



The countryside charity  
Lancashire, Liverpool City Region  
and Greater Manchester

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18<sup>th</sup> March 2022

Dear Strategic Planning Team,

I am writing on behalf of CPRE Lancashire, Liverpool City Region and Greater Manchester concerning the Regulation 19 consultation on the Blackburn with Darwen Local Plan 2021-2037 as set out on the website: [www.blackburn.gov.uk/localplan](http://www.blackburn.gov.uk/localplan).

## CPRE

We are CPRE, the countryside charity. We want a thriving, beautiful countryside for everyone.

We believe in countryside and green spaces that are accessible to all, rich in nature and playing a crucial role in responding to the climate emergency.

We stand for a countryside that enriches all our lives, nourishing our wellbeing, and that we in turn nourish, protect and celebrate. Our current campaign focus on:

- Ensuring low carbon land use, including supporting renewables in the right locations;
- Revitalising brownfield land in advance of bulldozing green fields;
- Supporting the rural economy and jobs;
- Planning for 'needed' homes, particularly 'genuinely' affordable ones;
- Protecting Local Green Space to ensure tranquillity, biodiversity, rural character, hedgerows, avoidance of light pollution.

CPRE recognises the importance of an adopted local plan with up-to-date policy and allocations to best enable sustainable development. When out of date, the local plan is rendered silent and land in the countryside of Blackburn with Darwen is more vulnerable to speculative development and the harm that brings, such as urbanisation and car dependency of otherwise rural areas. We acknowledge the Council must plan in accordance with the National Planning Policy Framework (NPPF).

CPRE is urging Government on its Levelling Up Reform to resolve the weaknesses of the NPPF, such as the over-riding focus on developer viability leading to acceleration of countryside loss when there are plenty of brownfield sites in need of regeneration in our towns and cities. More balance for environment and social factors is urgently needed in the NPPF.

## Blackburn with Darwen Local Plan 2021-2037 Regulation 19 consultation

CPRE wants to support the Council to identify the most sustainable locations to be identified for delivering needed development in the future. Our comments build on those previously made at the regulation 18 consultation stage. The amount of development planned should be realistic and a brownfield first approach is advocated.

I attach completed Blackburn with Darwen Local Plan Publication Stage Representation Form for the following:

**Core Policy 4 (CP4): Housing Development**

**Core Policy 10 (CP10): The Economy and Skills**

**Policy E179: Strategic Employment Site, Junction 5 of M65**

Leading from a reduced housing and employment requirement will be the absence of the justification for exceptional circumstances to release land in the Green Belt for housing and employment development.

**CPRE opposes all 'needless development' in the Green Belt.**

**CPRE is also strongly opposed to Policy E179.** CPRE submits a separate representation form but echoes all the issues raised in the representation of Guide and Belthorn Protect Our Green Belt Group in its opposition to development.

CPRE understands that over time policies should be refined to be effective, those focused on the environment must be a priority as for too long economic decisions have been given priority causing harm to our environment, human health, biodiversity, and this cannot continue in the future.

### Summary

We hope that the revised local plan will be adopted without unnecessary delay to support a 'truly' Balanced Growth strategy, with development proposed in suitable locations to help encourage investment to the area and the new development which Blackburn with Darwen needs.

We recognise that the Council faces difficult challenges and is seeking to protect the most valuable features of the environment throughout the Borough.

We hope Government reform of the planning system to focus on 'genuine' levelling up for Northern town and countryside, focusing investment to unlock its considerable brownfield assets and allows for a higher quality of life. To this end it is most important that land value is better captured by local authorities and that developer contributions will support the delivery of needed new community facilities and green infrastructure.

If you have any questions concerning the above, please do not hesitate to contact me.

Yours sincerely

**Jackie Copley MA, BA, (Hons), PgCert, MRTPI**  
Planning Manager