development. The parcel makes a weak contribution to Purpose 4 and as such, if it is assumed that the parcel makes no contribution to Purpose 4, the strong contribution to Purpose 3 means that the parcel would still not be identified as being suitable for release (in Green Belt terms). |
| 57 | Not Applicable | Not Applicable | No Contribution | Moderate | Weak | Parcel 57 makes a weak contribution to Purpose 4 and, therefore, if it assumed that the parcel makes no contribution to Purpose 4, it would still be identified as being suitable for release (in Green Belt terms). |
| 61 | Not Applicable | Not Applicable | Strong | Strong | Weak | Parcel 61 makes a strong contribution to Purposes 2 and 3. It forms part of the critical gap between the settlements of Britannia (Bacup) and Shawforth, as well as Shawforth and Whitworth. It is also free of urban development and is open countryside. The parcel makes a weak contribution to Purpose 4 and as such, if it is assumed that the parcel makes no contribution to Purpose 4, the strong contribution to Purpose 2 and 3 mean that the parcel would still not be identified as being suitable for release (in Green Belt terms). |
| 66 | Not Applicable | Not Applicable | Strong | Strong | Strong | Parcel 66 makes a strong contribution to Purposes 2, 3 and 4 and forms and a large area of elevated open countryside to the east of Whitworth and Shawforth. The parcel makes a strong contribution to Purpose 4 due to its contribution to the setting of Whitworth. If it is assumed that the parcel makes no contribution to Purpose 4, the strong contribution to Purposes 2 and 3 means that the parcel would still not be identified as being suitable for release (in Green Belt terms). |
| 69 | Moderate | Moderate | No Contribution | Weak | Weak | Parcel 69 makes a weak contribution to Purpose 4 and, therefore, if it assumed that the parcel makes no contribution to Purpose 4, it would still be identified as being suitable for release (in Green Belt terms). |
| 71 | Not Applicable | Not Applicable | No Contribution | Strong | Moderate | Parcel 71 makes a strong contribution to Purpose 3, as it forms a large area of open elevated countryside to the west of Whitworth. The parcel makes a moderate contribution to Purpose 4 within the existing assessment due to its contribution to setting of Whitworth. However, If it is assumed that the parcel makes no contribution to Purpose 4, the strong contribution to Purpose 3 means that the parcel would still not be identified as being suitable for release (in Green Belt terms). |
| 72 | Strong | Strong | No Contribution | Strong | Moderate | Parcel 72 makes a strong contribution to Purposes 1 and 3. It lies adjacent to Whitworth, which forms part of the large built up area of Rochdale and is open land with few urbanising features. The parcel makes a moderate contribution to purpose 4 within the existing study as it contributes to the setting of Whitworth. However, If it is assumed that the parcel makes no contribution to Purpose 4, the strong contribution to Purposes 1 and 3 means that the parcel would still not be identified as being suitable for release (in Green Belt terms). |
| 73 | Strong | Strong | No Contribution | Strong | Strong | Parcel 73 makes a strong contribution to Purposes 1 and 3. It lies adjacent to Whitworth, which forms part of the large built up area of Rochdale and is open land with few urbanising features. The parcel also makes a strong |

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| | | | on | | | contribution to purpose 4 as it contributes to the setting of Whitworth. However, If it is assumed that the parcel makes no contribution to Purpose 4, the strong contributions to Purposes 1 and 3 mean that the parcel would still not be identified as being suitable for release (in Green Belt terms). |
| 74 | Strong | Strong | No Contribution | Strong | Moderate | Parcel 74 makes a strong contribution to Purposes 1 and 3. It lies adjacent to Whitworth, which forms part of the large built up area of Rochdale and is open land with few urbanising features. The parcel also makes a moderate contribution to purpose 4 as it contributes to the setting of Whitworth. However, If it is assumed that the parcel makes no contribution to Purpose 4, the strong contributions to Purposes 1 and 3 mean that the parcel would still not be identified as being suitable for release (in Green Belt terms). |
| 75 | Strong | Strong | No Contribution | Strong | Strong | Parcel 75 makes a strong contribution to Purposes 1 and 3. It lies adjacent to Whitworth, which forms part of the large built up area of Rochdale and is open land, with few urbanising features. The parcel also makes a strong contribution to purpose 4 as it contributes to the setting of Whitworth. However, If it is assumed that the parcel makes no contribution to Purpose 4, the strong contributions to Purposes 1 and 3 mean that the parcel would still not be identified as being suitable for release (in Green Belt terms). |
| 77 | Strong | Strong | No Contribution | Moderate | Weak | Parcel 77 makes a strong contribution to Purpose 1. It lies adjacent to Whitworth, which forms part of the large built up area of Rochdale. The parcel makes a weak contribution to Purpose 4 and as such the consideration of Purpose 4 has a very limited impact on the potential harm of releasing the parcel. If it is assumed that the parcel makes no contribution to Purpose 4, the strong contribution to Purpose 1 in combination with the moderate contribution to Purpose 3 means that the parcel would still not be identified as being suitable for release (in Green Belt terms). |
| 78 | Strong | Strong | Strong | Strong | Weak | Parcel 78 makes a strong contribution to Purposes 1, 2 and 3. It lies adjacent to Middle Healey and Lower Healey which form part of the large built up area of Rochdale, and has a strong sense of openness. The land also forms part of the critical gap between Middle Healey and Broadley. The parcel makes a weak contribution to Purpose 4 and as such if it is assumed that the parcel makes no contribution to Purpose 4, the strong contribution to Purposes 1, 2 and 3 mean that the parcel would still not be identified as being suitable for release (in Green Belt terms). |

Chapter 3

Assessment of harm of release of H71, H72 and H73

See Actions 14.2, 14.3iii, 14.3iv, 14.4