

*On page 325 of the appendices, in regard to Local Green Spaces and their designation, the Town Council **strongly objects** to the addition of extra questions to be answered on top of the three criteria specified in the NPPF. This means we do not agree with page 326, which sets out a flowchart. Instead, the three criteria in the NPPF:*

- Is the site reasonably close to the community it serves?*
- Is the site demonstrably special to the community?*
- Is the site local in character and not an extensive tract of land?*

*are the **sole** criteria for designation as a Local Green Space that should be relied upon in the Pendle Local Plan.*

1. Ref: Local\_Plan\_Publication\_draft, Appendix 7: Criteria for the designation of Local Green Space pages 309-311 (previous draft pages 292-295).

Between drafts of the publication, it appears that the criteria have been assessed and rewritten along with changes in the flow chart by Pendle Council who have prepared a methodology to address what is their perceived requirements of the NPPF and accompanying Planning Practice Guidance (PPG).

I question the legality / morality of doing this at such a late stage as the residents had nominated their spaces using the criterion in the previous draft. If this is legal, I suggest that it could be perceived by residents of Pendle as a deliberate attempt to obstruct their goals of designation of Local Green Spaces.

Page 310. "Stage1: A desktop assessment of the factual information provided. Criteria 1-5 are addressed in sequence". Since the changes between drafts have been implemented it is not possible to determine the criteria because they are no longer numbered.

2. Ref: LGS-Report\_Methodology\_with\_site assessment\_FINAL.pdf  
Pages 74/75, LGS/LP4/DM12/028: Dewhurst Street Community Space

Appendix, in a previous draft of the Pendle Local Plan 4<sup>th</sup> Edition, I stood before councillors and officers to re-nominate this space as a Local Green Space. Supporting evidence was put before Councillors and Officers of Pendle Borough Council (PBC) based on the Desktop Assessment of the Assessor which remains unchanged in the final assessment.

Stage 1 of the Desktop Assessment (page 74). Criteria, is the designation endorsed by the Town Council? The check box has question mark inserted and coloured amber! I believe that Colne Town Council did endorse the site on or around 23 November 2023 and should be Yes.

Stage 1 of the Desktop Assessment (page 74). Criteria, the site is designated as woodland (WD124) in the Pendle Open Space Audit ... This appears to be incorrect, the Pendle Open Space Audit (2019) states that it is designated as Amenity Green Space (AG164).

## **Appendix.**

In the LGS Report the assessor states:

The site was nominated by two community groups for designation as Local Green Space.

*The decision to delegate land for Local Green Space is a matter for local discretion and once designated Local Green Space is subject to the same strong development restrictions as Green Belt of which Waterside is sadly lacking.*

## In Stage 2: Site Appraisal

- it is agreed by the assessor that it meets 3 of the 4 Government criteria in that *“the site is reasonably close to the community”*, *“the site is local in character and not an extensive tract of land”* and *“it can endure for the long term”*.

**The only criteria disputed is whether the site is “*demonstrably special to the community*”.**

**Supporting Evidence** states that the space is a valued community meeting place with many of the homes in the area having no garden access. Passers-by stop to take respite and can take the opportunity to watch bird’s feeding. Located on-site are a community notice board; a bench; litter bin; and a dog waste bin. The grassed areas are planted with daffodils and the path is maintained by a dedicated group called ***“The Friends of Dewhurst Street Community Space”***.

**The Assessor** uses 5 criteria when assessing whether the site is **“*demonstrably special to the community*”**.

These are: **Historic Significance; Tranquillity; Recreational Value; Richness of Wildlife; and Beauty**. The site must satisfy **one** or more of these criteria.

The site has no **Historic Significance**.

**Tranquillity** – the Assessor says it is adjacent to a “well used” but not overly busy road.

**Recreational Value** – the assessor writes the site “provides seating on land set back from Knotts Lane.

More positively it could be rewritten as: “the bench provides an excellent vantage point to watch the world go by”.

**For Richness of Wildlife** – the Assessor says, “the grassed areas are manicured, **BUT!** the trees offer a habitat for birds”.

Again, more positively this could be rewritten as: “four mature trees clustered on site which attract birds and wildlife”.

If the **manicured grass** is not to the Assessor’s liking, some areas could simply be transformed into **wild-flower garden beds**.

**As for the site:**

**Beauty** - the Assessor states the site is “well maintained”.

**The Growing Together Community Environmental Award** was presented to **The Friends of Dewhurst Street Community Space** jointly by **Waterside Neighbourhood Action Group** and **Colne in Bloom in 2022** and not Colne Town Council as stated in the report.

What the Assessor has failed to state is that when a person sits on the bench, it provides an excellent vantage point of **Pendle Hill, Blacko Tower, St Bartholomew’s Church and the Colne Town Hall Tower Clock**.