1.1. Following discussions held at the Matter 3: Revision of Green Belt Boundaries Local Plan hearing session held on Wednesday 1st February 2023, the Inspectors requested the Council prepare a supplementary note to clarify the following:

- The scope of the Green Belt Assessment prepared by LUC in 2019 to inform the Local Plan 2021-2037;
- The methodology used to identify land parcels as part of the Green Belt Assessment (2019);
- The approach to Green Belt boundary amendments in Local Plan (2021-2037);
- The scope of the Green Belt Study prepared by Envision in 2014 to inform Local Plan Part 2 (adopted in 2015); and
- Confirmation of the land parcels released from the Green Belt through Local Plan Part 2 (2015).

1.2. The Council has sought to provide additional information within this note to address each of the points raised.

EMERGING LOCAL PLAN (2021-2037)

Green Belt Assessment (LUC; 2019)

1.3. Blackburn with Darwen Council commissioned LUC to prepare a Green Belt Assessment in 2019 (E22) as part of the evidence base to inform the development of the Local Plan 2021-2037. The scope of the study included two key elements of assessment:

- A strategic evaluation of the Green Belt in Blackburn with Darwen to consider how well the current designated areas met the five purposes of the Green Belt as set out in the National Planning Policy Framework (NPPF). This covered the entirety of the Green Belt area designated in the Borough; and
• A subsequent assessment of specific areas within the Green Belt identified in the strategic evaluation that required further consideration as to their role in meeting the five purposes of the Green Belt as set out in the National Planning Policy Framework (NPPF).

1.4. To clarify, no assessment was undertaken to identify any possible new additions to the Green Belt as part of this study.

1.5. The overall purpose of the study was to undertake an independent, robust and transparent assessment of Green Belt within Blackburn with Darwen Borough to assess the potential harm to the Green Belt of releasing land for development.

1.6. The study comprised of a Stage 1 and a Stage 2 assessment as set out above. Stage 1 assesses the whole of the Green Belt in Blackburn with Darwen Borough in terms of its 'contribution' to the five purposes of the Green Belt, as set out in the National Planning Policy Framework (NPPF), namely:

- 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.

1.7. Stage 1 is a high-level appraisal identifying broad strategic variations in contribution across the Borough, and Stage 2 provides more specific information on the potential 'harm' of releasing specific areas from the designation, to be weighed up by the Council alongside sustainability and viability considerations in order to make decisions regarding the potential release of Green Belt land.

**Process for determining land parcels in Green Belt Assessment (2019)**

1.8. The identification of individual land parcels that were assessed through the Stage 2 process were a product of LUC’s independent assessment. They draw out strategic variations in Green Belt harm using the five Green Belt harm ratings. The extent of the Stage 2 assessment parcels has not been influenced by anything other than LUC’s professional judgement and the presence of clear boundaries and absolute constraints. The Stage 2
harm assessment does not rate areas constrained by absolute constraints on the basis that they would not be developed.

1.9. In relation to the process LUC undertook for defining the land parcels within the Stage 2 assessment, the following is useful to note:

- The assessments assumed that land would be released out from existing inset settlement edges;

- Parcels were defined around all inset settlements and up until the point that the release of land was deemed to cause high harm. All land beyond the defined parcels were therefore assessed as high harm area and text is provided to support this analysis under the heading ‘harm beyond outer boundary’ in each parcel assessment within the study (see Appendix 2 on page 76 of the Study);

- Where there were notable variations in harm within a Stage 2 parcel, but there were no clear boundaries to mark a clear parcel line, commentary was provided on the variations under the heading ‘potential to limit harm’ in each Stage 2 parcel assessment. This ensured all spatial variations in the Green Belt harm of release were identified through the Stage 2 assessment; and

- It was recognised that specific development proposals may have included the retention of undeveloped areas, and/or the implementation of landscaping measures – e.g., to create a stronger boundary – that could potentially reduce Green Belt harm, but the study could not consider specific development proposals, which were at varying stages of development and certainty. All Green Belt land was treated the same, for consistency purposes.

1.10. Further details on the Stage 2 assessment of harm can be found in Chapter 3 (covering methodology) and Appendix 2 (covering parcel judgements) of the final study report.

**Approach to Green Belt boundary amendments in Local Plan (2021-2037)**

1.11. As set out in the Council’s additional note on Green Belt Mapping (Action A4), other than the strategic release of Green Belt at Junction 5 of the M65, which is well-documented and justified through the Local Plan evidence, the Council are not seeking to establish boundary
changes for any strategic purposes, i.e. to make additional land available for development, or to change sustainable development patterns.

1.12. Other proposed amendments to the Green Belt boundary involve de minimis modifications to the borough boundaries to address inaccuracies with previous mapping found at the lower scales, improving the alignment of its digitalised layers. In addition, the Council have sought to make de minimis changes to the urban/village boundaries to better align them with ground features so to address further cartographic inconsistencies. Further details on Green Belt boundary amendments are included within the Green Belt Mapping Additional Note (EL7.A4).

LOCAL PLAN PART 2 (2015)

Green Belt Study (Envision; 2014)

1.13. There was also some discussion at the hearing session in relation to the previous Green Belt Study completed in 2014 by Envision to inform the Local Plan Part 2. Further details are provided below.

1.14. The Core Strategy recognised in Policy CS1 that in order to meet the borough’s development needs there was a need for small scale extensions to the urban areas of Blackburn and Darwen, including the possible release of designated Green Belt.

1.15. Through initial stages of Local Plan Part 2 preparation, it was confirmed that there was insufficient non green belt land to meet the housing requirements set out in the Core Strategy. Unless land was released from the Green Belt through Local Plan Part 2, the development needs for the borough over the next fifteen years of the plan period (to 2026) and beyond would not have been met in a sustainable manner and without unacceptable impact on the environment. This situation presented exceptional circumstances requiring the review of Green Belt boundaries around Blackburn and Darwen, and Local Plan Part 2 was the appropriate mechanism to undertake this review.

1.16. In order to assist in considering what Green Belt land should be released for development, the Council commissioned consultants Envision to prepare a Green Belt Study in 2013 as part of the evidence base to inform the development of the Local Plan Part 2. An important point to note with respect to this study was that it did not carry out a comprehensive review
of the Green Belt in the Borough. The study makes this clear at paragraph 3.2 where it states:

“This is not a strategic and comprehensive review of all Green Belt land within Blackburn with Darwen. The scope of the study is to examine the inner Green Belt boundary around Blackburn and Darwen and to assess whether land included within the defined Green Belt can be considered for removal from the Green Belt without affecting the integrity of the Green Belt.”

1.17. The Green Belt around Blackburn and Darwen was separated into sub-areas and then each sub area into parcels based on landscape character and land use using physical features as boundaries. Each parcel was then assessed on its contribution to meeting any one of the Green Belt purposes defined in the NPPF which allowed for the identification of parcels of land which could be considered for removal from the Green Belt without affecting the integrity and long term permanence of the Green Belt around Blackburn and Darwen.

Land parcels released through Local Plan Part 2 (2015)

1.18. Additional details were requested through the Local Plan hearing sessions to confirm which of the parcels identified as being suitable for release in the Green Belt Study (2014) were removed from the Green Belt through Local Plan Part 2 (2015). This information is provided below.

1.19. The Green Belt Study identified the following parcels as being suitable for removal without affecting their integrity (see Appendix A on page 7 for location of land parcels):

- **Parcels 1/01 & 1/02** - Brownhill, North East Blackburn;
- **Parcels 2/01, 2/02, 2/03 & 2/04** - North of Ramsgreave Drive / Yew Tree Drive (east of Whinney Lane), North Blackburn;
- **Parcels 3/01, 3/03, 3/07 & 3/10** - North West Blackburn (south of Wyfordby Avenue);
- **Parcels 4/01, 4/02, & 4/07** - South West Blackburn;
- **Parcels 6/04 & 6/07** - South east Darwen; and
- **Parcels 7/04, 7/06, 7/09 & 7/10** - East Darwen.

1.20. To clarify, not all parcels of land identified as being suitable for removal through the Green Belt Study were released from the Green Belt through Local Plan Part 2. The Council did not
consider it appropriate to release the following parcels of land from Green Belt for the reasons stated below:

- **Parcel 3/03** - This is a narrow and steep area of land which makes it undevelopable;
- **Parcel 3/07** - This parcel forms part of Witton Country Park;
- **Parcel 3/10** - This is an area of allotments;
- **Parcel 4/01** - This area of land forms a protected Biological Heritage Site (BHS);
- **Parcel 6/04** - This area of land is at different levels from surrounding built areas and difficult to access;
- **Parcel 7/04** - This area of land rises towards the ridge along Roman Road and any development would be intrusive into the landscape; and
- **Parcel 7/06** - This area of land adjoins the urban area of Hoddlesden which is a village. The Core Strategy in Policy CS1 envisages possible alterations to the Green belt only in relation to the urban areas of Blackburn and Darwen.

1.21. To confirm, this position is summarised in Table 2.1 on page 17 of the Green Belt Assessment ([E22](#)) which identifies which parcels were released/not released through the Local Plan Part 2. This has been included as Appendix A on page 7 for ease of reference.

1.22. The Local Plan Part 2 was found sound by an independent planning inspector and subsequently adopted by the Council in December 2015.

**CONCLUSION**

1.23. The information set out in this note summarises the scope of the Green Belt Study undertaken by consultants LUC in 2019 to inform the preparation of the Local Plan 2021-2037, in addition to clarifying the outcomes of the Green Belt Study previously undertaken by consultants Envision to inform the preparation of Local Plan Part 2 (adopted in 2015), as requested through the Matter 3 Local Plan hearing session.

1.24. Both studies provided an independent, robust and transparent assessment of Green Belt land within Blackburn with Darwen which helped to inform the relevant Plans.

1.25. To confirm, Local Plan 2021-2037 only proposes one area of Green Belt revision of significance to accommodate the strategic employment site (E179). Other revisions set out in the plan are very minor, are not considered to be relevant to the overall spatial strategy for
the Borough, and the Council has provided more detailed responses in relation to these in the Green Belt Mapping note that is available to view on the Local Plan Examination webpage.

1.26. The Council’s responses to the Inspectors Matters, Issues and Questions (MIQs) in relation to the proposed revisions of the Green Belt boundary (Matter 3) are also of relevance and should be read alongside this note.
Appendix A: Local Plan Part 2 Green Belt Study Findings (Envision; 2013)