

# **BOROUGH OF PENDLE LOCAL PLAN REVIEW**

## **REPORT OF A PUBLIC INQUIRY INTO OBJECTIONS**

**Inspector: Shelagh Bussey MA DipTP DipEM PhD MRTPI**

**Inquiry Period: 27 September 2005 – 13 December 2005**

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# The Planning Inspectorate

Room 3/25 Kite Wing  
Temple Quay House  
2 The Square  
Temple Quay, BS1 6PN

Direct Line 0117-372 8902  
Switchboard 0117-372 8000  
Fax No 0117-372 6241  
GTN 1371-8902  
<http://www.planning-inspectorate.gov.uk>

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Stephen Barnes,  
Chief Executive,  
Town Hall,  
Market Street,  
Nelson,  
Lancashire  
BB9 7LG.

Your Ref:

Our Ref: PINS/DP521

Date:

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Dear Sir

## **BOROUGH OF PENDLE LOCAL PLAN REVIEW** **REPORT OF INQUIRY INTO OBJECTIONS**

### **Introduction**

- 1 As you know, I was appointed by the First Secretary of State to hold a Public Inquiry into outstanding objections to the Borough of Pendle Local Plan Review. I now enclose my report of the Inquiry, which contains my recommendations on all duly made outstanding objections heard at the Inquiry and made in writing.
- 2 I held a pre-Inquiry meeting to outline the arrangements for the Inquiry on 5 July 2005. The Public Inquiry itself was held between 27 September 2005 and 10 November 2005, at the Town Hall, Nelson, and sat for a total of 18 days spread over six weeks. During that period, there were 32 formal and informal hearing sessions and two round table sessions, concerning housing and employment matters. Evidence was heard in connection with around 600 duly made objections. In addition, I have visited all of the sites that are the subject of objections or have a bearing on my understanding of those objections, either before or during the Inquiry. These took a further 15 days to complete. The Inquiry was formally closed on 13 December 2005.
- 3 The Borough of Pendle Local Plan Review was prepared by the Borough of Pendle Council in line with the 'transitional arrangements' provided for in the Town and Country Planning (Development Plan) (England) Regulations 1999, as modified by the Planning and Compulsory Purchase Act 2004 (Commencement No 2, Transitional Provisions and Savings) Order 2004. The local plan is part of a



statutory development plan prepared in the context of the established framework of planning policy guidance at national, regional and strategic level. This includes the Regional Planning Guidance for the North West (RPG13), which after 28 September 2004 became the Regional Spatial Strategy for the North West (RSS) and the Joint Lancashire Structure Plan 2001-2016 (JLSP), which was adopted in March 2005. This Local Plan Review replaces the Pendle Local Plan, which was adopted in January 1999 and covered the period up to 2001. Its purpose is to ensure that Pendle Borough has an up-to-date plan that reflects the land use policies for the Borough and which provides detailed guidance for assessing development proposals within it.

- 4 A Key Issues Report was issued for a 10 week consultation period on 24 June 2002. Following this, a response document was prepared in September 2002, covering the various issues arising from the Key Issues Report consultation. This was considered by the Council's Executive Committee on 19 September 2002. The first stage deposit plan was published for consultation on 22 September 2003, and was subject to a statutory consultation period until 3 November 2003. The re-deposit plan was published for consultation on 4 April 2005, with its consultation period running until 16 May 2005. In addition, omission sites have been the subject of statutory consultation on three separate occasions, all of which were completed prior to the opening of the Inquiry on 27 September 2005.
- 5 At the opening of the Inquiry the Council confirmed that all statutory formalities had been complied with, including the publication of notices announcing the Inquiry. During the course of the Inquiry there were no matters arising from the procedural aspects of the review.
- 6 At the first stage deposit, a total of 1187 representations were made to the Council. Of these, 471 were in support and 716 were objections. At the re-deposit stage, a further 649 representations were made, with 20 being in support and 629 objecting. Thus, a total of 1835 representations were made by 523 individuals. Of these, 1345 were objections. At the close of the Inquiry, 214 objections had been withdrawn unconditionally and 132 had been conditionally withdrawn. Therefore, there were 1131 duly made, outstanding objections before me. I have considered all of these. In addition, 1372 representations were made to the numerous omission sites. 307 of these amount to objections to the Council's proposals. At the pre-Inquiry meeting, the Council requested that I also take these omission site representations into account, which I have done.
- 7 As a result of the representations received during the re-deposit stage and further representations made by Objectors up until the close of the Inquiry, the Council has produced a list of its further suggested Changes, which are listed in Core Document 193 (CD 193) and detailed in the relevant written and oral rebuttal statements of the Council. They will not, therefore, be a surprise to those objectors. However, these Changes, which do not in my

opinion significantly change the thrust of the plan, have not been placed on formal deposit, but the Inquiry documents in which they are recorded were available for public inspection before the close of the Inquiry. I have not received any further written submissions in their regard. In these circumstances, I consider that anyone who wished to comment on the Council's suggested Changes has had adequate opportunity to do so. Thus, at the request of the Council, I have taken them into account in making my recommendations.

- 8 I have also had regard to all written material and oral evidence of Objectors and the Council up until the close of the Inquiry, together with all of the material in the Inquiry library, which is listed as Inquiry Core Documents in Annex D of my report. Schedules of the representations made, including objections to the first and re-deposit plans, supporting representations, withdrawn objections and omission site representations are appended at Annexes C1-C4. The Inquiry programme is shown at Annex A and the list of those who appeared at the Inquiry is given at Annex B of my report.

### **The Report**

- 9 My report contains recommendations on most of the policies of the re-deposit plan, including their reasoned justifications, other accompanying text and the appendices, and on numerous omission sites referred to by Objectors. In accordance with the 'transitional arrangements', my recommendations are binding on the Council.
- 10 I have prepared the normal brief form of report on the Inquiry and the objections. It generally follows the order of the re-deposit plan, on a policy-by-policy basis, covering both general and site-specific objections under the appropriate policy headings. Where Objectors refer to several policies in their site specific objections, they are generally dealt with separately under the relevant policies. My report is intended to be read together with the Re-deposit April 2005 version of the plan.
- 11 Since all documents and statements are recorded in Annex C1 to my report, and the Council and the Objectors are familiar with the evidence presented in their cases, my report concentrates on the key issues raised in the objections, along with my conclusions and recommendations. I have not received any further material from the Council or Objectors after the Inquiry closed that I have used in the preparation of my report, except for details of notification that land at Gib Hill, Nelson and at the Railway Sidings, Knotts Lane, Colne have been designated as Biological Heritage Sites. The imminence of these designations was discussed at several hearing sessions of the Inquiry. Therefore, I do not consider that it is information that should take any of the relevant Objectors, or the Council by surprise.

## Main Issues and Recommendations

- 12 I have found the re-deposit plan to be comprehensive, well thought out and sensitive to the key issues relevant to the Borough, particularly those of protecting the environment and urban renewal, especially within the HMR Pathfinder Area. It is my perception that most Objectors have not seriously challenged the main aims or objectives, or the overall development strategy of the plan, although the application of its policies is considered by some, to be contentious in certain cases. I consider that my observation on this matter is supported by the relatively few objections made to the Strategy Chapter of the plan, which sets out the Vision for the plan, its context, and its main aims, objectives and policy direction for the environment, housing, employment, town centres and retail development, transport, community facilities, recreation and leisure.
- 13 The modifications that I recommend, which are listed in a summary form after this preamble, address valid points made by the Council and Objectors, together with an intention to better reflect national, regional or strategic policy, especially where I consider that national guidance has not been adequately followed. My remit is only to make recommendations in response to my consideration of outstanding duly made objections.
- 14 However, I consider that there are a number of additional amendments which would be beneficial to the clarity of the plan that have arisen from: my recommendations; changes in published national policy and guidance during the local plan review process that are not always reflected in the re-deposit plan, which include, PPS6, PPS7, PPS9, Circular 05/2005 and amendments to the Use Classes Order with particular reference to former Class A3; re-ordering of foot notes; minor typographical errors and additional changes suggested by the Council. These would not change the meaning of the plan. To assist the Council, I have listed them as 'suggested changes', after the summary of main recommendations. However, they are not binding on the Council.
- 15 Turning now to my binding recommendations, the round table sessions on housing and employment established that the re-deposit plan, incorporating my recommended modifications, will make adequate provision for new housing and employment land within the Borough up to 2016, in accordance with the strategic requirements of the Joint Lancashire Structure Plan. Therefore, I do not recommend the allocation of any land for these uses during the plan period. I am satisfied also that the re-deposit plan makes satisfactory provision for other main land use types, including town centre, retail, community, recreation and leisure uses. Many objections made at the first stage deposit concerning transport matters were resolved in the re-deposit plan, by removing local plan policy support for the early implementation of the A56 Village Bypass and by instead, protecting the former Colne-Skipton railway track bed as a transport corridor. Thus, in my opinion, most of my recommendations will result in relatively minor changes to the policy

direction of the plan, but they will serve to add to the clarity and precision to it.

- 16 In my opinion, the most contentious matter to be resolved by the Inquiry concerned the concept of safeguarded land. In the re-deposit plan, this term is applied to sites that have been identified as being suitable for accommodating off-site replacement of dwellings demolished as part of the HMR Pathfinder programme, as a last resort, if no other sequentially better land were available where and when it was required. It does not apply to land that is referred to in PPG2 as, 'safeguarding land between the urban area and the Green Belt, which may be required to meet longer-term development needs'. To overcome this confusion, I have recommended that the term 'safeguarded land' is replaced in the re-deposit plan by the name 'HMR Reserved Housing Land'.
- 17 I have not recommended the de-allocation of any such sites designated in the re-deposit plan, but I have recommended a reduction in the area of site X22 to take account of the recent designation of part of that site as a Biological Heritage Site. To compensate, I have also recommended the designation of omission site X86 as a HMR Reserved Housing Land site.
- 18 However, the re-deposit plan does not make any provision for safeguarded land in the PPG2 sense. Like many Objectors, I consider that this is an unacceptable omission of the plan. As I reason in Chapter 3 of my report, which concerns the Green Belt, I do not endorse the Council's view that the proven lack of demand constituting special circumstances, referred to by the Inspector for the previous Local Plan Inquiry, have been satisfactorily demonstrated.
- 19 Whilst based on the current strategic housing requirements, I conclude that the Council can demonstrate sufficient supply up to 2021; this cannot be said for employment land, which as I conclude in Chapter 23 of my report, is just sufficient to meet current requirements up to 2016. In my opinion, the elements of uncertainty regarding regional requirements referred to at the previous Local Plan Inquiry still exist, because the RSS is currently under review and hence, there is the possibility that housing and/or employment land requirements for the Borough may be adjusted upwards.
- 20 Furthermore, the imminence of published new national guidance in the form of PPS3: Housing, is such that it is likely that the Council will need to review its policies for overall housing provision at an early stage, as part of the new LDF system. Therefore, I consider that circumstances similar to those that led to the designation of Protected Areas in the adopted Pendle Local Plan prevail.
- 21 Moreover, I do not consider that changes to the Green Belt boundary, as part of this review of the local plan, would conform to other components of the development plan. Both the RSS and the JLSP identify that there is no strategic case for altering the general

extent of the Green Belt in Lancashire. Furthermore, that it is unnecessary even to undertake a strategic study of the Green Belt within Lancashire before 2011. By this time, new Government guidance on housing will have been published, the RSS will have been reviewed and a much clearer picture of the long-term development requirements for the Borough will be known. Consequently, I conclude in Chapter 3 of my report that the Green Belt boundaries in Pendle should not be altered in this review of the Pendle Local Plan.

- 22 Therefore, I recommend that the designation of Protected Areas (Policy E2A) is carried forward from the adopted Pendle Local Plan, but that its policy text and reasoned justification are updated to reflect the intended longevity of Green Belt boundaries referred to in PPG2. I recommend policy and reasoned justification text for this new Policy 3A in Part A of Chapter 3 of my report. In Part B of that Chapter, I recommend that omission sites X11, X33, X34 and X35 are so designated.

### **General Comments**

- 23 Finally, I wish to express my appreciation for the co-operation and courtesy given to me by all those who appeared at the Inquiry. Statements and evidence were taken briefly and there was little repetition of arguments. As a result, the Inquiry time was used efficiently and effectively, particularly since most of the objections were dealt with as written representations or by informal hearing sessions of varying formats.
- 24 I acknowledge that the Council's planning team had a very heavy burden in preparing and presenting its rebuttal evidence, not only at the Inquiry, but also in responding to the written objections. The Council's advocate and witnesses were always helpful and I very much appreciate the endeavours also of their back-room team members, especially those that worked so hard at preparing the data bases for the duly made and omission site representations. My thanks also go to the various Objector companies, organisations and individuals who gave so much of their time and thought to their representations at the Inquiry and in writing. I hope that they found it a worthwhile process and that my recommendations will go some way towards meeting their concerns.
- 25 But my personal thanks must especially go to the succession of Programme Officers for the Inquiry; firstly Yvonne Parker, then Richard Hartley, followed by Derek Thomas and finally, Sameera Asghar, whose work greatly assisted the efficient running of the Inquiry. I also thank Neal Jillings, formerly a Higher Planning Officer of the Planning Inspectorate who recorded the details and produced the notes of the round table sessions, and Susannah Guest, a Planning Officer of the Planning Inspectorate who has assisted me with the proof reading of my report.

- 26 My report follows this preamble, preceded by a Summary of Main Recommendations, a list of non-binding Suggested Changes and a list of Abbreviations used in the report. Annexes setting out the Inquiry Programme, Appearances, Core Documents and Schedules of Representations with details of proofs of evidence and statements, follow. These latter Schedules are based on the Council's data bases, which contain details of all of the representations made.
- 27 A copy of this letter has been sent to the Government Office for the North West and to the Office of the Deputy Prime Minister.

Yours faithfully

A handwritten signature in black ink that reads "S. C. Bussey". The signature is written in a cursive style with a large, sweeping flourish at the end of the name.

***Shelagh Bussey***

MA DipTP DipEM PhD MRTPI

***Inspector***

## SUMMARY OF MAIN RECOMMENDATIONS

<u>Policy No.</u>	<u>Main Recommendations</u>	<u>Report Page No.</u>
<b>Introduction and Strategy</b>	Amend the second issue of the Housing Policy Direction of the Strategy given on page 14 so that it reads: Encourage housing renewal, including clearance and demolition.	<b>0-15 to 0-16</b>
	Number the paragraphs of the written statement throughout.	
	Amend the first paragraph of the Environment section of the Strategy so that it reads: The Borough has a distinct environmental character, which should be recognised by all as an important asset. The planning process can help to increase the awareness of the importance of Pendle’s environment, which contains sharp contrasts between remote upland moors and densely populated industrial valley landscapes and covers a historical timeframe ranging from prehistoric sites to modern textile mills.	
	Add the following phrase to the end of the last sentence of the first Transport Policy Direction/Land Use Aim given in the Table on page 19: ...and Community Rail Partnerships.	
	Amend the second criterion in Policy 30 to read: Rapid Transit 61 – Improvements to the rail and bus network in terms of new and segregated routes, increased frequencies, through ticketing, integrated systems and better customer environments and the introduction of Community Rail Partnerships.	
Add an additional paragraph, after the third paragraph, of the reasoned justification of Policy 30 to read: The East Lancashire Partnership, Lancashire County Council and Blackburn with Darwen Borough Council have commissioned The Association of Community Rail Partnerships (ACoRP) to look at ways of developing a community partnership for the East Lancashire Line between Preston, Blackburn, Accrington, Burnley and Colne. A Community Rail Partnership will act as a bridge between the railway and the local community, providing a means of promoting and developing local rail services through improving facilities for the local community, including improved station facilities, discounted fares, enhanced bus links and dedicated cycle routes to stations. The Strategic Rail Authority has recently published the Community Rail Development Strategy (CD88) and achieving the objectives of this strategy will depend on partnership and active support from the community. Success will see the railway placed at the heart of a vibrant local and rural economy, increasing accessibility, promoting environmental sustainability and social inclusion.		
*****		
<b>Policy 1</b>	Amend the last sentence of numbered paragraph 6 of Policy 1 so that it reads: Proposed extensions in the AONB or Green Belt must also comply with the criteria set out in Policies 2 and 3 respectively.	<b>1-9</b>
	Amend the settlement boundary of Barnoldswick to include land at Wapping, omission site X53, within the settlement boundary, as shown on the Proposals Map of the adopted Pendle Local Plan. The Proposals Map should be amended accordingly and the land should be shown as non-designated.	<b>1-12</b>

Amend the settlement boundary of Barnoldswick to include land at The Moorlands, Manchester Road, Barnoldswick, omission site X80, within the settlement boundary. The Proposals Map should be amended accordingly and the land should be shown as non-designated.

Amend the settlement boundary of Barrowford to include the Clough Springs Development, omission site X72, within the settlement boundary. The Proposals Map should be amended accordingly and the land should be shown as non-designated.

**1-16**

Amend the settlement boundary of Brierfield to include the new double garage, turning area and adjacent garden land at Den Mar Di, Kibble Grove, Brierfield, but excluding a 2.0 metre service strip to the east of the garage, part of omission site X05, within the settlement boundary, in accordance with Change No. 103. The Proposals Map should be amended accordingly and the land within the extended settlement boundary should be shown as non-designated.

**1-18**

Exclude omission site X29 (except that part which comprises omission site X28) from the settlement boundary of Colne and re-designate omission site X29, excluding omission site X28, as open countryside. For the avoidance of doubt omission site X28 should be placed within the settlement boundary for Colne. The Proposals Map should be amended accordingly.

Reduce the open space designation at omission site X41 to the area shown outlined in green on the plan at Appendix 2 of the Council's proof reference PBCP/186. The remainder of the site should be designated as open countryside and the whole of the site should be excluded from the settlement boundary.

**1-23**

Re-designate land at Red Lane, omission site X35/Y04 as open countryside outside the settlement boundary. (See Chapter 3 for my further recommendation on this site.)

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## **Policy 2**

Replace the first sentence of Policy 2 with text that reads as follows:

The Borough Council will seek to safeguard the parts of the Forest of Bowland Area of Outstanding Natural Beauty (AONB) and its setting, located within the Borough.

**2-2 to  
2-3**

Replace paragraph 2 of Policy 2 with text that reads as follows:

In particular, proposals for engineering works, new buildings, replacement buildings, extensions or alterations to existing buildings in the AONB should meet the following criteria:

1. In respect of extensions and alterations; not to be seen in public views to dominate the existing building in terms of shape, height, materials or fenestration.
2. In the case of engineering operations; not to detract from the natural beauty of the AONB.
3. Not result in any loss of amenity for occupiers of neighbouring properties.
4. In the case of replacement buildings; to bring about an environmental improvement and not result in a significant (i.e. no more than 25% of the volume of the original building) increase in bulk, extent or visual impact.
5. In the case of a dwelling or traditional building; not include materials, components and finishes which are alien to the architectural traditions of the area and the architectural integrity of the building and its setting.

Add the following sentence to the end of the reasoned justification for Policy 2, to clarify the meaning of 'major development' in this policy context:

A major development is 10 or more dwellings, or a residential site area of 0.5 hectare or more, or where the floor space to be

built is 1,000 square metres or more, or the non-residential site area is 1.0 hectare or more.

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### **Policy 3**

Add a new policy and supporting text that should follow Policy 3, which would read: **3-7**

#### **POLICY 3A – PROTECTED AREAS**

Within the areas shown on the Proposals Map as a Protected Area, no development will be permitted which would prejudice the open character of the area or its potential for long term development, during the plan period to 2016.

Its reasoned justification should read:

It is intended that these areas should remain open during the plan period. They represent areas of choice for possible development to meet future long term requirements and to ensure the protection of the Green Belt. The future of these areas is to be re-examined through subsequent reviews of the plan. Should long term pressure for development after 2016 prove that the areas will not be required for development, consideration will be given to their inclusion within the Green Belt. For development control purposes Policy 1 – Development in the Open Countryside applies to land designated as a Protected Area.

Amend the second paragraph of the reasoned justification of Policy 3 on page 26, so that it reads:

There have been no changes to the Green Belt boundaries in Pendle.

Designate land at Trough Laithe Farm, off Wheatley Lane Road, omission site X11, but excluding that part of the site which comprises omission site X71, as a Protected Area in accordance with new Policy 3A, which is set out in full at paragraph 3.32 of this report, and as Open Countryside falling outside the Settlement Boundary. The Proposals Map should also be amended accordingly to reflect these designations. **3-13**

Designate land at Lidgett Triangle, omission site X33, as a Protected Area, in accordance with new Policy 3A, which is set out in full at paragraph 3.32 of this report. The site should also be designated as Open Countryside outside the settlement boundary. **3-24**

Designate land between Skipton Old Road and Castle Road, omission site X34 including omission site Y22, as a Protected Area, in accordance with new Policy 3A, which is set out in full at paragraph 3.32 of this report. The site should also be designated as Open Countryside outside the settlement boundary. **3-25**

Designate Land at Red Lane, omission site X35, as a Protected Area, in accordance with new Policy 3A, which is set out in full at paragraph 3.32 of this report. The site should also be designated as Open Countryside outside the settlement boundary.

Amend the Proposals Map accordingly to reflect the designations of the sites referred to in the three preceding paragraphs.

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### **Policy 4**

Amend Table 2a and the Proposals Map to reflect the designation of omission site X27 as a BHS. **4-9**

Place land forming field numbers 750, 461 and 462 entirely outside the settlement boundary, by removing the safeguarded land designation from these fields (parts thereof) and by re-designating that land Open Countryside and BHS. **4-12**

Amend Table 2a and the Proposals Map to reflect these designations of field numbers 750, 461 and 462 as a BHS.

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**Policy 4A** No recommended modifications

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**Policy 4B** Amend the last sentence of the text of Policy 4B to read: **4B-1**  
The same level of protection will also be afforded to any new sites or areas which are designated by the appropriate agencies during the lifetime of the plan to ensure that as a minimum there is no net loss of heritage value.

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**Policy 4C** Change the title of Policy 4C to: **4C-5 to 4C-8**  
Policy 4C - Natural Heritage–County and District Designated Sites

Change the title of Policy 4C in the List of Policies given at the beginning of the Written Statement to:  
Policy 4C - Natural Heritage–County and District Designated Sites

Change the title of Table 2a to:  
Table 2a – County and District Designated Sites

Change the title of Table 2a in the list of Tables given at the beginning of the Written Statement to:  
Table 2a – County and District Designated Sites

Amend the wording of the first paragraph of the text of Policy 4C so that it reads:  
The Council will protect, conserve and where appropriate enhance all Biological Heritage Sites (BHS), Geological Heritage Sites (GHS), sites of Local Natural Importance (LNI) and Local Nature Reserves (LNR), as defined (where applicable) by BHS Partnership, Lancashire RIGS, Lancashire Wildlife Trust and Borough of Pendle. Current sites are listed in Table 2a and shown on the Proposals Map.

It is recognised that there may be new designations made during the lifetime of the Plan, therefore, the same level of protection will also be afforded to any new sites or areas designated by the appropriate agency.

Delete the last paragraph of the text of Policy 4C.

Amend the wording of the fourth paragraph of the text of Policy 4C so that it reads:

Where development is likely to result in loss or damage to a designated site, appropriate and adequate mitigation and compensation through planning obligations will be sought to ensure that as a minimum there is no net loss of value, and to ensure the protection and enhancement of the site's nature conservation interests.

Amend the last sentence of the second paragraph of the reasoned justification so that it reads:

This policy seeks to protect locally acknowledged sites of nature conservation; BHS, GHS, LNI and LNR, which have not been designated as being of international or national importance.

Amend the fourth paragraph of the reasoned justification so that it reads:

The control of development in County and District designated sites is important in conserving the natural heritage of these sites. Only under exceptional economic or social circumstances will development be permitted. Any proposed development should not have a significant impact on the designation. For any development granted planning permission conditions will be

imposed to prevent any damage to wildlife habitats or important physical features and planning obligations will be imposed to ensure that there is 'no net loss' of habitat. Consultation with the Lancashire Wildlife Trust and the Lancashire County Council Ecologist will be necessary in order to establish the acceptability of development within, or affecting, a County or District designated site.

Add text to the beginning of the fifth paragraph of the reasoned justification of Policy 4C so that it reads:

Any development that directly or indirectly affects a site of ecological or nature heritage will be required to submit a full ecological assessment as part of the planning application. This ecological assessment will be a material consideration in any decision. Only in very exceptional circumstances – i.e. where it can be shown that there is an overriding community benefit from a proposal – will development be permitted at some expense to the environment (i.e. Policy 29, development of the proposed transport corridor). In response to this environmental assessment adequate and appropriate mitigation and compensation measures will be used to account for any loss of value to a designated site. Such measures may include a restriction of development, operations and working methods, or the relocation of all or part of the affected habitat in order to ensure that there is 'no net loss' of habitat. In all cases planning obligations will be used to secure the mitigation programme. Where relocation is involved the developer should liaise with the appropriate wildlife bodies to produce a management plan for the relocation work. This management plan should include a monitoring programme and a specified period of maintenance or care which should be a minimum of 5 years.

Amend the text of the sixth paragraph of the reasoned justification of Policy 4C so that it reads:

There are a number of different bodies that are responsible for designating sites for environmental protection. The BHS Partnership, endorsed by Lancashire County Council, is responsible for designating Biological Heritage Sites (BHSs). Lancashire County Council has also agreed that Regionally Important Geological and Geomorphological Sites (RIGs) in Lancashire, identified by the Lancashire RIGs Group, are equivalent to Geological Heritage Sites (GHSs). The Lancashire Wildlife Trust and the Borough of Pendle are responsible for designating Sites of Local Natural Importance (LNIs) and Local Nature Reserves (LNRs). Guidelines have been produced for designating new environmental protection sites. In particular for the designation of LNIs proposals must follow the guidelines set out in the Lancashire Wildlife Trust's document: Guidelines for Important Wildlife Sites in Pendle (2005)<sup>1</sup>, or subsequent amendment thereof.

Amend the Proposals Map to remove the Biological Heritage Site designation from land at Birch Hall Lane, Earby that lies within the settlement boundary for Earby, in accordance with the BHS notification letter from Lancashire County Council dated 1st August 2005.

**4C-11**

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## **Policy 4D**

Amend paragraph 3 of the text of Policy 4D to read:

Development proposals that would adversely impact or harm, directly or indirectly, legally protected species will not be permitted, unless shown to meet the requirements of The Conservation (Natural Habitats, &c.) Regulations 1994.

**4D-2**

Amend the third sentence of the final paragraph of the reasoned justification for Policy 4D to read:

Enhancement schemes may include the increased use of locally native flora within landscaped areas of a development, the

creation of new wildlife habitats such as ponds, or the provision of nest boxes.

\*\*\*\*\*

## Policy 5

Replace the last sentence of the first paragraph of Policy 5 with the following statement:

**5-5 to  
5-7**

The Council will apply the following criteria to the following renewable energy proposals:

Add the following additional paragraph at the end of the text of Policy 5:  
Within designated areas (AONB, SAC, SPA, SSSI, Green Belt, Biological Heritage Sites, Geological Heritage Sites, Sites of Local Natural Importance or Local Nature Reserves) planning permission for renewable energy developments will only be granted where it can be demonstrated that the objectives of designation of the area will not be compromised by the development, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits. Outside designated areas renewable energy developments should not cause serious landscape or environmental harm.

Change the second paragraph of Policy 5 to read:  
Solar Energy – Solar photovoltaic (PV) panels will be encouraged on existing buildings (with the exception of Listed Buildings) and proposed buildings as long as they are not visually intrusive.

Replace the penultimate sentence of paragraph three of Policy 5 with the following sentence:  
Large scale wind farms will be resisted and wind turbine developments will be required to provide benefit to the local community subject to them meeting Circular 05/2005 (Planning Obligations) tests.

Change the wording of the first sentence of the last paragraph on page 38 to read:  
Development projects will be confined to those that supply some community benefit to the local area via contributions to a local community fund in cases where the tests of Circular 05/2005 (Planning Obligations) are met.

Insert the following additional paragraph before the last paragraph of the reasoned justification to Policy 5:  
Small scale and building related renewables including low or zero energy schemes also provide great potential for increasing energy efficiency and reducing reliance on non-renewable energy forms. Such developments should be encouraged and should be a key consideration in the determination of planning applications.

\*\*\*\*\*

## Policy 6

Replace the first four sentences of the second paragraph of the reasoned justification given on page 40 of the written statement with the following supporting text:

**6-4**

The Environment Agency has prepared maps showing areas of flood risk. These maps identify Flood Zones, and classify areas as Flood Zone 3 (high risk), Flood Zone 2 (low to medium risk) or Flood Zone 1 (little or no risk), and in accordance with Table 1 of PPG25, which identifies the types of development appropriate to each zone.

Replace the fifth sentence of the second paragraph of the reasoned justification given on page 40 of the written statement which reads:  
The Council has produced Supplementary Planning Guidance for Development and Flood Risk, which was adopted in 2004

and which it regularly updates. It contains maps prepared by the Environment Agency that identify Flood Zones and advice on flooding issues.

\*\*\*\*\*

**Policy 7** No recommended modifications

**Policy 8** No recommended modifications

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**Policy 9** Add the following additional paragraph at the end of the text of Policy 9: **9-2**  
For non-listed buildings of historic or architectural importance the same approach will be used, but the controls will be applied at a level commensurate with the importance of the building in question.

Add the following additional sentence at the end of the first paragraph of the reasoned justification:

In addition the Council will compile a local list of buildings of historic or architectural importance in consultation with local people.

Add the following text as a new penultimate paragraph in the reasoned justification:

Where proposals affect any non-listed building of architectural or historic importance, the Council will seek to control development which significantly affects the structure or its setting, and the approach will be similar to that set out for statutorily Listed Buildings. Controls will, however, generally be less stringently applied and will be at a level commensurate with the importance of the building.

\*\*\*\*\*

**Policy 10** Re-word the second numbered paragraph of Policy 10 as follows: **10-3**  
2. only grant consent for demolition (where permission is required) where a building is not of townscape, architectural or historic interest, and where an acceptable scheme of replacement or after-use for the site can be reasonably guaranteed.

Re-word the fourth numbered paragraph of Policy 10 as follows:  
4. seek to protect and enhance any parks, gardens and cemeteries of historic interest, and their setting, particularly those identified on the English Heritage Register of Parks and Gardens of Special Historic Interest.

Re-word the fourth paragraph of the reasoned justification for Policy 10 as follows:

PPG15 states that local planning authorities should protect registered parks and gardens in determining planning applications. The Council will seek to protect and enhance any parks, gardens and cemeteries of historic interest and their setting. The most important of these may be included on the English Heritage Register of Parks and Gardens of Special Historic Interest.

\*\*\*\*\*

**Policy 11** Re-word the second paragraph of the text of Policy 11 to read: **11-2**  
Development proposals that affect sites that are neither Scheduled Monuments nor otherwise of national importance will be dealt with on their merits.

Re-word the first sentence of the last paragraph of the reasoned justification to

Policy 11 as follows:

Development proposals that affect sites that are neither Scheduled Monuments nor otherwise of national importance will be dealt with on their merits.

\*\*\*\*\*

**Policy 12**

No recommended modifications

**Policy 13**

Re-order the bullet points in Policy 13, so that the third bullet point, which refers to siting and design is listed as the first bullet point.

**13-3 to  
13-4**

Add a further bullet point after that commencing; 'Sustainable drainage systems...' which reads:

The development shall demonstrate that it incorporates satisfactory standards of security to prevent crime both within the development site and in the surrounding area.

\*\*\*\*\*

**Policy 14**

Amend the penultimate paragraph of Policy 14 to read:

Development proposals including the planting of new woodland should ensure that the species to be planted are native to the locality. Development proposals including the planting of new hedgerows at the edge of a settlement or in the open countryside must ensure that the species to be planted are native to the locality.

**14-3 to  
14-4**

Amend the second sentence of the reasoned justification to Policy 14 to read as follows:

The Council is committed to their protection and will seek to preserve them where appropriate as defined by the DETR publication; Tree Preservation Orders: a guide to the law and good practice, through the creation of Tree Preservation Orders, and guidance contained within the Hedgerow Regulations (1997).

Amend the third sentence of the second full paragraph of the reasoned justification to Policy 14 given on page 53 of the written statement to read as follows:

There are five ancient woodlands of 2.0 hectares or more in the Borough and one immediately adjacent to but outside the Borough.

\*\*\*\*\*

**Policy 15**

Correct minor inconsistencies in the referencing of the Pendle Open Space Audit. Specifically, between the footnote reference numbers given in the policy text at paragraph 5 and the footnote itself on page 52, and the dates of the Open Space Audit given in the reasoned justification and the footnote on page 54, and the date of the Audit given in Appendix 3.

**15-2**

\*\*\*\*\*

**Policy 16**

Add the following additional sentence after the second sentence in the third paragraph of the reasoned justification for Policy 16 which would read:

Submitted schemes must show all existing and proposed services both above and below ground and all planting shown must be in accordance with recommendations of each particular service provider in terms of distance from the particular service.

**16-2**

\*\*\*\*\*

**Policy 17**

Delete the third sequential tier from the text of Policy 17, which refers to 'white land' and replace it with a new third tier that reads:

The development of previously undeveloped land within a

**17-28  
to**

settlement boundary, where this avoids areas of open space (Policy 33), areas identified as being of defined settlement character (Policy 12) and areas of natural heritage (Policies 4A-4C), where it is demonstrated that the site is well located in relation to houses, jobs, other services and infrastructure, and is or can be made accessible by public transport, walking or cycling.

Amend the first bullet point of the text of Policy 17, which refers to 'white land' so that it reads:

- For replacement dwellings where there is insufficient previously developed land within a settlement boundary to meet the needs of the proposal, development may be permitted on HMR Reserved Housing Land where it can be demonstrated that sites in accordance with 1-3 above are not available (or that the HMR Reserved Housing Site accords with either 1, 2 or 3 above) and the dwellings cannot be replaced on the same site.

I RECOMMEND that the plan be modified by deleting the third paragraph of the reasoned justification of Policy 17 below Figure 2a, which defines 'white land', and by replacing it with a new paragraph which reads:

The sequential approach detailed in 1-3 of this Policy is in accordance with that set out in Policy DP1 of the Regional Spatial Strategy and Policy 12 of the Joint Lancashire Structure Plan.

Delete the last four sentences of the third paragraph of the reasoned justification of Policy 17, below the heading 'Replacement of cleared dwellings', which start: 'All replacement dwellings...', and replace them with justification text which reads:

In accordance with the sequential search set out in Policy 17 (Points 1-3) all replacement dwellings should be located, in the following order of priority; i) in reused or converted buildings within a settlement boundary, ii) previously developed land within a settlement boundary; or, iii) previously undeveloped land within a settlement boundary (as defined by Policy 17 point 3). In respect of replacement dwellings, where it is demonstrated that sites in accordance with the sequential approach (Policy 17 points 1-3) are not available within the ADF boundary (or that the HMR Reserved Housing Site accords with either 1, 2 or 3 above) then consideration will be given to releasing some HMR Reserved Housing Land for new housing development.

Amend the third sentence of the fourth paragraph of the reasoned justification for Policy 17 below the heading 'Replacement of cleared dwellings', which refers to 'white land' so that it reads:

If there is sufficient previously developed land to meet the needs of replacement dwellings within the ADF boundaries over the plan period, the HMR Reserved Housing Land will remain undeveloped.

Amend the first sentence of the second paragraph of the reasoned justification for Policy 17 on page 69, which refers to 'white land', so that it reads:

Any proposal for affordable housing should be met in order of priority in accordance with the sequential search set out in Policy 17 (points 1-3): i) in reused or converted buildings within a settlement boundary; ii) previously developed land within a settlement boundary; or, iii) previously undeveloped land within a settlement boundary (as defined by Policy 17 point 3).

Amend the third sentence of the penultimate paragraph of the reasoned justification of Policy 1 on page 24, which refers to 'white land', so that it reads:

Any proposal for affordable housing should be met in order of priority on previously developed land and buildings within a settlement boundary, followed by previously undeveloped land within a settlement boundary (Policy 17).

Delete the reference to Urban White Land from Appendix 4 – Glossary and Abbreviations.

Amend the second paragraph of the Sequential Test explanation in Appendix 4, so that it reads:

Adopting a sequential approach to housing means that first preference should be for the re-use or conversion of an existing building within a settlement boundary, previously developed land within a settlement boundary, followed by the development of previously undeveloped land within a settlement boundary, where this avoids areas of open space, areas identified as being of defined settlement character and areas of natural heritage, where it is demonstrated that the site is well located in relation to houses, jobs, other services and infrastructure, and is or can be made accessible by public transport, walking or cycling, and only then allocated greenfield sites.

Amend exception B. to Policy 17 to read:

Housing for special need housing groups where there is an identified local need as set out in the Supporting People Strategy<sup>31</sup>.

Replace Figure 2a with the following table:

**Figure 2a – Housing Land Requirement in Pendle 2001-2016**

Joint Lancashire Structure Plan requirement	1970
Dwellings completed April 2001 – March 2005	-1317
Number of dwellings to be provided for	653
Dwelling units with planning permission (March 2005)	-1395
Total requirement to 2016	-742

Replace all references to 'safeguarded land/sites', as used in the context of Policy 17, throughout the written statement and on the Proposals Maps to: HMR Reserved Housing Land/Site.

Delete the definition of 'Safeguarded Housing Sites' from the Appendix 4 – Glossary and Abbreviations and insert the following definition of HMR Reserved Housing Land/Site:

Land that is protected for its potential to accommodate off-site replacement dwellings and associated infra-structure, including open space required in connection with residential clearance associated with the HMR Pathfinder Programme (in line with Policy 18). Monitoring will indicate if the sites are, or are not, required for housing development over the plan period.

Amend the first sentence of the last paragraph of the reasoned justification to Policy 17 on page 66 to read:

HMR Reserved Housing Land is land that is protected for possible use for off-site replacement housing associated with the HMR Pathfinder Programme.

Delete the last sentence of the last paragraph that commences on page 66 and the list of sites designated as safeguarded land given on page 67, from the reasoned justification and by placing them within the policy text after the first bullet point so that it reads:

- For replacement dwellings where there is insufficient previously developed land within a settlement boundary to meet the needs of the proposal, development may be permitted on HMR Reserved Housing Land where it can be demonstrated that sites in accordance with 1-3 above are not available (or that the HMR Reserved Housing Site accords with either 1, 2 or 3 above) and the dwellings cannot be replaced on the same site. The following sites are designated as HMR Reserved Housing Land:

Clitheroe Road, Brierfield	2.1 ha <sup>1</sup>
Gib Hill, Nelson (Phased)	12.01 ha

Knotts Lane, Colne	
(including the former Cement Works)	7.85 ha
Former Lucas Sports Ground, Reedley	2.64 ha
Further Clough Head, Nelson	3.66 ha <sup>2</sup>

Delete the fifth sentence of the third paragraph under the heading, 'Replacement of cleared dwellings', which reads: 'All replacement dwellings must be located within the boundary of the ADF from within which the original dwellings are to be cleared'.

Add a sentence to the end of the third paragraph under the heading, 'Replacement of cleared dwellings', as amended in accordance with the recommendations given above which reads:

Sites within a defined ADF boundary will be given priority for release so long as they are in a location suitable to serve the regeneration needs as identified through any master planning work or Area Action Plan.

Add a sentence at the end of the section of the reasoned justification to Policy 17 titled 'Replacement of cleared dwellings', which reads:

A review of the continued need for HMR Reserved Housing Land and the specific sites identified will be considered as part of the Local Development Framework.

Add the Area Development Framework (ADF) boundaries to the Proposals Maps.

Change references in the reasoned justification for Policy 17, under the heading, 'Affordable Housing', from 'Housing Needs Study 40' to 'Housing Needs Survey 40'.

Amend the footnote given on page 68 of the written statement to read:  
40 Pendle Borough Housing Needs Survey (2003). BoP

Amend the reference in Appendix 5 from 'Borough of Pendle (2004) Housing Needs Study. BoP' to read:  
Pendle Borough Housing Needs Survey (2003). BoP

Delete the fifth sentence of the fourth paragraph under the heading, 'Replacement of cleared dwellings', which reads: 'Many of the sites continue the Protected Area designation from the previous Local Plan'.

Designate land at James Nelson's Sports Ground, Nelson (omission site X86/Y11), as HMR Reserved Housing Land, excluding the part of the site that is the subject of planning application reference 13/05/0558P. This site should be added to the list HMR Reserved Housing Land sites given in the text of Policy 17 and shown on the Proposals Map.

**17-78**

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**Policy 18**

Amend criterion 2 of Policy 18 as follows:

2. New residential development (in line with Policy 17)1

**18-7 to  
18-8**

Add the following footnote to Policy 18:

1 Additional dwellings in excess of a one for one replacement will count against the Joint Lancashire Structure Plan (JLSP) requirement (Policy 12).

Amend criterion 4 of Policy 18 as follows:

4. Community facilities and employment opportunities (in line with Policies 23, 26 and 32)

Add text to the end of the reasoned justification for Policy 18, which would read:

When considering options for the future of an area, it is important that any decisions are based on an informed understanding of the historic environment. Whilst programmes of repair and refurbishment, clearance or remodelling in a relatively small compact area (i.e. a few blocks of terraced housing), or one that is not physically related to an adjoining

area, will not normally require a townscape or historical assessment to be undertaken, for those areas that are clearly of historical interest or are of sufficient size and coherence to warrant consideration (i.e. a neighbourhood), an appropriate townscape or historical assessment will be required.

Such an assessment should be undertaken before detailed proposals are drawn up for the regeneration of the area. As well as identifying assets which are protected through listing, scheduling or conservation area designation, the character of the area, its development over time and its relationship to the surrounding area should also be considered. Some areas may also retain significant buried archaeological remains and these will need to be investigated in advance of any future development. The scope for any additional recording work should be identified as part of any assessment.

Delete reference to 'Restructuring' from Policy 18 key text.

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## Policy 19

No modifications recommended

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## Policy 20

Delete the second sentence of the first bullet point of Policy 20 so that the new bullet point reads:

**20-4 to  
20-5**

- Density – New housing development should be provided at a minimum density of 30 dwellings per hectare net.

Delete the words 'excluding the identified exceptions' from the third sentence of the second paragraph of the reasoned justification to Policy 20.

Amend the second paragraph of the reasoned justification for Policy 20 from the third sentence onwards so that it reads:

It is recognised that in order to create choice in the local housing market, there may be a need for some lower density housing development in order to provide larger family homes with gardens, and exceptionally at other particularly visually sensitive sites, for example, in parts of some conservation areas. In these cases, a relaxation of the minimum 30 dwellings per hectare net requirement may be permitted where it is specifically, clearly justified by a Development Brief or design statement.

Amend the second paragraph of the reasoned justification for Policy 20 by adding text which reads:

In some situations it may be possible to deliver higher density development. In line with PPG3 this would be appropriate in areas of high accessibility such as adjacent to main public transport corridors or within town centres. In these locations the Council will seek to maximise development by encouraging development of up to, or in excess of, 50 dwellings per hectare.

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## Policy 21

No modifications recommended

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## Policy 22

Add a footnote to the word 'premises' where it is used for the first time in the text of Policy 22. The footnote should read:

**22-11**

In the context of Policy 22 the word 'premises' includes the buildings and land within the curtilage of the existing industrial site that is protected by the policy.

\*\*\*\*\*

## Policy 23

Amend Figure 3a contained within the reasoned justification for Policy 23, so that it reads:

**23-7 to  
23-8**

Figure 3a – Industrial and Business Land Requirement in Pendle 2001-2016 <sup>49</sup>

Supply at 31 March 2005	Requirement
Employment requirement of the Structure Plan 2001-2016	40.00 Ha
Industrial take up 2001-2005 (completions) (source PBC Employment Land Study 2005)	-10.92 Ha
Under construction at 31 March 2005 (source PBC Employment Land Study 2005)	-1.66 Ha
Land available at March 2005	
Outline, full or reserved matters permission, with no discounting (source PBC Employment Land Study 2005, as corrected)	-19.03 Ha
Vacant sites in Protected Employment Areas	-11.26 Ha
1999 adopted Local Plan allocations (still vacant)	-4.0 Ha
Sites >0.5 Ha outside of Protected Employment Areas where previous employment consents have lapsed but still remains vacant	-0.82 Ha
Requirement (Surplus)	+7.69 Ha

Amend footnote 49 to Policy 23 so that it reads:

49 Figures for take-up and availability taken from the Industrial and Business Land Availability Report (2005) as of 31 March 2005, updated to account for errors and omissions.

Amend paragraph 3 of the reasoned justification for Policy 23 so that it reads:

Figure 3a indicates the total supply of employment land as at 31 March 2005 having regard to employment land supply as defined in paragraph 6.3.36 of the Joint Lancashire Structure Plan. It includes land with planning permission for Class B use, land or vacant premises available for employment purposes within Protected Employment Areas, land or vacant buildings previously in employment use which have not been allocated for alternative land use, and which remain available for employment development. It excludes windfall sites, i.e. those not identified for employment purposes or those which the Council are not currently aware of as being available for development.

Delete the last paragraph of the Employment Strategy, which appears on pages 15 and 16 of the plan.

\*\*\*\*\*

## Policy 24

Amend Policy 24 to read:

Within rural areas, a wide range of economic activity<sup>52</sup> will be supported provided that proposals for development meet the following criteria: -

**24-6 to  
24-8**

1. The development is small scale for B1, B2, B8 or recreational uses.

AND

A. would re-use an appropriately located and suitably constructed existing building in the countryside which was;

- (i) in scale and design in keeping with its surroundings,

OR,

B. is a replacement building in the open countryside (excluding the Green Belt), which is suitably located and of permanent design and construction which would bring about an environmental improvement in terms of the impact of the current development on its surroundings and landscape and

which was;

- (i) on the footprint of the existing building,
- (ii) not proposing any large scale extensions<sup>53</sup>,

OR,

C. is within the settlement boundary of an existing village.

In addition, the proposal must be suitably and safely accessed and parking must be provided in line with the car and cycle parking standards in a location and for a use which does not adversely affect residential amenity. In addition Policies 28, 32 and 40 apply.

2. Proposals for new build (with the exception of the Green Belt) and the conversion or re-use of existing buildings for farm diversification projects for B1, B2, B8, recreational, or other relevant uses will be supported so long as the following criteria are met: -

- (i) either the form, bulk and general design of the building is in keeping with its surroundings, or where a building currently detracts from the rural character and appearance of the locality, its appearance can be satisfactorily improved,
- (ii) the proposal does not have a materially greater impact than the present use on the openness and function of the Green Belt, or the character of the AONB, or that of the surrounding countryside having regard to the scale, size, intensity and type of use proposed,
- (iii) the development must be suitably and safely accessed and parking must be provided in line with the car and cycling parking standards,
- (iv) and in the case of touring caravans or tent sites, the proposal is within easy access, by walking, cycling or public transport, of an existing settlement which can provide necessary facilities without detriment to the local economy.

New build in the Open Countryside, (excluding the Green Belt) and AONB areas may be permitted provided that sustainable development objectives are met, and they are of a design and scale appropriate to their rural surroundings.

Any noise or light pollution from a development must be kept to a minimum.

The loss of employment (B1, B2 or B8) uses from villages or rural areas will be resisted in the LRRAP priority area (see proposals map). Any proposal to re-develop sites/buildings for an alternative use must show that no employment use can be accommodated on the site. Tourist facilities will be permitted in line with Policy 40.

Amend footnote 52 on page 83 of the plan to read:

52 Economic activity refers to Use Classes A1, A2, A3, A4, A5, B1, B2, B8, D1, D2 and some Sui Generis. Additional Criteria apply to certain of these Use Classes within Policies 28 and 40.

Amend the reasoned justification for Policy 24 by adding the following clause to the fourth sentence of the first paragraph so that it reads:

Whilst supporting new economic activity there is recognition that in Pendle new development for employment should be small in scale and respect the size and character of the village or be accommodated within an existing building in the countryside

(with the exception of the Green Belt) without the need for large scale extension.

Delete the words 'Green Belt' from the seventh sentence of the reasoned justification for Policy 24 so that it reads:

New build will be permitted in the AONB provided that sustainable development objectives are met...

\*\*\*\*\*

## Policy 25

Amend point 4. of the text of Policy 25 to read:

4. Elsewhere outside of a defined town centre or local shopping centre, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre.

**25-6 to  
25-7**

Replace the last sentence of the third paragraph of the reasoned justification to Policy 25 with the following sentences:

Edge-of-centre is defined as: for retail purposes; a location that is well connected to and within easy walking distance (i.e. up to 300 metres) of the primary shopping area, and for all other main town centre uses this is likely to be within 300 metres of a town centre boundary. For office development, locations outside the town centre but within 500 metres of a public transport interchange, including railway and bus stations, within the urban area should be considered as edge-of-centre locations for purposes of the sequential approach.

Amend the first line of the text of Policy 25 so that it reads:

New retail and service development (Use Classes A1, A2, A3, A4, A5 D1, D2 and specified Sui Generis) should be located (in order of priority) (subject to Policy 26):

Amend the second sentence of the penultimate paragraph of the text of Policy 25 so that it reads:

Any ancillary uses (A2, A3, A4, A5, B1 (a) and D1) must be confined to 25% of the total developable area.

Delete reference to PPG6: Town Centres and Retail Developments in the last sentence of the reasoned justification for Policy 25 and replace it with reference to PPS6: Planning for Town Centres.

Amend the last sentence of the penultimate paragraph of the text to Policy 25 to read:

The development must be suitably accessed and parking must be provided in line with the Car and Cycle Parking Standards.

Amend the last sentence of the text of Policy 25 to read:

Any new service or retail development must be accessible by a choice of means of transport, including walking and cycling.

Amend the Proposals Map to define the Primary Shopping Area in Nelson town centre, in accordance with the Inquiry document (map) reference PBCP/200/1.

**25-15**

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## Policy 26

Amend the first sentence of the second paragraph of the reasoned justification for Policy 26 so that it reads:

Non-shopping uses acceptable on shopping frontages are defined as Use Classes A2, A3, A4, A5, B1 (a), D1, D2 and Sui Generis uses appropriate to a town centre location:...

**26-2**

Delete reference to PPG6: Town Centres and Retail Developments in the first sentence of the reasoned justification for Policy 26 and replace it with reference to PPS6: Planning for Town Centres.

\*\*\*\*\*

**Policy 27**

Delete the word 'Adequate' from the beginning of the fifth criterion of Policy 27.

**27-2 to  
27-3**

Amend the third criterion of the text of Policy 27 so that it reads:  
Any ancillary uses (A2, A3, A4, A5, B1 (a) or D1) are confined to 25% of the total developable area.

Delete reference to PPG6: Town Centres and Retail Developments in the second paragraph of the reasoned justification for Policy 25, and replace it with reference to PPS6: Planning for Town Centres.

\*\*\*\*\*

**Policy 28**

Amend the first paragraph of the text of Policy 28 to reflect the changes made to the Use Classes Order in 2005, with reference to Class A uses, so that it reads:  
Proposals to introduce new retail (A1), service (A2, A3, A4, A5) and community facilities (D1, D2 or specified Sui Generis – launderette, sale of fuel for motor vehicles) to the villages will be supported where: ...

**28-1 to  
28-2**

Amend the Town and Country Planning (Use Classes) Order 1987 (Summary) given in Appendix 4 – Glossary and Abbreviations, by deleting 'public houses' and 'wine bars and shops for the sale of hot food' from the A3 Use Class row. The description should read:  
Restaurants, cafes and snack bars

Amend the Town and Country Planning (Use Classes) Order 1987 (Summary) given in Appendix 4 – Glossary and Abbreviations, by inserting a row for Use Class A4 beneath A3. The description should read:  
Pubs and bars

Amend the Town and Country Planning (Use Classes) Order 1987 (Summary) given in Appendix 4 – Glossary and Abbreviations, by inserting a row for Use Class A5 beneath A4. The description should read:  
Take-Aways

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**Policy 29**

Delete the final bracketed clause of the reasoned justification for Policy 29, which reads:  
(See Appendix 2 –Table F)

**29-4**

Add a sentence to the end of the reasoned justification for Policy 29, which reads:  
The requirement for both Transport Assessments and Travel Plans are detailed by way of floor space thresholds in Table F of Appendix 2.

Replace reference to Circular 1/97 with reference to Circular 05/2005, in the reasoned justification for Policy 29 and throughout the plan.

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**Policy 30**

Amend the footnote 61 to Policy 30 to read:  
61 Further information on the Rapid Transport initiative can be obtained from Lancashire County Council.

**30-5 to  
30-6**

Amend criterion 3 of Policy 30 to read:  
3. Section 106 Agreements - Developers will be required to contribute towards public transport improvements in the vicinity of the development, where necessary, on sites of 0.4 hectare or more.

Amend the footnote 60 to Policy 30 to read:  
60 Further information on the Quality Bus Routes and the South Lancashire Rural Transport Partnership can be obtained from Lancashire County Council. South Lancashire Rural Transport Partnership currently has funding until April 2006.

Amend the last sentence of the second paragraph of the reasoned justification of Policy 30 to read:

In addition the scheme will support new and improved terminal facilities, with a possibility of renewing or upgrading existing bus stations. Proposals are already in place for a new bus/rail interchange in Nelson.

Amend the third sentence of the third paragraph of the reasoned justification for Policy 30 by deleting reference to 'trams'.

\*\*\*\*\*

**Policy 31** Amend the first sentence of the second paragraph of the text of Policy 31 to read: **31-4**

Cycle parking in new development will be provided at a minimum of 1 per 10 car spaces and covered secure provision will be required on all developments employing 30 or more full or part-time staff, in line with the Parking Standards.

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**Policy 32** Amend the third sentence of the final paragraph of the reasoned justification to Policy 32 to reflect the changes made to the Use Classes Order in 2005, with reference to Class A uses, so that it reads: **32-2**

Non community use will be regarded as A1, A2, A3, A4, A5, B1 (a), (b), (c), B2, B8, C1 or C3 and non-specified Sui Generis (Policy 25).

**Policy 33** Amend the open space designation on land at Applesgarth, Barnoldswick, omission site X81, to that shown on the plan attached as Appendix 2 of the document PBCP/205. This change should also be reflected in the next review of the Pendle Open Space Audit. **33-9**

Remove from the Proposals Map the Open Space (Woodland) designation from the field east of Greenfield, Colne. This change should also be reflected in the next review of the Pendle Open Space Audit.

Remove from the Proposals Map the Open Space designation from the James Nelson's Sports Ground, omission site X86.

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**Policy 34** No recommended modifications

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**Policy 35** Add an additional paragraph at the end of the reasoned justification for Policy 4D which would read: **35-1**

An ecological assessment will be required for any development proposal affecting sites defined within Policy 4D. The assessment should also detail the appropriate mitigation and compensation measures to account for any loss to these sites.

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**Policy 36** Add to Table 2a – Environmental Protection Sites details of any further sections of the Leeds and Liverpool Canal Corridor that are designated as sites of Local Natural Importance under Policy 4. **36-1**

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**Policy 37** No recommended modifications

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**Policy 38** Add a final paragraph to the text of Policy 38, which would read: **38-3**  
Applicants will be required to submit a statement with their

proposal which self-certifies that ICNIRP guidelines will be met; this must cover the whole installation.

Add a footnote to the acronym ICNIRP where it is used in the text of Policy 38. The footnote should read:

ICNIRP – International Commission on Non-Ionizing Radiation Protection. Guidance on this can be found in Planning Policy Guidance Note 8 (PPG8): Telecommunications.

Re-word the first sentence of the first paragraph of the reasoned justification of Policy 38 so that it would read:

Any proposal must be in line with the Council's Supplementary Planning Guidance 76 and should have regard to the guidance contained in the Government's Code of Best Practice on Mobile Phone Network Development.

Delete the first footnote 75 on page 109 of the written statement.

\* \* \* \* \*

## Policy 39

No recommended modifications

\* \* \* \* \*

## Policy 40

Insert a sub-criterion d) under criterion 2 of Policy 40, which reads:

**40-2 to  
40-3**

AND

- b. Assist rural regeneration in a location where the environment and the transport and utility infrastructure can accommodate the visitor impact.

\* \* \* \* \*

## Appendix 1

No recommended modifications

\* \* \* \* \*

## Appendix 2

No recommended modifications

\* \* \* \* \*

## Appendix 3

No recommended modifications

\* \* \* \* \*

## Appendix 4

Add a definition of Accessibility Corridors in Appendix 4-Glossary and Abbreviations, which reads:

**44-2 to  
44-3**

Accessibility Corridors - As a minimum this should consist of a bus corridor with at least a 15 minute frequency during week-days and half-hourly during evenings and weekends. Such corridors should be designated to "Quality Bus" standard and be served by routes to two or more transport hubs. Developments should be located within a maximum of 400 metres and preferably 300 metres walking distance from a bus stop on such a route.

Add a reference to Planning Policy Statements in Appendix 4-Glossary and Abbreviations, which reads:

Planning Policy Statements - Previously known as Planning Policy Guidance Notes (PPGs), Planning Policy Statements (PPSs) are prepared by the government, after public consultation, to explain statutory provisions and to provide guidance to local authorities and others on planning policy and the operation of the planning system. PPSs also explain the relationship between planning

policies and other policies which have an important bearing on issues of development and land use. PPSs are issued by the Office of the Deputy Prime Minister (ODPM) and local authorities must take their contents into account in preparing their development plans. PPSs are a material consideration in determining planning applications and appeals and they generally supersede development plan policies if they have been published at a later date. Advice is separated into accompanying documents so there is a clear distinction between policy and guidance.

**Appendix 5**

No recommended modifications

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**Omissions**

Delete reference to the 'Proposed route of A56 Villages Bypass' from Policy 29 key text.

**46-3**

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**General Representations**

No recommended modifications

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## LIST OF INSPECTOR'S SUGGESTED ADDITIONAL CHANGES

Summarised below is a list of changes that I suggest should be made to the re-deposit plan. They do not arise from outstanding duly made objections. As such, they are not binding recommendations. Nevertheless, I consider that they would aid the clarity and precision of the plan. They include changes that result from changes in published Government policy and guidance that has arisen since the publication of the re-deposit plan, minor grammatical and typing errors and other changes that have been highlighted by the Council, and other minor grammatical changes and typing errors which arise as a result of my recommendations for modification to the re-deposit plan.

Plan Policy/Page	Suggested Change	CD 193 Ref No.
Throughout plan	Correct any minor grammatical errors or typing errors that do not significantly change the meaning of the text in which they occur.	
Throughout plan	Re-number foot notes	
Throughout plan (Where not specifically recommended)	Change references from PPG6 to PPS6	
Throughout plan (Where not specifically recommended)	Change references from PPG7 to PPS7	
Throughout plan (Where not specifically recommended)	Change references from PPG9 to PPS9	
Throughout plan (Where not specifically recommended)	Change reference from Circular 1/97 to Circular 05/2005	
Throughout plan (Where not specifically recommended)	Change references from A3 uses to A3, A4 and A5 to take account of changes to the Use Classes Order in 2005	
Policy 32	Delete '1.' from before '2.' Improved community facilities of a similar nature.	86

## ABBREVIATIONS USED IN THE REPORT

T(t)he plan	Pendle Local Plan Review Re-deposit April 2005
LDF	Local Development Framework
LDD	Local Development Document
ADF	Area Development Frameworks
DPD	Development Plan Document
SPG	Supplementary Planning Guidance
SPD	Supplementary Planning Document
ODPM	Office of the Deputy Prime Minister
GONW	Government Office for the North West
NWRA	North West Regional Assembly
The Council	Pendle Borough Council
The County Council	Lancashire County Council
LPA	Local Planning Authority
CPRE	Campaign to Protect Rural England (Pendle CPRE)
SELRAP	Skipton-East Lancashire Rail Action Partnership
EA	Environment Agency
PMM	Plan, Monitor and Manage (approach advocated in PPG3)
ELEVATE	East Lancashire HMR Pathfinder
GPDO	The Town and Country Planning (General Permitted Development) Order 1995
Circular 01/97	Planning Obligations (superseded by Circular 05/2005 in July 2005)
Circular 03/98	Planning for Future Prison Development
Circular 05/2005	Planning Obligations
Circular 06/2005	Circular 06/2005 Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and Their Impact Within the Planning System
PPG2	Planning Policy Guidance Note 2: Green belts
PPG3	Planning Policy Guidance Note 3: Housing
PPG4	Planning Policy Guidance Note 4: Industrial, commercial development and small firms
PPG6	Planning Policy Guidance Note 6: Town Centres and Retail Developments
PPG7	Planning Policy Guidance Note 7: The Countryside-Environmental Quality and Economic and Social Development
PPG8	Planning Policy Guidance Note 8: Telecommunications
PPG12	Planning Policy Guidance Note 12: Development Plans
PPG13	Planning Policy Guidance Note 13: Transport
PPG15	Planning Policy Guidance Note 15: Planning and the Historic Environment
PPG16	Planning Policy Guidance Note 16: Archaeology and Planning
PPG17	Planning Policy Guidance Note 17: Planning for Open Space Sport and Recreation
PPG19	Planning Policy Guidance Note 19: Outdoor Advertisement Control

PPG25	Planning Policy Guidance Note 25: Development and Flood Risk
PPS1	Planning Policy Statement 1: Delivering Sustainable Development
PPS3 (draft)	Planning Policy Statement 3: Consultation Paper on a New Planning Policy Statement 3 (PPS3) Housing
PPS6	Planning Policy Statement 6: Planning for Town Centres
PPS7	Planning Policy Statement 7: Sustainable Development in Rural Areas
PPS9	Planning Policy Statement 9: Biodiversity and Geological Conservation
PPS22	Planning Policy Statement 22: Renewable Energy
RPG13	Regional Planning Guidance for the North West (Became RSS on 28 September 2004)
RSS	Regional Spatial Strategy for the North West
JLSP	joint lancashire structure plan ADOPTED MARCH 2005
CD	Inquiry Core Document
UCS	Urban Capacity Study
LRRAP	Lancashire Rural Recovery Action Plan
AONB	Area of Outstanding Natural Beauty
SPA	Special Protection Area
SAC	Special Area for Conservation
SSSI	Site of Special Scientific Interest
BHS	Biological Heritage Site
GHS	Geological Heritage Sites
LNR	Local Nature Reserves
BAP	Biodiversity Action Plan
LNI	Site of Local Natural Importance
SuDS	Sustainable Drainage Systems
HMR	Housing Market Renewal
dpa	Dwellings per annum
dph	Dwellings per hectare
RTS	Round table session

# **Introduction and Strategy**

## **A. Objections to Policy Wording and Approach**

### **Introduction**

- 0.1 The Pendle Local Plan Strategy provides the land-use planning context for the objectives outlined in the Pendle Community Strategy 2003-2018: A Place with a Future for Everyone (Pendle Partnership, 2004) (CD 68). It sets the framework for the 40 policies contained in the re-deposit plan, which in turn will help to deliver the priorities and objectives of the Pendle Community Strategy for the next 15 years.
- 0.2 Together, the Pendle Community Strategy and the re-deposit plan aim to outline a sustainable future for the Borough, whilst seeking to address particular areas and issues that deserve particular attention. They aim to ensure that Pendle residents enjoy the best possible quality of life, by creating a future that is economically, environmentally and socially sustainable.
- 0.3 There were 22 objections to the Strategy during the first stage deposit period. There were a further 8 objections received at the re-deposit stage. In addition, there were 21 representations in support of the Strategy.

### **Summary of Key Issues**

- Whether it is premature to refer to the Regional Spatial Strategy (RSS) in the plan.
- Whether the individual paragraphs of text within the plan should be numbered for ease of reference.
- Whether jargon should preferably be avoided or explained and whether other documents should be summarised.
- Whether the wording throughout the plan should be amended to emphasise that planning permissions/developments will be 'considered' in line with planning guidelines.
- Whether the Strategy takes into account effective community participation and if the plan was sufficiently widely advertised.
- Whether the policies of the plan will ensure that development does not result in environmental damage to the countryside, pollution of rural areas and over-population of the area.

- Whether strand 4 of the Vision given on page 10 of the plan, which refers to education, should be followed through in the policies of the re-deposit plan.
- Whether the Borough profile given at the beginning of the Environment section of the Strategy should be expanded to define the sense of place, identity and local distinctiveness of the area.
- Whether the policy considerations of the plan should acknowledge the benefit of valued environments not just within, but also adjacent to the Borough, and the impact of development upon them.
- Whether the Strategy section should explicitly aspire to improve environmental quality and/or to increase biodiversity, and to make reference to the Local Agenda 21 Strategy and to statutory protection of species.
- Whether it is appropriate for the plan to require, in the Environment section of the Strategy, that new developments make a positive contribution to Pendle's natural and built environment.
- Whether the third issue of the Housing Policy Direction of the Strategy section, which refers to the re-use of previously developed land for housing, is too restrictive.
- Whether, with reference to the Land Registry figures, remarks in the Housing section of the Strategy to; 'housing market collapse' or 'increasing unpopularity and social obsolescence of terraced housing', are justified and necessary.
- Whether Housing Market Renewal in Pendle should emphasise imaginative renovation that recognises the local distinctiveness of the Borough and the historic environment, and which avoids pre-empting the conclusions and recommendations of the ELEVATE study and the outcome of the Whitefield Public Inquiry, rather than focussing upon clearance and renewal.
- Whether the plan should encourage the provision of more new houses in the Borough in order to improve the range of dwelling types available.
- Whether the Employment Policy Direction of the Strategy section of the plan should acknowledge that if the viable employment use of a site ceases, or is likely to do so during the plan period, retail development may be considered as a potential means of maintaining the site as a source of employment.

- Whether the last issue of the Employment Policy Direction of the Strategy section, which refers to allocating greenfield land for employment in sustainable locations, accords with higher tier planning policy.
- Whether the Transport Strategy of the plan will achieve a satisfactory balance for the economic, social and environmental well-being of the Borough.
- Whether the Transport Strategy of the plan promotes accessibility to jobs and services, whilst encouraging more sustainable transport choices and reducing the need to travel by private car, in accordance with the thrust of PPG13.
- Whether specific reference should be made to PPG12 in the Transport Strategy of the plan.
- Whether there is an internal contradiction within the Policy Direction of the Transport Strategy of the plan between its Land-Use aims 1 and 4.
- Whether the Transport Strategy of the plan should be strengthened by giving explicit support for the East Lancashire Community Rail Partnership and for the rail option of improving cross border linkages (Trans-Pennine Rail).
- Whether the wording of the fourth part of the Community, Recreation and Leisure Policy Direction/Land Use Aim should be strengthened to give it greater weight.

### **Inspector's Reasoning and Conclusions**

- 0.4 Pendle CPRE considers that the changes made throughout the re-deposit plan, from 'Regional Planning Guidance' to 'Regional Spatial Strategy' (RSS), are premature and should be corrected.
- 0.5 However, the Planning and Compulsory Purchase Act 2004 strengthened the importance of regional planning by introducing Regional Spatial Strategies, which bring together economic, social and environmental issues linked to planning in a coherent framework. The strategies provide frameworks for determining planning applications and are now part of the statutory development plan. Regional Planning Bodies have the main responsibility for preparing RSSs. In the North West, this body is the North West Regional Assembly (NWRA).
- 0.6 As a result of the 2004 Act, the existing Regional Planning Guidance for the North West (RPG13) became the Regional Spatial Strategy for the North West and it includes the Regional Transport Strategy. Therefore, I consider that the re-deposit plan

is correct in referring to RPG13 as the RSS, even though its full review is already in hand.

- 0.7 On other general matters, objections are made that individual paragraphs of text within the plan are not numbered, and this hinders ease of reference. Also, that jargon should preferably be avoided or explained. In response, the Council comments that because the review of the Pendle Local Plan involves a series of stages, the use of paragraph numbering was considered to be confusing. I accept this argument for the preparation of the draft plan. However, I agree that paragraph numbering would greatly aid ease of reference and I recommend that the adopted version of the Pendle Local Plan Review contains paragraph numbers throughout.
- 0.8 The Government encourages local authorities to write succinct text and policies. As a result, I agree with the Council that it is difficult to avoid the use of jargon and acronyms. But in my opinion, their use is not excessive in this plan. Furthermore, the Glossary in the re-deposit plan has been extended to incorporate references that were omitted from the first stage deposit. Consequently, I consider that objections are met in this regard.
- 0.9 In my view, it is not practical to provide a summary of all the documents referenced within the Local Plan. For example, Planning Policy Guidance notes, like many other documents referenced throughout the Local Plan, contain complex information. A summary within the Local Plan is unlikely to convey the true content of these documents. However, details of all the documents referred to in the plan are included in the reference list contained in its Appendix 5, so that readers can obtain or view a copy, should they so wish. I consider that this is adequate.
- 0.10 The CPRE considers that the wording throughout the plan should be amended to emphasise that planning proposals will be 'considered' in line with planning guidelines. However, I do not think that this needs to be explicitly stated in the text of the written statement of the plan, because in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004 Act, all planning applications should be determined in accordance with the policies outlined in the Development Plan for Pendle, which include the Pendle Local Plan, the Joint Lancashire Structure Plan (JLSP) and the Regional Spatial Strategy (RSS).
- 0.11 The Town and Country Planning Act 1990, as amended by the Planning and Compulsory Purchase Act 2004, indicates that there is a presumption in favour of development that accords with the development plan and a presumption against development that does not. Consequently, I consider that it is correct for the re-

deposit plan to state that proposals which comply with the policies of the Development Plan will be granted planning permission.

- 0.12 Planning Policy Guidance Note 12: Development Plans (PPG12) provides local authorities with guidance on Local Plan consultation. It states that the form of any consultation is for individual local authorities to determine, but that publicity for their proposals and the methods for comment must be sufficient to encourage all sectors of the community to be involved.
- 0.13 Consultation on the review of the Pendle Local Plan commenced in June 2002. Copies of the Key Issues Report: Planning Our Future, A New Local Plan for Pendle (CD 31) were placed on public deposit in all local libraries, town halls and council offices/shops within the Borough. Advertisements were placed in all local papers and the London Gazette, and leaflets were distributed to all addresses in the Pendle area. The leaflet provided a summary of the issues and incorporated a respondent questionnaire to help gauge opinion. The findings of the questionnaire survey and other responses received to the Key Issues Report were fed into the First Stage Deposit Pendle Local Plan.
- 0.14 A six week public consultation on the first stage deposit Pendle plan commenced in September 2003. The same publicity procedures were followed, with the exception of the leaflet drop to all households. Hard copies of the document were priced at £15.00, to cover the costs of production, but to widen distribution, copies were also available on CD-Rom at a cost of £4.00, or it could be viewed or downloaded free of charge from the Council's website. In addition to mailing responses back to the Council, comments could also be e-mailed using the Standard Response Form found on the Council's website.
- 0.15 The six week public consultation on the re-deposit plan commenced in April 2005. Once again advertisements were placed in all local papers and the London Gazette, and copies were placed on public deposit in all local libraries, town halls and council offices/shops within the Borough. The re-deposit plan comprised three documents plus maps and cost £25:00. It could also be viewed or downloaded free of charge from the Council's website. Again, in addition to mailing responses back to the Council, comments could also be e-mailed using the Standard Response Form found on the Council's website.
- 0.16 A further six week public consultation on the 'Omission Sites' raised at both the first and re-deposit stages commenced in June 2005. Advertisements were placed in all local papers and the London Gazette, and copies were placed on public deposit in all local libraries, town halls and council offices/shops within the Borough. The purchase price of the Omission Sites booklet was

£25:00, but the document could also be viewed or downloaded free of charge from the Council's website. A standard response form was not produced on this occasion, with Objectors being encouraged to either write to or e-mail the Council with their comments.

- 0.17 In addition, copies of the Key Issues Report, first stage deposit and re-deposit plan and Omission Sites booklet were mailed to named contacts identified in PPG12, including Government agencies, statutory bodies, voluntary and community groups, for comment. Included amongst these were the seventeen Parish and Town Councils in Pendle. Copies were also supplied to the 50 local Councillors and the Member of Parliament for Pendle.
- 0.18 At each of the four stages identified above, over 120 copies of the relevant document were mailed directly to key contacts and organisations, and copies have been placed on public deposit in easily accessible locations throughout the Borough. Over 500 individuals have made over 2,700 representations, including supports and objections to the Local Plan Review.
- 0.19 I consider that these figures confirm that the extensive programme of public consultation, the associated advertising of the consultation process and the varied methods in which comments could be submitted, have been ample in encouraging all sectors of the local community to become actively involved in the current review of the Pendle Local Plan.
- 0.20 Turning to the contents of the Strategy section of the plan, the Environment Chapter of the re-deposit plan contains 18 policies that specifically intend to enhance or preserve the environmental quality of the Borough. These policies aim to protect the appearance of the countryside and the heritage of the built environment, by maintaining settlement character and by promoting high standards of design.
- 0.21 Sustainable development is a common theme throughout the plan and the Strategy Chapter specifically states that the Council is seeking to 'improve people's well-being without irreparably damaging the environment, or by compromising the ability of future generations to meet their needs'. It seeks to achieve this sustainability objective through a number of policies.
- 0.22 For example, Policy 32 - New Community Facilities and Policy 40 - Tourism, aim to locate new developments in areas that are accessible by public transport. Similarly, Policy 25 - Location of Service and Retail Development contains a sequential approach that seeks to concentrate development in town centres and local shopping centres, where accessibility by public transport is easiest. This policy also aims to ensure that new retail

development takes place in the six defined town/local shopping centres in Pendle and to help ensure that, subject to market forces, the number of vacant shops is kept to an absolute minimum.

- 0.23 I consider that this suite of policies will be sufficient to promote the plan's sustainability vision and to avoid the potential adverse impacts of development referred to by an Objector.
- 0.24 Strand 4 of the Vision contained in the Strategy reflects the objectives of the Pendle Community Strategy. However, the re-deposit plan is primarily a land-use document and, as such, it has limited influence over education development. The policies in the plan are dependent on the supply of information from the local education authority, which is Lancashire County Council. Nevertheless, Policy 32 - New Community Facilities allocates land to support an increase in education provision in Pendle.
- 0.25 The Council agrees with an objection made by the County Council, which suggests that the Borough profile given at the beginning of the Environment section of the Strategy should be expanded to define the sense of place, identity and local distinctiveness of the Borough. In response, it suggests that the first paragraph of this section of the Strategy should be amended in line with the County Council's suggested wording and in accordance with suggested Change No. 3 (CD 193). I endorse this Change, because in my opinion, it improves the contextual setting of the plan.
- 0.26 Also with reference to the Environment Strategy, further amended wording is suggested by an Objector to ensure that the benefit of, and the impact upon valued environments, not just within but also adjacent to the Borough, is acknowledged and also that the plan's Strategy section explicitly aspires to improve environmental quality or increase biodiversity.
- 0.27 The Council intends that the potential impact of any development on an adjacent Borough will be considered through the consultation procedure of the planning application process. I consider that is a suitable approach and I do not recommend that the Strategy text should be amended, as suggested by the Objector, in this regard.
- 0.28 Concerning references to biodiversity, Policy 4D - Natural Heritage - Wildlife Corridors, Species Protection and Biodiversity of the re-deposit plan, specifically highlights the Council's aspirations to improve environmental quality and to increase biodiversity throughout the Borough. In addition, there are further references made to biodiversity in both the Environment section of the Strategy, which were added at the re-deposit stage, and in the

other Environment policies. Therefore, I consider that these objections are met.

- 0.29 An Objector questions if it is appropriate for the plan to require, in the Environment section of the Strategy, that new developments make a positive contribution to Pendle's natural and built environment. The Objector suggests that it would be more realistic for the plan to seek to encourage new developments to do this, and to ensure that they will not result in a significant detrimental impact on development.
- 0.30 The Council considers that the Strategy, as currently worded, is a legitimate goal for the plan. In response to this objection, it comments that applications for planning approval will be appraised on their own merits, in accordance with the policies in the Local Plan. In particularly sensitive areas, these require a positive contribution, in others they seek to mitigate any potential damage to the environment. I support the Council's stance on this matter and I do not recommend any amendment to the plan in this regard.
- 0.31 Concerning the Housing section of the Strategy, Objectors request that phrases such as; 'housing market collapse' and 'terraced housing is becoming increasingly unpopular', should be substantiated or removed. In addition, they request that the findings of the ELEVATE Pathfinder programme should be awaited before assuming that there is a case for demolition.
- 0.32 However, Land Registry figures for January-March 1999 to January-March 2004 show that the average price of a terraced house in Pendle had risen by 54.48% in this five year period. This suggests a buoyant housing market, but in England and Wales over the same period the average increase was 95.21% (Land Registry – Comparison of House Prices) (CD 115).
- 0.33 Furthermore, I am satisfied by the evidence before me that at the micro level, there are areas of housing market collapse in Pendle. For example, Changing East Lancashire: The Housing Market (CD 109), a report produced in 2000 by DTZ Pieda Consulting for the East Lancashire Partnership, highlights that 26% of houses in East Lancashire were unfit for human habitation. In particular, the report highlights the Whitefield ward in Nelson, where 76% of the housing stock was in need of urgent repair. The Area Development Frameworks (ADFs) produced for Brierfield, Colne and Nelson in 2004 and 2005 (CDs 64-66) also highlight that there are problems relating to vacant dwellings, that will require significant investment if they are to be made habitable.
- 0.34 The Council informs that in the six year period since the last Pendle Local Plan was adopted, the average price paid for a

terraced property in Pendle (January-March 1999 to January-March 2005) has lagged behind the increase experienced across England and Wales by some 30.28%. Within the Borough the average increase in the price paid for a terraced property (88.07%) over the same period, is also well behind the increases in the average price paid for a semi-detached (112.3%) or a detached house (113.25%) (CD 116).

- 0.35 Thus, whilst I acknowledge that the relatively modest cost of a terraced house in some parts of the Borough provides a supply of affordable homes, especially for first time buyers, I consider that to state that: 'such housing is becoming increasingly unpopular' (i.e. terraced housing in need of repair), is borne out by robust evidence. Consequently, I think that such references in the text, for example at paragraph 2 of page 13 of the re-deposit plan, are both substantiated and justified.
- 0.36 Poor housing conditions can contribute to ill health, increased crime and vandalism, environmental decay and eventual abandonment. Better maintained housing located in such areas inevitably decreases in value, resulting in the collapse of specific housing markets. However, to reflect that these problems are not pronounced throughout the Borough, the re-deposit plan states that: 'Some of Pendle is suffering from housing market collapse ...' (see paragraph 1, page 12). I consider that this re-deposit amendment overcomes part of these objections.
- 0.37 Government support through the HMR Pathfinder will provide the opportunity to improve some of the worst areas of housing in the Borough through a programme of refurbishment and/or demolition and rebuild. The re-deposit plan does not actively encourage clearance and it recognises that this would be premature by stating that 'solutions will be developed which are based on the findings of the master planning' exercises to be carried out in each of the three Area Development Frameworks.
- 0.38 In order to emphasise the importance of encouraging housing renewal in the worst affected wards of the Borough by a variety of methods, including refurbishment, reference to 'clearance and demolition' was deleted in the Housing Policy Direction of the re-deposit plan.
- 0.39 However, in response to a counter objection made at the re-deposit stage to that change, which is thought could falsely give the impression that clearance will no longer be used as part of the HMR strategy, the Council suggests in Change No. 4 (CD 193) that the phrase; 'including clearance and demolition' should be reinstated. I support this Change. I consider that it provides clarity and accuracy to the Housing Policy Direction, by recognising that although the emphasis of the HMR programme is

unlikely to focus on clearance, some will inevitably occur. The Change also meets this counter objection.

- 0.40 Objections are made that there are insufficient new houses in the area in terms of both numbers and house types. However, the Housing Land Availability Report (March 2005) (CD 36) shows that from 1st April 2001-31st March 2005, there have, on average, been 329 housing completions in Pendle each year. With 1,317 dwellings completed over this period and a total of 1,407 units having planning permission at 31st March 2005, the report also demonstrates that the Council is currently in a position of over-supply with regard to meeting the JLSP housing requirement of 1,970 dwellings set out in its Policy 12, for the period 2001-2016. This situation is detailed in Policy 17 - Location of New Housing Development.
- 0.41 Therefore, due to the over-supply for new dwellings, I consider that it would be inappropriate for the Council to allocate additional land for general market housing development. The re-deposit plan does, however, safeguard some greenfield sites for housing, should this be required to support the HMR Pathfinder programme, and in particular, activity in the Area Development Frameworks in Brierfield, Colne and Nelson.
- 0.42 I have no reason to think that development arising from permissions already granted will not provide an appropriate mix and range of house types. In addition, Policy 20 – Quality Housing Provision requires that on sites of ten or more units a mix of housing size and style will be sought, so as to provide for local need and to create choice in the housing market. The policy also requires that new housing development contributes to the provision of a (high) quality environment for its residents. For these reasons, I do not support the objections which raise this matter.
- 0.43 Pendle CPRE comments that the use of brownfield sites for any and all development before any greenfield sites are considered should be stated as a Policy Direction for both the Housing and Employment sections of the Strategy. In its view, this would ease pressure for industrial land, since there is a much lesser requirement for housing land.
- 0.44 Planning Policy Guidance Note 3: Housing (PPG3) states that priority should be given to providing new housing on previously developed land within urban areas, to bringing empty homes back into use, or to converting existing buildings in preference to the development of greenfield sites.
- 0.45 In general accordance with this national advice, and in line with Policy DP1 of the RSS and Policy 12 of the JLSP, Policy 17 -

Housing of the re-deposit plan advocates the application of a sequential approach for the development of land for housing. This considers the re-use or conversion of existing buildings within a settlement boundary in the first instance, followed by the redevelopment of previously developed land within a settlement boundary and then the development of urban 'white' land. It states that this is the order of priority to be followed before the release of any greenfield land will be considered. However, I make recommendations in respect of reference to urban 'white' land in Chapter 17 of my report.

- 0.46 Greenfield land has been safeguarded for housing only to be released if a need arises through activities directly related to the HMR Pathfinder programme. Any proposed development on safeguarded land must also follow the sequential approach outlined in Policy 17 of the re-deposit plan. To this effect, the reasoned justification states that 'if there is sufficient brownfield/white land to meet the needs of replacement dwellings within the ADF boundaries over the plan period, the safeguarded land will remain undeveloped'.
- 0.47 Policy 14 of the JLSP requires Pendle to identify 40.0 hectares of employment land in order to meet anticipated development needs to 2016. The Strategy refers to the potential need for greenfield land, if previously developed land goes to housing.
- 0.48 In my opinion, the Policy Direction statements of the re-deposit plan and the sequential approach of Policy 17 correctly reflect higher tier planning policy.
- 0.49 With further reference to the Employment Policy Direction of the Strategy section of the re-deposit plan, another Objector considers that it should acknowledge that if the viable employment use of a site ceases, or is likely to do so during the plan period, retail development should be considered as a potential means of maintaining the site as a source of employment.
- 0.50 I agree that retailing plays an important role in providing new employment opportunities in Pendle. However, in my opinion, not all of its employment sites are appropriate for retail development. Policy 25 - Location of Service and Retail Development sets out a sequential approach, which seeks to concentrate retail development within town centres and local shopping centre boundaries. This approach follows Government guidance contained in Planning Policy Statement 6: Planning for Town Centres (PPS6), which seeks to promote accessibility and sustainability issues. It also helps to minimise the diversion of trade away from town centres.

- 0.51 Consequently, I do not consider that the 'blanket' acknowledgement sought by the Objector is appropriate. In my opinion, all proposed retail uses of employment land should be considered on their own merits through the development control process, having regard to the retail policies of the Development Plan and all other material considerations.
- 0.52 The Transport Strategy text makes specific reference to Planning Policy Guidance Note 13: Transport (PPG13), but not to Planning Policy Guidance Note 12: Development Plans (PPG12). This omission is objected to, because PPG12 promotes the desirability of integrating land-use and transport policies. However, the plan does refer to the desirability of new development being carried out in accessible locations. The Transport Strategy also makes reference to the JLSP, which identifies the need for an integrated approach to transport planning.
- 0.53 In line with guidance in PPG12, the RSS and the JLSP, the track bed of the disused Colne to Skipton railway line is protected for future transport use in the re-deposit plan. This is also reflected in the Policy Direction of the Transport Strategy of the plan and avoids prejudice against the re-opening of a rail or road link along its route. Furthermore, Policy 30 - Sustainable Travel Modes promotes improvements to the rail and bus networks in Pendle.
- 0.54 Consequently, I consider that the spirit of PPG12, with regards to its aspirations for integrating land-use and transport policies, is adequately reflected in the re-deposit plan. I do not think that it would add to the plan to include specific reference to PPG12 within the Transport Strategy section.
- 0.55 An Objection made by SELRAP questions if the Transport Strategy of the plan will achieve a satisfactory balance between the economic, social and environmental well-being of the Borough. Also, whether the Transport Strategy adequately promotes accessibility to jobs and services, whilst encouraging more sustainable transport choices and reducing the need to travel by private car, in accordance with the thrust of PPG13. To highlight these concerns the Objector refers to the line of the Colne-Skipton railway and the proposed A56 Village Bypass.
- 0.56 A key principle of PPG13 is to support more sustainable transport choices. Policy 30 - Sustainable Travel Modes in the re-deposit plan outlines the Council's commitment to supporting the implementation and use of sustainable travel modes within the Borough. The policy requires new developments to be accessible by a variety of travel modes and in turn is linked to other policies such as Policy 32 - New Community Facilities. New developments are also required to provide a minimum number of covered,

secure cycle parking spaces on all developments employing 30 or more full or part-time staff.

- 0.57 Policy 30 also promotes improvements to the rail and bus networks in Pendle. The re-deposit plan, therefore, protects the former route of the Colne-Skipton railway line for future transport use (Policy 29 – Creating an Improved Road Transport Network), in accordance with the policy position of the JLSP and it avoids prejudicing the re-opening of a rail or road link along its route. However, a traffic impact analysis, economic justification and an environmental mitigation scheme will be required for any future transport proposals along the line of the former railway, to ensure that any impact on the landscape is both justified and minimised, and to ensure that it retains an important role as a wildlife corridor and habitat.
- 0.58 I consider that this policy approach is appropriate and it reflects the position of the several other documents referred to by SELRAP in this instance, including in the Northern Way Growth Strategy. Thus, I do not consider that the Strategy of the re-deposit plan should be amended in response to this objection.
- 0.59 An Objector to the first stage deposit refers to an apparent inconsistency in the Transport Policy Direction Table, which in the 'Issues' column refers to both private and public transport, but in the 'Policy Direction' column supports the early implementation of the A56 Village Bypass as the first Land Use Aim, whereas the fourth refers to making public transport an attractive alternative.
- 0.60 However, the re-deposit plan states within the Policy Direction section of the Transport Strategy that: 'Policy to support the protection of the former Colne-Skipton Railway line as a transport corridor for future transport use' will be implemented. In addition, Policy 29 - Creating an Improved Road Transport Network reinforces this by stating that: 'The former route of the Colne-Skipton railway line will be protected for future transport use'. I interpret that this demonstrates both commitment to the rail track bed protection within the Strategy section, in addition to the removal of perceived contradiction in aims 1 and 4 of the same section.
- 0.61 Another of SELRAP's objections states that the Transport Policy Direction of the Strategy should be strengthened by providing explicit support for the East Lancashire Community Rail Partnership and the rail option by improving cross-border linkages.
- 0.62 The Council agrees with this re-deposit objection and suggests that the Policy Direction/Land Use Aim for the first point in the Transport Policy Direction Table be extended to state that: 'Policy

to encourage improved public transport through the Light Rapid Transit System and Community Rail Partnerships', as set out in suggested Change No. 5 (CD 193).

- 0.63 In addition, the Council proposes that the reasoned justification in Policy 30 – Sustainable Travel modes, should be amended to include an additional paragraph, after the third paragraph, which refers to the East Lancashire Community Rail Partnership, in accordance with suggested Change No. 84 (CD 193).
- 0.64 The Council also proposes that Criterion 2 in Policy 30 should be amended in accordance with suggested Change No. 78 (CD 193), which also refers to Community Rail Partnerships. I endorse these Changes, which meet part of the objection of SELRAP and others.
- 0.65 The objection also states that Pendle Borough Council should specifically highlight rail as a sustainable mode of public transport in the Transport section of the plan's Strategy, by giving explicit support to the East Lancashire Community Rail Partnership for the existing railway line between Colne and Preston and for the re-opening of the former railway between Colne and Skipton.
- 0.66 In response, the Council supports the improvement of Trans-Pennine transport links through West Craven. To this end, the re-deposit plan protects both the track-bed of the former Colne-Skipton railway and an alternative route to the west of Earby, in order to facilitate the implementation of such improvements in due course, in the form of a railway and/or a bypass. I support this approach. In my opinion, it would be contrary to Policy 8 of the JLSP for the re-deposit plan to only support the re-opening of the railway as requested by the Objector. Thus I do not support this element of the objection.
- 0.67 An Objector requests that for greater weight, the wording of the fourth part of the Community, Recreation and Leisure Policy Direction/Land Use Aim should be strengthened to read: 'As a priority, community facilities that have already been promised should be provided. Any future development should not be allowed to proceed unless the provision of community facilities is guaranteed'.
- 0.68 However, I do not support this suggested amendment to the Strategy because, in my opinion, there are specific policies in the plan which will ensure that the future needs of the community are catered for. For example, residential developments of ten or more units are expected to provide an Open Space requirement, where there is an identified deficiency through Policy 21 - Provision of Open Space in New Housing Development. Monies for community facilities will be provided through Section 106 Agreements from the developer (Appendix 1), and Policy 21 sets out the conditions

whereby contributions will be sought for new Open Space and its future maintenance. A Section 106 agreement is legally binding, but the enforcement of such an agreement is not a Local Plan issue.

## **RECOMMENDATIONS (binding)**

- 0.69 **I RECOMMEND that the plan be modified by amending the second issue of the Housing Policy Direction of the Strategy given on page 14 so that it reads:**

**Encourage housing renewal, including clearance and demolition.**

- 0.70 **I RECOMMEND that the plan be modified by numbering the paragraphs of the written statement throughout.**

- 0.71 **I RECOMMEND that the plan be modified by amending the first paragraph of the Environment section of the Strategy so that it reads:**

**The Borough has a distinct environmental character, which should be recognised by all as an important asset. The planning process can help to increase the awareness of the importance of Pendle's environment, which contains sharp contrasts between remote upland moors and densely populated industrial valley landscapes and covers a historical timeframe ranging from prehistoric sites to modern textile mills.**

- 0.72 **I RECOMMEND that the plan be modified by adding the following phrase to the end of the last sentence of the first Transport Policy Direction/Land Use Aim given in the Table on page 19:**

**...and Community Rail Partnerships.**

- 0.73 **I RECOMMEND that the plan be modified by amending the second criterion in Policy 30 to read:**

**Rapid Transit<sup>61</sup> – Improvements to the rail and bus network in terms of new and segregated routes, increased frequencies, through ticketing, integrated systems and better customer environments and the introduction of Community Rail Partnerships.**

- 0.74 **I RECOMMEND that the plan be modified by adding an additional paragraph, after the third paragraph, of the reasoned justification of Policy 30 to read:**

The East Lancashire Partnership, Lancashire County Council and Blackburn with Darwen Borough Council have commissioned The Association of Community Rail Partnerships (ACoRP) to look at ways of developing a community partnership for the East Lancashire Line between Preston, Blackburn, Accrington, Burnley and Colne. A Community Rail Partnership will act as a bridge between the railway and the local community, providing a means of promoting and developing local rail services through improving facilities for the local community, including improved station facilities, discounted fares, enhanced bus links and dedicated cycle routes to stations. The Strategic Rail Authority has published (2004) the Community Rail Development Strategy and achieving the objectives of this strategy will depend on partnership and active support from the community. Success will see the railway placed at the heart of a vibrant local and rural economy, increasing accessibility, promoting environmental sustainability and social inclusion.

0.75 I RECOMMEND no further modification to the plan in response to these objections.

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### **B. Objections to Specific Sites - Routes**

Former Colne-Skipton railway line, omission site X69  
Route of A56 Village Bypass, omission site Y18

#### **Summary of Key Issues**

- Whether the plan conflicts with PPG12, the RSS and with the JLSP by not protecting the old railway line from any development which would prevent the reinstatement of the Colne/Skipton rail link.
- Whether the rail link between Colne and Skipton should be reinstated in order to take traffic, including freight, off the road to reduce road congestion.
- Whether, in order to avoid prejudice to the reinstatement of the Colne/Skipton rail link, an alternative route for the A56 Village Bypass should be identified.
- Whether the early implementation of the A56 Village Bypass scheme would amount to a sustainable transport strategy.

## Inspector's Reasoning and Conclusions

- 0.76 The RSS states that priority should be given to investment in the maintenance, management and selective improvement of regionally significant highway routes. Its Policy T1 indicates that it is critical to the economic competitiveness of the region that transport systems should be modern, efficient and very well integrated. The RSS also recognises that further investment is still required on some sections of the highway network to bring it up to a safe and modern standard, and to provide relief for those communities badly affected by heavy flows of through traffic. The A56 north-east from the M65 at Colne to North Yorkshire is identified as a route of regional significance. Policy T2 of the RSS also advises local authorities to consider the potential of disused rail track beds for possible transport schemes and to apply appropriate protection policies where justified.
- 0.77 In 1995 an Examination in Public into the proposals contained in the draft Lancashire Structure Plan (1991-2006) was held. The panel reported that the M65 easterly extension should be deleted from the Plan, but endorsed improvements to the A56 between Colne and the A59.
- 0.78 The Local Transport Plan for Lancashire (2001-2006) states that the main part of the strategic highway network through Pendle is the M65 and A6068/A56 route. It identifies that the A56 Village Bypass is required to provide an effective continuation of the strategic road network into Yorkshire. The Draft Lancashire Local Transport Plan (2006-2010) states that the A56 Village Bypass is expected to be brought forward as a scheme for the Local Transport Plan (2010-2016).
- 0.79 The proposed route of the Bypass, approved by Lancashire County Council and North Yorkshire County Council after public consultation, follows part of the former Colne to Skipton rail track bed. However, Policy 10 of the JLSP protects the rail track bed for transport, rather than road use, in light of the possible reinstatement of the railway line and guidance contained in the RSS relating to the protection of disused rail track bed.
- 0.80 The reasoned justification of JLSP Policy 10 states that 'the value of the former Colne-Skipton railway line includes possible long-term potential for rail reinstatement as well as being the preferred route for the A56 Village Bypass. It is therefore, important that this corridor is safeguarded for transport purposes'. It goes on to state that, 'before a final decision is made on the most appropriate road alignment, further analysis of options will be undertaken ensuring the potential of rail re-instatement is not precluded'. Policy 8 of the JLSP also identifies a need for

improvement to the highway network between Colne and the North Yorkshire border.

- 0.81 I consider that it is not a role of the re-deposit plan to establish an argument for the A56 Village Bypass, but rather to designate land-uses in line with strategic policies contained in both the RSS and the JLSP. The latter identifies a need to improve cross border linkages into North Yorkshire.
- 0.82 I acknowledge that the JLSP post-dates the findings of the Lancashire County Council's Overview and Scrutiny Committee, which in their Prioritisation of Major Transport Schemes in May 2003 noted that a consultation exercise undertaken with the Pendle Citizen's Panel in 2000 revealed that 77% were in favour of the construction of the A56 Village Bypass. The Committee predicted that traffic levels would be reduced by 30% on the congested North Valley Road in Colne and by 64% on Skipton Road. In addition, traffic avoiding Colne by travelling through the village of Barrowford then along Barnoldswick Road and the B6251, would also be reduced, although the levels were not quantified. A cost-benefit ratio of anything over 2.5 is considered by the Government to provide good value for money. I consider that with a score of 3.4, the A56 Village Bypass proposal clearly exceeds this threshold.
- 0.83 In 2003, Lancashire County Council and North Yorkshire County Council commissioned the study entitled, 'Future of the Skipton-Colne Railway Formation' (Steer Davies Gleave) (CD 86). This sets out and describes the various options and the costs and benefits accruing to each one. The study concluded that reinstatement of a single-track railway, together with construction of the road scheme, was technically feasible. However, although the report noted that a double-track railway with the road option would have significant costs and recommended that, in this case, the road and railway should follow different routes, the construction of the A56 Village Bypass and the reinstatement of the former Colne-Skipton railway line to double track standards are not mutually exclusive options.
- 0.84 As a result of the conclusions of the initial report, further work was commissioned on possible alternative road alignments, in particular, the section between Colne and Foulridge. The 'Future of the Skipton-Colne Railway Formation: Assessment of an Alternative Alignment for the A56' (CD 163) includes broad cost estimates and an initial assessment of the environmental impact of alternative schemes. The study is indicative only, as full engineering and topographic information was not available. The report indicates that the main problem for accommodating both a new road and a re-instated railway occurs between Colne and Foulridge. However, studies indicate that it would be feasible to

provide a single track railway and a bypass within the former rail corridor. The study further indicates that use of corridors other than the disused railway for a bypass, between these locations, would be both more environmentally damaging and have higher costs.

- 0.85 To summarise, the re-deposit plan, through Policy 29 - Creating an Improved Road Transport Network, protects the former route of the Colne to Skipton railway line, and a proposed route through the open countryside to the west of Earby, for future transport use. In my opinion, it therefore accords with the position of higher tier planning policy and it avoids prejudice against the re-opening of a rail or road link along its route. I consider that it would be inconsistent with this policy to give higher priority to the reinstatement of the rail route in a way that could prejudice the implementation of an A56 Village Bypass scheme.

#### **RECOMMENDATION (binding)**

- 0.86 **I RECOMMEND no modification to the plan in response to these objections.**

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# **Policy 1 – Development in the Open Countryside**

## **A. Objections to Policy Wording and Approach**

### **Summary of Key Issues**

- Whether Policy 1 should contain a Borough Profile or introduction to set the environmental context for the plan.
- Whether Policy 1 permits a sufficiently broad range of uses in the rural area.
- Whether Policy 1 accords with PPS7, which refers to diversification of the economy as a whole.
- Whether the exception provided at numbered paragraph 4 of Policy 1, which supports the provision of low cost rural housing adjacent to an existing settlement boundary, is harmful to the protection of environmental interests that seek to protect the countryside.
- Whether the limits to expansion of existing buildings in the countryside that are set by Policy 1 are arbitrary, unduly restrictive and inconsistent with permitted development rights.
- Whether Policy 1 should impose a limit on the scale of increase permitted to existing buildings in conservation areas.
- Whether numbered paragraph 7 of Policy 1 should also cross-refer to Policy 4D.
- Whether a further exception should be added to Policy 1 to permit essential utilities to carry out their operational needs in the countryside.
- Whether a further exception should be added to Policy 1 in favour of development proposals to restore and/or fund a suitable alternative use for a listed building.
- Whether Policy 1 should clarify the factors that were taken into account in drawing up the settlement boundaries.
- Whether Policy 1 should clarify why some safeguarded sites for housing are located outside the settlement boundaries despite the presumption of Policy 1 that development should be located within the settlement boundaries, and the guidance of national, regional and strategic policies, which do not favour residential

development of greenfield sites, especially those located in the countryside.

- Whether the Housing Market Renewal (HMR) area should be limited to land within the settlement boundaries.
- Whether in the absence of certainty that the sites safeguarded for housing will be required in connection with HMR programme the settlement boundaries should be adjusted to include them.
- Whether Policy 1 should include a requirement that development proposals should be in keeping with the character of the landscape in which they are located.
- Whether there are other environmental designations of land that should be listed in Policy 1 and/or referred to in its reasoned justification.
- Whether the Proposals Map, in some instances, gives an inaccurate impression of the developed form of the Borough.
- Whether the removal of the 'open countryside' designation from a site would permit the future development of that site.

### **Inspector's Reasoning and Conclusions**

- 1.1 In response to an Objector's suggestion that the Strategy Section of the plan should contain a Borough Profile or appropriate introduction that indicates that the Council is aware of, and wishes to increase awareness in others of the Borough's distinctive character, I recommend at paragraph 0.71 of my report that a Borough Profile should be added to the Strategy Section of the plan. It would inform that: 'The Borough has a distinct environmental character which should be recognised by all as an important asset. The planning process can help to increase the awareness of the importance of Pendle's environment, which contains sharp contrasts between remote upland moors and densely populated industrial landscapes and covers an historical timeframe ranging from prehistoric sites to modern textile mills.'
- 1.2 I consider that this statement suitably sets the context for the plan and that it is most appropriately contained in the Strategy Section. There is no need to repeat it in Policy 1.
- 1.3 With reference to an objection that Policy 1 is too restrictive in terms of the uses permitted in the rural areas, amendment was made to numbered paragraph 8 of the policy at the re-deposit stage, by adding the word, 'including'. This clarifies that the list of Use Classes specified in the policy is not definitive of the permitted uses. I consider that the policy now allows sufficient

scope to allow appropriate development in the open countryside and that the objection is thereby overcome.

- 1.4 Whilst numbered paragraph 2 of Policy 1 refers specifically to the diversification of an agricultural enterprise, numbered points 1, 7 and 8 relate to the wider economy. Thus, I do not consider that Policy 1 relates only to agriculture. In my interpretation, it seeks to allow a range of uses that are appropriate in the countryside. In my opinion, it strikes the right balance between fostering rural economic activity and safeguarding the countryside, in line with the guidance of PPS7. For these reasons, I do not support the criticism that it is too restrictive.
- 1.5 Numbered paragraph 4 of Policy 1 and text of the reasoned justification for the policy given on page 24 of the Plan supports the provision of low cost rural housing adjacent to an existing settlement boundary, where there is an identified need, in line with Policy 17. However, this support has given rise to two objections.
- 1.6 Trawden Community Group objects to the principle of this exception. It considers that more innovative ways of providing affordable housing should be sought, such as the regeneration of existing properties. However, PPG3 indicates that the Government is concerned that there should be adequate housing provision in rural areas to meet the needs of local people. A recent update to the PPG, (Housing Update: Planning for Sustainable Communities in Rural Areas), states that affordable housing provision in rural areas should be supported by a rural exception site policy. This approach is further supported by Policy UR9 of the RSS, which informs that development plans should address the development of affordable housing to meet identified local needs as an exception to normal planning policies in rural areas.
- 1.7 In my opinion, the exception contained in Policy 1 that refers to the provision of rural housing is entirely consistent with national and regional policy in this regard. Furthermore, the sequential test of Policy 17 and the reasoned justification for Policy 5 of the JLSP give greater priority to the use of brownfield sites and to the conversion of redundant buildings. Thus an Objector's preference for the regeneration of existing buildings to provide affordable homes already has policy support.
- 1.8 Another Objector is concerned that the text of the reasoned justification for this element of Policy 1 implies that this aspect of the policy is too permissive, at the expense of other considerations; but I disagree. Other policies of the plan contain criteria that control specific aspects of the design of development and its location. Furthermore, the Council has a duty to consider all planning applications submitted to it, in the light of the

prevailing planning policies. Therefore, I do not consider that it would add to Policy 1 to change the wording of the reasoned justification for Policy 2, which is found on page 24 of the re-deposit plan, from; '... the Council will permit ...' to, '... the Council will consider...', as suggested by an Objector.

- 1.9 Another Objector is concerned that the limits to expansion of existing buildings in the countryside that are set by Policy 1 are arbitrary and unduly restrictive, especially in the AONB. Consequently, that they may prevent appropriate design solutions which would nevertheless respect the location and character of the existing building and the impact of the proposal on the surrounding countryside.
- 1.10 However, Green Belt and AONB are nationally recognised land-use designations. It is embedded in national planning policy that limiting the scale of development is important for the protection and continued importance of these areas. For example, PPG2 clarifies at paragraph 3.6 that a domestic extension that is not disproportionate in scale to the original building is appropriate in the Green Belt.
- 1.11 It is my opinion that if re-deposit plan Policy 1 did not set a clear limit on the scale of development that may be appropriate in the countryside, including in the Green Belt and the AONB, it would be unacceptably vague. At the re-deposit stage, numbered paragraph 6 of Policy 1 was expanded to clarify that small scale extension or alteration of an existing building is defined as being an increase in the size of the building by not more than 25%. The footnote to the first stage deposit version of the policy, which set lower limits for development in the Green Belt and in the AONB was deleted at the re-deposit stage. Now the percentage limit is no less for development in the Green Belt or in the AONB, but development in those areas must also comply with the relevant Policies 2 or 3.
- 1.12 I consider that taking into account national guidance, a limit of 25% increase in the size of the original building is reasonable, in order both to protect the countryside and to enable occupiers to extend and alter their buildings to suit their needs, and to allow for high quality design in development. I consider that the re-deposit version of Policy 1 meets these objections. However, in order to further improve the clarity of this part of the policy, I support the Council's suggested Change No. 6 (CD 193), that refers to making grammatical changes to numbered paragraph 6.
- 1.13 An Objector considers that Policy 1 should also refer to a specific limitation on the scale of increase permitted to existing buildings located within a conservation area. I do not support this view. Policy 1 relates to any area of open countryside. It does not exclude conservation areas and as such, including reference to

them within this policy is unnecessary. However, development in conservation areas must satisfy a stronger policy test, as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, which requires that all such development preserves or enhances the conservation area in which it is located. Thus, with regards to development in conservation areas Policy 1 should be read together with Policy 10 – Areas of Special Architectural or Historic Interest, which refers specifically to development within a conservation area, and which includes relevant design criteria.

- 1.14 The County Council suggests that numbered paragraph 7 of Policy 1 should also cross-refer to Policy 4D, especially where it refers to protected species. I disagree.
- 1.15 Policies 4A, 4B and 4C are specific in that they relate to SAC/SPAs, SSSIs and specifically designated Natural Heritage Sites respectively. These sites have been designated because they have particular attributes that require protection, whereas Policies 24 and 40 relate to rural businesses and tourism respectively, and they foster specific activities that would not otherwise be permitted in the open countryside.
- 1.16 However, Policy 4D is wider in scope than the policies referred to above. It requires that all development protects and enhances wildlife corridors regardless of location. It should be applied to all development proposals, not only those referred to in numbered paragraph 7 of Policy 1. Thus to refer to it, as suggested by an Objector, would imply that Policy 4D should not have significant weight in the other sections of Policy 1, which is not the intention. For these reasons, I do not support the objection.
- 1.17 The National Grid Company PLC wishes Policy 1 to be amended to allow utility providers to carry out essential developments in the countryside, by adding a further exception to the policy, which refers specifically to 'essential utilities development'.
- 1.18 The Town and Country Planning (General Permitted Development) Order 1995 (including amendments) allows development of a specified appropriate scale without the need for planning permission from the LPA. Furthermore, the Electricity Act provides that for larger scale development, such as pylons and overhead lines for the national grid, permission is not also required under planning legislation. Thus smaller or larger developments are not subject to the limitations of Policy 1.
- 1.19 In my opinion, it is not unreasonable that other types of operational development that do require specific planning permission should be assessed against relevant policies of the Development Plan. I consider that any such development that is shown to be essential to the operational needs of the utility

company should be considered as an exception to normal planning policy that may be permitted if exceptional planning circumstances prevail. Thus I do not support this objection.

- 1.20 Nor do I agree that Policy 1 should have an additional exception added, which supports a scheme to restore and/or fund a suitable alternative use for a listed building that complies with Policy 9 – Buildings of Special Architectural or Historic Interest of the re-deposit plan, including residential development, for several reasons. Firstly, Policy 1 allows for the diversification of an existing agricultural enterprise or for small scale employment use or tourism. Secondly, numbered paragraph 5 of Policy 1 was amended at the re-deposit stage to include reference to a traditional rural building. Thirdly, Policy 17 – Location of New Housing Development has also been substantially revised. Its amendment includes exception F., which specifically covers the point made by the Objector. In my opinion, these policy references are wide enough in scope to allow appropriate uses of listed buildings. Consequently, I do not support this objection.
- 1.21 Several objections made at the first stage deposit question the transparency of the process for drawing up the settlement boundaries, the need to safeguard land for housing and the compliance of those designations with national, regional and strategic planning policy. In response to those objections, a paragraph of text was inserted at the beginning of the reasoned justification for Policy 1 at the re-deposit stage. It explains that generally, the defined settlement boundaries have been carried forward from the adopted Local Plan and that the following factors were taken into account in drawing them up: the setting of the urban area within the landscape (topography) and the limit to which the built form extends.
- 1.22 In addition, it explains that the settlement boundaries also include new allocated areas to allow them to come forward for development if necessary, if it is required in association with the HMR programme.
- 1.23 In the Council's assessment, the selection of these sites accords with the sequential test of PPG3 and also the sequential approach of Policy 17 of the re-deposit plan, and the position of the JLSP towards the use of greenfield sites, as set out at its paragraph 6.3.30. The Council further argues that as the settlement boundaries have been adjusted to include the safeguarded sites within them, the allocation of such sites does not offend PPS7, since these sites are no longer designated open countryside. The designation of 'Areas of Special Landscape' in the adopted Local Plan, which applies to some of the safeguarded sites, now carries very little weight, because that designation has no support from the JLSP or PPS7.

- 1.24 I support the Council's arguments. I also consider that the process of safeguarding land in connection with the HMR programme is supported by the RSS. For example, Policy UR5 of the RSS does not preclude the safeguarding of land. It indicates that Core Development principles need to be followed, as set out in its Policy DP1. These set out a sequential approach for development, which under iii) allows the use of greenfield sites. Policy UR5 requires a plan, monitor and manage (PMM) approach, in accordance with Policies UR6, UR7 and UR8. Policy UR6 specifically relates to Existing Housing Stock and Housing (Market) Renewal. It recognises that clearance will be an integral part of the housing regeneration process and it requires that housing strategies should 'reflect local circumstances and priorities as well as available resources'.
- 1.25 Pendle, which is specifically highlighted in Policy UR6, is experiencing an intense period of major change in its housing market. The allocation of HMR safeguarded housing land is a component in the management of that process and in my opinion, is squarely in line with the principles of development, as set out in the RSS.
- 1.26 The HMR Pathfinder area for Pendle was originally identified by the ODPM based on statistical information at their disposal. It was then refined by the individual local authorities. The final HMR Intervention Area boundary for Pendle was approved by the ODPM in 2002. It follows a combination of ward, Enumeration District and partial Enumeration District boundaries. The boundaries of these areas are not confined to the urban area, and therefore, extend beyond the settlement boundary in some places.
- 1.27 In a few locations, the HMR Intervention Area covers parts of the open countryside, as defined in the re-deposit plan. This anomaly occurs where the Enumeration District covers a large geographical area. However, this does not mean that the need for constraint on development proposals within the countryside is wavered. Policy 1 clearly sets out the restrictions and exceptions to developing in the open countryside. Development associated with the HMR programme is not included as one of the exceptions to Policy 1.
- 1.28 Turning to the need to safeguard land, the ELEVATE programme is the HMR programme that is prevalent throughout East Lancashire. Demolition of unfit/low demand houses is an integral part of that programme. At this juncture the precise numbers of dwellings to be demolished is not known. The safeguarding of land is needed to facilitate the programme in the event that demolition rates exceed replacement on the site of demolition and on other sites in accordance with the sequential site selection process that is required to be followed under Policy 17 and PPG3.

- 1.29 I consider that were such land required and there was no safeguarded land available, the HMR programme would be severely hampered. Alternatively, if the safeguarded sites are not required for the replacement of dwellings demolished as part of the HMR programme they will not be built upon. I consider in more detail the planning merits of and the requirement for sites selected for safeguarding in Chapter 17 of my report.
- 1.30 However, in general terms, I am satisfied that the factors that have been taken into account in drawing up the settlement boundaries, as shown in the re-deposit plan, are now clearly stated in the reasoned justification for Policy 1, and therefore, that the procedure is transparent. Furthermore, I have no reason to question those factors or to doubt that the process of including additional land within some settlements is well founded and supported by higher tier planning policy. It will be for a future review of the Local Plan to consider if the land is still required for development, and if not, if the settlement boundaries should be re-adjusted accordingly.
- 1.31 I conclude that the additional text inserted at the beginning of the reasoned justification to Policy 1 at the re-deposit stage meets the several objections which raised these matters at the first stage deposit.
- 1.32 In response to an objection made at the first stage deposit that not all appropriate environmental designations are referred to in Policy 1, an additional paragraph was added at the end of the policy at the re-deposit stage. It informs that proposals for development in an area designated as AONB, Green Belt, SAC, SPA, SSSI, BHS, GHS, LNI and LNR must conform to Policies 2-4C inclusive. In addition, reference to all these designations, and also to buildings or areas of historic importance, was added throughout the reasoned justification for the policy. In my opinion, these objections are, therefore, met. That made by Pendle CPRE was conditionally withdrawn on the basis of these re-deposit changes.
- 1.33 The County Council objects to the deletion, at the re-deposit stage of the plan, of the requirement that development proposals should be in keeping with the character of the landscape in which they are located. The reason for its deletion was because this is a requirement of Policy 20 of the JLSP. Since the JLSP forms part of the Development Plan, the Council considers that there is no need to repeat this policy requirement in the re-deposit plan.
- 1.34 I support the Council's view on this matter. Furthermore, this reference to the JLSP is quite rightly, in my opinion, mentioned in the fourth paragraph of the reasoned justification for Policy 1, which also clearly explains that the Landscape Character Approach

must be adopted for any new development. Also, that details of this approach are provided in the Council's SPG: Development in the Open Countryside. For these reasons, I do not support this objection.

- 1.35 An Objection made at the first stage deposit comments that, in some cases, the Proposals Map is out of date in that it fails to show some recent developments; therefore that it gives a false impression of the developed form of the area. However, whilst I consider that the Proposals Map is explicitly clear in indicating the precise land uses, protected areas and other features that are subject to policies of the plan, it does not necessarily show the most recent developments because it is based on the most up-to-date plans available from Ordnance Survey at the time it was prepared, which do not always show most recent developments. Nevertheless, I am satisfied that the Proposals Map, as amended at the re-deposit stage is a true and accurate reflection of what the plan proposes. Therefore, I recommend no changes to it in response to this objection.
- 1.36 Barnoldswick Town Council queries if the removal of an open countryside designation means that future development may be permitted. In general terms, I consider that the answer is, 'yes'. The presumption to allow development is greater within a settlement boundary, because the sequential tests of planning policies at all levels give higher priority to the development of sites within urban areas. However, development must be compatible with its land-use designation, unless there are exceptional material considerations that indicated otherwise.

#### **RECOMMENDATIONS (binding)**

- 1.37 **I RECOMMEND that the plan be modified by amending the last sentence of numbered paragraph 6 of Policy 1 so that it reads:**

**Proposed extensions in the AONB or Green Belt must also comply with the criteria set out in Policies 2 and 3 respectively.**

- 1.38 **I RECOMMEND no further modification to the plan in response to these objections.**

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## **B. Objections to Specific Sites**

### **BARNOLDSWICK**

Land at Wapping, Barnoldswick, omission site X53

The Homelands, Manchester Road, Barnoldswick, omission site X55

The Moorlands, Manchester Road, Barnoldswick, omission site X80

#### **Summary of Key Issues**

- Whether land at Wapping, omission site X53, should be included within the settlement boundary for Barnoldswick.
- Whether land at The Homelands, Manchester Road, omission site X55, should be included within the settlement boundary for Barnoldswick.
- Whether The Moorlands, Manchester Road, Barnoldswick, omission site X80, should be included within the settlement boundary for Barnoldswick.

#### **Inspector's Reasoning and Conclusions**

##### **Land at Wapping, Barnoldswick, omission site X53**

1.39 Omission site X53 is located at the south-eastern periphery of Barnoldswick. It comprises 1.15 hectares and is bounded by residential development to the south, allotments and housing to the east, a mill to the north and a footpath to the west, beyond which is agricultural land. The land is greenfield and is used for grazing. It is included in the settlement boundary for Barnoldswick, as shown in the adopted Local Plan, but it was excluded at the first stage deposit, because it is an undeveloped, open, greenfield site. Therefore, in the Council's opinion, it does not fulfil criterion 2 of the settlement boundary definition. Two representations supporting the designation of the site as open countryside have been submitted.

1.40 However, I find the reason for this site's exclusion from the settlement boundary somewhat illogical. The site is within the settlement boundary shown in the adopted Local Plan. The first paragraph of the reasoned justification added at the re-deposit stage informs that: 'The defined settlement boundary has been carried forward from the adopted Local Plan (January 1999)', (except for the inclusion within the settlement boundary of new safeguarded land allocations). The factors used to define the settlement boundaries are also carried forward from the adopted Local Plan. Therefore, there does not appear to me to be a policy based explanation of why this site is now excluded.

- 1.41 Like a colleague Inspector who considered a section 78 appeal at this site, I consider that the site can reasonably be regarded as forming 'rounding off'. The Council concedes that it is physically and functionally part of the urban area. I also agree with the Objector that the footpath at the western boundary forms a logical, defensible urban boundary. I note the Council's concern that the openness of the site contributes to the amenity of the surrounding area, but in my view the Council has demonstrated that the policies of the adopted Local Plan have been successful in protecting the site from unsuitable development. I see no reason why those of the re-deposit plan should not be equally as successful. Therefore, I support this objection.

**The Homelands, Manchester Road, Barnoldswick, omission site X55**

- 1.42 Omission site X55 is located at the southern periphery of Barnoldswick. It is 0.7 hectare in extent. It comprises the residential curtilage of The Homelands, which contains the large detached house and its outbuildings, which are separated from the southern part of the settlement by two grassed plots. Sporadic development in the open countryside continues to the south of the site. To the west is open countryside, and to the east is Letcliffe Country Park. This site is not included in the settlement boundary for Barnoldswick, as shown in the adopted Local Plan, and it is designated within an Area of Special Landscape. One representation supporting the designation of the site as open countryside beyond the settlement boundary has been submitted.
- 1.43 An amendment to the settlement boundary is sought to enable windfall development of the two plots in the northern part of the garden; a type of development which the Objector says a recent section 78 appeal Inspector found would be characteristic of the settlement pattern of the area. The development would help finance improved access to the existing dwelling and consequential improved highway safety for drivers and pedestrians on this part of Manchester Road.
- 1.44 I saw that The Homelands is a dwelling set within extensive grounds, which appears to me to be more characteristic of the open countryside than the urban area. It is my opinion that in the vicinity of omission site X55 the boundary of the adjacent, The Moorlands, which is contiguous with other developments along the Manchester Road (B6251) that have smaller suburban gardens, represents a clear demarcation between the urban and rural areas. I consider that the site X55 lies beyond the limit to which the built form extends in this part of Barnoldswick, consequently that this omission site does not meet the second of the criteria which are used to define the settlement boundary. For these reasons, I do not support this objection.

## **The Moorlands, Manchester Road, Barnoldswick, omission site X80**

- 1.45 Omission site X80 is located at the southern periphery of Barnoldswick, within the residential curtilage of and to the rear of the dwelling known as The Moorlands. The settlement boundary divides the site, with the house located within the settlement boundary and the remainder of its curtilage located beyond it, in the open countryside. It is 0.11 hectare in extent. It is bounded by residential properties and gardens to the north and west and by Letcliffe Country Park to the east. Two representations supporting the designation of the site as open countryside beyond the settlement boundary have been submitted.
- 1.46 In its proof of evidence and at the informal hearing session at which the objection concerning this site was heard, the Council conceded that the omission site is contained within the residential curtilage of The Moorlands and that it can be classified as being previously developed land; having a hard standing. Furthermore, that the settlement boundary was drawn to represent the built form extent, and therefore, that previously developed land immediately adjacent to an urban area should be included within the settlement boundary for Barnoldswick. Consequently, I conclude that the settlement boundary should be amended to include omission site X80, in accordance with suggested Change No. 107 (CD 193).
- 1.47 Thus, I agree with the Council on this matter and I support the objection.

### **RECOMMENDATIONS (binding)**

- 1.48 **I RECOMMEND that the plan be modified by amending the settlement boundary of Barnoldswick to include land at Wapping, omission site X53, within the settlement boundary, as shown on the Proposals Map of the adopted Pendle Local Plan. The Proposals Map of the re-deposit plan should be amended accordingly and the land should be shown as non-designated.**
- 1.49 **I RECOMMEND that the plan be modified by amending the settlement boundary of Barnoldswick to include land at The Moorlands, Manchester Road, Barnoldswick, omission site X80, within the settlement boundary. The Proposals Map should be amended accordingly and the land should be shown as non-designated.**
- 1.50 **I RECOMMEND no further modification to the plan in response to these objections.**

## **BARROWFORD & HIGHERFORD**

Former safeguarded site at Barrowford Road, omission site Y02 and X11  
St Thomas' Church of England Primary School off Wheatley Lane Road,  
omission site Y05

Land at 143A Wheatley Lane Road, omission site Y06

Clough Springs Development, omission site X72

Land between Clough Springs and St Thomas' School, omission site X73

### **Summary of Key Issues**

- Whether land at Barrowford Road, omission sites Y02 and X11, should be de-allocated as a safeguarded site for housing and re-designated as open countryside.
- Whether the omission of the St Thomas' Church of England Primary School, omission site Y05, from the Proposals Map gives a false impression of the extent of the built form at Barrowford.
- Whether land at 143A Wheatley Lane Road, omission site Y06, should be included within the settlement boundary for Barrowford.
- Whether land at the Clough Springs development, omission site X72, should be included within the settlement boundary for Barrowford.
- Whether land between Clough Springs and St Thomas' School, omission site X73, should be included within the settlement boundary for Barrowford.

### **Inspector's Reasoning and Conclusions**

#### **Former safeguarded site at Barrowford Road, omission sites Y02 and X11**

- 1.51 An objection was made at the first stage deposit that land at Barrowford Road, omission sites Y02 and X11, should be de-allocated as a safeguarded site for housing and re-designated as open countryside. At the re-deposit stage, the site was de-allocated as a safeguarded site for housing within the settlement boundary and was re-designated as Green Belt, mainly falling outside the settlement boundary for Barrowford. At the informal hearing session at which this objection was heard, the Objector confirmed that the objection was met on the basis of this change.
- 1.52 However, several counter objections were made to this re-deposit change of designation for the site, which I report upon elsewhere in my report, namely in Chapters 3, 17 and 23. My overall conclusion and recommendation on this site, which is contained in Chapter 3 of my report, is that the site should be mainly excluded

from the settlement boundary and re-designated as a Protected Area within the Open Countryside, in line with this objection.

- 1.53 The exception to this re-designation is the land north of the pylons and adjacent to the Barrowford Business Park, which is designated as a Protected Employment Area – B1 only, in order to reflect an extant planning permission for B1 development that includes this triangular parcel of land within the application site. However, a condition of that planning permission reserves the land for landscaping, so that its open nature will, nevertheless, be retained.

**St Thomas' Church of England Primary School, off Wheatley Lane Road, omission site Y05**

- 1.54 The settlement boundary for Barrowford was re-drawn at the re-deposit stage to include the site of the school, omission site Y05 within the settlement boundary for Barrowford. As a consequence, the previous open countryside designation was also removed from the site. I note that the base map may not accurately reflect the layout of the new school, but I am satisfied that the development is wholly contained within the revised settlement boundary and that as such, the Proposals Map accurately shows the extent of development in this part of Barrowford. I consider that these objections are met.

**Land at 143A Wheatley Lane Road, omission site Y06**

- 1.55 This objection appears to be based on a misinterpretation of the Proposals Map for the first stage deposit. On this map, 143A Wheatley Lane Road and adjacent properties were included within the settlement boundary for Barrowford. At the re-deposit stage the settlement boundary was re-drawn in the vicinity of 143A Wheatley Lane Road to place the fields around Trough Laithe Farm, previously safeguarded for housing into the open countryside and Green Belt. However, site Y06 remained as non-designated land within the Barrowford settlement boundary. The objection is, therefore, met.

**Clough Springs Development, omission site X72**

- 1.56 The settlement boundary for Barrowford shown in the re-deposit plan was carried forward from the adopted Pendle Local Plan, which was drawn and adopted prior to the Clough Springs development. The development of Beech House as part of the Clough Springs development represents the new extent of the built form of Barrowford. Since the purpose of the settlement boundary is to reflect the setting of the urban area within the landscape and the limit to which the built form extends, the Council agrees that the settlement boundary should be amended

to include omission site X72 within it and to remove the open countryside designation, in accordance with suggested Change No. 106 (CD 193).

- 1.57 Three representations requesting that the site be designated as open countryside beyond the settlement boundary have been submitted. Nevertheless, I support the Council's suggested Change No. 106, which reflects up-to-date circumstances, and which overcomes the original objection.

**Land between Clough Springs and St Thomas' School, omission site X73**

- 1.58 The site, which is 0.39 hectare in extent, is located at the north-western periphery of Barrowford. It is bounded by St Thomas' School to the east and the Clough Springs residential development to the west. The site is greenfield, open land that extends to the open countryside to the north. Wheatley Lane Road forms its southern boundary. Six representations supporting the designation of the site as open countryside beyond the settlement boundary have been submitted.

- 1.59 The objection is made on the grounds that the site should be included within the settlement boundary as it is enclosed on three sides, and development of the site would infill a gap within a built-up frontage. Infill development of the site should be considered as 'rounding off' the settlement. Thus it is thought that the open countryside designation should be removed and that the site should be included within the urban area.

- 1.60 Whilst the site is indeed surrounded on three sides by residential and educational uses, I consider that it shares the characteristics of the open countryside. I saw that it provides an important gap that contributes significantly to the setting of the urban area and it provides a transition from the urban area to the open countryside. I consider that any development of the site would amount to an inappropriate encroachment into the countryside.

- 1.61 In my opinion, the inclusion of the site within the settlement boundary would place the site under undue pressure from development. Furthermore, since the site is not defined on its northern side by a strong natural feature, the development of this site could jeopardise and place pressure on the surrounding countryside for further development, which would lead to urban sprawl. I consider that the exclusion of the site from the urban area is in line with the two factors used for defining a settlement boundary.

- 1.62 I have taken into account the Objector's further comments that the site could provide a suitable housing site if a future review of

the RSS required the provision of more houses and greenfield sites on which to accommodate them. But this would be a matter for the new Local Development Framework for Pendle to take account of.

1.63 For the reasons that I have given, I do not support this objection.

**Former Barnoldswick Service Reservoir, off Park Hill, omission site X52**

1.64 The site is 1.184 hectares in area. It is a former service reservoir, with ancillary buildings and grassed areas situated partly within and partly outside the settlement boundary for Barnoldswick. The part within the settlement boundary has no designation in the re-deposit plan. The part falling outside is designated as Open Countryside. The Objector notes that Policy 17 – Location of New Housing Development states that a sequential approach should be used for the allocation of new sites for development. Barnoldswick Service Reservoir, which lies immediately adjacent to the urban area is no longer in operational use and will be available for re-use as a previously developed brownfield site. As such, it is considered that the site should be included within the urban area.

1.65 I saw that in the vicinity of the omission site, the boundary of the former reservoir and the perimeters of the gardens of adjoining housing represent a clear demarcation between the urban and rural areas. I consider that to include the largely undeveloped areas of land to the south and west of the former reservoir within the settlement boundary for Barnoldswick would increase its potential for development in the future and would encourage encroachment into the open countryside, which is contrary to Policy 1 - Development in the Open Countryside. As there is no requirement to identify housing land within the re-deposit plan, I do not consider that it is appropriate to include the ancillary areas adjacent to the former service reservoir within the settlement boundary.

1.66 For these reasons I do not support the objection or consider that the settlement boundary should be changed in the vicinity of the site.

**RECOMMENDATIONS (binding)**

1.67 **I RECOMMEND that the plan be modified by amending the settlement boundary of Barrowford to include the Clough Springs Development, omission site X72, within the settlement boundary. The Proposals Map should be amended accordingly and the land should be shown as non-designated.**

1.68 **I RECOMMEND no further modification to the plan in response to these objections.**

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## **BRIERFIELD**

Garden land at Den Mar Di, Kibble Grove, Brierfield, omission site X05

### **Summary of Key Issue**

- Whether garden land at Den Mar Di, Kibble Grove, Brierfield, omission site X05, should be included within the settlement boundary for Brierfield.

### **Inspector's Reasoning and Conclusion**

#### **Garden land at Den Mar Di, Kibble Grove, Brierfield, Omission site X05**

1.69 It is requested that the settlement boundary be amended to incorporate a new double garage to the property, together with an additional 2.0 metres wide maintenance strip and the turning area to the property within the settlement boundary. As shown at the first stage deposit, the settlement boundary would split the curtilage of the site, with part falling within the urban area and part in the open countryside. This is thought, by the Objector, to be illogical. One representation supporting the designation of the omission site as open countryside beyond the settlement boundary has been submitted.

1.70 Subsequent to the completion of the new garage at the site, the Council accepts that in order to reflect the limit of the built form in the vicinity, the settlement boundary should be changed to include the garage, the turning area and adjacent garden, but not the additional 2.0 metres wide maintenance stripe requested by the Objector. In the Council's view, the land east of the suggested new settlement boundary represents open land and green fields which, if included within the urban area, may lead to development and loss of openness of the area. I endorse the Council's view on this matter.

1.71 In my opinion, the suggested Change No. 103 (CD 193) reflects the appropriate curtilage of the property that should be included within the settlement boundary, to which the restrictions imposed by Policy 1 would not apply. I consider that the inclusion of the requested maintenance strip would amount to a departure from the application of the two main criteria that are used to draw up the settlement boundaries, which would introduce unwelcome inconsistency and lack of transparency in the plan. Furthermore, I do not consider that a maintenance strip is required to be included

within the boundary, as the land's exclusion from within the boundary would not apparently impact on the ability for the property inside of the boundary to be maintained.

1.72 Thus to conclude, I support this objection in part.

### **RECOMMENDATION (binding)**

1.73 **I RECOMMEND that the plan be modified by amending the settlement boundary of Brierfield to include the new double garage, turning area and adjacent garden land at Den Mar Di, Kibble Grove, Brierfield, but excluding a 2.0 metre service strip to the east of the garage, part of omission site X05, within the settlement boundary, in accordance with Change No. 103. The Proposals Map should be amended accordingly and the land within the extended settlement boundary should be shown as non-designated.**

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### **COLNE (including COTTONTREE)**

Land south of South Valley, Colne, omission site X23

Land at Grosvenor Street, Colne, omission site X40

Land off Dewhurst Street, Colne, omission site X41

Land off Trawden Road, Cottontree, omission site X50

Nelson and Colne College, Barrowford Road, omission site Y03

Land at Red Lane, omission site X35/Y04

### **Summary of Key Issues**

- Whether the settlement boundary for Colne should be amended to exclude land between Waterside and Marsden, omission site X23.
- Whether the settlement boundary for Colne should be amended to exclude land at Grosvenor Street, omission site X40.
- Whether land at Dewhurst Street, Colne, omission site X41, should be included within the settlement boundary for Colne.
- Whether the settlement boundary should be amended to include land off Trawden Road, Cottontree, omission site X50.
- Whether land at Nelson and Colne College, Barrowford Road, omission site Y03, should be de-allocated as a safeguarded site for housing because it lies outside the settlement boundary and within the open countryside.

- Whether land at Red Lane, omission site X35/Y04, should be de-allocated as a safeguarded site for housing in order to protect the open countryside.

## **Inspector's Reasoning and Conclusions**

### **Land south of South Valley, Colne, omission site X23**

- 1.74 Omission site X23 is 123 hectares in area and extends across the south of Colne through the ward of Waterside. The site is allocated as open countryside outside the settlement boundary, as requested by an Objector, with the exception of the parts of the site known as Knotts Lane (omission site X26, which contains omission site X27) and the former cement works (omission site X28), which are allocated as safeguarded land for housing, and the surrounding land to that site (omission site X29). These sites fall within settlement boundary, as they do in the adopted Pendle Local Plan.
- 1.75 In Chapter 17 of my report I refer in more detail to the need for safeguarding land generally in association with the HMR programme and specifically to the need to safeguard sites X26 and X28 for this purpose. However, with regards to omission site X29, I concur with the Council that the land is not required as HMR safeguarded housing land.
- 1.76 In the re-deposit plan, omission site X29 is shown as non-designated land falling within the settlement boundary. However, I consider that these designations will leave it very vulnerable to pressure for development, and that the strong southern boundary to development at Colne formed by the existing new housing development in the vicinity of Knotts lane would be under threat of erosion. In my opinion, the openness of omission site X29 contributes to the setting of the urban area of this part of Colne. Therefore, it serves the criteria for defining the settlement boundary as set out at page 23 of the plan, and should be excluded from the settlement boundary. The merits of this change were suggested by the Council at an informal hearing session at which this site was considered as part of the larger objection site X23. Thus substantially, this objection and representations made to the advertisement of omission site X23 are met.

### **Land at Grosvenor Street, Colne, omission site X40**

- 1.77 Omission site X40 is a square parcel of land situated opposite numbers 25-41 Grosvenor Street. It is bounded by residential development on two sides and open countryside on the others. It is 0.16 hectare in extent and comprises allotments and a well cared for, equipped play area. It is clearly an area that is cherished by local people. In recognition of this and to remove

threat of any future development, it is requested that the site be excluded from the settlement boundary for Colne and re-designated as open countryside, or as an Area of Settlement Character, as defined in Policy 12 – Maintaining Settlement Character of the plan.

- 1.78 A substantial number of representations made in response to advertisement of this omission site support these requests and also suggest that the site should be re-designated as open space. However, procedurally, this latter request should have been made at either the first stage deposit or the re-deposit stages.
- 1.79 Whilst I have no doubt that the site provides a very important local amenity, in my opinion, its two uses as allotments and a play area are urban related uses rather than purposes associated with the countryside. Therefore, I consider that the site should be included with the urban area and contained in the settlement boundary. In my opinion, it would be inappropriate to designate it as open countryside. Nevertheless, taking into account the high volume of support for the recreational value of the site to local people and the guidance contained at paragraph 11 of Planning Policy Guidance Note 17: Planning for Open Space Sport and Recreation (PPG17), I suggest that the re-designation of the site as open space should be considered as part of the forthcoming LDF process.
- 1.80 Topic Paper 6: Maintaining Settlement Character (CD 54) sets out the policy context for Policy 12. It explains that the primary purpose of the policy is to protect sites within defined settlement boundaries that play an essential role in the character of a particular settlement, with regard to their setting and local amenity.
- 1.81 Most of the sites identified under Policy 12 are surrounded by development, but this site has open countryside on two sides. Nor, in my opinion, does it play an essential role in the character of the settlement. For these reasons I do not consider that it qualifies as being an Area of Settlement Character. Thus, I do not support this objection or recommend that the designation of omission site X40 be changed at this review of the Local Plan.

#### **Land off Dewhurst Street, Colne, omission site X41**

- 1.82 It is considered by an Objector that the settlement boundary for Colne has been drawn too tightly along the rear of Dewhurst Street. The area to the south-east, which is shown to be allotments on the Proposals Map is a brownfield, former storage area and should, in my opinion, more appropriately be included within the settlement boundary. This would clear the way for the land to come forward as a windfall site for two dwellings.

Representations made in response to advertisement of the omission site object to this proposition.

- 1.83 The site is around 0.45 hectare in extent. It is situated to the north-east of Knotts Lane and is located opposite the site of the former cement works that is safeguarded for housing. It abuts dwellings to the north-west. It lies outside the settlement boundary and most of the site is designated as open space. The remainder is designated as open countryside. However, at the informal hearing session at which this objection was heard, the Council conceded that the allotment (open space) designation is incorrect. The true, smaller area of allotments should remain as allocated open space, with the remainder being designated as open countryside, in accordance with suggested Change No. 105 (CD 193).
- 1.84 From my observations of the site I support this suggested Change, and I am of the opinion that the site should remain outside the settlement boundary for this part of Colne. I consider that especially in this location, it is important that the settlement boundary is drawn tightly around Dewhurst Street, because it represents the limit of the built form at this point. Together with the designation of the site as open space and open countryside, it will help prevent the spread of urban sprawl at the south-eastern periphery of Colne.
- 1.85 I do not consider that the concept of 'squaring off' the settlement boundary at this location, as suggested by the Objector, is a sound planning reason to adjust the settlement boundary at this point. Furthermore, it could create a precedent for many other similar sites. With regards to its suitability for housing, as I set out in detail in Chapter 17 of my report, the Borough is in a position of over-supply for housing; therefore, this land is not needed for residential purposes. For these reasons, I do not support the objection.

#### **Land off Trawden Road, Cottontree, omission site X50**

- 1.86 Omission site X50 is a cleared industrial mill site with an extensive hard standing. It lies to the east of the B6250, immediately to the south of the bridge over Colne Water. To the north there are areas of terraced housing and to the immediate south there is a small factory unit, beyond which and to the east and west is open countryside. The site lies outside a settlement boundary and it is designated as Green Belt.
- 1.87 The County Council considers that it should be included in the settlement boundary for Colne and be alternatively allocated either for housing or employment purposes. There was no support

for and considerable objection to the County Council's proposition resulting from advertisement of this omission site.

- 1.88 The settlement boundaries in Pendle have been established on the basis that they should only enclose the main settlement area and, wherever possible, they should follow clearly identifiable features. In the vicinity of the omission site, I saw that Colne Water represents a clear demarcation. In my opinion, sporadic, dispersed or ribbon development and open undeveloped parcels of land on the edges of settlement, such as the objection site should normally be excluded from defined settlement areas, in order to prevent their consolidation.
- 1.89 Furthermore, as I conclude in Chapters 17 and 23 of my report, the Council has identified sufficient housing and employment land to satisfy the Structure Plan requirements for this plan period, without the need to allocate additional sites outside settlement boundaries. For these reasons, I do not support this objection and I conclude that the site should remain outside the settlement boundary.

#### **Nelson and Colne College, Barrowford Road, omission site Y03**

- 1.90 An objection is made on the grounds that land at Nelson and Colne College, Barrowford Road, omission site Y03, should be de-allocated as a safeguarded site for housing because it lies outside the settlement boundary and within the open countryside.
- 1.91 Whilst the site was safeguarded for housing at the first stage deposit, it was also proposed to be within the settlement boundary for Colne. However, at the re-deposit stage it was de-allocated as a safeguarded site and re-designated as open space, but retained within the settlement boundary. I support these designations of the site because they reflect the outline planning permission granted on the site for conversion to residential, which will ensure the conservation of this attractive and prominent building. In addition, the open space designation on the playing fields part of the site will ensure that it remains open.
- 1.92 At the informal hearing session at which this objection was considered the Objector confirmed that the objection was met on the basis of these re-deposit changes.

#### **Land at Red Lane, omission site X35/Y04**

- 1.93 Omission site X35 lies to the south of Red Lane, Colne between Great House Farm and The Meadows. To the north and south of the site are dwellings, the Sacred Hearts School lies to the east, with Green Belt to the west. The site is 2.58 hectares in extent and is used as grassland. In the adopted Pendle Local Plan it is

designated as a Protected Area outside the settlement boundary and in an Area of Special Landscape. At the first stage deposit, the site was safeguarded for housing and situated within the settlement boundary. There were 78 objections to that designation. However, at the re-deposit stage the site was de-allocated as a safeguarded housing site and it was re-designated as Green Belt outside the settlement boundary and within the open countryside. There were 6 representations supporting these designations in response to advertisement of the omission site.

- 1.94 I support the de-allocation of the site as safeguarded land for housing and its exclusion from the settlement boundary. However, for reasons which I give in Chapter 3 of my report, I do not support the designation of the site as Green Belt. Nevertheless, it is my opinion that the site forms part and parcel of the wider countryside to the west, in terms of its appearance and function. Consequently, I consider that it should be protected from the threat of development pending a strategic review of the Green Belt and future reviews of the Development Plan. In these circumstances I conclude that its appropriate designations are as a Protected Area within the Open Countryside. I consider that these designations would meet the objections.

#### **RECOMMENDATIONS (binding)**

- 1.95 **I RECOMMEND that the plan be modified by excluding omission site X29 (except that part which comprises omission site X28) from the settlement boundary of Colne and by re-designating omission site X29, excluding omission site X28, as Open Countryside. For the avoidance of doubt omission site X28 should be placed within the settlement boundary for Colne. The Proposals Map should be amended accordingly.**
- 1.96 **I RECOMMEND that the plan be modified by reducing the open space designation at omission site X41 to the area shown outlined in green on the plan at Appendix 2 of the Council's proof reference PBCP/186. The remainder of the site should be designated as Open Countryside and the whole of the site should be excluded from the settlement boundary.**
- 1.97 **I RECOMMEND that the plan be modified by re-designating land at Red Lane, omission site X35/Y04 as Open Countryside outside the settlement boundary. (See Chapter 3 of this report for my further recommendation on this site.)**
- 1.98 **I RECOMMEND no further modification to the plan in response to these objections.**

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## **EARBY**

Glen Farm, Red Lion Street, omission site X85

Farmyard and Buildings at Glen Farm, Red Lion Street, omission site Y43

Bawhead Road, Earby, omission site X84

### **Summary of Key Issues**

- Whether Glen Farm, and its associated buildings at Red Lion Street, Earby, omission sites X85 and Y43 respectively, should be included within the settlement boundary for Earby.
- Whether land at Bawhead Road, Earby, omission site X84, should be excluded from the settlement boundary and designated as open countryside.

### **Inspector's Reasoning and Conclusions**

#### **Glen Farm, Red Lion Street, omission site X85**

- 1.99 Omission site X85 is an open field having an area of around 0.52 hectare. It is located on the south side of Glen Cottages on Red Lion Street outside the settlement boundary and within the open countryside. These designations were the subject of substantial support in response to advertisement of this omission site.
- 1.100 It is bounded by agricultural buildings on one side and residential curtilages on two others. It opens to extensive open countryside to the south. The Objector contends that the area is too small to be of agricultural benefit. Its proximity to the beck and residential area, and its distance from the main body of the farm makes it unsuitable for modern agricultural use.
- 1.101 The settlement boundaries in Pendle have been established on the basis that they should only enclose the main settlement area, and wherever possible, they should follow clearly definable features. I saw that in the vicinity of Glen Farm, the perimeters of the gardens of adjoining housing represent a clear demarcation between the urban and rural areas.
- 1.102 I have taken into account that the Objector considers that the site is unsuitable for modern agricultural use, but I do not consider that this justifies its inclusion within the settlement boundary and the removal of the open countryside designation. To do so would place the site under development pressure, which in my opinion would result in undesirable consolidation and sprawl at the eastern periphery of the settlement. For these reasons I do not support the objection.

### **Farmyard and Buildings at Glen Farm, Red Lion Street, omission site Y43**

- 1.103 At the first stage deposit, omission site Y43, which comprises agricultural buildings and courtyard, was designated as open countryside outside the settlement boundary. However, in response to this objection, omission site Y43 was placed within the settlement boundary and the open countryside designation was removed at the re-deposit stage. I support these changes, which overcomes the objection.

### **Bawhead Road, Earby, omission site X84**

- 1.104 Omission site X84 is a greenfield site in agricultural use. It is 1.66 hectares in area. It is bounded by residential development on its western and southern sides, by educational uses on its northern side and open countryside on its eastern side. The site has the benefit of an extant outline planning permission for residential development. Both in the adopted Pendle Local Plan and the first stage deposit plan, the site was designated as a housing allocation within the settlement boundary. At the re-deposit stage, the housing allocation was removed from the site in response to the reduced housing requirement of the JLSP. The site remains within the settlement boundary, but it is not designated for a specific use. This position reflects the fact that there is a live planning permission for residential development at the site.
- 1.105 Several objections were made to the retention of omission site X84 within the settlement boundary for Earby and to the annotation of this greenfield site as 'white land'. It is requested that the site be placed outside of the settlement boundary and designated as open countryside, in order to protect it from development. The considerable amount of new residential building that has recently taken place in Earby is referred to. In addition, a substantial number of representations were made in response to advertisement of the omission site, objecting to the inclusion of the site within the settlement boundary.
- 1.106 I have no reason to think that the extant planning permission will not be implemented following approval of its reserved matters details. Therefore, I consider that it is prudent that the likelihood of the development of this site is reflected by the position of the settlement boundary, which is intended to show the extent of the built form. Consequently, I consider that it would be illogical to designate the site as open countryside. Consideration of revoking the planning application does not fall within the remit of this Inquiry. However, taking into account the over-supply of housing land within the Borough and the greenfield nature of the site, if the extant planning permission was not implemented, the

sequential test of Policy 17 of the re-deposit plan would give the site a very low priority for development.

- 1.107 I have had regard to the significant amount of opposition to the non-designation of this site and its inclusion within the settlement boundary for Earby, but for the reasons that I have given, I do not support those objections.

### **RECOMMENDATION (binding)**

- 1.108 **I RECOMMEND no modification to the plan in response to these objections.**

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### **HIGHAM**

Land north of Sabden Road, omission site X01

#### **Summary of Key Issue**

- Whether land north of Sabden Road, omission site X01, should be included within the settlement boundary.

#### **Inspector's Reasoning and Conclusions**

- 1.109 Omission site X01 is located at the northern periphery of Higham, outside of the settlement boundary and within the Green Belt. It is around 0.3 hectare in extent and is occupied by an extended garden, access road and an area of hard standing. However, from the Council's representations it seems that some of these developments may not be authorised. Two representations of support for the designation of the site were made in response to advertisement of the omission site.
- 1.110 The Objector argues that the Higham settlement boundary has been drawn too tightly and that this has had the effect of preventing development on the edge of the village, forcing development to be crammed into the core of the village and possibly causing an increase in house prices, which will force young people to move out of the village and will lead to its demise.
- 1.111 From my observation, the settlement boundary forms the appropriate demarcation between the urban part of the village and the countryside to the north. I consider that any adjustment of the boundary northwards to encompass the omission site would represent encroachment into the countryside and would result in undue pressure for development that could result in loss of openness of the Green Belt.

1.112 I agree with the Objector that it appears illogical for the settlement boundary to include the substantial curtilages of numbers 17 and 19 Sabden Road, but that land is not the subject of an objection before me. I do not consider that it provides a good reason to extend the boundary as requested. There is no need to provide additional housing land in Pendle, nor does the re-deposit plan make allocations for affordable housing, provision for which is to be considered through the development control process, and may be permitted where such a proposal complies with exception C. of Policy 17. For these reasons, I do not support the objection.

### **RECOMMENDATION (binding)**

1.113 **I RECOMMEND no modification to the plan in response to this objection.**

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### **LANESHAW BRIDGE**

Land south of Keighley Road, omission site X46  
Land to the east of Emmott Lane, omission site X47

#### **Summary of Key Issues**

- Whether land south of Keighley Road, Laneshaw Bridge, omission site X46, should be included within the settlement boundary and allocated for housing.
- Whether land to the east of Emmott Lane, omission site X47, should be included within the settlement boundary and allocated for mixed use development.

#### **Inspector's Reasoning and Conclusions**

##### **Land south of Keighley Road, omission site X46**

1.114 Omission site X46 is located to the south and west of the village of Laneshaw Bridge, between the settlement boundary as defined in the plan and Colne Water. It is 5.49 hectares in extent and is used as grazing land. Except for a small part at its eastern edge, the site lies outside the settlement boundary and is designated as Green Belt. In response to advertisement of the omission site, 14 representations and a petition containing 210 signatures were received objecting to a request that the site should instead be included within the settlement boundary and allocated for housing.

1.115 The settlement boundaries in Pendle have been established on the basis that they should only enclose the main settlement area and

wherever possible, they should follow clearly identifiable features. I consider that in the vicinity of Laneshaw Bridge, the A6068 and the perimeters of the gardens of adjoining housing represent a clear demarcation between the urban and the rural areas.

- 1.116 I consider that to extend the settlement boundary southwards to Colne Water would represent a significant loss of Green Belt for which no exceptional circumstances have been cited. Furthermore, Pendle is in a position of over-supply for housing, so the land is not required for this purpose. For these reasons, I do not support the objection.

**Land to the east of Emmott Lane, Laneshaw Bridge, omission site X47**

- 1.117 Omission site X47 lies to the east of the village of Laneshaw Bridge and is situated behind cottages along the east side of Emmott Lane. To the south-east of the site there is a housing development under construction. To the north and east are areas of uninterrupted open countryside. The southern boundary is defined by a public house and the A6068. Except for the service road running along the rear of dwellings in Emmott Lane, the site is excluded from the settlement boundary and is designated as open countryside.
- 1.118 In response to advertisement of the omission site 14 representations and a petition containing 210 signatures were received objecting to the request that the whole site be included within the settlement boundary and allocated for mixed use development.
- 1.119 The settlement boundaries in Pendle have been established on the basis that they should only enclose the main settlement area and wherever possible, they should follow clearly identifiable features. I consider that in the vicinity of omission site X47, the development in Emmott Lane represents a clear demarcation between the urban and the rural areas. In my opinion, undeveloped parcels of land, such as the objection site, should normally be excluded from defined settlement areas. This ensures that areas of scattered and loose-knit development on the edge of settlements that provide the transition from the main settlement to the open countryside are maintained. I consider that these are an essential part of the rural fringes. In my opinion, their consolidation with infill development would be detrimental to the character of the area as a whole.
- 1.120 Pendle Borough is in a position of over-supply for housing and as far as I am aware, there is not a pressing need for car parking or a community resource centre in the village. Consequently, I do not support an objection that requests that the site should be

included within the settlement boundary and allocated for mixed use development.

### **RECOMMENDATION (binding)**

1.121 **I RECOMMEND no modification to the plan in response to these objections.**

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### **KELBROOK & SOUGH**

Land off A56 between Kelbrook and Sough, omission site X82

#### **Summary of Key Issue**

- Whether land off A56 between Kelbrook and Sough, omission site X82, should be reinstated as Area of Special Landscape.

#### **Inspector's Reasoning and Conclusions**

- 1.122 Omission site X82 lies to the west of the A56 and to the north-west of the village of Kelbrook. It is 4.93 hectares in extent and is used as grazing land. In the adopted Pendle Local Plan it is designated as an Area of Special Landscape outside the settlement boundary for Kelbrook. In the re-deposit plan it is designated as open countryside outside the settlement boundary. Objectors are concerned that the open countryside designation will not afford the site sufficient protection from development pressure.
- 1.123 With regards to the Area of Special Landscape designation under Policy E3 of the adopted Pendle Local Plan, a statement of non-conformity has been submitted by the County Council in respect of the Lancashire Structure Plan (1991-2006) and the now adopted JLSP. In their statement of non-conformity (CD 131) the County Council states that; 'Policy 20 of the JLSP identifies landscape character types and requires development to be appropriate to the landscape character type within which it is situated'. Areas of Special Landscape as identified in Policy E3 are an obsolete policy designation, which does not conform to the JLSP. Therefore, in my opinion, it would be inappropriate to use this designation in the re-deposit plan.
- 1.124 The designation of open countryside essentially performs the same function as Policy E3, and provides the same level of protection for the countryside. Once defined, settlement boundaries provide certainty and predictability and they provide a clear guide to development control decisions, as required by PPG12 and PPS7. Defining a settlement boundary helps to avoid disputes over whether a particular site, especially if on the edge of

a settlement, is covered by policies that allow infill or other development. By directing development to appropriate sustainable areas of existing settlements they also help to protect the countryside from unsuitable development.

- 1.125 I support the proposed designations of the site and I consider that they will provide it with appropriate protection from pressure for unsuitable development. This was accepted by Kelbrook and Sough Parish Council at the informal hearing session at which its objection on this matter was heard. However, for the reasons that I have given, I do not support objections which seek an obsolete designation, as Area of Special Landscape.

### **RECOMMENDATION (binding)**

- 1.126 **I RECOMMEND no modification to the plan in response to these objections.**

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### **NELSON**

Gib Hill, Nelson, omission site X22

#### **Summary of Key Issue**

- Whether land at Gib Hill should be excluded from the settlement boundary in order to protect the open countryside.

#### **Inspector's Reasoning and Conclusions**

- 1.127 Omission site X22 comprises land at Gib Hill that extends to 12.44 hectares. It is situated to the south-east of Nelson. On the west, the site is bordered by residential properties. To the north it abuts two schools, and to the east it opens out to open countryside. Part of it is forestry plantations and part is used for grazing. Several public footpaths cross the site and it is used for informal recreation. In the adopted Pendle Local Plan the site lies outside the settlement boundary and is designated as Area of Special Landscape. However, at the first stage deposit, the settlement boundary was amended to include the site and it was safeguarded for housing. These designations were retained at the re-deposit stage.
- 1.128 Over four hundred objections have been received to these designations at the first and re-deposit stages. In addition, a further four representations objecting to the designations were made in response to advertisement of this omission site. These request the exclusion of the site from the settlement boundary

and its alternative designation for a variety of 'protective' purposes.

- 1.129 I consider the merits of the land as a safeguarded site for housing in Chapter 17 of my report, where I conclude that the site should be designated as a HMR safeguarded housing site. I consider other suggested designations in other appropriate Chapters of my report. Here, I consider if omission site X22 should be excluded from the settlement boundary.
- 1.130 The Council has reviewed the settlement boundaries as part of this review of the Local Plan. So as to follow the plan, monitor and manage approach (PMM), as advocated by PPG3, it has included safeguarded land within the settlement boundary to allow for flexibility should development pressures exist for regeneration purposes over the plan period. This is in line with Policy SD6 of the RSS, which states that: 'In those parts of the Region not covered by Green Belt, where identified local needs up to 2016 cannot be fully met within existing settlement boundaries, development plans will need to review settlement boundaries...'
- 1.131 Some greenfield land has been safeguarded for housing, only to be released if a need arises through activities directly related to the HMR programme. Any proposed development on safeguarded land must also follow the sequential approach of Policy 17 of the re-deposit plan, and to this effect the reasoned justification states that; 'if there is sufficient brownfield/white land to meet the needs of replacement dwellings within the ADF boundaries over the plan period, the safeguarded land will remain undeveloped'.
- 1.132 A Statement of Conformity has been issued by the County Council indicating agreement between the re-deposit plan and the now adopted JLSP. In addition, the reasoned justification to Policy 12 of the JLSP states that; 'districts that include safeguarded greenfield land policies in their Local Plans should make clear that development of such land must have a lower priority than brownfield land included within areas of urban regeneration'. I consider that Policy 17 of the re-deposit plan follows this approach.
- 1.133 The need to safeguard land at Gib Hill for housing rests with the preparation and part approval of three Area Development Frameworks (ADFs). The ADF for Nelson was approved by the Council in 2002 subject to further master planning being undertaken to investigate the reasons for low housing demand and to identify appropriate intervention. The ADF strategy identifies that in order to 'kick start' the restructuring of the housing market there needs to be an increase in housing choice. At this time, it is not known what level of clearance and replacement will be necessary. It is intended that Area Action

Plans will identify the amount of clearance to take place, the number of dwellings to be replaced on site and any need for off-site replacement.

- 1.134 As a consequence, the Council has safeguard sites for possible housing development in the event that the Area Action Plans identify a need for such land. Policy 2 of the JLSP states that most development will be concentrated in the principal urban areas and main towns. Nelson and Colne are identified as main towns. The safeguarded land at Gib Hill, Nelson has been included in the settlement boundary for Nelson so that it forms part of the urban area. The Council's intention is that the site will be developed if required to assist in Housing Market Renewal.
- 1.135 I consider that to leave the allocated safeguarded site outside of the settlement boundary would give it less weight and would put greater pressure for development on other sites outside of the settlement boundary. Thus, it is my opinion that the inclusion of safeguarded land within the settlement boundary provides greater protection to other land outside of the settlement boundary, as defined in the Plan. For these reasons I do not support objections that request that the whole of omission site X22 should be excluded from the settlement boundary.
- 1.136 However, reference should be made to Chapter 4 of my report, where I recommend in response to other objections made to Policy 4 – Natural Heritage that the settlement boundary and the extent of the safeguarded land designations are amended to exclude field numbers 750, 461 and 462, which are currently included in omission site X22.

### **RECOMMENDATION (binding)**

- 1.137 **I RECOMMEND no modification to the plan in response to these objections.**

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### **SALTERFORTH**

Land to the south of Earby Road, omission site X56

#### **Summary of Key Issue**

- Whether the settlement boundary of Salterforth should be amended to include land to the south of Earby Road, omission site X56.

## Inspector's Reasoning and Conclusions

- 1.138 Omission site X56 is designated open countryside and lies outside the settlement boundary for Salterforth. It comprises fields to the south of Earby Road, immediately east of the village of Salterforth. It is bounded by areas of open countryside on three sides. To the north-west there is a new linear housing development of detached homes, constructed on the line of the former railway, which used to separate the omission site from the village. To the north-east there is an isolated area of housing comprising four small rows of terraced housing. It is around 0.6 hectare in extent. In response to advertisement of the omission site six parties objected to the Objector's suggested inclusion of the site within the settlement boundary.
- 1.139 The Objector states that the settlement boundary at Salterforth is too restrictive and does not allow for any modest development in the village up to 2016, to support village services, such as the school and post office, or to provide affordable housing for local residents. In the Objector's opinion, Salterforth is a relatively sustainable settlement with a good service base, employment opportunities, where limited further growth would not be out of place. It also has good public transport links to larger settlements.
- 1.140 The settlement boundaries in Pendle have been established on the basis that they should only enclose the main settlement area and, wherever possible, they should follow clearly identifiable features. In the vicinity of the omission site, the settlement boundary has been drawn along the northern margin of the wide gravel track that passes beneath the former railway line.
- 1.141 In his report (CD30/1) the Inspector for the last Local Plan Inquiry noted that; "both Sykes Laithe and Hayfield View opposite give the appearance of being farmhouses and they are well detached from the main part of the settlement". He went on to state that; "Sykes Laithe is not comparable with the developed areas to the north-west included in the settlement and, consequently, the boundary should not be altered to include it". The omission site comprises open fields immediately to the east of Sykes Laithe.
- 1.142 I concur with his view. In my opinion, the omission site forms an important gap, which should be retained to prevent visual coalescence of the developments to the north-east and the north-west.
- 1.143 The plan does not identify allocations for affordable housing. Applications for the provision of affordable housing will be dealt with through the development control process and may be permitted where they comply with exception C. to Policy 17, which states that; 'for special needs or affordable housing,

exception sites adjoining a settlement boundary in rural areas will be considered where there is insufficient land within a village settlement boundary'.

- 1.144 As such, it is for an applicant to prove that their development proposals meet the criteria for affordable housing, outlined in the reasoned justification for Policy 17, by way of a planning application that can be assessed and determined through the development control process. Evidence has not been submitted to the Inquiry to indicate that local services in the village are under threat of closure.
- 1.145 There is no requirement to identify general market housing land within the Pendle Local Plan. Furthermore, I consider that to include the omission site within the settlement boundary will increase its potential for development and would encourage encroachment into the open countryside, which is contrary to Policy 1.
- 1.146 For all of these reasons I do not support the objection and I conclude that omission site X56 should remain outside the settlement boundary.

#### **RECOMMENDATION (binding)**

- 1.147 **I RECOMMEND no modification to the plan in response to this objection.**

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#### **TRAWDEN**

Land off Lane House Lane, omission site X51

#### **Summary of Key Issue**

- Whether land off Lane House Lane, omission site X51, should be included within the settlement boundary for Trawden.

#### **Inspector's Reasoning and Conclusions**

- 1.148 Omission site X51 is situated to the west of Lane House Lane at the southern end of the village of Trawden. It is 0.26 hectare in extent and lies within the open countryside, outside the settlement boundary for Trawden. To the north-west is the last house in a ribbon of development that extends 0.4 kilometres south from the village towards Hollin Hall Mill, which lies across Lane House Lane that bounds the north-eastern boundary of the site and which opens out to the wider countryside on its two other sides.

- 1.149 It is the Objector's case that the settlement boundary should be extended to include land off Lane House Lane, which could be used to provide housing, as a car park for visitors or for community use. In response to advertisement of the omission site, 23 representations supporting the exclusion of the site from the settlement boundary were submitted.
- 1.150 The Objector has identified three possible options for use of the land, but has not provided any justification why these may be required. However, Pendle Borough has an over-supply of land for housing; thus, there is no need to allocate further land for housing in the re-deposit plan. In my opinion, the site is poorly located to provide community facilities for the village of Trawden or the surrounding area, because it is at the extreme southern end of the settlement, along what is effectively a very long cul-de-sac. Nor has evidence been provided of a pressing need for additional car parking in this part of the village.
- 1.151 The settlement boundaries in Pendle have been established on the basis that they should only enclose the main settlement area and, wherever possible, they should follow clearly identifiable features. In the vicinity of the omission site, the settlement boundary has been drawn along the south-eastern boundary of the existing dwelling referred to above and the southern side of Lane House Lane. I consider that these boundaries are clear and that they appropriately define the limit to which the built form extends in this part of the village.
- 1.152 Furthermore, it is my opinion that to include the parcel of land off Lane House Lane within the settlement boundary would increase its potential for development in the future and would encourage encroachment into the open countryside. Any development on the site would remove important views along the valley of Trawden Beck towards the upland farms at Bents. I consider that these views are important in continuing to provide a setting for Trawden.
- 1.153 For these reasons, I do not support the objection. I conclude that omission site X51 should not be included within the settlement boundary for Trawden.

#### **RECOMMENDATION (binding)**

- 1.154 **I RECOMMEND no modification to the plan in response to this objection.**

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## **Policy 2 – Area of Outstanding Natural Beauty**

### **A. Objections to Policy Wording and Approach**

#### **Summary of Key Issues**

- Whether Policy 2 is sufficiently specific with regards to the types of development that may be permitted within the AONB.
- Whether the text of Policy 2 includes sufficient detail against which proposals for development within the AONB can be adequately assessed.
- Whether Policy 2 takes sufficient account of the effect of development on the setting of the AONB.

#### **Inspector’s Reasoning and Conclusions**

- 2.1 Objections were made at both the first and re-deposit stages that the meaning of the term; ‘large scale development’, and also at the first stage deposit to the phrase; ‘development deemed incompatible with the local area’, are unclear in the context of this policy. However, both of these phrases have been removed from the re-deposit version of the plan. They are replaced by the terms; ‘major’ and ‘that would detract from the natural beauty of the Forest of Bowland AONB’, respectively.
- 2.2 In addition, the Council suggests that further text should be added to the end of the reasoned justification, to explain the precise meaning of the word ‘major’ in this context, in accordance with Change No. 9 (CD 193). I consider that the amended policy, together with that suggested added text, is satisfactory and that these elements of the objections are met.
- 2.3 At the first stage deposit, GONW also objected that the criteria against which planning applications in the AONB are decided were inappropriately delegated to SPG. In response, they are included within the text of the re-deposit version of Policy 2. However, GONW further objected that although the policy now sets out criteria for extensions and alterations to buildings, it still does not include principles against which other development in the AONB would be considered.
- 2.4 The Council agrees that this criticism is valid. In response, it suggests that the second paragraph of the policy should be re-written in accordance with Change No. 8 (CD 193), to provide criteria for assessing development proposals for engineering works, new buildings, replacement buildings, extensions and alterations to

existing buildings in the AONB. I support this suggested Change, which in my opinion properly brings necessary detail into the policy text, as required by PPG12, and which also meets the objection.

- 2.5 The National Trust is concerned that the first sentence of Policy 2 implies that those parts of the Borough that are not within the AONB but form part of its setting, are not safeguarded. This was not the Council's intention, and in response, it suggests that the first sentence of the policy is amended in accordance with Change No. 7 (CD 193). I support this Change, which I consider overcomes the objection, which was conditionally withdrawn on its basis, and which brings the policy in line with Policy ER2 of the RSS, which refers specifically to the protection of the setting of AONBs.

### **RECOMMENDATIONS (binding)**

- 2.6 **I RECOMMEND that the plan be modified by replacing the first sentence of Policy 2 with text that reads as follows:**

**The Borough Council will seek to safeguard the parts of the Forest of Bowland Area of Outstanding Natural Beauty (AONB) and its setting, located within the Borough.**

- 2.7 **I RECOMMEND that the plan be modified by replacing paragraph 2 of Policy 2 with text that reads as follows:**

**In particular, proposals for engineering works, new buildings, replacement buildings, extensions or alterations to existing buildings in the AONB should meet the following criteria:**

- 1. In respect of extensions and alterations; not to be seen in public views to dominate the existing building in terms of shape, height, materials or fenestration.**
- 2. In the case of engineering operations; not to detract from the natural beauty of the AONB.**
- 3. Not result in any loss of amenity for occupiers of neighbouring properties.**
- 4. In the case of replacement buildings; to bring about an environmental improvement and not result in a significant (i.e. no more than 25% of the volume of the original building) increase in bulk, extent or visual impact.**

5. In the case of a dwelling or traditional building; not include materials, components and finishes which are alien to the architectural traditions of the area and the architectural integrity of the building and its setting.

2.8 I RECOMMEND that the plan be modified by adding the following sentence to the end of the reasoned justification for Policy 2, to clarify the meaning of 'major development' in this policy context:

A major development is 10 or more dwellings, or a residential site area of 0.5 hectare or more, or where the floor space to be built is 1,000 square metres or more, or the non-residential site area is 1.0 hectare or more.

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## **B. Objections to Specific Sites**

**Omission Site X31, Land at Barrowford Road, Colne.**

### **Summary of Key Issue**

- Whether land at Barrowford Road, Colne, omission site X31, should be designated as an AONB.

### **Inspector's Reasoning and Conclusions**

- 2.9 In order to safeguard the site to a greater extent, and to ensure its openness for the foreseeable future, an Objector states that land at Barrowford Road, Colne (X31) should be designated as an AONB. Three omission site representations support this view.
- 2.10 However, AONBs are designated solely on account of their natural beauty, which must be distinctive in character and so outstanding that it is in the nation's interest to safeguard it. Designation demands that planning policies and decisions should focus on conservation and enhancement of the landscape. The Government regards the National Park and AONB designations as conferring the highest status of protection as far as landscape and scenic beauty are concerned.
- 2.11 Whilst I consider that land at Barrowford Road, Colne, omission site X31, is attractive, it is my opinion that its landscape quality is not nationally outstanding. In addition, I consider that on its own, the site is too small to be viable as an AONB. Furthermore, I am of the view that the area of countryside between the omission site and the boundary of the Forest of Bowland AONB is unlikely to be

considered, by the Countryside Agency, which has the statutory power to designate such areas, to be of such outstanding natural beauty that it would contemplate an extension of the AONB area to encompass the omission site and the intervening land. For these reasons, I do not consider that the site justifies designation as AONB. I conclude that the site's designation as Green Belt within the Open Countryside provides it with sufficient protection against future development.

**RECOMMENDATION (binding)**

2.12 **I RECOMMEND no modification to the plan in response to this objection.**

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## **Policy 3 – Green Belt**

### **A. Objections to Policy Wording and Approach**

#### **Summary of Key Issues**

- Whether the meaning of ‘inappropriate development’ should be defined within the context of Policy 3.
- Whether in the reasoned justification to Policy 3 the words ‘purposes’ and ‘objectives’ are inappropriately interchanged.
- Whether the reasoned justification to Policy 3 should be expanded to clarify how it seeks to ensure that the objectives of Green Belt will be fulfilled.
- Whether Policy 3 should make reference to any parts of the Green Belt which have landscape or nature conservation value.
- Whether Policy 3 should be re-worded to read that; ‘development will only be considered’.
- Whether the existing Green Belt boundaries should be altered in this review of the Pendle Local Plan.
- Whether land should be safeguarded in the context of Annex B of PPG2.

#### **Inspector’s Reasoning and Conclusions**

- 3.1 The reasoned justification for Policy 3 in the re-deposit plan states that Planning Policy Guidance 2: Green Belts (PPG2) provides a definition of ‘inappropriate’ development and, therefore, clarifies what is deemed ‘appropriate’ development in the Green Belt. The Government encourages Local Planning Authorities to prepare concise and succinct policies and text. Thus, in my opinion, there is no need to reiterate the definition given in PPG2, in Policy 3.
- 3.2 The reasoned justification for the policy also identifies the purposes of Green Belt as defined in PPG2, and in response to an objection, inaccurate synonymous use of ‘purposes’ and ‘objectives’ were rectified at the re-deposit stage. The reasoned justification section does not also define the six objectives of Green Belt, as referred to in paragraph 1.6 of PPG2. However, since PPG2 is referred to in the reasoned justification for Policy 3, I consider that this would be unnecessary repetition of policy stated elsewhere.

- 3.3 Paragraph 1.7 of PPG2 indicates that although Green Belts often contain areas of attractive landscape, the quality of the landscape is not relevant to the inclusion of land within a Green Belt, or to its continued protection. Therefore, I consider that it would be inappropriate to make reference in Policy 3 to any parts of the Green Belt which have landscape or nature conservation value, as requested by English Nature. The Council has separate policies in the re-deposit plan which relate to landscape and nature conservation.
- 3.4 The CPRE considers that the wording of Policy 3 implies that no other planning considerations apply to the determination of planning applications. It, therefore, requests that the policy should be re-worded to read; 'development will only be considered' from 'development will only be permitted'.
- 3.5 However, a Local Planning Authority (LPA) has a duty to consider all planning applications submitted to it. I consider that the requested word change would wrongly imply that the LPA would not determine or accept a planning application if it was not in line with the policy. Furthermore, the caveats in the policy and in the reasoned justification, which follow on from PPG2, are very strong in being able to reject applications for proposals that would not be acceptable in the Green Belt. In my opinion, there is no need to amend the wording of the policy to achieve the Objector's aims.
- 3.6 For these reasons, I recommend no modification to the plan in response to the objections that raise these matters.
- 3.7 Objection is made to the existing Green Belt being altered as part of this Local Plan review, when there is uncertainty over future development requirements. The Council's response is that it does not plan to allocate further Green Belt, but at the re-deposit stage, it has included some of the sites within the Green Belt boundary that are currently allocated as 'Protected Areas' in the adopted Pendle Local Plan.
- 3.8 It argues that these amendments to the Green Belt do not amount to changes to the general extent of the Green Belt in Pendle. Furthermore, that the changes are justified by the exceptional circumstances that derive from the existing 'Protected Areas' status of this land. However, I do not support the Council on this matter for the following reasons.
- 3.9 Paragraph 2.6 of PPG2 informs that once the general extent of a Green Belt has been approved, it should be altered only in exceptional circumstances. Paragraph 2.7 of the PPG goes on to state that where existing local plans are being revised and updated, existing Green Belt boundaries should not be changed unless alterations to the structure plan have been approved, or

other exceptional circumstances exist, which necessitate such revision.

- 3.10 This policy guidance is reiterated in Policy 6 of the JLSP, which emphasises that in Lancashire, the general extent of the Green Belt will be maintained. The reasoned justification for Policy 6 states at paragraph 6.1.25 that there is no strategic case for altering the general extent of Green Belt. In addition, Policy SD5 of the RSS informs that there is no need to undertake a strategic study of the Green Belt within Lancashire before 2011.
- 3.11 However, the JLSP only defines the general extent of the Green Belt in Lancashire. It is the responsibility of the LPA to define the precise Green Belt boundary in the local plan. The Green Belt boundaries within Pendle Borough were defined for the first time in 1999, upon adoption of the Pendle Local Plan.
- 3.12 However, the principle of a Green Belt along the Calder Valley was established in the North East Lancashire Structure Plan (1979), with the aim of preventing the closely spaced towns from coalescing, to avoid a potential loss of settlement identity. But, at the previous Pendle Local Plan Inquiry, held in 1996, the Inspector noted that although Pendle Borough Council had prepared two drafts of the Green Belt Local Plan, the Inquiry was the first time that the boundaries had been formally scrutinised.
- 3.13 The Inspector noted at the Inquiry that the Green Belt boundary in Pendle was intended to be tightly drawn. He acknowledged that it was difficult for LPAs to make long term forecasts as to the requirements for development land, but commented that this is what they had to do when preparing Green Belt boundaries. As a result, he considered that the proposed inner Green Belt boundaries would need to be reviewed immediately, in order to accommodate the development proposed in the next Structure Plan (1996 to 2006).
- 3.14 To overcome this problem he recommended the designation of 'Protected Areas', where development would not be allowed but the potential need for them to be allocated for development could be dealt with in the subsequent review of the Pendle Local Plan. He considered this was necessary in order to avoid the risk of undermining the concept of the Green Belt's long term permanency. As a consequence of this decision, Policy E2A was added to the adopted Pendle Local Plan with the explanation that should pressures for development prove to be less than anticipated at the review stage, consideration would be given to the inclusion of these areas within the statutory Green Belt.

- 3.15 This review of the Pendle Local Plan is taking place in the context of changed strategic policies on housing and the introduction of the Government initiative of a HMR Pathfinder for East Lancashire.
- 3.16 Topic Paper 1: Housing Land Requirements (CD 49) indicates that there is no need to allocate land for net new housing during the review plan period. The Housing Land Availability Reports (March 2004 and March 2005) (CD 35 and CD 36) show that there are sufficient sites completed or with planning permission to meet the JLSP new net housing target up to 2016. The Urban Potential Study (2005) (CD 38) identifies that within Pendle there are enough previously developed sites to provide around 627 dwellings. I generally concur with the Council's conclusions on these matters.
- 3.17 Taking these factors into account, and considering the overall housing requirement as detailed in Topic Paper 1, and the need for safeguarded land as detailed in Topic Paper 2: The Need for Safeguarded Land (CD 50), the Protected Areas designated under Policy E2A of the adopted Pendle Local Plan (1999) were re-assessed by the Council to determine if they nevertheless had a role to play in helping to meet the requirements of the HMR Pathfinder and the detailed Area Development Frameworks (ADFs) in Pendle.
- 3.18 The Housing Market Renewal Pathfinder in Pendle is centred on the towns of Brierfield, Nelson and Colne. It envisages a programme in which the selective demolition of poor quality houses, for which there is little or no demand, will inevitably play a part. Replacement housing is likely to be provided at lower densities than that removed, so there is potentially a need to provide additional development land off-site.
- 3.19 However, for reasons that I comment on in more detail in section B of this Chapter of my report, none of the 'Protected Areas' were considered to be suitable for this purpose. I do not disagree with the Council's conclusions on these matters. I am also satisfied that there is sufficient employment land available during the plan period to satisfy the requirement of Policy 14 of the JLSP to provide 40.0 hectares of new employment land within the Borough, without the need to allocate any of the 'Protected Areas' for employment purposes. I comment on this matter in more detail in Chapter 23 of my report.
- 3.20 Consequently, I conclude that in the current circumstances, the 'Protected Areas' are not required for development during the plan period. However, this conclusion does not lead me to further conclude that those sites should now be included within the Green Belt. Nor should this conclusion be interpreted that I consider any

of the sites to be unacceptable in principle for development in the long term. That is not the case.

- 3.21 For the following reasons, I am not convinced that circumstances prevail in Pendle that justify any changes to the general extent of the Green Belt boundary at this time and in advance of the possible strategic review of the Green Belts post 2011 referred to in the RSS.
- 3.22 I do not endorse the Council's view that the proven lack of demand constituting special circumstances, referred to by the Inspector for the previous Local Plan Inquiry (CD 30/1 paragraph 2.22. page 31) have been satisfactorily demonstrated. Thus, the exceptional circumstances referred to in paragraph 2.7 of PPG2 are not satisfied either, since paragraph 2.8 of PPG2 informs that it is necessary to establish Green Belt boundaries that will endure. Paragraph 2.12 and Annex B of the PPG also refer to the safeguarding of land well beyond the plan period.
- 3.23 I would interpret 'well beyond' to mean a considerable number of years after 2016, the expiry of this plan. Whilst based on the current strategic housing requirements, the Council can demonstrate sufficient supply up to 2021, this cannot be said for employment land, which as I conclude in Chapter 23 of my report, is barely sufficient to meet current requirements up to 2016. In my opinion, the elements of uncertainty regarding regional requirements referred to at the previous Local Plan Inquiry still exist, because the RSS is currently under review and there is the possibility that housing and/or employment land requirements for the Borough may be adjusted upwards.
- 3.24 Furthermore, the imminence of published new national guidance in the form of PPS3: Housing is such that it is likely that the Council will need to review its policies for overall housing provision at an early stage as part of the new LDF system. Therefore, I consider that the circumstances similar to those that led to the designation of Protected Areas prevail.
- 3.25 Moreover, I do not consider that changes to the Green Belt boundary as part of this review of the Local Plan would conform to other components of the Development Plan. Both the RSS and the JLSP, which post date the previous Inspector's report, identify that there is no strategic case for altering the general extent of the Green Belt in Lancashire. Furthermore, that it is unnecessary even to undertake a strategic study of the Green Belt within Lancashire before 2011. By this time, new Government guidance on housing will have been published, the RSS will have been reviewed and a much clearer picture of the long term development requirements for the Borough will be known.

- 3.26 In my opinion, changes to the recently defined Green Belt within Pendle would be premature prior to the imminent review of national and regional policy. Also, in the absence of other considerations that individually or cumulatively amount to exceptional circumstances, any such changes would, in my opinion, conflict with the advice of PPG2, which stresses the permanence of Green Belts.
- 3.27 Thus to summarise, I conclude that in principle, the Green Belt boundaries in Pendle should not be altered in this review of the Pendle Local Plan. I make recommendations for consequential amendments to the Proposals Map in part B of this Chapter of my report.
- 3.28 The Protected Areas designated under Policy E2A of the adopted Pendle Local Plan were defined to provide areas of choice to meet future, longer term development requirements, and to ensure the protection of the Green Belt for the longer term. The Protected Areas designation is generally synonymous with the designation, 'Safeguarded Land' referred to in PPG2 at its paragraph 2.12 and in Annex B.
- 3.29 However, it is not the Council's intention to carry forward Policy E2A of the adopted Pendle Local Plan into the re-deposit plan. The question therefore arises as to how land currently protected by Policy E2A, which is now proposed to be designated as Green Belt, should be alternatively designated. Objectors argue that there remains a need to safeguard land in terms of the meaning given to that land in Annex B of PPG2, but that it would be inappropriate simply to carry forward Policy E2A, because it does not fully accord with PPG2 guidance on this matter. Consequently, that there is a need for a new policy.
- 3.30 Policy E2A and the concept of Protected Land were devised because in Pendle there was no regional or strategic context for safeguarding land. Therefore, I consider that this local policy void would best be rectified by carrying forward the concept of Protected Areas, but updating the policy text and reasoned justification to reflect the intended longevity of Green Belt boundaries referred to in PPG2.
- 3.31 This designation would apply a strict control over development in order not to prejudice the open character of such land, or its potential for long term development. However, in order to provide guidance on the restricted types of development that may be permitted within the Protected Areas, I consider that such land should also be designated as Open Countryside, to which Policy 1 applies.

## RECOMMENDATIONS (binding)

- 3.32 I RECOMMEND that the plan be modified by the addition of a new policy and supporting text that should follow Policy 3, which would read:

### POLICY 3A – PROTECTED AREAS

Within the areas shown on the Proposals Map as a Protected Area, no development will be permitted which would prejudice the open character of the area or its potential for long term development, during the plan period up to 2016.

Its reasoned justification should read:

It is intended that these areas should remain open during the plan period. They represent areas of choice for possible development to meet future long term requirements and to ensure the protection of the Green Belt. The future of these areas is to be re-examined through subsequent reviews of the plan. Should long term pressure for development after 2016 prove that the areas will not be required for development, consideration will be given to their inclusion within the Green Belt. For development control purposes Policy 1 – Development in the Open Countryside applies to land designated as a Protected Area.

- 3.33 I RECOMMEND that the plan be modified by amending the second paragraph of the reasoned justification of Policy 3 on page 26, so that it reads:

There have been no changes to the Green Belt boundaries in Pendle.

- 3.34 I RECOMMEND no further modification to the plan in response to these objections.

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## B. Objections to Specific Sites

### Introduction

- 3.35 For the reasons that I have given above, in part A of this Chapter of my report, I conclude that in principle, the Green Belt boundaries in Pendle should not be altered in this review of the

Local Plan, unless exceptional circumstances exist with regards to the specific site, that necessitates their revision.

- 3.36 Paragraph 1.5 of PPG2 sets out the five purposes of including land in Green Belts: to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns from 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. In Pendle, I do not consider that the fourth of these purposes is applicable.
- 3.37 Paragraph 2.9 of PPG2 indicates that wherever practicable a Green Belt boundary should be several miles wide so as to ensure an appreciable open zone all around the built-up area concerned. Also, that boundaries should be clearly defined, using recognisable features such as roads, streams, belts of trees or woodland edges where possible.
- 3.38 I use these main factors in my assessment of the merits of the specific sites referred to by Objectors for inclusion or not within the Green Belt.

## **BARROWFORD & HIGHERFORD**

Land to the west of the former Vinegar Works, Wheatley Lane, omission site X12.

Land north-west of Barrowford between the settlement boundary, the Green Belt and LRRAP, omission site X16.

Land at Trough Laithe Farm, off Wheatley Lane Road, omission site X11.

Land at Barrowford Business Park, adjacent to Lower Clough Mill, omission site X71.

Land between 30 and 79 Barnoldswick Road and Ralph Laithe, omission site X74.

### **Summary of Key Issues**

- Whether land to the west of the former Vinegar Works, Wheatley Lane, omission site X12, should be excluded from the Green Belt.
- Whether land north-west of Barrowford between the settlement boundary, Green Belt and LRRAP, omission site X16, should be included within the Green Belt.
- Whether land at Trough Laithe Farm, off Wheatley Lane Road, omission site X11, should be included within the Green Belt.

- Whether land at Barrowford Business Park, adjacent to Lower Clough Mill, omission site X71, should be designated as open countryside or Green Belt.
- Whether land between 30 and 79 Barnoldswick Road and Ralph Laithe, omission site X74, should be included in the Green Belt.

## **Inspector's Reasoning and Conclusions**

### **Land to the west of the former Vinegar Works, Wheatley Lane, omission site X12.**

- 3.39 Omission site X12 includes No. 12 Wheatley Lane Road. It is 0.63 hectare in extent and is located on the northern side of Wheatley Lane Road adjacent to a school and recent housing conversion development, and opposite semi-detached and detached houses. The land to the north and east is open and in agricultural use. The southern side of the road marks the northern edge of the built-up part of this part of Barrowford. The site is designated as Green Belt within an Area of Special Landscape in the adopted Pendle Local Plan. In the re-deposit plan it is designated as Green Belt outside the settlement boundary and within open countryside.
- 3.40 Thus, the re-deposit plan designations reflect policies in the JLSP and the RSS, which indicate that the general extent of Green Belts should not be altered. In response to advertisement of the omission site there were six representations supporting the Green Belt designation of the site and none objecting to it.
- 3.41 The Objector suggests that the existing Green Belt boundary makes an uncharacteristic detour around the site. However, in my opinion it follows a logical line following the stream and including other buildings from Noggarth Road to the west. The Vinegar Works has recently been re-developed for housing, but this site falls within the settlement boundary for Barrowford, as defined in the adopted Local Plan. A new school has recently been built to the east of the site, but this site does not fall within land defined as Green Belt in the adopted Pendle Local Plan or in the re-deposit Local Plan.
- 3.42 The site has been the subject of applications for residential development and I consider removing its Green Belt designation would increase pressure for its development. Such development would result in the westward sprawl of Barrowford to the north of Wheatley Lane Road. For these reasons I do not support the objection.

**Land north-west of Barrowford between the settlement boundary, Green Belt and LRRAP, omission site X16.**

- 3.43 Omission site X16 comprises a substantial area of primarily agricultural land located at the north-western periphery of Barrowford. It includes a number of public footpaths and is used informally by walkers. It is designated as an Area of Special Landscape in the adopted Pendle Local Plan. However, a statement of non-conformity has been issued by the County Council regarding this designation. In the re-deposit plan the site lies within the open countryside outside the settlement boundary. In response to advertisement of the omission site there were four representations supporting the requested Green Belt designation of the site.
- 3.44 I consider that the site has the potential to check the unrestricted sprawl of Barrowford, to assist in safeguarding the countryside from encroachment and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. However, I consider that the inclusion of land, omission site X16 to the north-west of Barrowford, within the Green Belt would involve a change to the general extent of the Green Belt, which would be inconsistent with Policy 6 of the JLSP. For this reason I do not support the objection.

**Land at Trough Laithe Farm, off Wheatley Lane Road, omission site X11.**

- 3.45 Omission site X11 lies to the south-west of Barrowford, approximately 1.0 km north-west of Nelson town centre. It is situated to the north of the Barrowford Business Park. The site incorporates the fields and buildings of three farmsteads: Trough Laithe Farm, Laund Farm and Higher Parrock Farm. To the east and west are areas of residential development, and the campus of Nelson and Colne College lies across Pendle Water to the east. The site is around 26.1 hectares in extent and is currently used as grazing land.
- 3.46 It is designated in the adopted Pendle Local Plan as a Protected Area (Policy E2A) and within an Area of Special Landscape outside the settlement boundary for Barrowford. At the first stage deposit, the majority of the site was designated as a safeguarded housing site within the settlement boundary. In the re-deposit plan the site is designated as Green Belt within the open countryside and outside the settlement boundary for Barrowford. The western part of the site lies within the Carr Hall Road, Wheatley Lane Conservation Area and a small triangle of land in the eastern section of the site is allocated as a Protected Employment Area (B1 only). Seventeen representations in support of these re-

deposit designations were submitted in response to advertisement of the omission site.

- 3.47 It is the Objector's contention that the site should not be included within the Green Belt, but it should be identified as safeguarded land to meet any potential longer term development needs, under the terms of advice set out in paragraph 2.12 of PPG2.
- 3.48 I consider that the northern boundary of the site with extant planning permission would provide a strong Green Belt boundary, and the land would serve the Green Belt purposes of assisting in safeguarding the countryside from encroachment and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. I support the view of the Inspector for the previous Local Plan Inquiry that Nelson and Barrowford have essentially merged and thus, that the second purpose of Green Belts would not be achieved.
- 3.49 However, it is my opinion that this designation would conflict with national guidance on Green Belts, as set out in PPG2, with regional policy given in Policy SD5 of the RSS, and with strategic policy given in Policy 6 of the JLSP. Furthermore, I do not consider that the Council has satisfactorily demonstrated that the exceptional circumstances referred to in paragraph 2.7 of PPG2 exist in this case. I consider that the circumstances that led to the original designation of Protected Areas prevail and that the element of uncertainty regarding regional and strategic requirements still exists, because the RSS is currently under review and there is the possibility that housing and/or employment land requirements for the Borough may be adjusted upwards. In my opinion, the Council has failed to acknowledge the longevity requirement of PPG2 regarding the certainty of endurance of Green Belt boundaries.
- 3.50 Notwithstanding my comments on the possible Green Belt merits of the omission site, I nevertheless consider that the sensitive development of the land would be appropriate, if there was a pressing need for development land in the Borough. I take the Council's designation of the site as a safeguarded housing site at the first stage deposit as its endorsement of this opinion.
- 3.51 It is, therefore, my conclusion that the site should be 'safeguarded' for possible long term development needs. However, Policy E2A of the adopted Pendle Local Plan and the concept of Protected Land were devised because there was no regional or strategic context for safeguarding land. Therefore, I have recommended in part A of this Chapter of my report that this policy void should be rectified by carrying forward the concept of Protected Areas, but updating the policy text and its reasoned justification to reflect the intended longevity of Green Belt

boundaries. I recommend that the site is designated as a Protected Area in the context of new Policy 3A, and as Open Countryside falling outside the Settlement Boundary. I consider that such designations would meet the objection.

**Land at Barrowford Business Park, adjacent to Lower Clough Mill, omission site X71.**

3.52 Omission site X71 is a greenfield site having an area of 2.46 hectares. There is residential development to the north of the site. It abuts Pendle Water to the east and there are open fields to the west and south. The land is designated as a site with extant planning permission in the adopted Pendle Local Plan. It was safeguarded for housing at the first stage deposit and it is designated as a Protected Employment Area (B1 only) in the re-deposit plan. Its designation as open countryside or Green Belt is sought by the Objector. These designations were supported by another party in response to advertisement of the site as an omission site.

3.53 The Council contends that the omission of this site, in the first stage deposit plan, from the Protected Employment Area (B1 only) at Barrowford Road, Barrowford was a cartographic error. The Proposed Map Changes booklet, accompanying the re-deposit plan, shows that the area to the north of the pylon line (Map Change No. 7) is now included within the Protected Employment Area (B1 only), to reflect the extant outline planning permission for B1 use, which includes the omission site. I have no reason to doubt that the site will be developed in pursuance of the planning permission. I, therefore, consider that is appropriate to include the whole of the site having planning permission for B1 use within the Protected Employment Area.

3.54 However, a planning condition of the outline permission prevents the erection of a building on this area of land, which is reserved for additional landscaping that will help to reduce the impact of the Business Park development on nearby residential areas. Unless permission is granted for the condition to be varied it will ensure that the omission site remains free from development. Thus the spirit, if not the detail of the objection is met.

**Land between 30 and 79 Barnoldswick Road and Ralph Laithe, omission site X74**

3.55 The site is located to the east of Barnoldswick Road. It is bounded by residential properties on three sides and by open countryside and Green Belt on the other. It is 2.5 hectares in area. It is shown designated as Green Belt outside the settlement boundary in the adopted Pendle Local Plan, and in the first stage and re-deposit plans. There were five representations supporting these

designations made in response to advertisement of the omission site.

- 3.56 The objection is made on the basis that no allowance has been made for this land to be developed as an 'infill' residential site. It is contended that the Pendle Green Belt Subject Plan (1987) (Map C) (CD 98) showed this area to be outside of the Green Belt. The current policy should be amended so that this infill site is released from the Green Belt.
- 3.57 However, the Council is in a situation of over-supply with regards to its housing land, as demonstrated by the latest Housing Land Availability Report (CD 36). For this reason, the re-deposit plan does not allocate any land for new residential development.
- 3.58 Furthermore, the Pendle Green Belt Subject Plan (1987) to which the Objector refers was a Draft Written Statement prepared for public comment. The first opportunity for the Pendle Green Belt boundaries to be examined at Inquiry was during the adopted Pendle Local Plan Public Inquiry in 1996. The Inspector, although stating in his report that the Pendle Green Belt had been drawn tightly around the settlement boundaries, acknowledged that the particular section in the vicinity of the omission site, between Colne and Barrowford, is a 'narrow belt which is under pressure from both sides'.
- 3.59 In my opinion, Barnoldswick Road defines a clear western boundary to the Green Belt and the site fulfils three purposes of Green Belt, as set out at paragraph 1.5 of PPG2. It importantly helps prevent the merger of Colne and Barrowford, it helps prevent encroachment of the countryside and it assists in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 3.60 For these reasons I consider that the omission site is properly included within the Green Belt. Furthermore, no strategic case exists for altering the general extent of the Green Belt, as required by Policy 6 of the JLSP. In addition, PPG2 indicates that where existing local plans are being revised and up-dated, existing Green Belt boundaries should not be changed unless alterations to the structure plan have been approved, or other exceptional circumstances exist, which necessitate such revision. I am not aware that exceptional circumstances exist in this case. Consequently, I do not support this objection.

### **RECOMMENDATIONS (binding)**

- 3.61 **I RECOMMEND that the plan be modified by designating land at Trough Laithe Farm, off Wheatley Lane Road, omission site X11, but excluding that part of the site which**

comprises omission site X71, as a Protected Area in accordance with new Policy 3A, which is set out in full at paragraph 3.32 of this report and as Open Countryside falling outside the Settlement Boundary. The Proposals Map should also be amended accordingly to reflect these designations.

3.62 I RECOMMEND no further modification to the plan in response to these objections.

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## **BRIERFIELD**

### **Land off Robinson Lane, omission site X03**

#### **Summary of Key Issue**

- Whether land off Robinson Lane, omission site X03, should be removed from the Green Belt.

#### **Inspector's Reasoning and Conclusions**

- 3.63 Omission site X03 is located at the end of Robinson Lane, which is a private track serving some residential properties and Reedley Nurseries. It measures approximately 0.3 of a hectare. The majority of the site is pasture land. The remainder is used as a house, known as Galen, with its residential curtilage, and for the stabling of horses. In the adopted Pendle Local Plan it is designated as Green Belt outside the settlement boundary. It has retained those designations at the first and re-deposit stages of the plan. Four representations of support for these designations were made in response to advertisement of the omission site.
- 3.64 The basis of the objection is that land off Robinson Lane, Brierfield should be considered for residential development given that the site is accessible to the existing infrastructure of Brierfield, with the main town and community facilities to support development within easy reach.
- 3.65 However, the erection of houses in the Green Belt is, by definition, harmful in PPG2 terms. This is not a rural village and in my opinion, the site is properly designated as Green Belt. I consider that the boundary of this part of the Green Belt logically follows the canal and that the site fulfils the third and fifth purposes of Green Belt, as set out in PPG2: namely, that the undeveloped parts of it help safeguard the countryside from encroachment and it assists in urban regeneration, by encouraging the re-cycling of derelict and other urban land.

- 3.66 The re-deposit plan does not allocate any land for new residential development because the Borough has an over-supply for housing against the JLSP requirements. In addition, Policy 17 of the re-deposit plan strictly controls the development of sites coming forward as windfalls or infill plots. Therefore, the land is not required for housing purposes.
- 3.67 Furthermore, there are strong policy presumptions against the release of land in the Green Belt. PPG2 advises that existing Green Belt boundaries should not be changed unless alterations to the structure plan have been approved, or other exceptional circumstances exist, which necessitate such revision. Policy 6 of the JLSP states that the general extent of Green Belts in Lancashire will be maintained. In addition, paragraph 4.8.4 of Policy E2 (Green Belt) of the adopted Pendle Local Plan reiterates that it is intended that in Pendle the Green Belt will endure beyond the life of that plan.
- 3.68 In my opinion, the requested change in designation of the site would conflict with these policy considerations, and in the absence of exceptional circumstances, would be inappropriate. For these reasons I do not support the objection.

## **RECOMMENDATION**

- 3.69 **I RECOMMEND no modification to the plan in response to this objection.**

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## **COLNE (including COTTONTREE)**

Land south of South Valley, omission site X23  
Land at Barrowford Road, omission site X31  
Land at Lidgett Triangle, omission site X33  
Land between Skipton Old Road and Castle Road, omission site X34  
Land off Trawden Road, Cottontree, omission site X50  
Land at Red Lane, omission site X35

## **Summary of Key Issues**

- Whether land south of South Valley, omission site X23, should be designated as Green Belt.
- Whether land at Barrowford Road, omission site X31, should be removed from the Green Belt.
- Whether land at Lidgett Triangle, omission site X33, should be designated as Green Belt.

- Whether land between Skipton Old Road and Castle Road, omission site X34, should be designated as Green Belt.
- Whether land off Trawden Road, Cottontree, omission site X50, should be removed from the Green Belt.
- Whether land at Red Lane, omission site X35, should be designated as Green Belt.

## **Inspector's Reasons and Conclusions**

### **Land south of South Valley, omission site X23**

- 3.70 Omission site X23 is around 123.0 hectares in area and extends across the south of Colne through the ward of Waterside. In the re-deposit plan, the site is designated as open countryside outside the settlement boundary, with the exception of the parts of the site known as Knotts Lane (omission site X26) and the former cement works (omission site X28), which are allocated as safeguarded land for housing, and the surrounding land to that site (omission site X29). These sites fall within the settlement boundary, as they do in the adopted Pendle Local Plan. Ten objections made at the first stage deposit request that omission site X23 is designated as Green Belt. Four representations supporting this request were made in response to advertisement of the omission site.
- 3.71 With regard to this matter, Topic Paper 3: The Green Belt (CD 51) explains that the Green Belt in Pendle was first defined in the 1987 draft Green Belt Subject Plan. The information from the subsequent 1990 draft Green Belt Local Plan was fed into the Pendle Local Plan, which was adopted in 1999. The Inquiry to the adopted Local Plan was the first time the Green Belt boundaries had been tested.
- 3.72 The main purpose of the Green Belt, which runs to the north and west of the Borough is to prevent the larger urban areas of Nelson and Colne sprawling and merging with the surrounding smaller settlements, of Barrowford, Foulridge, Laneshaw Bridge and Trawden. However, the Inspector at the previous Local Plan Inquiry acknowledged that there may be potential for further urban expansion on the south-eastern fringe of Nelson and Colne. Therefore, inclusion of this land within the Green Belt could hinder provision for potential future development requirements in the Borough.
- 3.73 Concerning the purposes of Green Belt that the omission site could potentially fulfil, I agree that it is important that part of the site, between the school and the former railway sidings, remains

open to prevent the coalescence of Nelson and Colne. I also agree that Green Belt designation could prevent urban sprawl and loss of countryside. However, the main part of the site, which lies beyond the settlement boundary and within the open countryside, including the parcel of land that I refer to above, is already protected from significant development, by Policy 1.

- 3.74 I conclude in Chapter 17 of my report that land at the former railway sidings and surrounding land, and at the former cement works (omission sites X26, X27 and X28) should be safeguarded for housing associated with the HMR programme. Therefore, these parcels of land should not, in my opinion, be designated as Green Belt. Furthermore, policy considerations presume against the designation of the omission site as Green Belt, which I consider would amount to a significant change to the extent of the Green Belt.
- 3.75 Policy SD5 of the RSS indicates that the need for exceptional substantial change to any Green Belt in the region should be investigated by a strategic study. The Policy goes on to say that there is no need to undertake a strategic study of the Green Belt within Lancashire before 2011.
- 3.76 Policy 6 of the JLSP indicates that the general extent of the Green Belt boundaries in Lancashire will be maintained. In addition, Paragraph 4.8.4 of Policy E2 (Green Belt) of the adopted Pendle Local Plan reiterates that it is intended that Pendle Green Belt will endure beyond the life of that plan. In my opinion, the requested designation would conflict with these policy considerations, and in the absence of exceptional circumstances, would be inappropriate.
- 3.77 Objectors also refer to the Government's new Direction on Green Belts. However, this is only in draft consultation form at the present and, therefore, I am able to give it only the weight which is appropriate to the early stage which has been reached in its preparation processes. In any case, the draft document mainly considers how departures from the development plan, in terms of new development within Green Belt areas, should be dealt with. The Direction only briefly mentions that local plans should be considering increasing their allocation of Green Belt land. Furthermore, the Direction states that the Government has no plans to review national policy on Green Belts. Therefore, the guidance in PPG2 is maintained.
- 3.78 For all of these reasons, I do not support these objections.

### **Land at Barrowford Road, omission site X31**

- 3.79 Omission site X31 comprises around 23.0 hectares of open farmland situated on the eastern edge of Colne. It is attractive

countryside bisected by Wanless Water. Part of its eastern boundary abuts part of the proposed route of the A56 Village Bypass. The site is allocated in the adopted Pendle Local Plan as Green Belt and as a Special Landscape Area. In the re-deposit plan it is designated as Green Belt beyond the settlement boundary and in the Open Countryside. One objection to the designation was made at the first stage deposit. Ten representations of support were made. In addition, a further nine representations supporting the Green Belt designation of the site were made in response to advertisement of the omission site.

- 3.80 The Objector contends that exceptionally, the site should be released from the Green Belt in order to provide employment land, to enhance the economic development of the Borough. Reference is made to the 'Cambridge Study', (The Pendle Economy and Future Outlook (CD 78)), which identifies the omission site as being of suitable quality and location to provide for the employment needs of the Borough, as anticipated by the Study.
- 3.81 However, as I conclude in Chapter 23 of my report, the Council can demonstrate that it has an adequate supply of new employment land to meet the 40.0 hectares of land required by the JLSP, up to 2016. The Cambridge Study is not a statutory document and consequently, it carries significantly less weight than the JLSP, which also post dates the Study.
- 3.82 Nevertheless, I consider that the re-deposit plan reflects the spirit and the purpose of the Cambridge Study, which was used to inform the preparation of the plan. Its findings are also echoed in the RSS. However, the study did not recommend that a large site should be allocated; rather it set out scenarios, one of which recommended the allocation of around 26.0 hectares of employment land. But in the light of the identified adequate supply, no further greenfield sites are required for employment purposes. Nor do I consider that there is a need to safeguard land specifically for this purpose.
- 3.83 Turning to the Green Belt merits of the site, I consider that it fulfils all except for the fourth of the purposes set out at paragraph 1.5 of PPG2, and it has well defined boundaries on its southern and eastern sides. Furthermore, there is a strong policy presumption against its release from the Green Belt.
- 3.84 PPG2 states, at its paragraph 2.6 that Green Belts should only be altered in exceptional circumstances. In addition, Policy 6 of the JLSP indicates that the general extent of Green Belts across Lancashire should endure. Moreover, given the emphasis of the JLSP on re-cycling urban brownfield sites and on urban regeneration, I do not consider that there is a strategic case for

altering the general extent of the Green Belt in Pendle. Also, paragraph 4.8.4 of Policy E2 (Green Belt) of the adopted Pendle Local Plan states: 'that it is intended that Pendle Green Belt will endure beyond the life of this plan'.

- 3.85 For all of these reasons, I conclude that the designations of omission site X31, as set out in the re-deposit plan are appropriate. I do not support the Objector's request for its removal from the Green Belt.

### **Land at Lidgett Triangle, omission site X33**

- 3.86 Omission site X33 is agricultural land that lies to the south-east of Skipton Old Road and to the rear of properties on Keighley Road, Colne. It is 6.15 hectares in extent (including existing properties on Skipton Old Road, Colne). In the adopted Pendle Local Plan the site is designated as a Protected Area under Policy E2A outside the settlement boundary and within the Lidgett and Bents Conservation Area. In the re-deposit plan, it is designated as Green Belt outside the settlement boundary and within the Lidgett and Bents Conservation Area. In response to advertisement of the omission site, 102 representations of support for these designations were made.

- 3.87 The objection is made on the basis that the designations of the adopted Pendle Local Plan should be retained because the considerations that applied at the time of its adoption remain largely unchanged. The previous Inspector considered that the site should not be included in the Green Belt so as to protect the long term interests of the Green Belt. The site is surrounded on all sides by existing development.

- 3.88 The Council states that its case for re-designating the site as Green Belt is two-fold. Firstly, because it meets the fifth criterion of paragraph 1.5 of PPG2, and secondly, the Council considers that the long term development needs of the Borough can be accommodated on brownfield sites, or on alternative safeguarded land that is better related to the regeneration needs of Colne.

- 3.89 I support the Council on the first consideration. I believe that, in common with most other greenfield sites close to the urban area, the protection of the site from development during the period of the re-deposit plan will assist in urban regeneration, by encouraging the recycling of derelict and other urban land within the Borough. It is remote from the intended areas of housing intervention associated with the HMR programme and consequently, in my view, the site would be unsuitable for and would detract from that initiative.

- 3.90 However, I am not convinced that this site will not be required for development in the longer term, after 2016, or that it would be unsuitable in principle for development. The RSS is currently under review and the possibility that it will ultimately result in a higher requirement for housing and/or employment in Pendle in the long term should not, in my opinion, be discounted. Therefore, I consider that it would be imprudent to designate this land as Green Belt in advance of this review.
- 3.91 In addition, I believe that the current, higher tier planning policy contained in the Development Plan and in PPG2 presumes against the designation of land that would amount to a change in the general extent of the Green Belt. I refer particularly to Policy 6 of the JLSP, which informs that the general extent of Green Belts across Lancashire should endure. Also, Paragraph 4.8.4 of Policy E2 (Green Belt) of the adopted Pendle Local Plan informs that it is intended that Pendle Green Belt will endure beyond the life of that plan.
- 3.92 Thus in principle, I support the Objector's case that the site should retain its 'Protected Area' status. I conclude that omission site X33 should be designated as a Protected Area, in accordance with my recommended new Policy 3A, as set out in part A of this Chapter of my report. For avoidance of doubt, it should also remain outside the settlement boundary, within the Open Countryside to which Policy 1 applies and within the Lidgett and Bents Conservation Area.

#### **Land between Skipton Old Road and Castle Road, omission site X34**

- 3.93 Omission site X34 is agricultural land that lies to the north-west of Skipton Old Road and to the south-east of Castle Road. It is 10.92 hectares in extent. In the adopted Pendle Local Plan the site is designated as a Protected Area under Policy E2A outside the settlement boundary. In the re-deposit plan it is designated as Green Belt outside the settlement boundary. The most southern part of the site also lies within the Lidgett and Bents Conservation Area. In response to advertisement of the omission site, numerous representations of support for these designations were made.
- 3.94 The objection is made on the basis that the designations of the adopted Local Plan should be retained because the considerations that applied at that stage remain largely unchanged. Therefore, that the removal of the Protected Area designation is illogical and will not assist with the longer term planning of the area.
- 3.95 The Council states that its case for making this change in designation is two-fold. Firstly, because the site is worthy of

inclusion in the statutory Green Belt, because it meets the fifth criterion of paragraph 1.5 of PPG2, and secondly, because the Council can demonstrate that long term development needs can be accommodated on brownfield sites or on alternative safeguarded land, as defined in Policy 17, that is better related to the regeneration needs of Colne.

3.96 I support the Council on the first matter. I believe that, in common with most other greenfield sites close to the urban area, the protection of the site from development during the period of the re-deposit plan will assist in urban regeneration, by encouraging the recycling of derelict and other urban land within the Borough. It is remote from the intended areas of housing intervention associated with the HMR programme and consequently, in my view, the site would be unsuitable for and would detract from that initiative.

3.97 However, I am not convinced that this site will not be required for development in the longer term, after 2016. The RSS is currently under review and the possibility that it will ultimately result in a higher requirement for housing and/or employment in Pendle in the medium to long term should not, in my opinion, be discounted. Therefore, I consider that it would be imprudent to designate this land as Green Belt in advance of this review.

3.98 In addition, I believe that the current, higher tier planning policy contained in the Development Plan and in PPG2 presumes against the designation of land that would amount to a change in the general extent of the Green Belt. I refer particularly to Policy 6 of the JLSP, which informs that the general extent of Green Belts across Lancashire should endure. Furthermore, paragraph 4.8.4 of Policy E2 (Green Belt) of the adopted Pendle Local Plan indicates that it is intended that in Pendle, the Green Belt will endure beyond the life of the plan. Thus in my opinion, there is not a strategic case for altering the general extent of the Green Belt boundaries in Pendle, nor are there exceptional circumstances in this particular case.

3.99 Thus in principle, I support the Objector's case that the site should retain its 'Protected Area' status. I conclude that omission site X34 should be designated as a Protected Area, in accordance with my recommended new Policy 3A, as set out in part A of this Chapter of my report. For avoidance of doubt, the site should also remain outside the settlement boundary and within the Open Countryside, to which Policy 1 applies.

#### **Land off Trawden Road, Cottontree, omission site X50**

3.100 Omission site X50 is a cleared industrial mill site with an extensive hard standing. It is 0.56 hectare in extent and lies to the east of

the B6250 to the south of the bridge over Colne Water. To the north there are areas of terraced housing and to the south there is a small factory unit, beyond which, and to the east and west is open countryside. In the adopted Pendle Local Plan the site is designated as Green Belt, an Area of Special Landscape and it falls outside the settlement boundary. In the re-deposit plan the site is designated as being within the Green Belt, the Open Countryside and in the Winewall and Cottontree Conservation Area. In response to advertisement of the omission site, seventeen representations supporting the re-deposit designations were submitted. The County Council considers that the site should be removed from the Green Belt, and be alternatively allocated, either for housing or employment purposes.

- 3.101 However, I do not support this objection. The site is separated from the Cottontree area of Colne by Colne Water. This watercourse marks the limit of the settlement boundary for Colne. The objection site lies within a narrow strip of open countryside, to which Policy 1 applies, that separates the industrial and market town of Colne from the village of Trawden.
- 3.102 Because of the vital role that this area of countryside plays in preventing the neighbouring settlements of Colne and Trawden from merging into one another it was designated as part of the Green Belt established by Lancashire County Council in the late 1970s/early 1980s. Furthermore, Policy 6 of the JLSP states that 'the reasons for defining the general extent (of the Green Belt in Lancashire) still endure' and that there is 'no strategic case for altering the general extent of Green Belts'.
- 3.103 I consider that this area of Green Belt serves the important purpose of helping to prevent the neighbouring settlements of Colne and Trawden from coalescing. It assists in safeguarding the countryside from encroachment and it helps to preserve the setting and special character of the village of Trawden, which the Inspector at the Inquiry into the adopted Pendle Local Plan noted retains the 'character of a Pennine upland village'. It also provides a clear demarcation between earlier and later developments.
- 3.104 Although I do not consider that the site can be regarded as being of high quality landscape, as noted in PPG2; 'the quality of the landscape is not relevant to the inclusion of land within a Green Belt or to its continued protection'. In my opinion, it is the openness of the site that plays the 'positive role' required by PPG2 (paragraph 1.6). I consider that any development on the site would close off one of the few views of the open countryside to the east of the B6250 on the approach to Trawden and would effectively bridge the 'gap' between the two settlements.

- 3.105 I acknowledge that the provision of new housing on previously developed land accords with Government guidance. However, the Housing Land Availability Report 2005 (CD 36) records that in the period from 1st April 2001 to 31st March 2005, 1,317 dwellings were completed in Pendle. A further 1,407 units had planning permission at the end of the survey period. This leaves Pendle with a surplus of 754 dwellings against the JLSP requirement of 1,970 dwellings to 2016. Thus the Council is in a position of over-supply and will continue to apply a housing moratorium until such time as a future Housing Land Availability report demonstrates that an over-supply no longer exists. With reference to Chapter 23 of my report, I am also satisfied that the plan makes adequate provision for employment land to satisfy the JLSP requirement for 40.0 hectares of new employment land during the plan period.
- 3.106 On this basis, I do not recommend the removal of omission site X50 from the Green Belt or its allocation for housing or employment.

#### **Land at Red Lane, omission site X35**

- 3.107 Omission site X35 lies to the south of Red Lane, Colne between Great House Farm and The Meadows. To the north and south of the site are dwellings, the Sacred Hearts School lies to the east, with Green Belt to the west. The site is 2.58 hectares in extent and is used as grassland. In the adopted Pendle Local Plan the site is designated as a Protected Area outside the settlement boundary and in an Area of Special Landscape. At the first stage deposit the site was safeguarded for housing and situated within the settlement boundary. There were numerous objections to that designation. However, at the re-deposit stage the site was de-allocated as a safeguarded housing site and it was re-designated as Green Belt outside the settlement boundary and within the open countryside. There were six representations supporting these designations in response to advertisement of the omission site.
- 3.108 One objection was made on the basis that the site should be allocated for general market housing. However, at the informal hearing session at which it was heard, the Objector conceded that this objection had been overcome by events regarding the reduced housing supply requirement of the JLSP and the objection was amended to a request that the land should be safeguarded.
- 3.109 The other Objectors request that the site should retain its designations of the adopted Pendle Local Plan, or that it be allocated for the previously identified needs of education to serve the present community. These latter objections have been conditionally withdrawn on the basis of the re-deposit plan designation of the site as Green Belt.

- 3.110 The Council argues that it is justified in making its re-deposit changes in designation because it can demonstrate that the site is worthy of inclusion in the statutory Green Belt since it meets the fifth criterion of paragraph 1.5 of PPG2. Also, because the long term development needs of the Borough can be accommodated on brownfield sites, or on alternative safeguarded land, as defined in Policy 17, that is better related to the regeneration needs of Colne.
- 3.111 I partly support the Council on the first matter. I believe that in common with most other greenfield sites close to the urban area, the protection of the site from development during the period of the re-deposit plan will assist in urban regeneration, by encouraging the re-cycling of derelict and other urban land within the Borough. It is remote from the intended areas of housing intervention associated with the HMR programme and consequently, in my view, the site would be unsuitable for and would detract from that initiative.
- 3.112 However, I am not convinced that this site will not be required for development in the longer term, after 2016. The RSS is currently under review and the possibility that it will ultimately result in a higher requirement for housing and/or employment land in Pendle in the medium to long term should not, in my opinion, be discounted. Therefore, I consider that it would be imprudent to designate this land as Green Belt in advance of this review.
- 3.113 In addition, I consider that the current, higher tier planning policy of the other elements of the Development Plan and PPG2 presume against the designation of land that would amount to a change in the general extent of the Green Belt. I refer particularly to Policy 6 of the JLSP, which informs that the general extent of Green Belts across Lancashire should endure. Also, paragraph 4.8.4 of Policy E2 (Green Belt) of the adopted Pendle Local Plan states; 'that it is intended that Pendle Green Belt will endure beyond the life of this plan'.
- 3.114 Thus in principle, I support the Objectors' cases that the site should retain its 'Protected Area' status. I conclude that omission site X35 should be designated as a Protected Area, in accordance with my recommended new Policy 3A, as set out in part A of this Chapter of my report. For avoidance of doubt the site should also remain outside the settlement boundary and within the Open Countryside, to which Policy 1 applies.

## RECOMMENDATIONS (binding)

- 3.115 I RECOMMEND that the plan be modified by designating land at Lidgett Triangle, omission site X33, as a Protected Area, in accordance with new Policy 3A, which is set out in full at paragraph 3.32 of this report. The site should also be designated as Open Countryside outside the settlement boundary.
- 3.116 I RECOMMEND that the plan be modified by designating land between Skipton Old Road and Castle Road, omission site X34 including omission site Y22, as a Protected Area, in accordance with new Policy 3A, which is set out in full at paragraph 3.32 of this report. The site should also be designated as Open Countryside outside the settlement boundary.
- 3.117 I RECOMMEND that the plan be modified by designating Land at Red Lane, omission site X35, as a Protected Area, in accordance with new Policy 3A, which is set out in full at paragraph 3.32 of this report. The site should also be designated as Open Countryside outside the settlement boundary.
- 3.118 I RECOMMEND that the plan be modified by amending the Proposals Map accordingly to reflect the designations of the sites referred to in the three preceding recommendations.
- 3.119 I RECOMMEND no further modification to the plan in response to these objections.

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## KELBROOK & SOUGH

Land off A56 between Kelbrook and Sough, omission site X82

### Summary of Key Issue

- Whether land off the A56 between Kelbrook and Sough, omission site X82, should be designated as Green Belt.

### Inspector's Reasoning and Conclusions

- 3.120 Omission site X82 lies to the west of the A56 and to the north-west of the village of Kelbrook. It is 4.93 hectares in extent and is used as grazing land. In the adopted Pendle Local Plan it is designated as an Area of Special Landscape outside the settlement boundary for Kelbrook. In the re-deposit plan it is designated as open countryside outside the settlement boundary.

3.121 An Objector is concerned that the open countryside designation will not afford the site sufficient protection from development pressure and that it should, therefore, be designated as Green Belt. In his opinion, the site forms a natural boundary between Kelbrook and Sough. Thirty-eight representations supporting this proposition were made in response to advertisement of the omission site.

3.122 However, omission site X82 is located well beyond the designated Green Belt in Pendle, which seeks to contain the main urban areas in the south of the Borough. Kelbrook and Sough are villages within the open countryside that are 'connected' by ribbon development alongside the A56. I agree that the omission site makes an important contribution to the feeling of separation between these two distinct settlements. However, as I have concluded in Chapter 1 of my report, the designation of the omission site as open countryside offers it sufficient protection against unsuitable development. Furthermore, there is a strong policy presumption against designating this land as Green Belt at national, regional, strategic and local levels.

3.123 For these reasons, I do not support the objection. Moreover, the Objector conceded at the informal hearing session at which the objection was heard that Green Belt designation of the site would be inappropriate.

### **RECOMMENDATION (binding)**

3.124 **I RECOMMEND no modification to the plan in response to this objection.**

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### **LANESHAW BRIDGE**

Land opposite Hartley Hospital, Keighley Road, omission site X45

#### **Summary of Key Issue**

- Whether land opposite Hartley Hospital, Keighley Road, omission site X45, should be removed from the Green Belt.

#### **Inspector's Reasoning and Conclusions**

3.125 Omission site X45 is 1.97 hectares in extent. It comprises grazing land and two dwellings. It is situated on the southern side of the A6068. There are dwellings to the east, west and north. From the road, the open aspect to the south provides extensive views across open countryside towards the Winewall and Cottontree Conservation Area and the South Pennine Moors. In the adopted

Pendle Local Plan the site is placed outside the settlement boundary and is designated as an Area of Special Landscape and Green Belt. In the re-deposit plan it is designated as Open Countryside and Green Belt, and it remains outside the settlement boundary for Laneshaw Bridge.

- 3.126 Objection was made to these designations at the first stage deposit. In addition, there were thirteen representations of support made to the designations in response to advertisement of this omission site.
- 3.127 The Objector states that omission site X45 forms part of a built-up frontage and its development would constitute infill between adjacent residential uses. It is thought that the land does not serve any of the five purposes for Green Belt, as set out in PPG2, and so the designation should be deleted from this land, which should instead be included within the settlement boundary and allocated for housing.
- 3.128 I consider the merits of the site for housing in Chapter 17 of my report. Regarding the designation of the settlement boundary, its purpose is to provide clear and unambiguous guidance as to where the principle of development is likely to be considered acceptable. Once defined, settlement boundaries are intended to give a measure of certainty and predictability, in accordance with the advice contained in PPG12, at paragraph 3.12.
- 3.129 The settlement boundaries in Pendle have been established on the basis that they should only enclose the main settlement area, and wherever possible, they should follow clearly identifiable features. I consider that in the vicinity of the omission site, the A6068 and the perimeters of the gardens of adjoining housing to the east, west and south represent a clear demarcation between the urban and rural areas. In my opinion, they are appropriately drawn. I consider that they provide an equally clearly defined edge to the Green Belt.
- 3.130 Turning to the Green Belt merits of the omission site, I consider that its Green Belt designation helps to safeguard the countryside from encroachment and it assists in urban regeneration, by encouraging the re-cycling of derelict and other urban land, which is particularly pertinent in the context of Pendle, as referred to in Policy 6 of the JLSP.
- 3.131 Furthermore, PPG2 states at paragraph 2.6 that in the absence of a strategic review, Green Belts should only be altered in exceptional circumstances. I am not aware of any considerations that may amount to exceptional circumstances in this case. In addition, Policy 6 of the JLSP indicates that the general extent of Green Belts across Lancashire was first defined in the late

1970s/early 1980s. The reasons for defining its general extent still endure.

3.132 Also, Paragraph 4.8.4 of Policy E2 (Green Belt) of the adopted Pendle Local Plan informs that it is intended that the Pendle Green Belt will endure beyond the life of this plan. Furthermore, as I conclude in Chapter 17 of my report, there is an over-supply for housing in Pendle for duration of the plan period. Therefore, the land is not required for housing purposes.

3.133 For all of these reasons, I conclude that the designation of omission site X45, as set out in the re-deposit plan is appropriate. I do not support the Objector's request for their removal.

### **RECOMMENDATION (binding)**

3.134 **I RECOMMEND no modification to the plan in response to this objection.**

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### **NELSON**

Gib Hill, omission site X22

Land north of Marsden Golf Course, omission site X30

### **Summary of Key Issues**

- Whether land at Gib Hill, omission site X22, should be included within the Green Belt.
- Whether land north of Marsden Golf Course, omission site X30, should be included within the Green Belt.

### **Inspector's Reasoning and Conclusions**

#### **Land at Gib Hill, omission site X22**

3.135 Omission site X22 comprises land at Gib Hill that extends to 12.44 hectares. It is situated to the south-east of Nelson. On the west, the site is bordered by residential properties. To the north it abuts two schools and to the east it opens out to open countryside. Part of it is forestry plantations and part is used for grazing. Several public footpaths cross the site and it is used for informal recreation. In the adopted Pendle Local Plan the site is placed outside the settlement boundary and is designated as an Area of Special Landscape. However, at the first stage deposit the settlement boundary was amended to include the site and it was

safeguarded for housing. These designations were retained at the re-deposit stage.

- 3.136 Over four hundred objections have been received to these designations at the first and re-deposit stages. Of these, several request re-designation of the land as Green Belt. A further three representations requesting Green Belt designation were made in response to advertisement of this omission site. The reasons given for re-designation are to prevent the south-eastern sprawl of Nelson, to prevent the merger of Nelson and Colne, to assist in safeguarding the countryside from encroachment and to assist in urban regeneration, by encouraging the re-cycling of derelict and other urban land. It is also questioned why land at Barrowford, omission site X11, which shares similar characteristics, has been designated as Green Belt, but land at Gib Hill has not.
- 3.137 I comment on this last point with specific reference to site X11 earlier in this section of my report and I recommend that the Barrowford site is designated as a Protected Area: not Green Belt.
- 3.138 With reference to land at Gib Hill, I agree with Objectors that the site could potentially check sprawl of development at Nelson, if there was not a need for additional housing land to serve that community. Also, that it would assist in safeguarding the countryside from encroachment, if there was not a need for additional housing land associated with HMR programme.
- 3.139 However, I conclude in Chapter 17 of my report that the site should be safeguarded for HMR reserve housing. Furthermore, I do not agree that the Green Belt designation of the site would assist in urban regeneration. In my opinion, it would actually hinder the HMR programme, if there were insufficient land available for decanting and replacement housing for the Nelson ADF. Nor do I support the coalescence argument, because the site does not extend any further eastwards than the school to the north-east of the site.
- 3.140 In addition, I consider that there are compelling policy considerations against Green Belt designation of the omission site, which I consider would amount to a substantial change to the extent of the Green Belt. Policy SD5 of the RSS states; 'the need for exceptional substantial change to any Green Belt in the Region should be investigated by a strategic study'. The Policy goes on to say that; 'there is no need to undertake a strategic study of Green Belt within Greater Manchester, Cheshire or Lancashire before 2011'.
- 3.141 Policy 6 of the JLSP advises that; 'the general extent of Green Belts in Lancashire will be maintained'. Paragraph 6.1.25 of the reasoned justification to Policy 6 informs that; 'the general extent

of Green Belt across Lancashire was first defined in the late 1970s/early 1980s. The reasons for defining this general extent still endure. Also, paragraph 4.8.4 of Policy E2 (Green Belt) of the adopted Pendle Local Plan states that; 'it is intended that Pendle Green Belt will endure beyond the life of this plan'.

- 3.142 In my opinion, the requested designation would conflict with these policy considerations, and in the absence of exceptional circumstances, would be inappropriate. Therefore, for all of these reasons, I do not support these objections.

### **Land north of Marsden Golf Course, omission site X30**

- 3.143 Omission site X30 is 40.18 hectares in extent and is located to the north-east of Marsden Golf Course and to the south of Knotts Drive in Colne. The site is situated between Nelson and Colne and is some distance from the main built-up areas. It comprises predominantly agricultural land interspersed with farm buildings. In the re-deposit plan omission site X30 lies outside the settlement boundary in open countryside. There are two Geological Heritage Sites within the boundary of the site. These are Castercliffe and Tum Hill, and there is a Scheduled Monument at Castercliffe Fort.
- 3.144 Seven objections requesting the re-designation of the land as Green Belt were submitted at the first stage deposit and a further three representations requesting Green Belt designation were made in response to advertisement of this omission site. The reasons given for re-designation are to prevent urban sprawl, to prevent the merger of Nelson and Colne, to assist in safeguarding the countryside from encroachment, to protect wildlife and to safeguard the land for future generations. Objectors also request clarification of the reasons why none of the land south of Colne is designated as Green Belt.
- 3.145 With regard to this, Topic Paper 3: The Green Belt explains that the Green Belt in Pendle was first defined in the 1987 draft Green Belt Subject Plan. The information from the subsequent 1990 draft Green Belt Local Plan was fed into the Pendle Local Plan, which was adopted in 1999. However, the Inquiry to the adopted Local Plan was the first time the Green Belt boundaries had been tested.
- 3.146 The main reason why the Green Belt runs to the north and west of the main built up parts of the Borough is to prevent the larger urban areas of Nelson and Colne sprawling and merging with the surrounding smaller settlements of Barrowford, Foulridge, Laneshaw Bridge and Trawden. In addition, the Inspector at the previous Local Plan Inquiry acknowledged that there may be potential for further urban expansion on the south-eastern fringe

of Nelson and Colne. Therefore, inclusion of this land within the Green Belt could hinder potential provision for future development requirements in the Borough.

- 3.147 Concerning the purposes of Green Belt that the omission site could potentially fulfil, I do not agree that it has a crucial role in preventing the merger of Nelson and Colne, because it forms somewhat of an 'island' between the towns, that is surrounded by other non-Green Belt land. I agree that Green Belt designation could prevent urban sprawl and loss of countryside. However, its location beyond a settlement boundary, together with the protection afforded by Policy 1, strictly limits potential for development of the site. Protection of wildlife and safeguarding land for future generations are not purposes of Green Belt. These considerations would, nevertheless, be protected by Policy 1.
- 3.148 Furthermore, I consider that policy considerations presume against the designation of the omission site as Green Belt. Policy SD5 of the RSS states that; 'the need for exceptional substantial change to any Green Belt in the Region should be investigated by a strategic study'. The policy goes on to say that; 'there is no need to undertake a strategic study of Green Belt within Greater Manchester, Cheshire or Lancashire before 2011'.
- 3.149 Policy 6 of the JLSP informs that; 'the general extent of Green Belts in Lancashire will be maintained'. Paragraph 6.1.25 of the reasoned justification to Policy 6 advises that; 'the general extent of Green Belt across Lancashire was first defined in the late 1970s/early 1980s, and that the reasons for defining this general extent still endure. Moreover, given the Plan's emphasis on recycling urban brownfield sites and a renewed emphasis on urban regeneration, there is no strategic case for altering the general extent of Green Belts'.
- 3.150 In addition, paragraph 4.8.4 of Policy E2 (Green Belt) of the adopted Pendle Local Plan states that; 'it is intended that the Pendle Green Belt will endure beyond the life of this plan'. In my opinion, the requested designation would conflict with these policy considerations, and in the absence of exceptional circumstances, would be inappropriate.
- 3.151 An Objector also refers to the Government's new Direction on Green Belts. It mainly considers how departures from the Development Plan, in terms of new development within Green Belt areas, should be dealt with. The Direction only briefly mentions that local plans should be considering increasing their allocation of Green Belt land. However, it is only in draft consultation form at the present. Therefore, I am able to give it only the weight which is appropriate to the early stage which has been reached in its preparation processes. Furthermore, the Direction states that the

Government has no plans to review national policy on Green Belts; thus the guidance in PPG2 is maintained.

3.152 Therefore, for all of these reasons, I do not support these objections.

**RECOMMENDATION (binding)**

3.153 **I RECOMMEND no modification to the plan in response to these objections.**

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## **Policy 4 - Natural Heritage**

### **A. Objections to Policy Wording and Approach**

#### **Introduction**

- 4.1 Planning Policy Statement 9: Biodiversity and Geological Conservation sets out the Government's objectives for conservation and its framework for safeguarding our natural heritage under domestic and international law. Many important sites for nature conservation have been designated under the statutes and international conventions. Local Authorities are required to identify and provide for the protection and enhancement of the natural heritage within their areas. As part of their planning function, they have a responsibility to take account of sites of significant nature conservation value.
- 4.2 The UK as a whole has a responsibility to ensure the conservation and enhancement of habitats and species that are important in both a national and international context. One approach to achieving this is the establishment of a system of protected sites.
- 4.3 However, on their own, statutory sites cannot fully conserve natural heritage and biodiversity. Further designations exist for sites outside of the international and national designations. These vary in the level of protection they afford. Biological Heritage Site (BHS) is the name given to the most important non-statutory wildlife sites in Lancashire. They contain valuable habitats such as ancient woodland, species-rich grassland and bogs. Many provide a refuge for rare and threatened plants and animals.
- 4.4 BHSs form an irreplaceable part of the environment and are a major part of the strategy to conserve the biological richness of Lancashire. Sites are defined by the County Council, in partnership with the Lancashire Wildlife Trust and English Nature, on the basis of objective biological/ecological criteria. BHSs are afforded protection through their inclusion in the JLSP and the Local Plans or Local Development Frameworks (LDFs) prepared by each district authority. Some sites may support habitats or species which have specific protection under other legislation, such as the Wildlife and Countryside Act and the European Community Habitats or Birds Directives.
- 4.5 However, the successful conservation of BHSs requires more than protection by the planning system, it also depends in practice upon the co-operation of the owners and occupiers of the land in question. To this end, it is important that a strong partnership is developed between the bodies that administer the system and those people who actually own and/or manage the land.

4.6 Policy ER5 of the RSS advises that the highest level of protection should be given to international and national sites of nature conservation value, but informs that overall the nature conservation resource of the North West should be protected and enriched. Following from this, JLSP Policy 21: Lancashire's Natural and Man-Made Heritage, states that the degree of protection given to a heritage asset will reflect its position within the hierarchy of designations shown in Table 6 of the policy, with the greatest protection being assigned to sites or features of international then national importance, as explained in paragraph 6.4.4. The underlying principle of the policy is that, as a minimum, there should be 'no net loss' of environmental value arising from any development.

### **Summary of Key Issues**

- Whether Policy 4 should be strengthened to improve the environmental protection afforded to designated sites at all levels, in line with Policy 21 of the JLSP and Policy ER5 of the RSS.
- Whether Policy 4 sufficiently promotes opportunities for conservation and enhancement of biodiversity, contributions to habitat de-fragmentation and the development of ecological frameworks.
- Whether Policy 4 should differentiate between Sites of Special Scientific Interest (SSSI) and Biological Heritage Sites (BHS) in terms of the level of protection afforded to them.

### **Inspector's Reasoning and Conclusions**

4.7 The Lancashire Wildlife Trust raised significant objection to Policy 4 at the first stage deposit. In its view, the policy should be strengthened to better reflect the requirements of Policy 21 of the JLSP and Policy ER5 of the RSS. It suggested numerous changes to the policy wording and its reasoned justification.

4.8 In response, Policy 4 and its supporting text were deleted at the re-deposit stage and a new suite of environmental protection policies, together with their associated text, were added in replacement. They comprise; Policy 4A – Natural Heritage – International Sites, Policy 4B – Natural Heritage – National Sites, Policy 4C – Natural Heritage – Local sites and Policy 4D – Natural Heritage – Wildlife Corridors, Species Protection and Biodiversity. I consider that these changes significantly improve the environmental protection afforded by the plan and overcome all parts of the objection, which was conditionally withdrawn on their basis.

- 4.9 The Lancashire Wildlife Trust was also concerned, at the first stage deposit that Policy 4 did not seek to conserve environmental features and to create new habitats and linkages or corridors adjacent to areas of semi-natural vegetation, in order to contribute to the relevant Biodiversity Action Plans and to the creation of ecological frameworks.
- 4.10 However, I consider that this objection was also largely addressed at the re-deposit stage, by the re-writing of Policy 4. Although Policy 4D of the re-deposit plan does not set out a full ecological framework, it does aim to protect wildlife corridors, to encourage the re-establishment of habitats, species populations and to help maintain and enhance biodiversity. This is in line with Policy ER5 of the RSS, which aims to reverse habitat fragmentation. Policy 4D of the re-deposit plan also identifies a number of examples of wildlife corridors which should be conserved and enhanced in order to allow species to migrate and disperse between habitats, thereby increasing biodiversity levels. The objection was conditionally withdrawn on the basis of the changes made to the policy at the re-deposit stage.
- 4.11 With particular reference to SSSIs and BHSs, another Objector suggests that Policy 4 should not differentiate between sites in terms of the level of protection afforded to them, but I disagree for the following reasons. SSSIs seek to ensure the conservation and enhancement of habitats and species that are important in a national context. They are statutory wildlife sites and have protection in law. In contrast, BHSs are designated locally and seek to conserve the biological richness of Lancashire. Protection is primarily afforded through their inclusion in the JLSP and the Pendle Local Plan. Furthermore, PPS9 refers, at paragraphs 5(i), 7 and 9, to the importance of planning policies making clear distinctions between the hierarchy of international, national, regional and locally designated sites.
- 4.12 Thus, in line with PPS9 and Policy 21 of the JLSP, the re-deposit plan refers to SSSIs in a new Policy 4B: Natural Heritage – National Sites; whilst BHSs are included in Policy 4C: Natural Heritage – Local Sites. For these reasons, I do not support the objection.

#### **RECOMMENDATION (binding)**

- 4.13 **I RECOMMEND no modification to the plan in response to these objections.**

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## **B. Objections to Specific Sites**

### **Introduction – Policy Background**

- 4.14 The Draft Guidelines for Important Wildlife Sites in Pendle (CD 129), produced by Lancashire Wildlife Trust, set out criteria for assessing various sites to ascertain their suitability for designation as a site of Local Natural Importance (LNI). If a potential site of LNI is identified, it will be considered for designation by the relevant Area Committee to final designation by the Executive. Such designation can take place outside the Local Plan review process.
- 4.15 Biological Heritage Sites (BHSs) are designated by the BHS Partnership, and Geological Heritage Sites (GHS) are designated by the Lancashire RIGS Group. Both are endorsed by Lancashire County Council. Sites must meet the specific guidelines referred to above.
- 4.16 The Council has a duty to consider appropriate sites for designation as a site of LNI, or to put forward to the County Council sites worthy of designation as either a BHS or GHS. If sufficient survey evidence is presented to the Council to demonstrate that the site fulfils the criteria for designation as a LNI site then the Council will consider it against the adopted draft guidelines referred to above.
- 4.17 The Council also has a duty to consider appropriate sites for designation as Local Nature Reserves (LNR). If sufficient survey evidence is presented to demonstrate that the site fulfils the criteria for designation as a LNR then the Council will consider this with English Nature. The relevant criteria for assessment are set out in English Nature's document entitled, 'Local Nature Reserves in England' (CD 137). Such sites must be at least of 'some reasonable natural interest'. Another fundamental criterion for designation of a site as a LNR is that the Council must have an interest in it.
- 4.18 However, such designation of sites cannot be done through the Local Plan review process, as it involves negotiation and approval by an outside body; English Nature. Policy 4C – Natural Heritage – Local Sites recognises that new designations may be made during the life time of the plan and it informs that the same level of protection will be afforded to any new site or areas designated by the appropriate agency. Policy 4C of the re-deposit plan lists the designated environmental protection sites in Table 2a.
- 4.19 Also of relevance to the designation of new LNIs and LNRs, PPS9 and the Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and Their Impact Within the

Planning System (Circular 06/2005), state that new Government advice on LNRs and Local Sites was to be issued in the autumn of 2005, but at the time of completing my report in March 2006, it still had not been published.

- 4.20 It is anticipated that the guidance will provide advice on the development and management of systems to identify these sites. It will propose frameworks and standards for their operation, as well as for the selection, protection and management of the sites themselves. I consider that to designate land as a LNI or LNR would be premature in advance of new Government advice on this matter.

### **COLNE (including COTTONTREE)**

Land south of South Valley, omission site X23

Land to south of Colne, omission site X24

Land at Knotts Lane, omission site X26

Railway Sidings, Knotts Lane, omission site X27

The Millennium Green, omission site X36

Land at Wood Street, omission site X44

### **Summary of Key Issues**

- Whether land south of South Valley, omission site X23, should be designated as a site of Local Natural Importance.
- Whether land south of Colne, omission site X24, should be designated as a site of Local Natural Importance.
- Whether the railway sidings, omission site X27, should be designated and listed as an Environmental Protection Site
- Whether the railway sidings and surrounding land, omission sites X26 and X27 should be designated as a Biological Heritage Site, as a site of Local Natural Importance, or as a Local Nature Reserve.
- Whether The Millennium Green, omission site X36, should be designated as a site of Local Natural Importance.
- Whether land at Wood Street, omission site X44, should be designated as a site of Local Natural Importance.

### **Inspector's Reasoning and Conclusions**

#### **Land south of South Valley, omission site X23**

- 4.21 Omission site X23 is around 123.0 hectares in area and extends across the south of Colne through the ward of Waterside. In the re-deposit plan the site is designated as open countryside outside

the settlement boundary, with the exception of the parts of it known as Knotts Lane (omission site X26, which contains omission site X27) and the former cement works (omission site X28), which are allocated as safeguarded land for housing, and the surrounding land to site X28 (omission site X29). These sites fall within the settlement boundary, as they do in the adopted Pendle Local Plan. However, I conclude in Chapter 1 of my report that site X29 should be removed from the settlement boundary and designated as open countryside.

4.22 Thus the majority of the omission site lies outside the settlement boundary and is designated as open countryside. Four Objectors request that the whole site is designated as a site of Local Natural Interest. They point out that there are no designated environmental protection sites within Waterside ward. This request was supported by several others in response to advertisement of the omission site.

4.23 The Objectors have not supplied information to demonstrate that this larger site would meet the Council's guidelines for designation as a LNI site, or to demonstrate that the site is worthy of BHS or GHS designation. (Separate objections are made in respect of the smaller sites contained within omission site X23, which I report upon below.) Thus I have no basis on which to make a recommendation that the site meets the relevant criteria for designation. Therefore, I do not support these objections.

#### **Land to south of Colne, omission site X24**

4.24 Omission site X24 is located on the north-west slope of the valley side to the east of Nelson and south of Colne. It is 74.55 hectares in area and is mostly used for rough grazing with some woodland planting. It is bounded to the east by Southfield Lane, to the south by a municipal golf course, to the west by agricultural land, to the north-west by the Colne-Burnley railway and to the north by Colne residential area and Knotts Lane.

4.25 In the re-deposit plan the site is mostly designated as lying outside the settlement boundary within open countryside. A portion to the north is within the settlement boundary and is designated as a safeguarded site for housing. This same parcel is also within the Housing Market Renewal Intervention Area, to which Policy 18 applies. Near the south-eastern corner of the site is Castercliffe Hill Fort, which is a scheduled ancient monument, to which Policy 11-Archaeology applies. An area in the north-east corner, Tum Hill, is also designated as a Geological Heritage Site.

4.26 An objection made at the first stage deposit requests that the site be designated as a site of Local Natural Importance. This request

was supported by several others in response to advertisement of the omission site.

4.27 However, no evidence has been provided to substantiate the claim of Local Natural Importance. Also, for the reasons that I set out in the Introduction to this part of my report, I consider that to designate a site as a LNI or LNR, would be premature in advance of the imminently anticipated new Government advice, referred to in Circular 06/2005. Furthermore, it is my opinion that any assessment of such designations should be on-going, and not part of the Local Plan review process.

4.28 For these reasons, I do not support the objection.

**Land at Knotts Lane, omission site X26 and the Railway Sidings, Knotts Lane, omission site X27**

4.29 Omission site X26 lies to the west of a new development at Knotts Drive, Colne. It is bounded at its north-eastern edge by the Colne – Blackpool railway line and it incorporates a further omission site within its boundary (X27). It is 7.89 hectares in area, and comprises part railway sidings (brownfield) and part grazing land (greenfield). The site is in private ownership. In the re-deposit plan it is safeguarded for housing, in accordance with Policy 17. For the reasons which I give in Chapter 17 of my report, I endorse this designation. The site is within the settlement boundary for Colne. It is also within the Housing Market Renewal Intervention Area boundary for Colne, to which Policy 18 of the plan applies.

4.30 Several Objectors request that the land is designated as an Environmental Protection Site. Some specifically request that it is designated as a BHS, LNR or LNI. It is contended that the site meets the criteria for designation as a BHS on the grounds of its artificial habitats (Ar2) and Bryophytes (Br2 and Br4). It is also stated by Objectors that a proposal for the designation of site X27 was submitted to the BHS Review Panel in 2001 and it was in principle, considered to be worthy of designation. However, in accordance with a policy of the BHS Partnership, proposals that are currently the subject of a planning application, appeal or public inquiry are not accepted. The Panel, therefore, decided to defer designating the site until its planning position was resolved.

4.31 However, after the close of the Inquiry, it was brought to my attention that the site has now been designated as a BHS, thus some of these objections have been met. I consider that this designation will inevitably reduce the capacity of the land to accommodate housing, but it is not clear to me from the evidence submitted, that the whole of the site is of high nature conservation value; parts may still be suitable for development, whilst other parts should left undisturbed. This is a matter that

would be resolved at a planning application stage. For this reason, I do not recommend that the site is de-designated as HMR safeguarded land. However, I recommend that as a matter of clarity and precision, the BHS designation of omission site X27 is noted in Table 2a of the plan and on the Proposals Map.

- 4.32 I do not consider that conflict will arise with the implementation of the HMR programme in making this recommendation, because taking into account that I have recommended that additional land is designated for HMR Housing at James Nelson's Sports Ground, Nelson (omission site X86/Y11), it is likely that surplus land has been allocated overall for this purpose. Land safeguarded at Gib Hill falls within both the Nelson and Colne ADFs. This also enables a degree of flexibility; but Policy 17 will ensure that such land is developed only if needed essentially in connection with the HMR programme, and as a last resort. It also means that the designation of omission site X27 as a BHS can be given the weight appropriate to its designation, without seriously impacting on the HMR initiative.
- 4.33 Designation as a LNR requires the Council to demonstrate to English Nature that any such site meets the criteria set out in English Nature's document entitled, 'Local Nature Reserves in England'. Such sites must be at least of some reasonable natural interest, and the Council must have an interest in the site. The site X26/X27 is in private ownership; therefore, in my opinion, it is inappropriate for LNR designation for this reason alone. Consequently, I do not support Objectors requesting this designation.

#### **The Millennium Green, omission site X36**

- 4.34 Omission site X36 is located between Shaw Street, Bridge Street and Colne Water, about 80.0 metres from Colne town centre. It is 1.51 hectares in area. In the re-deposit plan it is designated as Open Space to which Policies 14, 21, 33 and 34 apply. It is within the settlement boundary and also within the Housing Market Renewal Intervention Area. An Objector requests that the site be designated as a LNI. However, neither the Objector nor the Council has provided additional information to support or rebut this suggestion.
- 4.35 In my opinion, pending new Government guidelines for LNI designations, a decision on this matter would be premature. For this reason I do not support the objection.

#### **Land at Wood Street, omission site X44**

- 4.36 Omission site X44 is located on the eastern side and at the northern end of Lenches Road. It is 0.42 hectare in area and is

split into two sections. The northern section which fronts the houses on Wood Street is mostly fenced. It comprises mown grass and appears to be an informal open space. The southern section is slightly larger, and is a small holding used for grazing cattle. The site is within the settlement boundary and the Housing Market Renewal Intervention Area. The proposed cycleway network, to which Policy 30 – Sustainable Travel Modes applies, passes along the northern boundary of the site.

4.37 An Objector requests that the site be designated as a LNI. Two representations of support for this designation were submitted in response to advertisement of the omission site. However, neither the Objector nor the Council has provided additional information to support or rebut this suggestion.

4.38 In my opinion, pending new Government guidelines for LNI designations a decision on this matter would be premature. For this reason I do not support the objection.

#### **RECOMMENDATION (binding)**

4.39 **I RECOMMEND that the plan be modified, by amending Table 2a and the Proposals Map to reflect the designation of omission site X27 as a BHS.**

4.40 **I RECOMMEND no further modification to the plan in response to these objections.**

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#### **NELSON**

Gib Hill, omission site X22  
Land north of Marsden Golf Course, omission site X30

#### **Summary of Key Issues**

- Whether land at Gib Hill, omission site X22, should be designated as a site of Local Natural Importance.
- Whether land north of Marsden Golf Course, omission site X30, should be designated as a site of Local Natural Importance.

#### **Inspector's Reasoning and Conclusions**

##### **Gib Hill, omission site X22**

4.41 Omission site X22 comprises land at Gib Hill that extends to 12.44 hectares. It is situated to the south-east of Nelson. On the west the site is bordered by residential properties. To the north it abuts two schools and to the east it opens out to open countryside. Part

of it is forestry plantations and part is used for grazing. Several public footpaths cross the site and it is used for informal recreation. In the adopted Pendle Local Plan the site is outside the settlement boundary and is designated as an Area of Special Landscape. However, at the first stage deposit the settlement boundary was amended to include the site and it was safeguarded for housing. These designations were retained at the re-deposit stage.

- 4.42 Over four hundred objections have been received to these designations at the first and re-deposit stages. Of these, several request that the site be added to the list of Environmental Protection Sites, as a BHS, LNI or LNR. Further representations supporting these alternative designations were made in response to advertisement of this omission site.
- 4.43 Detailed evidence supporting and rebutting the merits of the site for these designations were submitted to the Inquiry by Objectors and the Council respectively. Notwithstanding this conflicting evidence, for the reasons that I have given in my introduction to this section of my report, I do not consider that the decision to designate or not, this site as a BHS falls within the remit of this Local Plan Review. This is a matter that has to be approved by the BHS Partnership and endorsed by the County Council. At the time of the informal hearing session of the Inquiry, at which this matter was considered, an application for the BHS designation of this site was being considered by the BHS Panel. Subsequently, I have been informed that the application has been approved, and that three fields partly within site X22 are now designated as a BHS.
- 4.44 Designation as a LNR requires the Council to demonstrate to English Nature that the site meets the criteria set out in English Nature's document entitled; 'Local Nature Reserves in England'. Such sites must be at least of some reasonable natural interest and the Council must have an interest in the site, which it does in this case.
- 4.45 From the evidence submitted to this Inquiry, it seems to me that parts of omission site X22 may satisfy English Nature's criteria. However, it is not within my remit to make such a designation, because that involves negotiation and approval by English Nature. It is a procedure that can take place outside of this review of the Local Plan since Policy 4C recognises that new designations may be made during the life time of the plan and that the same level of protection will be afforded to any new site or areas designated by the appropriate agency.
- 4.46 Furthermore, I consider that to designate land as a LNI or LNR would be premature in advance of new, imminent Government

advice outlined in Circular 06/2005. For all of these reasons, I do not support these objections that request environmental designation of the omission site within this Local Plan review process.

- 4.47 Nevertheless, I am persuaded by the evidence presented to this Inquiry that with regards to possible LNI status, fields 750, 461 and 462 are the most sensitive. (This has been confirmed by post Inquiry designation of these fields as a BHS.) As discussed at the relevant informal hearing session, these fields impinge only marginally on the area of the designated safeguarded site. Therefore, I conclude that it would be expedient, in the interest of wildlife conservation, to exclude them from the HMR safeguarded area.
- 4.48 I further recommend that the designation of part of omission site X22 as BHS or should be recorded in Table 2a and on the Proposals Map.
- 4.49 I do not consider that conflict will arise with the implementation of the HMR programme in making these recommendations, because I have recommended in Chapter 17 of my report that additional land is designated for HMR Housing at James Nelson's Sports Ground, Nelson (omission site X86/Y11. This enables flexibility; but Policy 17 will ensure that such land is developed only if needed essentially in connection with the HMR programme, and as a last resort. It also means that the designation of part of the site as a BHS can be given the weight appropriate to this description without seriously impacting on the HMR initiative.

#### **Land north of Marsden Golf Course, omission site X30**

- 4.50 Omission site X30 is 40.18 hectares in extent and is located to the north-east of Marsden Golf Course and to the south of Knotts Drive in Colne. The site is situated between Nelson and Colne and is some distance from the main built up areas. It comprises predominantly agricultural land interspersed with farm buildings. In the re-deposit plan, omission site X30 lies outside the settlement boundary in open countryside. There are two Geological Heritage Sites within the boundary of the site. These are Castercliffe and Tum Hill and there is a Scheduled Monument at Castercliffe Fort. Objectors request that the site is designated as a site of Local Natural Importance.
- 4.51 However, neither the Objector nor the Council has provided additional information to support or rebut this suggestion. In my opinion, pending new Government guidelines for LNI designations a decision on this matter would be premature. For this reason I do not support these objections.

## RECOMMENDATIONS (binding)

- 4.52 **I RECOMMEND that the plan be modified by placing land forming field numbers 750, 461 and 462 entirely outside the Settlement Boundary, by removing the safeguarded land designation from these fields (parts thereof) and by re-designating that land as Open Countryside and BHS.**
- 4.53 **I RECOMMEND that the plan be modified, by amending Table 2a and the Proposals Map accordingly to reflect these designations.**
- 4.54 **I RECOMMEND no further modification to the plan in response to these objections.**

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## SALTERFORTH

Woodland at the old Boat Yard (between Salterforth Lane and Old Nell Laithe), omission site X58

Woodland within Park Close Quarry, omission site X59

Woodland at Bashfield to the west of Higher Green Hill Farm, omission site X60

Woodland within Salterforth Quarry, omission site X61

Woodland to the north side of County Brook Mill, omission site X62

Alder plantation at Salterforth Moss/Middle Moss, omission site X64

### Summary of Key Issues

- Whether woodland at the old Boat Yard (between Salterforth Lane and Old Nell Laithe), omission site X58, should be designated as a BHS or LNI.
- Whether woodland within Park Close Quarry, omission site X59, should be designated as a BHS or LNI.
- Whether woodland at Bashfield to the west of Higher Green Hill Farm, omission site X60, should be designated as a BHS or LNI.
- Whether woodland within Salterforth Quarry, omission site X61, should be designated as a BHS or LNI.
- Whether woodland to the north side of County Brook Mill, omission site X62, should be designated as a BHS or LNI.
- Whether the alder plantation at Salterforth Moss/Middle Moss, omission site X64, should be designated as a BHS or LNI.

## **Inspector's Reasoning and Conclusions**

### **Woodland at the old Boat Yard (between Salterforth Lane and Old Nell Laithe), omission site X58**

- 4.55 Omission site X58 lies outside the settlement boundary within open countryside. It is located between Salterforth Lane, Old Nell Laithe and the Leeds and Liverpool Canal at Salterforth. The site is 0.47 hectare in area and comprises scrub woodland with localised tipping and fill. The Objector claims that the site has been identified as a potential BHS or a site of Local Natural Importance.
- 4.56 However, no evidence has been provided to substantiate the claim. Furthermore, such designation is not part of the Local Plan review process. Sites are designated as BHSs by the County Council, thus the Borough Council intends that the details of this site will be sent to Lancashire County Council for their consideration in accordance with the draft guidelines for the selection of sites of LNI in Pendle.
- 4.57 However, the Council's guidelines on LNI designation may need to be reviewed in the light of Government guidance, which is expected to be published imminently. Therefore, I consider that to designate the omission site as an LNI or LNR prior to the publication of new national guidance on the matter would be premature. For these reasons, I do not support the objection.

### **Woodland within Park Close Quarry, omission site X59**

- 4.58 Omission site X59 lies outside the settlement boundary within open countryside. It comprises a linear strip of woodland running around the lip of the Park Close quarry excavation. The site is 0.4 hectare in area and is rough land with mostly self-seeded woodland and scrub around the perimeter of the old quarry workings, which now functions as a re-claimed stone yard. The Objector claims that the site has been identified as a potential BHS or a site of LNI.
- 4.59 However, no evidence has been provided to substantiate the claim. Furthermore, such designation is not part of the Local Plan review process. Sites are designated as BHSs by the County Council, thus the Borough Council intends that the details of this site will be sent to Lancashire County Council for their consideration. The Draft Guidelines for Important Wildlife Sites in Pendle set out criteria for assessing various sites to ascertain their suitability for designation as a site of LNI.
- 4.60 However, these may need to be reviewed in the light of new Government guidance, which is expected to be published

imminently. Therefore, I consider that to designate the omission site as an LNI or LNR prior to the publication of new national guidance on the matter would be premature. For these reasons, I do not support the objection.

#### **Woodland at Bashfield to the west of Higher Green Hill Farm, omission site X60**

4.61 Omission site X60 lies outside the settlement boundary within open countryside. It is located on Bashfield Beck on agricultural land to the west of Salterforth Lane and Higher Green Hill Farm, Salterforth. The site is 0.05 hectare in area and comprises a small walled copse on Bashfield Beck surrounded by agricultural grazing land. The Objector claims that the site has been identified as a potential BHS or a site of LNI.

4.62 However, no evidence has been provided to substantiate the claim. Furthermore, such designation is not part of the Local Plan review process. Sites are designated as BHSs by the County Council, thus the Borough Council intends that the details of this site will be sent to Lancashire County Council for their consideration. The Draft Guidelines for Important Wildlife Sites in Pendle set out criteria for assessing various sites to ascertain their suitability for designation as a site of LNI.

4.63 However, these may need to be reviewed in the light of Government guidance, which is expected to be published imminently. Therefore, I consider that to designate the omission site as an LNI or LNR prior to the publication of new national guidance on the matter would be premature. For these reasons, I do not support the objection.

#### **Woodland within Salterforth Quarry, omission site X61**

4.64 Omission site X61 lies outside the settlement boundary within open countryside. It is scrub woodland around the perimeter of Salterforth Quarry which, except for the access, it completely encloses. The site is 2.78 hectares in area and comprises rough land with mostly self-seeded woodland and scrub around and within the old quarry workings. The open quarry in the centre is a car scrap yard. The Objector claims that the site has been identified as a potential BHS or a site of LNI.

4.65 However, no evidence has been provided to substantiate the claim. Furthermore, such designation is not part of the Local Plan review process. Sites are designated as BHSs by the County Council, thus the Borough Council intends that the details of this site will be sent to Lancashire County Council for their consideration. The Draft Guidelines for Important Wildlife Sites in

Pendle set out criteria for assessing various sites to ascertain their suitability for designation as a site of LNI.

- 4.66 However, these may need to be reviewed in the light of Government guidance, which is expected to be published imminently. Therefore, I consider that to designate the omission site as an LNI or LNR prior to the publication of new national guidance on the matter would be premature. For these reasons, I do not support the objection.

#### **Woodland to the north side of County Brook Mill, omission site X62**

- 4.67 Omission site X62 lies outside the settlement boundary within open countryside. It is located to the north-west of County Brook Mill between the mill and its reservoir. It is 0.31 hectare in area and comprises woodland which has grown up on the area of historically operational land between the reservoir and the mill. The Objector claims that the site has been identified as a potential BHS or a site of LNI.

- 4.68 However, no evidence has been provided to substantiate the claim. Furthermore, such designation is not part of the Local Plan review process. Sites are designated as BHSs by the County Council, thus the Borough Council intends that the details of this site will be sent to Lancashire County Council for their consideration. The Draft Guidelines for Important Wildlife Sites in Pendle set out criteria for assessing various sites to ascertain their suitability for designation as a site of LNI.

- 4.69 However, these may need to be reviewed in the light of Government guidance, which is expected to be published imminently. Therefore, I consider that to designate the omission site as an LNI or LNR prior to the publication of new national guidance on the matter would be premature. For these reasons, I do not support the objection.

#### **Alder plantation at Salterforth Moss/Middle Moss, omission site X64**

- 4.70 Omission site X64 lies outside the settlement boundary within open countryside. It is located on agricultural land to the south of Bashfield Farm and east of the Leeds and Liverpool Canal. The site is 0.18 hectare in area and comprises a linear copse of alder trees along a ditch on agricultural grazing land. The Objector claims that the site has been identified as a potential BHS or a site of LNI.

- 4.71 However, no evidence has been provided to substantiate the claim. Furthermore, such designation is not part of the Local Plan review process. Sites are designated as BHSs by the County

Council, thus the Borough Council intends that the details of this site will be sent to Lancashire County Council for their consideration. The Draft Guidelines for Important Wildlife Sites in Pendle set out criteria for assessing various sites to ascertain their suitability for designation as a site of LNI.

4.72 However, these may need to be reviewed in the light of Government guidance, which is expected to be published imminently. Therefore, I consider that to designate the omission site as an LNI or LNR prior to the publication of new national guidance on the matter would be premature. For these reasons, I do not support the objection.

### **RECOMMENDATION (binding)**

4.73 **I RECOMMEND no modification to the plan in response to these objections.**

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### **ROUTES**

Transport link from Colne to the North Yorkshire border, omission site X68  
Former Colne-Skipton railway line, omission site X69

### **Summary of Key Issues**

- Whether proposals for the A56 Village Bypass should be deleted or amended in order to avoid conflict with the BHS protected sites along its route.
- Whether the very exceptional circumstances referred to in the reasoned justification for Policy 4C exist that would permit the construction of the A56 Village Bypass at the expense of the BHS sites through which it would pass.
- Whether the environmental costs and benefits of the proposed A56 Village Bypass should be made public.

### **Inspector's Reasoning and Conclusions**

4.74 Omission site X68 is the transport link from Colne to the North Yorkshire border. It represents the eastern continuance of the M65/A56/M66 corridor, offering a direct link to the M6 and M62, which form part of the Trans-European Networks (TENs) and two other strategic routes, in the form of the M60 and M61.

4.75 The Protected Route follows the line of the former railway, north from the A6068 (Vivary Way) in Colne towards the B6383 (Kelbrook Road) and just west of the village of the same name. At this point, the route deviates into open countryside, passing to

the west of the villages of Kelbrook, Sough and Earby, before rejoining the line of the former railway to the north of the latter settlement. It is 9.5 kilometres in length and comprises disused rail track and open countryside.

- 4.76 In the re-deposit plan the Protected Route for Transport Use is designated as open countryside, part Biological Heritage Site, part Green Belt, part Earby Conservation Area and partly within the settlement boundaries for Colne and Earby.
- 4.77 The former railway line is designated as a Biological Heritage Site (BHS) and, in addition, passes through or close to the BHS's at Wanless Bridge Triangle, Leeds and Liverpool Canal, Sandhole Clough and Sough Pasture.
- 4.78 Lancashire County Council's Overview and Scrutiny Committee, in their Prioritisation of Major Transport Schemes in May 2003, noted that a consultation exercise undertaken with the Pendle Citizen's Panel in 2000 revealed that 77% of respondents were in favour of the construction of the A56 Village Bypass. They predicted that traffic levels would be reduced by 30% on the congested North Valley Road in Colne and by 64% on Skipton Road. In addition, traffic avoiding Colne, by travelling through the village of Barrowford then along Barnoldswick Road and the B6251, would also be reduced, although the levels were not quantified. A cost-benefit ratio of anything over 2.5 is considered by the Government to provide good value for money. With a score of 3.4, which excludes any regeneration, integration or environmental criteria, the A56 Village Bypass clearly exceeds this threshold.
- 4.79 However, several objections were made at the first stage deposit regarding a perceived conflict between the designation of the route of the proposed A56 Village Bypass and its potentially adverse impact on the BHSs through which it would pass, and a lack of transparency in the analysis of environmental costs that would result.
- 4.80 Local Planning Authorities are advised to have regard to the relative significance of international, national, local and informal designations in considering the weight to be attached to nature conservation interests. They should only apply local designations to sites of substantive nature conservation value, and should take care to avoid unnecessary constraints on development.
- 4.81 Policy 21 of the JLSP requires a 'no net loss' approach to heritage/environmental conservation. However, this does not mean protecting every site or feature in situ, although there will be a strong presumption against development adversely affecting international and national sites and areas. Table 6 of Policy 21

defines Biological Heritage Sites as being of 'Regional and County Importance'. Thus any development which would damage a heritage site or feature will only be allowed where there are other overriding considerations in the public interest. In such cases, development proposals should include measures to mitigate the damage to the heritage resource.

- 4.82 The text of Policy 4C of the re-deposit plan informs that in general, development proposals within a BHS, GHS, LNI or LNR site will only be permitted where it can be shown that there are exceptional economic or social benefits which clearly outweigh the extent of ecological harm that would result from the development. The reasoned justification further states that only in very exceptional circumstances, if it can be shown that there is an overriding community benefit from a proposal, development may be permitted at some expense to the environment. In these circumstances, a full site assessment will be required before any work can commence. In response to this assessment, adequate and appropriate mitigation and compensation measures may include a restriction of development operations and working methods, or the relocation of all or part of the affected habitat.
- 4.83 The proposed route of the Bypass, which was approved by Lancashire County Council and North Yorkshire County Council after public consultation, follows part of the former Colne to Skipton rail track bed. Policy 10 of the JLSP protects the rail track bed for transport, rather than road use, to allow for the possible reinstatement of the railway line and to reflect guidance contained in the RSS relating to the protection of disused rail track beds.
- 4.84 The reasoned justification of Policy 10 of the JLSP states that; 'the value of the former Colne-Skipton railway line includes possible long-term potential for rail reinstatement as well as being the preferred route for the A56 Village Bypass. It is therefore, important that this corridor is safeguarded for transport purposes'. It goes on to inform that before a final decision is made on the most appropriate road alignment, further analysis of options will be undertaken to ensure that the potential of rail reinstatement is not precluded.
- 4.85 Policy 8 of the JLSP also identifies a need for improvement to the highway network between Colne and the North Yorkshire border. It informs that the improvements proposed reflect the priorities established in the Regional Transport Strategy and the Local Transport Plan. These priorities are expected to deliver significant improvements to road safety and environmental quality and to help economic development.
- 4.86 I do not consider that it is the role of the re-deposit plan to establish an argument for the A56 Village Bypass, but rather to

designate land-uses in line with strategic policies contained in both the RSS and the JLSP, the latter of which identifies a need to improve cross border linkages into North Yorkshire. Thus Policy 29 – Creating an Improved Transport Network of the re-deposit plan protects the former route of the Colne to Skipton railway line for future transport use, in accordance with the policy position of the JLSP, and it avoids prejudicing the re-opening of a rail or road link along its route.

- 4.87 Lancashire County Council, in conjunction with other organisations, is responsible for identifying and designating Biological Heritage Sites. Therefore, I consider that it is reasonable to assume that, in the opinion of the County Council, improving transport links along the protected route between Colne and the border with North Yorkshire provides the ‘exceptional circumstances’ referred to in Policy 21 of the JLSP, which are necessary to justify the ‘unavoidable loss or damage to a site’ of nature heritage. In line with the ‘no net loss approach’ to heritage conservation outlined in the JLSP, at paragraph 6.4.6, and in Policy 4C of the re-deposit plan, any development will be required to include mitigation measures. These may include the creation of appropriate new heritage resources, on or off-site.
- 4.88 From the evidence before me, I believe that improving transport links through West Craven into North Yorkshire will contribute towards creating a ‘vibrant economy’ and to making the area’s residents ‘feel safer’, which are two key goals identified in the Pendle Community Strategy. In my opinion, improved transport links will potentially help to attract new businesses to the area, thus helping to diversify and strengthen the local economy.
- 4.89 Furthermore, I consider that any reduction in traffic along the A56, arising from road improvements, rail reinstatement or improvements to public transport, will considerably improve safety for pedestrians, cyclists and local traffic in Colne, Foulridge, Kelbrook, Sough and Earby. Indirectly, it may also reduce traffic flows in the village of Barrowford, on a route used to avoid congestion in the A56 corridor.
- 4.90 In my opinion, the quality of life for residents in those settlements would improve, and possibly the economic benefits may spread beyond the immediate area. On this basis, I consider that the benefits that would accrue from improved transport links between Colne and the North Yorkshire borders would most likely outweigh any damage that may be caused to natural habitats, especially as these could be largely overcome by mitigation measures.
- 4.91 I conclude that the arguments for and against the proposed A56 Village Bypass have been adequately debated in the public arena and that the balance of the evidence indicates that any

unmitigated loss to nature conservation interests can be justified by other environmental and social benefits that would arise from the construction of the road link. For these reasons, I do not support objections to its construction.

**RECOMMENDATION (binding)**

4.92 **I RECOMMEND no modification to the plan in response to these objections.**

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## **Policy 4A – Natural Heritage – International Sites**

No objections were made to this policy; therefore I make no recommendations concerning it.

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## **Policy 4B – Natural Heritage – National Sites**

### **Objections to Policy Wording and Approach**

#### **Summary of Key Issue**

- Whether the last paragraph of Policy 4B should be amended to ensure that as a minimum, there is no net loss of heritage value to SSSIs as a result of development permitted.

#### **Inspector's Reasoning and Conclusions**

4B.1 The underlying principle of Policy 21 of the JLSP is that as a minimum, there should be 'no net loss' of environmental value arising from any development. In order to bring Policy 4B in line with the Structure Plan and in response to this objection, the Council suggests that the last sentence of Policy 4B should be amended in accordance with suggested Change No. 10 (CD 193). This would add the words: 'in order to ensure that as a minimum there is no net loss of heritage value'. I support the suggested Change, which would bring Policy 4B in line with the JLSP, and would meet the objection.

#### **RECOMMENDATION (binding)**

4B.2 **I RECOMMEND that the plan be modified by amending the last sentence of the text of Policy 4B to read:**

**The same level of protection will also be afforded to any new sites or areas which are designated by the appropriate agencies during the lifetime of the plan in order to ensure that as a minimum there is no net loss of heritage value.**

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## **Policy 4C – Natural Heritage – Local Sites**

### **A. Objections to Policy Wording and Approach**

#### **Summary of Key Issues**

- Whether the title of Policy 4C is misleading.
- Whether the title of Table 2a is inaccurate.
- Whether Policy 4C should be amended with regards to its references to Biological Heritage Sites.
- Whether Policy 4C should be less permissive in character.
- Whether Policy 4C should be amended to state that, as a minimum, development should result in no net loss of natural heritage value, to comply with the JLSP.
- Whether Policy 4C should give greater recognition to the link between wildlife sites and the delivery of UK and Lancashire BAP targets and objectives through conservation.
- Whether the reasoned justification for Policy 4C should be amended to recognise that some of the Biological Heritage Sites qualify for protection at a national level but have not been so designated.
- Whether the reasoned justification of Policy 4C should be amended to avoid confusion over the use of the term 'permitted development'.
- Whether the reasoned justification for Policy 4C should be amended with regards to the need for the submission of ecological assessments with planning applications.
- Whether the reasoned justification for Policy 4C should be amended with regards to its reference to the Lancashire RIGS Group.
- Whether Policy 4C should be amended to clarify that the definitive list of local sites may include some that are not shown on the Proposals Map.
- Whether ancient woodland of between 0.5 and 2.0 hectares in extent should be defined as Sites of Local Natural Importance.

## Inspector's Reasoning and Conclusions

- 4C.1 Policy 4 was re-written and divided into four parts at the re-deposit stage; Policy 4A - Natural Heritage-International Sites, Policy 4B - Natural Heritage-National Sites, Policy 4C - Natural Heritage-Local Sites and Policy 4D – Natural Heritage – Wildlife Corridors, Species Protection and Biodiversity. The objections reported upon in this section of my report were all made in response to the re-deposit Policy 4C.
- 4C.2 Lancashire County Council considers that the title of the policy should be amended to read 'Natural Heritage – Non-statutory Sites' or 'Natural Heritage – County & District Designated Sites'. The Council agrees and suggests in Change No. 11 (CD 193) that the title of Policy 4C should be changed to; 'Natural Heritage – County and District Designated Sites'. For consistency it is also suggested that the Change is also reflected in the list of policies given at the beginning of the written statement, in accordance with suggested Change No. 2 (CD 193).
- 4C.3 I endorse these Changes, which I consider better reflect the wider importance of local natural heritage sites to biodiversity, and the status afforded to their protection. I also consider that they overcome the objection, which was conditionally withdrawn on their basis.
- 4C.4 The County Council and Lancashire Wildlife Trust point out that the title of Table 2a does not reflect the revised title of Policy 4C. In response, the Council suggests that it be amended in accordance with suggested Change No. 18 (CD 193). For consistency it is also suggested that the Change is also reflected in the list of tables given at the beginning of the written statement, in accordance with suggested Change No. 1 (CD 193).
- 4C.5 I agree with these Changes, which in my opinion would improve the consistency of the policy and would overcome these aspects of the objections, on the basis of which the County Council has conditionally withdrawn its objection.
- 4C.6 The County Council also suggests that in order to improve the precision of the policy, amendments should be made to the first paragraph of policy text. These would clarify that the definitive boundaries of BHS and other local sites are not necessarily those shown on the Proposals Maps, but those held by the organisations maintaining the register of individual site systems. The Lancashire Wildlife Trust made a similar objection in respect of local sites generally.

- 4C.7 The Council agrees with elements of these objections and suggests Change No. 12 (CD 193) that amends the end of the first sentence of the policy to read; 'Current sites are listed in Table 2a and shown on the Proposals Map'. I support this suggested Change, which in my view better reflects that new sites may be designated in the future. The County Council has conditionally withdrawn its objection on the basis of this Change.
- 4C.8 In addition, and as discussed at the informal hearing session at which the Lancashire Wildlife Trust's objection on this matter was considered, it is my opinion that in order to highlight that other sites may be added during the lifetime of the plan, the last paragraph of the policy text should be moved to follow on from the end of the first paragraph of policy text. The Council agreed that it does not object to this change, which in my opinion would completely satisfy this objection.
- 4C.9 Pendle CPRE considers that in order to reflect that a number of considerations may have to be taken into account in the determination of planning applications, the word 'permitted' in the third paragraph of Policy 4C should be replaced with the word 'considered'.
- 4C.10 I do not agree. All development proposals that are submitted to the Council and that fall within a designated heritage site will need to be 'considered', but they will only be 'permitted' where it can be shown that there are exceptional economic or social benefits, which clearly outweigh the extent of ecological harm that may be caused by the proposed development. I consider that taking into account all of the amendments that I recommend should be made to Policy 4C, together with its reasoned justification, strict criteria are set, against which development proposals will be considered. In my opinion, there is no need to reword the text to inform that unsuitable development will not be allowed. This is self evident. For these reasons I do not support the objection.
- 4C.11 In order to bring Policy 4C in line with JLSP Policy 21, and in response to another objection by the County Council, the Borough Council agrees that the wording of the fourth paragraph of policy text should be amended by adding the words 'as a minimum' before 'there is no net loss of value', in accordance with suggested Change No. 13 (CD 193). I endorse this change, which in my opinion improves the clarity of the policy and overcomes the objection.
- 4C.12 In order to further improve the clarity of Policy 4C, the County Council considers that it should be amended to give greater recognition to the link between wildlife sites and the delivery of UK and Lancashire BAP targets and objectives through

conservation. It suggests additional text that refers also to statutory wildlife sites.

- 4C.13 However, statutory designations such as SACs, SPAs and SSSI are respectively the subjects of Policies 4A - International Sites and 4B - National Sites. I consider that to make reference to them within Policy 4C would be both inappropriate and confusing. Therefore, I do not support this objection.
- 4C.14 The County Council suggests that the reasoned justification for Policy 4C should be amended to recognise that some BHSs comprise sites of at least County significance, which are recognised to qualify for national status, but have not been so designated. The Borough Council agrees with this objection and suggests that the last sentence of the second paragraph of the reasoned justification of Policy 4C should be amended in accordance with suggested Change No. 14 (CD 193). I consider that this Change would improve the clarity of the policy and it would meet the objection, which has been conditionally withdrawn on its basis.
- 4C.15 The fourth paragraph of the reasoned justification of Policy 4C uses of the term 'permitted development'. It is pointed out that the use of this phrase, in this context, is confusing. To rectify this, the Council suggests Change No. 15 (CD 193). I endorse this suggested Change, which would reword the paragraph in order to avoid potential confusion with the GPDO. It would also overcome the objection, which has been conditionally withdrawn on its basis.
- 4C.16 An Objector considers that paragraph five of the reasoned justification for Policy 4C should be amended with regards to the need for the submission of ecological assessments. It is considered that the need for a full ecological assessment should not be restricted to exceptional cases, but should be required in support of any planning application which directly or indirectly affects a site of ecological and/or natural heritage.
- 4C.17 The Council supports this view and in response to the objection it suggests that the beginning of the fifth paragraph of the reasoned justification should be amended to clarify this, as set out in its suggested Change No. 17 (CD 193). I consider that this Change strengthens and clarifies the policy. It also overcomes the objection, which as a result, has been conditionally withdrawn.
- 4C.18 In response to a further objection from the County Council, the Borough Council agrees that the sixth paragraph of the reasoned justification for Policy 4C is inaccurate with regards to its reference to the Lancashire RIGS Group and its responsibilities. It therefore suggests Change No. 16 (CD 193), which amends that

paragraph. I endorse the Change, which in my opinion clarifies that there are several different bodies that are responsible for designating sites for environmental protection in Lancashire. It also meets the objection, which has been conditionally withdrawn on its basis.

- 4C.19 Another Objector states that ancient woodland of between 0.5 hectare and 2.0 hectares should be defined as Sites of Local Natural Importance (LNIs). However, Pendle has around 299.0 hectares of ancient woodland (Forestry Commission, 1998). Of this total, the Lancashire Biodiversity Action Plan (Lancashire County Council 2001) identifies eleven woods in Pendle that account for 40.0 hectares of ancient semi-natural woodland. The Lancashire Inventory of Ancient Woodlands (Provisional) (English Nature, 1994) identifies five woods in Pendle of over 2.0 hectares that can be classified as ancient woodlands and that together, they account for 19.8 hectares of woodland (Lancashire County Council, Lancashire Environment 2002). These five ancient woodlands are all included in the list of Biological Heritage Sites given in Table 2a of the re-deposit plan.
- 4C.20 The 2.0 hectare minimum size qualification for inclusion in the Lancashire Inventory of Ancient Woodlands (Provisional) is a national standard. However, most of Lancashire's ancient semi-natural woods are small by national standards. Consequently, a number of sites of ancient semi-natural woodlands, between 1.0 hectare and 2.0 hectares in extent, which merit protection in terms of their habitat quality, may warrant Biological Heritage Site designation. Such designation, however, is a Lancashire County Council function.
- 4C.21 The Guidelines for Important Wildlife Sites in Pendle (CD 129) set out criteria for assessing various sites to ascertain their suitability for designation as a site of LNI. However, these guidelines may need to be reviewed in the light of forthcoming national guidance referred to in Circular 06/2005. In these circumstances, I consider that it would be premature to designate other (unspecified) sites. Consequently, I do not support this objection.

#### **RECOMMENDATIONS (binding)**

- 4C.22 **I RECOMMEND that the plan be modified by changing the title of Policy 4C to:**

**Policy 4C - Natural Heritage—County and District Designated Sites**

- 4C.23 **I RECOMMEND that the plan be modified by changing the title of Policy 4C in the List of Policies given at the beginning of the Written Statement to:**

**Policy 4C - Natural Heritage–County and District Designated Sites**

- 4C.24 **I RECOMMEND that the plan be modified by changing the title of Table 2a to:**

**Table 2a – County and District Designated Sites**

- 4C.25 **I RECOMMEND that the plan be modified by changing the title of Table 2a in the list of Tables given at the beginning of the Written Statement to:**

**Table 2a – County and District Designated Sites**

- 4C.26 **I RECOMMEND that the plan be modified by amending the wording of the first paragraph of the text of Policy 4C so that it reads:**

**The Council will protect, conserve and where appropriate enhance all Biological Heritage Sites (BHS), Geological Heritage Sites (GHS), sites of Local Natural Importance (LNI) and Local Nature Reserves (LNR), as defined (where applicable) by BHS Partnership, Lancashire RIGS, Lancashire Wildlife Trust and Borough of Pendle. Current sites are listed in Table 2a and shown on the Proposals Map.**

**It is recognised that there may be new designations made during the life time of the Plan, therefore, the same level of protection will also be afforded to any new sites or areas designated by the appropriate agency.**

- 4C.27 **I RECOMMEND that the plan be modified by deleting the last paragraph of the text of Policy 4C.**

- 4C.28 **I RECOMMEND that the plan be modified by amending the wording of the fourth paragraph of the text of Policy 4C so that it reads:**

**Where development is likely to result in loss or damage to a designated site, appropriate and adequate mitigation and compensation through planning obligations will be sought to ensure that as a minimum there is no net loss of value, and to ensure the protection and enhancement of the site’s nature conservation interests.**

- 4C.29 **I RECOMMEND that the plan be modified by amending the last sentence of the second paragraph of the reasoned justification so that it reads:**

**This policy seeks to protect locally acknowledged sites of nature conservation; BHS, GHS, LNI and LNR, which have not been designated as being of international or national importance.**

- 4C.30 **I RECOMMEND that the plan be modified by amending the fourth paragraph of the reasoned justification so that it reads:**

**The control of development in County and District designated sites is important in conserving the natural heritage of these sites. Only under exceptional economic or social circumstances will development be permitted. Any proposed development should not have a significant impact on the designation. For any development granted planning permission conditions will be imposed to prevent any damage to wildlife habitats or important physical features and planning obligations will be imposed to ensure that there is 'no net loss' of habitat. Consultation with the Lancashire Wildlife Trust and the Lancashire County Council Ecologist will be necessary in order to establish the acceptability of development within, or affecting, a County or District designated site.**

- 4C.31 **I RECOMMEND that the plan be modified by adding text to the beginning of the fifth paragraph of the reasoned justification of Policy 4C so that it reads:**

**Any development that directly or indirectly affects a site of ecological or nature heritage will be required to submit a full ecological assessment as part of the planning application. This ecological assessment will be a material consideration in any decision. Only in very exceptional circumstances – i.e. where it can be shown that there is an overriding community benefit from a proposal – will development be permitted at some expense to the environment (i.e. Policy 29, development of the proposed transport corridor). In response to this environmental assessment adequate and appropriate mitigation and compensation measures will be used to account for any loss of value to a designated site. Such measures may include a restriction of development, operations and working methods, or the relocation of all or part of the affected habitat in order to ensure that there is 'no net loss' of**

habitat. In all cases planning obligations will be used to secure the mitigation programme. Where relocation is involved the developer should liaise with the appropriate wildlife bodies to produce a management plan for the relocation work. This management plan should include a monitoring programme and a specified period of maintenance or care which should be a minimum of 5 years.

4C.32 I RECOMMEND that the plan be modified by amending the text of the sixth paragraph of the reasoned justification of Policy 4C so that it reads:

There are a number of different bodies that are responsible for designating sites for environmental protection. The BHS Partnership, endorsed by Lancashire County Council, is responsible for designating Biological Heritage Sites (BHSs). Lancashire County Council has also agreed that Regionally Important Geological and Geomorphological Sites (RIGs) in Lancashire, identified by the Lancashire RIGs Group, are equivalent to Geological Heritage Sites (GHSs). The Lancashire Wildlife Trust and the Borough of Pendle are responsible for designating Sites of Local Natural Importance (LNIs) and Local Nature Reserves (LNRs). Guidelines have been produced for designating new environmental protection sites. In particular for the designation of LNIs proposals must follow the guidelines set out in the Lancashire Wildlife Trust's document: Guidelines for Important Wildlife Sites in Pendle (2005)<sup>1</sup>, or subsequent amendment thereof.

4C.33 I RECOMMEND no further modification to the plan in response to these objections.

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### **B. Objections to Specific Sites**

4C.34 Objections were made at the re-deposit stage that the following sites should be designated as County and District sites of various environmental designations.

Railway Sidings, Knotts Lane, Colne, omission site X27  
Gib Hill, Nelson, omission site X22

4C.35 I have taken these objections into account, together with representations submitted in response to advertisement of the omission sites, in my consideration of the sites referred to in

Chapter 4 of my report. To avoid repetition, I have not duplicated those considerations here. The sites which I now consider were only objected to at the re-deposit stage.

## **EARBY**

Birch Hall Lane, omission site X25

### **Summary of Key Issues**

- Whether the BHS boundary at Birch Hall Lane, omission site X25 should be amended to align with the settlement boundary.
- Whether the house and garages of Hodge Syke House should be shown on the Proposals Map.

### **Inspector's Reasoning and Conclusions**

4C.36 Omission site X25 is located north and west of Hodge Syke House on Birch Hall Lane, Earby. It is a narrow strip of land situated inside of the settlement boundary running through the garden land of Hodge Syke House and numbers 39 and 41 Birch Hall Lane. It is bounded on three sides by open countryside. At the first stage deposit the site was placed outside of the settlement boundary and within the open countryside. It was also designated as a Biological Heritage Site. At the re-deposit stage it was placed inside the settlement boundary and designated as a Biological Heritage Site. It is also within the Earby Conservation Area.

4C.37 In response to an objection received to the first stage deposit plan, the settlement boundary for Earby was extended along Birch Hall Lane, at the re-deposit stage, to follow the fence line to the rear of Nos. 39 and 41 and Hodge Syke House. The Council agreed that this land, being a private garden, was an urban land use. The settlement boundary was also altered to include a small area of land, adjacent to Hodge Syke House, which was formerly occupied by up to four free-standing garages. Available maps and aerial photographs indicate only one garage on the site prior to 1986, and two in 1990. There are currently no garages on this overgrown site; only hard standing foundations.

4C.38 The Birch Hall Lane Biological Heritage Site was approved in September 1993 by the County Council. The BHS boundaries used by the Borough Council in the re-deposit plan were obtained from the County Council's Geographic Information System (GIS) plots of all BHS sites in Lancashire.

4C.39 A letter received by the Borough Council from the County Council on 1st August 2005 (CD 154) states that; 'it has recently been realised that the boundary of Birch Hall Lane Pasture BHS was

inaccurate. This was due to cartographic errors on our GIS, which could be clearly seen when compared to our original paper mapping of the BHS'.

- 4C.40 The errors identified were two-fold. Firstly, the former garage site adjacent to Hodge Syke House had been incorrectly included within the BHS site. Evidence of garages on this site from aerial photographs taken shortly prior to the BHS designation reinforces the fact that this piece of land was incorrectly designated. Secondly, the BHS boundary followed a small drainage channel running through the gardens of numbers 39 and 41 Birch Hall Lane, as opposed to the fence line at the rear of the properties. Aerial photographs confirm that this fence line existed prior to designation of the BHS in 1993.
- 4C.41 As a result, the County Council has amended the boundary of this BHS to follow the rear of numbers 39 and 41 Birch Hall Lane, Hodge Syke House and also to exclude the former garage site adjacent. Consequently, like the Council, I agree with the Objector and recommend that this amendment should be reflected in the plan so that it aligns with the settlement boundary shown in the re-deposit plan, as set out in suggested Change No. 104 (CD 193). I consider that this Change meets part of the objection.
- 4C.42 I am aware that in response to advertisement of the omission site at the re-deposit stage, 74 objections were made to the repositioning of the Settlement and BHS boundaries to exclude the site. I do not support them, for the reasons that I give above.
- 4C.43 With regards to Hodge Syke House and the garages being shown on the Proposals Map, I am satisfied that the Council has used the most recent OS Map base for publication of the re-deposit Map Changes. The garages are not shown on this base map as they are no longer situated on the site, and Hodge Syke House is represented by a simpler form, due to the small scale nature of the map base supplied. I agree with the Council that it is unable to make any changes to resolve this part of the objection. However, in the event of future plans being generated at a larger scale, I suggest that the more detailed form of the house be shown.

#### **RECOMMENDATION (binding)**

- 4C.44 **I RECOMMEND that the plan be modified by amending the Proposals Map to remove the Biological Heritage Site designation from land at Birch Hall Lane, Earby that lies within the settlement boundary for Earby, in accordance with the BHS notification letter from Lancashire County Council dated 1st August 2005.**

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## NELSON

Land below Castercliffe Hill Fort, omission site X78

### Summary of Key Issue

- Whether there is other land below Castercliffe Hill Fort that is worthy of designation as a Geological Heritage Site.

### Inspector's Reasoning and Conclusions

- 4C.45 Objectors support the creation of Geological Heritage Sites near Tum Hill and Castercliffe Hill fort. However, it is questioned whether the features on Castercliffe are archaeological rather than geological. It is also pointed out that there are bell-pits not just on Castercliffe Hill Fort, but also further down the hillside, including at Gib Hill. It is requested that the hillside is investigated for the presence of more geological features worthy of protection. This latter request was supported in responses submitted regarding advertisement of the omission site X78.
- 4C.46 Sites are designated as Geological Heritage Sites by Lancashire RIGS Group, through the County Council. In response to these objections the Council has stated that the details of omission site X78 will be sent to them for their consideration. It may, therefore, subsequently be added to the Table 2a list in the future. However, such designation is not part of the Local Plan review process.
- 4C.47 Castercliffe Hill fort has already been designated as a Geological Heritage Site at the re-deposit stage due to its recognised geological features. I also consider that an Objector's contention that there are archaeological features in the vicinity is backed up by the site's listing on the Lancashire Sites and Monuments Record, in addition to its GHS status. Nor do I dispute that geological features may also be apparent.
- 4C.48 However, the reasoned justification to Policy 11-Archaeology acknowledges that; 'as well as Scheduled Monuments there are many archaeological and historic sites of interest in Pendle. Many of these are included in the Lancashire Sites and Monuments Record, which is maintained by Lancashire County Council Archaeological Services'.
- 4C.49 Thus, before any application for development on the site is determined the applicant may be required to survey the land and provide documentation and evaluation of any finds, in line with Policy 11 of the re-deposit plan. This would not necessarily prevent development on the site, but it may affect the design and setting of such development. However, this is a matter of detail

which, in my opinion, is not appropriate to be considered as part of this Local Plan review process.

4C.50 For these reasons, I do not consider that these objections warrant amendment to the plan.

**RECOMMENDATION (binding)**

4C.51 **I RECOMMEND no modification to the plan in response to these objections.**

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## **Policy 4D – Natural Heritage – Wildlife Corridors, Species Protection and Biodiversity**

### **Summary of Key Issues**

- Whether Policy 4D should be amended to take better account of European protected species.
- Whether the wording in the final paragraph of the reasoned justification for Policy 4D, which reads; ‘to increase the use of flora’, is unacceptably imprecise.
- Whether Policy 4D should include a key showing the areas which it protects.

### **Inspector’s Reasoning and Conclusions**

- 4D.1 In response to the County Council’s objection that criteria 1 and 2 of Policy 4D do not comply with the requirements of the Conservation (Natural Habitats &c.) Regulations 1994, and the three tests quoted in the reasoned justification, the Council suggests that paragraph 3 of the policy text should be amended in accordance with its suggested Change No. 19 (CD 193). I endorse this Change, which I consider would clarify the policy and overcome the objection.
- 4D.2 The County Council also considers that wording in the last paragraph of the reasoned justification of Policy 4D, which reads; ‘the increased use of flora’, is unacceptably imprecise. The County Council suggests that this wording should be amended to reflect that it refers to the creation of ‘naturalistic’ habitats with a diversity of native vegetation/flora. The Council accepts this criticism and in response, it suggests that the paragraph should be amended in accordance with its suggested Change No. 20 (CD 193). I support this Change, which I consider further improves the clarity of the policy and overcomes the objection.
- 4D.3 With reference to an objection which suggests that the areas protected by Policy 4D should be identified in the plan, I consider that this would be impractical because, as the second sentence of the first paragraph of the justification text indicates, many of the types of site/habitat which can act as wildlife corridors are small and widespread, and consequently, difficult to identify on the plan. For these reasons I do not support this objection.

**RECOMMENDATIONS (binding)**

- 4D.4 **I RECOMMEND that the plan be modified by amending paragraph 3 of the text of Policy 4D to read:**

**Development proposals that would adversely impact or harm, directly or indirectly, legally protected species will not be permitted, unless shown to meet the requirements of The Conservation (Natural Habitats, &c.) Regulations 1994.**

- 4D.5 **I RECOMMEND that the plan be modified by amending the third sentence of the final paragraph of the reasoned justification for Policy 4D to read:**

**Enhancement schemes may include the increased use of locally native flora within landscaped areas of a development, the creation of new wildlife habitats such as ponds, or the provision of nest boxes.**

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## **Policy 5 – Renewable Energy Sources**

### **Summary of Key Issues**

- Whether Policy 5 should be amended to clarify that other sources of renewable energy, in addition to those specifically referred to in the policy text, may also be acceptable in principle.
- Whether Policy 5 should be amended to differentiate between the importance of local and other more important environmental designations and to make clear that local landscape and local conservation designations will not alone be used to refuse planning permission for renewable energy developments.
- Whether Policy 5 goes far enough in supporting solar and other sources of renewable energy production.
- Whether Policy 5 is too permissive towards wind turbine development.
- Whether Policy 5 should exclude wind turbines and biomass energy developments from designated areas.
- Whether Policy 5 should limit wind turbine developments to individual and small groups of turbines.
- Whether Policy 5 should be clarified regarding its requirement for renewable energy developments to benefit the local area/community.
- Whether Policy 5 should permit some flexibility in the de-commissioning of renewable energy projects to allow for proper consideration of individual schemes.
- Whether the reasoned justification for Policy 5 should refer to the contribution the Borough can make to national and regional targets within the constraints that exist.
- Whether the reasoned justification for Policy 5 should refer to habitat mitigation or compensation.
- Whether small scale and building related renewables, including low or zero energy schemes, should be referred to in Policy 5.

### **Inspector's Reasoning and Conclusions**

- 5.1 The reasoned justification to Policy 5 refers to organic matter (wood chippings and natural waste) as being a source for natural energy that is supported by the policy, but this is not absolutely clear from

the policy text itself. To avoid confusion and to meet the objection raised, the Council suggests that the last sentence of the first paragraph of the policy text should be changed to clarify that the following three paragraphs of policy text are criteria to be applied to renewable energy proposals, rather than being a definitive list of acceptable sources, as set out in suggested Change No. 22 (CD 193). I support this Change, which in my opinion clarifies the policy and meets the objection.

- 5.2 Policies 4A, 4B, 4C and 4D of the re-deposit plan refer to all levels of environmental designations. Their relative importance is referred to in these policies of the plan and in the Council's SPG (Development in the Open Countryside) (CD 107). Thus I consider that it is unnecessary to repeat this information in Policy 5, as requested by an Objector.
- 5.3 However, I agree with Objectors that Policy 5 should clarify that all renewable energy schemes are capable of being sited in natural heritage designated areas, provided that the objectives of the designation would not be compromised by the development proposed. The Council has suggested, as Change No. 26 (CD 193), that an additional paragraph should be added at the end of the policy text, which would clarify this and which would meet these objections. I endorse this Change.
- 5.4 Several Objectors consider that Policy 5 does not go far enough in promoting solar and other forms of renewable energy production. In particular, Tum Hill Residents Group and others think that solar panels and the harnessing of other renewable energy sources should be made compulsory for both new and existing buildings. The County Council urges that reference should remain in Policy 5 to innovative design in new buildings, in order to promote the integration of solar photovoltaic (PV) panels in new development where suitable. Other Objectors also consider that policy encouragement should be given to the use of solar panels on new buildings, and that in accordance with PPS22, the plan should include a policy which encourages the design of buildings that take maximum advantage from sunlight.
- 5.5 In my opinion, it would be unreasonable to insist that all new and existing buildings are fitted with solar panels, because in some instances they may be unacceptably visually intrusive. Similarly, innovative design of buildings may not always be appropriate, or necessary in order to incorporate solar panels. However, I do agree that greater encouragement should be given to their use. Thus I support the Council's suggested Change No. 23 (CD 193), which would add this requested policy support at the second paragraph of Policy 5, and which would meet these objections.

- 5.6 The third paragraph of Policy 5, which refers to wind turbines, has given rise to several objections at both the first and re-deposit stages of the plan. At the first stage deposit English Nature objected that the policy is too permissive in respect of wind turbines. However, criteria were added to the policy at the re-deposit stage, against which planning applications would be assessed. In my view these meet the objection.
- 5.7 Several Objectors comment on the appropriateness or otherwise of siting wind turbines within or adjacent to environmental designated areas. In response to such objections made at the first stage deposit, Policy 5 was amended to permit wind turbine development in designated areas, provided that it does not give rise to serious environmental detriment and it respects the character of the local countryside.
- 5.8 However, the County Council and the Pendle CPRE consider that these changes should be further amended to reflect that wind turbines outside designated areas should also take account of landscape considerations and should not be visually intrusive. Within the designated areas, such proposals should not compromise the objectives of the designation.
- 5.9 As I report above, I agree that Policy 5 should clarify that all renewable energy schemes are capable of being sited in designated areas, provided that the objectives of the designation would not be compromised by the development. The Council has suggested that an additional paragraph should be added at the end of the policy text, which clarifies this. I support this Change (Change No. 26, CD 193).
- 5.10 However, I do not endorse the Council's suggested Change No. 24 (CD193), which would add of the words; 'as long as they are not visually intrusive', at the end of the first sentence of the third paragraph of Policy 5. PPS22 acknowledges, at paragraph 20, that of all renewable technologies, wind turbines are likely to have the greatest visual and landscape effects. Therefore, in my opinion, the suggested additional wording would be too restrictive. I consider that other criteria of Policy 5, which refer to resistance to large scale wind farms and the de-commissioning of redundant renewable energy structures are sufficient to ensure that any adverse visual impacts are minimised and temporary. Furthermore, suggested Change No. 26, which I support, requires that outside designated areas renewable energy development should not cause serious landscape or environmental harm.
- 5.11 Other objections to Policy 5 refer to the appropriateness of limiting the scale of wind turbine developments. Energie Kontor UK Ltd considers that it is unreasonable to restrict wind turbine development to 'individual and small groups', without justification in

the supporting text. In response, references to 'small' groups were removed at the re-deposit stage and additional supporting text was added to clarify that in Pendle, energy companies have demonstrated that the Borough is unable to accommodate large scale wind farms due to both geographical and environmental factors found within the area. For these reasons, the reasoned justification explains that applications for large scale wind farms will be resisted, but not totally opposed.

- 5.12 The omission of the word 'small' at the re-deposit stage has given rise to a counter objection. But in my view its definition as; 'up to four wind turbines', was an arbitrary figure which was not justified. The Council has a duty to consider all planning applications, which should each be considered on its own merits. Thus I do not think that that the policy should be further amended to exclude the consideration of certain scales of wind turbine developments.
- 5.13 It is objected that at the first stage deposit, Policy 5 implied that any electricity generated by wind turbines must be wholly consumed locally. However, in the re-deposit plan, the reasoned justification clarifies that; 'development projects will be confined to those that supply some community benefit to the local area either in terms of energy supply or via contributions to a local community fund.' I consider that this change meets the objection.
- 5.14 However, that supporting text gave rise to a counter objection on the basis that Policy 5 implies that wind turbine developments should have a positive impact, which is not required by PPS22. Furthermore, that the requirements of payments to offset the impact of wind farms on a community's long term amenity is unlikely to meet the tests of Circular 05/2005, nor is the provision of reduced rate electricity related to planning considerations.
- 5.15 I note that Policy 5 does not specifically require wind turbine developments to have positive impacts, although this is implied when read with the RSS, which seeks a positive approach to renewable energy provision. Thus, I recommend no change to the policy in this regard. However I agree that, as worded, implementation of the policy may not comply with Circular 05/2005. Therefore, I generally support the Council's suggested Change No. 25 (CD 193), which would amend the penultimate sentence of paragraph three of Policy 5, but which should up updated to reflect that Circular 01/97 has been superseded by Circular 05/2005.
- 5.16 I consider also that the Council's suggested Change No. 27 (CD 193), to the reasoned justification of the policy, would further bring the policy in line with Circular 05/2005, and it would partly meet an objection.

- 5.17 The last paragraph of Policy 5 requires that all redundant renewable energy structures or equipment are removed within one year. I agree with the Council that this is an appropriate timescale for the removal of redundant equipment and structures. Therefore, I do not recommend any modification to the policy regarding this objection that seeks greater flexibility in this regard.
- 5.18 In response to an objection from English Nature that the reasoned justification for Policy 5 should refer to the contribution the Borough can make to national and regional targets within the constraints that exist, supporting text was added at the re-deposit stage, which I consider meets the objection.
- 5.19 The County Council is concerned that in order to satisfy the requirements of Policy ER5 of the RSS, the reasoned justification for Policy 5 should include text relating to habitat mitigation or compensation, in order to help 'protect and enrich through conservation, restoration and re-establishment.' Also, that long term monitoring is required to inform future proposals.
- 5.20 In response, supporting text was added at the re-deposit stage which points out that Policy 5 recognises the importance of balancing the needs of renewable energy developments with conservation interests and the heritage of the Borough. I consider that this is sufficient to reflect the requirements of the RSS. In my opinion, habitat mitigation or compensation is a detailed matter that should be addressed on an individual basis, and need not be referred to specifically within the reasoned justification for Policy 5.
- 5.21 The County Council also suggests that small scale and building related renewables, including low or zero energy schemes, should be referred to in Policy 5. It suggests that this would link to Policy 13 - Quality and Design of New Development, which promotes energy efficiency and the use of renewable energy. In response to this objection the Council suggests the addition of a paragraph to the reasoned justification for Policy 5 in accordance with suggested Change No. 28 (CD 193). I support this suggested Change, which would meet the objection that has been conditionally withdrawn on this basis.

## **RECOMMENDATIONS (binding)**

- 5.22 **I RECOMMEND that the plan be modified by replacing the last sentence of the first paragraph of Policy 5 with the following statement:**

**The Council will apply the following criteria to the following renewable energy proposals:**

- 5.23 I RECOMMEND that the plan be modified by adding the following additional paragraph at the end of the text of Policy 5:

Within designated areas (AONB, SAC, SPA, SSSI, Green Belt, Biological Heritage Sites, Geological Heritage Sites, Sites of Local Natural Importance or Local Nature Reserves) planning permission for renewable energy developments will only be granted where it can be demonstrated that the objectives of designation of the area will not be compromised by the development, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits. Outside designated areas renewable energy developments should not cause serious landscape or environmental harm.

- 5.24 I RECOMMEND that the plan be modified by changing the second paragraph of Policy 5 to read:

Solar Energy – Solar photovoltaic (PV) panels will be encouraged on existing buildings (with the exception of Listed Buildings) and proposed buildings as long as they are not visually intrusive.

- 5.25 I RECOMMEND that the plan be modified by replacing the penultimate sentence of paragraph three of Policy 5 with the following sentence:

Large scale wind farms will be resisted and wind turbine developments will be required to provide benefit to the local community subject to them meeting Circular 05/2005 (Planning Obligations) tests.

- 5.26 I RECOMMEND that the plan be modified by changing the wording of the first sentence of the last paragraph on page 38 to read:

Development projects will be confined to those that supply some community benefit to the local area via contributions to a local community fund in cases where the tests of Circular 05/2005 are met.

- 5.27 I RECOMMEND that the plan be modified by inserting the following additional paragraph before the last paragraph of the reasoned justification to Policy 5:

Small scale and building related renewables including low or zero energy schemes also provide great

potential for increasing energy efficiency and reducing reliance on non-renewable energy forms. Such developments should be encouraged and should be a key consideration in the determination of planning applications.

5.28 I RECOMMEND no further modification to the plan in response to these objections.

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## **Policy 6 – Development and Flood Risk**

### **Summary of Key Issues**

- Whether the review of the Local Plan should have progressed to its re-deposit stage in the absence of a Strategic Flood Risk Assessment.
- Whether changes made at the re-deposit stage, which allow developers to provide flood alleviation measures, unacceptably weakens Policy 6.
- Whether Policy 6 and the Proposals Map provide sufficient guidance on the areas in the Borough that are at risk from flooding and on the extent of the flood plains.
- Whether Policy 6 adequately promotes the use of Sustainable Drainage Systems (SuDS).

### **Inspector's Reasoning and Conclusions**

- 6.1 The Environment Agency objects that the review of the Local Plan has proceeded to such an advanced stage in the absence of a Strategic Flood Risk Assessment (SFRA) being carried out, which it considers is required to accord with Table 1 of PPG25. It refers also to paragraphs 27-30 of the PPG, which require that the risks of flooding are taken into account in formulating policies in development plans.
- 6.2 However, in my interpretation, PPG25 does not require that a SFRA be carried out as part of this Local Plan review process, nor has the Environment Agency raised a similar objection to the adoption process of the Local Plan of the neighbouring Local Authority of Burnley, which occurred after the publication of PPG25. Furthermore, the JLSP, which was adopted in March 2005 and to which section 38 (6) of the Planning and Compulsory Purchase Act 2004 gives primacy, being the most recently adopted element of the Development Plan, does not require a SFRA to be carried out on a Local Plan.
- 6.3 Paragraph 6.4.20 of the JLSP requires that a flood risk assessment should be provided with Local Plan/Local Development Framework allocations in areas of high flood risk. However, no development allocations are proposed in the Pendle Local Plan review. Hence, the Council has not carried out a SFRA in accordance with Policy 24 of the JLSP.
- 6.4 In these circumstances, and in the absence of further evidence from the Environment Agency on this matter, this objection does

not appear to me to have substance. I am satisfied from the information before me that the Local Plan review process undertaken by the Council is correct in this regard.

- 6.5 Policy 6 and its reasoned justification were substantially re-written at the re-deposit stage, mainly at the suggestion of the Environment Agency. Criterion 1 of the amended policy now permits developers to provide flood alleviation measures, where necessary, in order for development to go ahead. Kelbrook and Sough Parish Council object to this change, because in its view, natural flood plains should be capable of being reclaimed without interference from development.
- 6.6 However, as indicated in PPG25, there are occasions where development in a flood plain may be appropriate. The first criterion of the policy now reflects this guidance and responds to part of an objection made by the Environment Agency. Furthermore, criterion two of the policy, which generally reflects the first part of the first stage deposit version of Policy 6, indicates that development will not be permitted where it would increase the risk of flooding elsewhere by reducing the capacity of the flood plain, installing a culvert, or increasing the flow of water into the flood plain.
- 6.7 In addition, the Council has produced an SPG on Development and Flood Risk (CD 118), which is referred to in the reasoned justification of the policy and which is used by the Council in its determination of planning applications. It provides guidance in respect of development and the functional flood plain.
- 6.8 It is my opinion that the re-deposit version of Policy 6 is now satisfactorily worded to reflect the Government's current policy on flood risk, which aims to reduce the risks to people and the developed and natural environment. I do not consider that the changes made at the re-deposit stage weaken its ability to secure this aim. However, as discussed at the informal hearing session concerning an objection made by Kelbrook and Sough Parish Council, I consider that it would be helpful if the reference to the SPG was more clearly highlighted in the reasoned justification to the policy. I have made a recommendation in this regard below.
- 6.9 Amongst other matters, the Lancashire Wildlife Trust and several other Objectors were concerned that the first deposit version of the plan failed to refer, either in Policy 6 or on the Proposals Map, to the areas at risk from flooding and the extent of the flood plain. However, this information is provided and regularly updated by the Environment Agency, and it is reproduced in the Council's SPG on Development and Flood Risk. In my opinion, these are the most appropriate sources of this information to ensure that the information provided is the most up to date available. The information is also available online from the Environment Agency

website. Thus, it is conveniently available to many people. Furthermore, paragraph 51 of PPG25 indicates that it may be appropriate to include such information in SPG. This recognises the inherent problem of including constantly changing data on the Proposals Map.

- 6.10 However, the Environment Agency has pointed out in an objection made at the re-deposit stage that wording for parts of the reasoned justification, which refer to indicative flood plain maps that were incorporated in response to its objection made at the first stage deposit, are already out of date. Consequently, the Council suggests that the first three sentences of paragraph two of the reasoned justification should be amended in accordance with Change No. 29 (CD 193). I support this Change which, in my opinion, adds precision to the policy.
- 6.11 References to SuDS were added to the text of Policy 5 and its reasoned justification at the re-deposit stage. On this basis, the objection of the Lancashire Wildlife Trust was conditionally withdrawn. However, these references have given rise to a counter objection from United Utilities, which points out that SuDS structures, typically ponds, do not align with its assets base and would represent a maintenance liability. It will only consider adoption of surface water sewers draining to a balancing pond if the Local Authority takes the responsibility for the maintenance of the pond and certain legal agreements are in place.
- 6.12 However, PPG25 is very specific about the use of SuDS, where appropriate. In particular, at paragraph 42, it encourages their use where possible in an effort to control surface water run off and flooding elsewhere. Whilst costs are important issues for agencies such as sewage undertakers, that consideration should not, in my opinion, be the driving force behind the formulation of planning policy.
- 6.13 Policy 6 clearly indicates that SuDS 'may' be appropriate according to planning circumstances that should be assessed by the LPA and the Environment Agency. In my view, it would be inappropriate for a third party, such as United Utilities, to influence the decision making on a planning application for monetary reasons, especially taking into account the application of PPG25, which is quite clear in promoting SuDS.
- 6.14 In my opinion Policy 6 strikes the correct balance by seeking to protect existing and proposed development from the effects of flooding, including the use of SuDS. I consider that the issue of maintenance is a matter for detailed development control decisions and negotiation, not for policy setting. Therefore, I do not recommend any modification to the plan in response to this objection.

## RECOMMENDATIONS (binding)

- 6.15 I RECOMMEND that the plan be modified by replacing the first four sentences of the second paragraph of the reasoned justification given on page 40 of the written statement with the following supporting text:

The Environment Agency has prepared maps showing areas of flood risk. These maps identify Flood Zones, and classify areas as Flood Zone 3 (high risk), Flood Zone 2 (low to medium risk) or Flood Zone 1 (little or no risk), and in accordance with Table 1 of PPG25, which identifies the types of development appropriate to each zone.

- 6.16 I RECOMMEND that the plan be modified by replacing the fifth sentence of the second paragraph of the reasoned justification given on page 40 of the written statement with the following supporting text:

The Council has produced Supplementary Planning Guidance<sup>1</sup> for Development and Flood Risk that was adopted in 2004 and which it regularly updates. It contains maps prepared by the Environment Agency that identify Flood Zones and advice on flooding issues.

- 6.17 I RECOMMEND no further modification to the plan in response to these objections.

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## **Policy 7 – Water Resource Protection**

### **Summary of Key Issues**

- Whether the second paragraph of the text of Policy 7 should be amended to read; 'will not be considered unless'.
- Whether the third paragraph of the reasoned justification for Policy 7 should be amended to make reference to water companies as water resource consultees.

### **Inspector's Reasoning and Conclusions**

- 7.1 Pendle CPRE considers that the wording of the second paragraph of the text to Policy 7 should be amended to stress that full planning considerations apply to development proposals, not only those matters listed in the policy. In its opinion, its suggested change to the wording of the policy to read; 'will not be considered unless', would strengthen the plan and assist the Council in rebutting unwanted planning applications, while still retaining the option for approval if all policies of the plan are met.
- 7.2 However, a Local Planning Authority has a duty to consider all planning applications submitted to it. In my opinion, the suggested word change would imply that the LPA would not determine or accept some planning applications. The development plan is the starting point for the consideration of planning applications and the LPA cannot remove the right of applicants to have their proposals assessed against the policies set out in it. I consider that Policy 7 is quite clear in stating the circumstances under which development proposals will be permitted. Therefore, I do not support this objection.
- 7.3 In response to a first stage deposit objection made by Yorkshire Water Services, Policy 7 of the re-deposit plan makes reference to Water Companies in paragraph three of its reasoned justification. I consider that this change overcomes the objection.

### **RECOMMENDATION (binding)**

- 7.4 **I RECOMMEND no modification to the plan in response to these objections.**

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## **Policy 8 – Contamination and Pollution**

### **Summary of Key Issues**

- Whether Policy 8 should require an impact statement for all applications involving outdoor lighting.
- Whether Policy 8 should be amended to make specific reference to the role of United Utilities and consents that may be required from that body.
- Whether the wording of Policy 8, incorrectly infers that there are no considerations other than contamination and pollution that should be taken into account in determining planning applications.

### **Inspector's Reasoning and Conclusions**

- 8.1 Objectors are concerned that the first stage deposit version of Policy 8, which sought to control the harmful pollution effects of outdoor lighting in the open countryside did not go far enough. They seek to ensure that other outdoor lighting, not in the open countryside, is also controlled by the policy. The Council accepts that light pollution can occur in urban areas. Thus the words 'in the open countryside' have been omitted from the re-deposit version of the policy. I consider that this amendment meets with the thrust of their objections.
- 8.2 With regards to objections, which request that Policy 8 should also control pollution from street lighting and all-weather sports pitches, the Council points out that the County Council is responsible for street lighting. In the Borough Council's opinion, it would be inappropriate for control over street lighting to be included in the policy, given that it could not be enforced. In my opinion, Policy 8 includes sufficient control over other forms of outdoor lighting, such as at sports pitches. I do not consider that further amendment to the policy is necessary in response to these objections.
- 8.3 The last paragraph of Policy 8 refers to investigations and assessments that must be made in connection with proposals to develop a brownfield site or land within 250 metres of a landfill site. It states that 'only where the Council's Environmental Health Department and associated pollution control authorities are satisfied that the risk from pollution is adequately controlled will permission be granted.' In addition, paragraph three of the reasoned justification for the policy reiterates that bodies associated with pollution control will be consulted on all potentially polluting development proposals.

- 8.4 In my opinion, it would be inappropriate to specifically refer to the associated pollution control authorities as being the Environment Agency and United Utilities, because United Utilities are not the only sewage undertaker in Pendle. As worded, Policy 8 automatically includes United Utilities in the area that they administer, but it is also sufficiently flexible to facilitate parties other than United Utilities to operate.
- 8.5 I do not consider that it is the role of the Local Plan to inform applicants when permission is, or is not needed to connect into a public sewer. This should be informed on a case by case basis. For these reasons, I do not consider that Policy 8 should be changed in response to these objections.
- 8.6 Policy 8 specifically relates to the issue of pollution. In my opinion, it is proper that it gives clear guidance for developers on pollution matters. I do not agree that the policy implies that contamination and pollution considerations are paramount, since the plan should be read as a whole and decision makers are required to carry out a balancing exercise where there are a number of considerations to be taken into account. I do not recommend that the policy or its reasoned justification should be amended in response to this objection.

**RECOMMENDATION (binding)**

- 8.7 **I RECOMMEND no modification to the plan in response to these objections.**

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## **Policy 9 – Buildings of Special Architectural or Historic Interest**

### **Summary of Key Issue**

- Whether Policy 9 should be amended to ensure that any locally listed buildings of architectural or historic merit are protected by the policy, regarding demolition or alteration.

### **Inspector's Reasoning and Conclusions**

- 9.1 Objection was made at the first stage deposit by the Council for British Archaeology, which requested that any local lists of buildings of architectural or historic importance should be the subject of wide public consultation. Also, that any locally listed buildings of architectural or historic merit should be protected by Policy 9, regarding demolition or alteration. The Council agreed with this objection, and in response it removed the word 'statutory' from the fifth line of the policy text at the re-deposit stage. However, this amendment introduced unintended confusion in the policy, which was objected to by the County Council at the re-deposit stage.
- 9.2 The County Council points out that this and other alterations made to the policy and to its reasoned justification have resulted in the removal of almost all protection from non-listed buildings within the Borough. The Council agrees with this re-deposit objection and accepts that it has introduced some confusion regarding the Council's intention to provide locally listed buildings with adequate policy protection from demolition or alteration, commensurate with their importance.
- 9.3 The Council, therefore, suggests that additional text should be added to Policy 9 and to its reasoned justification, to indicate that the Council will approach proposals that affect locally important buildings in a similar way to statutorily listed buildings, but at a level appropriate to their importance. I support the Council's approach concerning locally important buildings and its suggested further amendment to Policy 9 and its supporting text, which are set out as Change Numbers 31, 32 and 33 in CD 193. In my opinion they will clarify the policy and they will meet the outstanding objections to it. That made by the County Council has been conditionally withdrawn on the basis of these changes.

## RECOMMENDATIONS (binding)

- 9.4 I RECOMMEND that the plan be modified by adding the following additional paragraph at the end of the text to Policy 9:

For non-listed buildings of historic or architectural importance the same general approach will be used, but the controls will be applied at a level commensurate with the importance of the building in question.

- 9.5 I RECOMMEND that the plan be modified by adding the following additional sentence at the end of the first paragraph of the reasoned justification for Policy 9:

In addition, the Council will compile a local list of buildings of historic or architectural importance in consultation with local people.

- 9.6 I RECOMMEND that the plan be modified by adding the following text as a new penultimate paragraph in the reasoned justification for Policy 9:

Where proposals affect any non-listed building of architectural or historic importance, the Council will seek to control development which significantly affects the structure or its setting, and the approach will be similar to that set out for statutorily Listed Buildings. Controls will, however, generally be less stringently applied and will be at a level commensurate with the importance of the building.

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## **Policy 10 – Areas of Special Architectural or Historic Interest**

### **A. Objections to Policy Wording and Approach**

#### **Summary of Key Issues**

- Whether numbered paragraph 2 of Policy 10 should take into account 'architectural merit' as well as townscape or historic merit, in the consideration of applications for demolition.
- Whether more weight should be given in Policy 10 to proposals for demolition in a conservation area, if it would assist with the regeneration of the area and is part of a comprehensive strategy or project that has been approved by the Council.
- Whether a further section should be added to Policy 10, which refers to the protection and enhancement of registered parks and gardens, and their setting (including conservation areas).

#### **Inspector's Reasoning and Conclusions**

- 10.1 At the re-deposit stage, reference to 'architectural interest' was included in numbered paragraph 2 of Policy 10. Reference to Planning Policy Guidance Note 15: Planning and the Historic Environment (PPG15) and its guidance on demolition in a conservation area were also added to the reasoned justification of the policy. In my opinion, these changes strengthen the policy and overcome an objection.
- 10.2 An Objector is concerned that numbered paragraph 2 of Policy 10, which states that demolition will only be permitted; 'where an acceptable scheme of replacement can be reasonably guaranteed' could hinder regeneration of high density terraced houses, where as part of an overall scheme, those buildings need to be demolished to make way for other uses. Therefore, it is considered by the Objector that more weight should be given to proposals for demolition in a conservation area, if they would assist with the regeneration of the area and are part of a comprehensive regeneration strategy or master plan approved by the Council. It is suggested that paragraph 2 of the policy text should be amended by adding the following wording; '*...where an acceptable after-use for the site which enhances the area can be reasonably guaranteed.*'
- 10.3 PPG15 advises that account should be taken of the part played in the architectural or historic interest of the area by the building for which demolition is proposed, and of the wider effects of demolition on the building's surroundings and on the conservation area as a whole. The general presumption is in favour of retaining

buildings which make a positive contribution to the character or appearance of the conservation area. However, proposals to demolish should be assessed against the same broad criteria as proposals to demolish listed buildings. These criteria include, exceptionally, where the proposed works would bring substantial benefits for the community, which have to be weighed against the arguments in favour of preservation.

- 10.4 In the Pendle context, it is my view that there may be occasions when the demolition of a building would enable substantial regeneration benefits for the community. This exception is enabled by national guidance and by Policy 10. Furthermore, the Council agrees that having regard to the desirability of preserving or enhancing the character or appearance of the area, the site may be considered to be more suitable for open space, rather than for a replacement building. The additional phrase suggested by the Objector and incorporated in the Council's suggested Change No. 34 (CD 193) would add this flexibility to the policy. I endorse this suggested Change, which I consider to be entirely appropriate in the particular context of Pendle, and which would meet the objection.
- 10.5 Several objections made at both the first and re-deposit stages refer to the desirability of protecting and enhancing registered (or not) parks and gardens, and their setting (including conservation areas).
- 10.6 In order to bring Policy 10 into line with PPG15 and Policy ER3 of the RSS in this regard, several amendments were made to the policy text and its reasoned justification at the re-deposit stage. These include specific reference to protecting the setting of areas identified as being of historic or architectural importance. In addition, a further sub-section 4. was added to the policy, which refers specifically to the protection and enhancement of any parks, gardens and cemeteries of historic interest, if identified on the English Heritage Register of Parks and Gardens of Special Historic Interest. I consider that these amendments add to the policy and partly meet the first stage deposit objection made by the National Trust - North West Region, which was conditionally withdrawn on their basis.
- 10.7 However, as the Trust subsequently pointed out in an objection made at the re-deposit stage, whilst a reference is now made to 'settings' in the introduction and first numbered paragraph of the policy, it is not included in the new policy text at numbered paragraph 4. In response to this inconsistency the Council suggests revised wording for this paragraph, as set out in suggested Change No. 35 (CD 193).

- 10.8 In addition, and in acknowledgement that there may be other parks and gardens worthy of protection which are not on the Register, but may nevertheless be locally important and worthy of retention, the Council also suggests that paragraph 4 of the reasoned justification should be amended in accordance with suggested Change No. 36 (CD 193) to highlight this.
- 10.9 I endorse these suggested Changes, which in my opinion improve the consistency of the policy, both within itself and with the guidance of PPG15. In my opinion, they also meet the objections which raise these issues, and which were conditionally withdrawn on their basis.

#### **RECOMMENDATIONS (binding)**

- 10.10 **I RECOMMEND that the plan be modified by re-wording the second numbered paragraph of Policy 10 as follows:**

**2. only grant consent for demolition (where permission is required) where a building is not of townscape, architectural or historic interest, and where an acceptable scheme of replacement or after-use for the site can be reasonably guaranteed.**

- 10.11 **I RECOMMEND that the plan be modified by re-wording the fourth numbered paragraph of Policy 10 as follows:**

**4. seek to protect and enhance any parks, gardens and cemeteries of historic interest, and their setting, particularly those identified on the English Heritage Register of Parks and Gardens of Special Historic Interest.**

- 10.12 **I RECOMMEND that the plan be modified by re-wording the fourth paragraph of the reasoned justification for Policy 10 as follows:**

**PPG15 states that local planning authorities should protect registered parks and gardens in determining planning applications. The Council will seek to protect and enhance any parks, gardens and cemeteries of historic interest and their setting. The most important of these may be included on the English Heritage Register of Parks and Gardens of Special Historic Interest.**

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## **B. Objections to Specific Sites**

Pendle Brook House, Halstead Street, Barrowford, omission site X15

Land off Trawden Road, Cottontree, Colne, omission site X50

Further Clough Head, Nelson, omission site X20

Land between the settlement boundary and the Conservation Area boundary at Thaw House/Town House Quarry, Southfield, Nelson, omission site X21

### **Summary of Key Issues**

- Whether the boundary of the Barrowford Conservation Area should be extended to include Pendle Brook House, omission site X15.
- Whether land off Trawden Road, Cottontree, Colne, omission site X50, should be excluded from the Winewall and Cottontree Conservation Area.
- Whether land at Further Clough Head, Nelson, omission site X20, should be included within the Southfield Conservation Area.
- Whether land between the settlement boundary and the Conservation Area boundary at Thaw House/Town House Quarry, Southfield, Nelson, omission site X21, should be included within the Southfield Conservation Area.

### **Inspector's Reasoning and Conclusions**

#### **Pendle Brook House, Halstead Street, Barrowford, omission site X15**

- 10.13 Two Objectors consider that omission site X15 should be included within the Barrowford Conservation Area. This view is supported by two parties in response to advertisement of the omission site.
- 10.14 Pendle Brook House is a modern, and in my opinion, a relatively undistinguished building. It is located within the settlement boundary, but lies just outside the Barrowford Conservation Area, which includes properties to the east and west.
- 10.15 The Conservation Area was designated in 1987. The Council's Committee report on the designation noted that; 'though few individual buildings of special architectural or historic interest remain within the proposed conservation area, there are a number of groups of buildings and street frontages which contribute significantly to the character and townscape interest of the area, particularly those in Church Street and Gisburn Road'.

- 10.16 The site of Park Mill and the adjoining car parking area (adjacent to Pendle Brook House) were specifically excluded from the final designated boundary of the conservation area, because they were not considered to contribute to the overall townscape quality of Barrowford. Pendle Brook House was apparently excluded because it is of neither special architectural or historic interest, nor makes a positive contribution to the townscape of the area, being set back from the road frontage.
- 10.17 At the informal hearing sessions at which these objections were heard, the Council conceded that the Conservation Area boundaries were drawn very tightly, and that it is possible that when the Barrowford Conservation Area is reviewed in the near future, more land that contributes to its setting will be included. This would include the omission site. However, in accordance with the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and PPG15, the Council intends to pursue any definition or revision of conservation area boundaries separately from the Local Plan review process.
- 10.18 Since the site clearly forms part of the setting of the Conservation Area any development of the site would, in any case, have to be of a high standard of design, in accordance with Policies 10 and 13 of the plan and with PPG15. In these circumstances, I see no need to review the boundaries of the Conservation Area as part of this review of the Local Plan. Therefore, I do not support these objections.

#### **Land off Trawden Road, Cottontree, Colne, omission site X50**

- 10.19 Omission site X50 is a cleared industrial mill site with an extensive hard standing. It lies to the east of the B6250 immediately to the south of the bridge over Colne Water. To the north, there are areas of terraced housing and to the immediate south there is a small factory unit, beyond which and to the east and west is open countryside. The site lies outside a settlement boundary, it is at the heart of the Conservation Area and it is designated as Green Belt. It is partly screened by trees along the road frontage.
- 10.20 The County Council considers that it should be removed from the Conservation Area and be alternatively allocated either for housing or employment purposes. As I conclude in Chapters 17 and 23 of my report, the Council has identified sufficient housing and employment land to satisfy the Structure Plan requirements for this plan period, without the need to allocate additional sites outside settlement boundaries. There was no support for and considerable objection to the County Council's proposition resulting from advertisement of this omission site.

- 10.21 The Winewall and Cottontree Conservation Area was designated in 2002. The reason for its designation is to preserve or enhance the strongly historic and traditional character of the area. It lies at the juncture of two countryside character types; moorland fringes and valley sides. In the former type, buildings are characteristically integrated into the landscape and often sheltered by trees (Winewall). In the latter (Cottontree) the villages are mainly hidden by the landform in the wider landscape. Colne Water marks the boundary between the two types of landscape. Despite recent pressure for development little suburban development has taken place in the area.
- 10.22 I consider that the former building at this site, together with its location was in keeping with the character of the area, and the fact that the mill has been cleared does not detract from the area's character. Furthermore, the site is situated well within the Conservation Area, which has only recently been designated. I have no detailed evidence before me to indicate that the boundaries of the designation are inappropriate. Thus I do not support this objection.

#### **Further Clough Head, Nelson, omission site X20**

- 10.23 Omission site X20 is located within the settlement boundary for Nelson and it is allocated as a safeguarded site for housing. One Objector and one representation made in response to advertisement of the omission site consider that the site should be included within the Southfield Conservation Area.
- 10.24 The site borders the Southfield Conservation Area, which was designated in 2003. The proposed boundary was based on several factors including the historical development of the Southfield area, existing field, road and stream boundaries, and the extent of views within and around the area. The Council's Committee report noted: 'The Southfield area is an historic area with attractive small settlements on the topmost slopes of Pendle Water valley. There are five Grade II listed buildings and one Grade II\* listed building in the area, each supported by a range of barns and other farm buildings. These buildings are set in attractive fields generally with dry stone walls around the settlements and hedgerows on the lower valley slopes, the shape of which indicates a mix of ancient and post-mediaeval enclosure.'
- 10.25 I do not consider that the site shares these characteristics. I perceive that it falls within the urban area of Nelson and that it forms a logical extension to the existing housing development to the north.
- 10.26 In any case, in accordance with the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and PPG15,

the Council intends to pursue any definition or revision of conservation area boundaries separately from the Local Plan review process. I consider that this stance is justified and that there is no compelling need to review the boundary of the Southfield Conservation Area differently. Consequently, I do not support this objection.

**Land between the settlement boundary and the Conservation Area boundary at Thaw House/Town House Quarry, Southfield, Nelson, omission site X21**

10.27 Omission site X21 lies to the south of omission site X20. It falls outside the settlement boundary for Nelson and is within the open countryside. One Objector and two representations made in response to advertisement of the omission site consider that the site should be included within the Southfield Conservation Area, because in the opinion of the Pendle CPRE, a Conservation Area boundary that followed the residential boundary of Thaw House down to Town House Quarry would be more logical.

10.28 I acknowledge that there is some merit in this argument and I saw that the site shares many of the characteristics that are typical of the designated area. However, in accordance with the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and PPG15, the Council intends to pursue any definition or revision of conservation area boundaries separately from the Local Plan review process. I consider that this action is justified and that there is no compelling need to review the boundary of the Southfield Conservation Area differently. Consequently, I do not support this objection.

**RECOMMENDATION (binding)**

10.29 **I RECOMMEND no modification to the plan in response to these objections.**

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## **Policy 11 - Archaeology**

### **Summary of Key Issue**

- Whether amendments are required to Policy 11 and its reasoned justification to bring it in line with PPG16 and to improve its clarity.

### **Inspector's Reasoning and Conclusions**

- 11.1 At the first deposit stage the Council for British Archaeology objected that Policy 11 failed to highlight the importance of other sites of national importance and it was, therefore, inconsistent with PPG16. It also suggested that other minor amendments should be made to the policy text and to its reasoned justification. I am satisfied that all but one of the points made in these objections have been met by alterations made at the re-deposit stage and that they go some way towards improving the clarity of Policy 11 and its consistency with national guidance.
- 11.2 The one other change requested by the Council for British Archaeology, with which neither the Council nor I agree, is that to the last sentence of the policy text. The Objector requires it to be reworded by removing the clause which allows any required recording of archaeological remains during development.
- 11.3 However, paragraph 29 of PPG16 recognises that conditions may be imposed which allow for the recording of remains during development in circumstances where remains are disturbed during operations. Paragraph 31 of PPG16 also acknowledges that there will be occasions when the presence of archaeological remains only becomes apparent once development has commenced. On such occasions it will be necessary for recording of remains to be allowed during development. In my opinion, Policy 11 of the plan quite properly allows for these circumstances.
- 11.4 Other changes made to Policy 11 and its supporting text at the re-deposit stage gave rise to a counter objection from the County Council. It points out that the second paragraph of the policy and its associated reasoned justification are flawed, because all Scheduled Monuments are, by definition, of national importance.
- 11.5 The Council agrees with this re-deposit objection. In order to avoid confusion, it therefore suggests that the second paragraph of the policy text should be reworded in accordance with suggested Change No. 37 (CD 193). Also, that a similar alteration is made to the final sentence of the last paragraph of the reasoned justification, as set out in Change No. 38 (CD 193). I support these suggested Changes, on which basis the objection is conditionally withdrawn.

**RECOMMENDATIONS (binding)**

- 11.6 I RECOMMEND that the plan be modified by re-wording the second paragraph of the text of Policy 11 to read:

Development proposals that affect sites that are neither Scheduled Monuments nor otherwise of national importance will be dealt with on their merits.

- 11.7 I RECOMMEND that the plan be modified by re-wording the first sentence of the last paragraph of the reasoned justification to Policy 11 as follows:

Development proposals that affect sites that are neither Scheduled Monuments nor otherwise of national importance will be dealt with on their merits.

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## **Policy 12 – Maintaining Settlement Character**

### **A. Objection to Policy Wording and Approach**

#### **Summary of Key Issue**

- Overall the Objector supports the intentions of the policy to protect settlement character from excessive urbanising development. However, the Objector wishes to maintain the right to comment further on other sites as the Pendle Open Space Audit had not been published at the time of the first stage deposit plan.

#### **Inspector's Reasoning and Conclusions**

- 12.1 At the time of preparing the first stage deposit plan, the Pendle Open Space Audit (CD 47) was still in draft form, and was not formally adopted until April 2004 after an 8 week public consultation exercise. The Pendle Open Space Audit was, therefore, available for the public to consider at the time of the consultation period for the re-deposit plan in April 2005. I consider that the Objector has had ample opportunity to comment on both the Pendle Open Space Audit and Policy 12 of the re-deposit plan, but no further comments were received from the Objector in this regard.

#### **RECOMMENDATION (binding)**

- 12.2 **I RECOMMEND no modification to the plan in response to this objection.**

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### **B. Objections to Specific Sites**

#### **Introduction**

- 12.3 Policy 12 - Maintaining Settlement Character aims to protect sites which contribute to the openness, character and local amenity of a settlement. The policy identifies that these sites should lie within a settlement boundary. Topic Paper 6: Maintaining Settlement Character (CD 54) informs that these sites are not designated as formal open space as they fall outside of the typologies given in PPG17, or their maintenance cannot be controlled.

## **BARNOLDSWICK**

Land at Applesgarth, Barnoldswick, omission site X81

### **Summary of Key Issue**

- Whether land at Applesgarth, Barnoldswick, omission site X81, should be designated as a Site of Settlement Character.

### **Inspector's Reasoning and Conclusions**

- 12.4 Omission site X81 is situated opposite the Rolls Royce factory in Barnoldswick. It abuts the Leeds and Liverpool Canal and rises uphill from the canal to Lockfield Drive. The site is located approximately 1.0 kilometre from Barnoldswick town centre. Access to it is via Applesgarth, which narrows into a track, bisecting the site from north to south. It is 1.68 hectares in extent and comprises woodland, grassland and allotments. The site is within the settlement boundary and is open in character.
- 12.5 The objection to its designation as a Site of Settlement Character is made on the basis that the gardens at Bank Edge, Deerstones and Landsdown, and the land previously occupied by Coates Poultry Farm play little part in the character of the area. The Site of Settlement Character designation should, therefore, be removed.
- 12.6 As a matter of clarification, the Site of Settlement Character area, as designated in the re-deposit plan, does not cover the gardens of Bank Edge, Deerstones or Landsdown, but it does apply to the remainder of the omission site. Several representations of support for the designation of the site were submitted in response to advertisement of the omission site.
- 12.7 Although Coates ward, within which the site is located, is well served by surrounding, formally designated outdoor open space, there are deficits within the ward of many other typologies of open space, such as park, civic space and woodland. I consider that this site, which may be described as being a semi-natural urban green space, importantly provides a different function as it contributes to the openness, character and local amenity of the area.
- 12.8 It is my opinion that the site should remain as a Site of Settlement Character because it serves the local population in accordance with strand 1 of the plan's Vision by providing for the needs of all ages and cultures. Taking into account its location, I consider that removal of the designation would place undue pressure for development on the site. Therefore, I do not support the objection.

## **RECOMMENDATION (binding)**

12.9 **I RECOMMEND no modification to the plan in response to this objection.**

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## **BRIERFIELD**

Land at Halifax Road, omission site X06

Land at Clay Farm, Kings Causeway, omission site X07

### **Summary of Key Issues**

- Whether land at Halifax Road, omission site X06, should be designated as a Site of Settlement Character.
- Whether land at Clay Farm, Kings Causeway, omission site X07, should be designated as a Site of Settlement Character.

### **Inspector's Reasoning and Conclusions**

#### **Land at Halifax Road, omission site X06**

- 12.10 Omission site X06 is a large triangular shaped parcel of grassland, which is located between Halifax Road and Kings Causeway, Brierfield. It is bounded by residential properties on all three sides and is situated well within the settlement boundary within the urban area. It falls outside both the Housing Market Renewal Intervention Area boundary and the Area Development Framework boundaries of Nelson and Brierfield.
- 12.11 It is 13.1 hectares in extent and is used for informal recreation. The site is allocated as a housing site in the adopted Pendle Local Plan, but it is designated as a Site of Settlement Character in the re-deposit plan. The reason for its designation is because, in the Council's opinion, omission site X06 contributes to the openness, character and local amenity of the surrounding residential areas. I share that view.
- 12.12 Six objections were made to this designation at the first stage deposit, but there were 161 representations of support and a further 62 representations of support were made in response to advertisement of the omission site. Most Objectors consider that better use would be made of the site, which is frequently used by dog walkers, if it were re-allocated as a housing site for high quality dwellings.
- 12.13 I note that the surrounding residential area is well served by formally designated open space. However, in my opinion, omission site X06 provides a different function, in that it

contributes to the openness, character and local amenity of the area. In particular, I consider that as a Site of Settlement Character, the land serves the local population in accordance with strands 1, 2 and 5 of the plan's Vision. It provides for the needs of all ages and cultures (strand 1), it helps to achieve sustainable development by providing an informal recreational area (strand 2), and it provides amenity to the area, which helps to allow people to live and work without fear (strand 5). For these reasons, I consider that the designation is appropriate.

- 12.14 I do not consider that the site serves the local population in accordance with strategy strand 6: creating a vibrant housing market, because, as I conclude in Chapter 17 of my report, Pendle is currently in a position of over-supply with regards to meeting the housing requirements set by the JLSP. Thus, the re-deposit plan does not allocate any land for residential development.
- 12.15 For these reasons, I consider that the designation is appropriate. Consequently, I do not support these objections.

#### **Land at Clay Farm, Kings Causeway, omission site X07**

- 12.16 Omission site X07 comprises the south-eastern part of omission site X06. It is 3.16 hectares in area. One objection has been made to its designation as forming part of a Site of Settlement Character on the grounds that the land should be allocated for housing. In response to advertisement of the omission site, 61 representations of support for its designation as a Site of Settlement Character were submitted.
- 12.17 For the reasons I give concerning omission site X06, I do not support this objection.

#### **RECOMMENDATION (binding)**

- 12.18 **I RECOMMEND no modification to the plan in response to these objections.**

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#### **COLNE (including COTTONTREE)**

Land south of South Valley, omission site X23 (including omission sites X26, X27 and X28)  
Land off Windermere Avenue, omission site X32  
Land at Red Lane, omission site X35

## Summary of Key Issues

- Whether the list of sites designated under Policy 12 should be extended to include sites outside a settlement boundary, and if so, whether land south of South Valley, omission site X23 should be added.
- Whether land off Windermere Avenue, omission site X32, should be designated as a Site of Settlement Character.
- Whether land at Red Lane, omission site X35, should be designated as a Site of Settlement Character.

## Inspector's Reasoning and Conclusions

### Land south of South Valley, omission site X23 (including omission sites X26, X27 and X28)

- 12.19 Omission site X23 is 123.0 hectares in area and extends across the south of Colne through the ward of Waterside. The site is allocated as open countryside outside the settlement boundary, with the exception of the parts of the site known as Knotts Lane (omission site X26, which includes omission site X27) and the former cement works (omission site X28), which are allocated as safeguarded land for housing and the surrounding land to that site (omission site X29). These sites fall within the settlement boundary, as they do in the adopted Pendle Local Plan. Two objections made at the first stage deposit request that omission site X23 is designated as a Site of Settlement Character. Two representations supporting this request were made in response to advertisement of the omission site.
- 12.20 Topic Paper 6: Maintaining Settlement Character sets out the policy context for Policy 12 of the re-deposit plan. It explains that the primary purpose of Policy 12 is to protect sites, within defined settlement boundaries that play an essential role in the character of a particular settlement, with regard to their setting and local amenity. The majority of sites identified under Policy 12 are surrounded by development on a number of sides and are likely to be subject to development pressure.
- 12.21 However, the sites designated under Policy 12 do not relate well to the Area Development Framework areas and, therefore, would not provide a positive contribution to regeneration if they were to be developed. Land outside settlement boundaries that is designated as open countryside is protected from significant development by Policy 1. For these reasons I do not consider that it is appropriate to extend protection of land by Policy 12 to sites beyond the settlement boundaries.

- 12.22 Omission site X23 contains land at Knotts Lane, Colne, which is within the Area Development Framework for Colne. The remainder of site X23 is outside of the settlement boundary and is afforded protection under Policy 1 of the re-deposit plan. Therefore, I consider that a Site of Settlement Character designation would be unnecessary in respect of this land, in order to restrict significant development.
- 12.23 The Council has yet to finalise decisions on the Lower South Valley Priority Action Area. However, the ADF strategy clearly affords weight to the redevelopment of the Lower South Valley and in response to the possibility that regeneration work may be carried out in this area, land off Knotts Lane (sites X26 and X28) has been safeguarded to accommodate housing that would help to improve the mix and choice of housing types in the area. I support these allocations. In my opinion, designation of these parts of omission site X23 as a Site of Settlement Character would undermine the purpose of safeguarding land at Knotts Lane.
- 12.24 For all of these reasons, I do not support these objections.

**Land off Windermere Avenue, omission site X32**

- 12.25 Omission site X32 is located at the eastern edge of Colne within its settlement boundary, to the north of Skipton Old Road and to the east of Windermere Avenue. It is bounded by dwellings on its western and southern sides and a footpath runs along part of its eastern boundary. It is 3.92 hectares in area. It is designated as a Site of Settlement Character under Policy 12. There were numerous representations of support for this designation made in response to advertisement of the omission site.
- 12.26 The Objector contends that the Settlement Character designation of this site is inappropriate because it is on the edge of the settlement and serves no special purpose compared with other open land around the settlement. Also, that the Inspector at the last Local Plan Inquiry concluded that the site was correctly included within the settlement boundary, should not be included within the Green Belt and could be considered for future housing development. The Objector requires the Site of Settlement Character designation to be removed and the site to be allocated for housing.
- 12.27 It is further argued that of the seven sites designated as Sites of Settlement Character in the re-deposit plan, six of these seven are clearly within the urban area, whereas this site is at the periphery. As such, it does not contribute to the settlement, as defined in Policy 12. The land is in private ownership and there is nothing to distinguish it from any other open land on the fringe of

urban Pendle. Its designation is, therefore, considered by the Objector to be inappropriate.

- 12.28 Sites of Settlement Character as designated under Policy 12 are typically in private ownership, thus ownership is not a constraint to such designation. Topic Paper 6 also informs that the character of a settlement is defined not just by the buildings, walls and trees, but also by the spaces and views between them and these spaces contribute to the settings of the buildings. Policy 12 of the plan informs that informal open spaces within defined settlement boundaries often play an essential role in the character of that particular settlement, with regards to setting and local amenity. The policy does not restrict sites that are on the periphery of the settlement from this designation. Omission site X32 was noted by the Inspector at the last Local Plan Inquiry to be much appreciated by local residents for its local amenity and recreational value. I consider that this opinion is borne out by the large number of representations of support for the designation.
- 12.29 In my opinion, omission site X32 cannot be designated as formal open space, because it falls outside the typologies outlined in PPG17. In addition, although the site is privately owned, it does contribute to the visual amenity of the surrounding residential development. PPG3 comments that in order to promote more sustainable residential environments, both within and outside urban areas, local planning authorities should promote a greener residential environment. I consider that the site has been appropriately designated as a Site of Settlement Character in order to help maintain the visual amenity of this part of Colne.
- 12.30 The inclusion of this site within the settlement boundary was considered to be correct by the Inspector for the previous Local Plan Inquiry, as it would provide flexibility with regards to the housing land situation. I have no reason to disagree. However, the current situation with regards to housing land supply is now different. Pendle is currently in a position of over-supply with regards to meeting the housing requirements set by the JLSP. Thus, in order to comply with the JLSP, the plan does not allocate any land for residential development.
- 12.31 For all of these reasons, I conclude that the site at Windermere Avenue, Colne, is appropriately designated as a Site of Settlement Character. Therefore, I do not support the objection.

#### **Land at Red Lane, omission site X35**

- 12.32 Omission site X35 lies to the south of Red Lane, Colne between Great House Farm and The Meadows. To the north and south of the site are dwellings, the Sacred Hearts School lies to the east, with Green Belt to the west. The site is 2.58 hectares in extent

and it comprises grassland. In the adopted Pendle Local Plan the site is designated as a Protected Area outside the settlement boundary and in an Area of Special Landscape. At the first stage deposit the site was safeguarded for housing and placed within the settlement boundary.

- 12.33 There were 78 objections to that designation, which include a request that the site be designated as a Site of Settlement Character. At the re-deposit stage, the site was de-allocated as a safeguarded housing site and it was re-designated as Green Belt outside the settlement boundary and within the open countryside. However, with reference to Chapter 3 of my report, I have recommended that the site should not be included within the Green Belt, but should be re-designated as a Protected Area in the open countryside falling outside the settlement boundary.
- 12.34 The designation of Sites of Settlement Character under Policy 12, is intended to protect land falling within the urban area from development. Therefore, I do not consider that it is appropriate to so designate this site. Furthermore, my recommended designations would provide it stronger protection, under Policies 1 and 3A. Therefore, I consider that the spirit of the objections is met.

### **RECOMMENDATION (binding)**

- 12.35 **I RECOMMEND no modification to the plan in response to these objections.**

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### **KELBROOK & SOUGH**

Land off the A56 between Kelbrook and Sough, omission site X82

#### **Summary of Key Issue**

- Whether land off the A56 between Kelbrook and Sough, omission site X82, should be designated as a Site of Settlement Character.

#### **Inspector's Reasoning and Conclusions**

- 12.36 Omission site X82 lies to the west of the A56 (Colne Road) to the north-west of the village of Kelbrook. Watercourses form the site boundary to the north (New Cut) and east (Kelbrook Beck also known as Harden Brook). To the west lies an embankment carrying the track-bed of the former Colne to Skipton Railway and to the south are agricultural fields. A track off the A56 crosses the middle of the site before passing under the railway. It is 4.93 hectares in extent and is used as grazing land. In the adopted

Pendle Local Plan the site is designated as an Area of Special Landscape outside the settlement boundary for Kelbrook. In the re-deposit plan the site is designated as open countryside outside the settlement boundary.

- 12.37 The Objector wishes the site to be designated as a Site of Settlement Character, since it is currently designated as an Area of Special Landscape. It is in the floodplain and it forms a natural boundary between Kelbrook and Sough.
- 12.38 However, the County Council has issued a statement of non-conformity in respect of the Area of Special Landscape (Policy E3) designation in the adopted Pendle Local Plan. In their statement of non-conformity (CD 131), the County Council states that: 'Policy 20 of the JLSP identifies landscape character types and requires development to be appropriate to the landscape character type within which it is situated'. Thus, the Area of Special Landscape designation, as identified in Policy E3 is an obsolete policy designation that does not conform to the JLSP. Furthermore, the designation of open countryside (Policy 1) essentially performs the same function as the Area of Special Landscape designation and it provides the same level of protection for the countryside.
- 12.39 It is an essential requirement of the re-deposit plan Policy 12 designation that the sites falls within a settlement boundary, but the omission site does not. However, in my opinion, to include the omission site within the settlement boundary for Kelbrook would place it under greater pressure for development. I consider that the current designation of omission site X82 offers it greater protection than would a Settlement Character designation. I, therefore, conclude that its designation, as open countryside outside the settlement boundary is appropriate. For these reasons I do not support the objection, the spirit of which I, nevertheless, consider is met.

#### **RECOMMENDATION (binding)**

- 12.40 **I RECOMMEND no modification to the plan in response to this objection.**

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#### **NELSON**

##### **Summary of Key Issue**

- Whether land at Gib Hill, omission site X22, should be designated as a Site of Settlement Character.

## Inspector's Reasoning and Conclusions

- 12.41 Omission site X22 comprises land at Gib Hill that extends to 12.44 hectares. It is situated to the south-east of Nelson. On the west the site is bordered by residential properties. To the north it abuts two schools and to the east it opens out to open countryside. Part of it is forestry plantations and part is used for grazing. Several public footpaths cross the site and it is used for informal recreation. In the adopted Pendle Local Plan the site is outside the settlement boundary and is designated as an Area of Special Landscape. However, at the first stage deposit the settlement boundary was amended to include the site and it was safeguarded for housing. These designations were retained at the re-deposit stage.
- 12.42 The primary purpose of Policy 12 is to protect sites within defined settlement boundaries, which play an essential role in the character of a particular settlement, with regard to their setting and local amenity. The sites allocated under Policy 12 do not relate well to the Area Development Framework areas and would not, therefore, provide a positive contribution to regeneration if they were to be developed.
- 12.43 I do not consider that this applies to land at Gib Hill, Nelson, which is within both the Area Development Framework for Nelson and that for Colne. Whilst it is currently a pleasant open area situated at the periphery of the built-up area that is crossed by footpaths and used for informal recreation, I consider that it is important that this site is safeguarded for housing associated with the HMR programme. I expand on my reasons for concluding this in Chapter 17 of my report. The suggested designation of the site as a Site of Settlement Character would conflict with the safeguarded land designation. Furthermore, I do not agree that the development of omission site X22 as part of the HMR programme would result in the merger of Colne and Nelson as feared by the Objector. Consequently, I do not support the objections.

### RECOMMENDATION (binding)

- 12.44 **I RECOMMEND no modification to the plan in response to these objections.**

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## **Policy 13 – Quality and Design of New Development**

### **Summary of Key Issues**

- Whether Policy 13 should provide more in-depth guidance to developers in order that a high quality of design of development is achieved.
- Whether Policy 13 should aim to provide a high quality environment for all residents of the Borough.
- Whether Policy 13 should promote more widespread use of natural materials that are indigenous to the area.
- Whether Policy 13 should promote energy-efficient, innovative construction methods and building design.
- Whether it is appropriate to refer to redundant and unfit housing within Policy 13.
- Whether Policy 13 should seek to incorporate ‘Secure by Design’ measures in new development.
- Whether Policy 13 should aim to protect environmental features other than trees and hedgerows.

### **Inspector’s Reasoning and Conclusions**

13.1 It is the Council’s opinion that specific criteria to assist developers in designing high quality developments, against which proposals are assessed, should come forward as part of SPG/SPD. It points out that the reasoned justification to Policy 13 informs that specific control will apply in conservation areas and provides core development control principles. However, this approach is criticised by GONW and the Pendle Civic Trust, both of whom consider that more guidance should be provided within the policy text rather than being delegated to SPG.

13.2 I support the Council’s stated intention regarding its general approach for Policy 13. References to SPG within the policy text have been removed in the re-deposit version. They are now provided at the end of the reasoned justification. I consider that this is an improvement to the policy, which partly meets these objections.

13.3 However, as discussed at the informal hearing session, the actual layout of the policy seems to me to be somewhat muddled. I consider that Policy 13 would be further improved if its bullet points were re-ordered to start with general principles and descending to

matters of detail. Thus, in my opinion, the third bullet point, which refers to siting and design, should come first.

- 13.4 In response to an objection that the policy should seek to ensure that a quality environment is achieved for the occupants of Pendle, having regard to levels of daylight, overlooking or odour control, the first sentence of the policy was amended at the re-deposit stage to include reference to protecting and enhancing the quality of life for its residents. I consider that this strengthens the policy and meets that objection.
- 13.5 Several objections have been made to the guidance provided in Policy 13 on the external materials to be used on buildings. Some people consider that the guidance is too specific in this regard and that as a result, innovative design will be stifled. Others think that the policy should require more wide-spread use of natural stone and that the promotion of artificial stone in some locations is inappropriate because it does not weather well in Pendle.
- 13.6 Although, in my opinion, Policy 13 quite rightly recognises the particular importance of listed buildings and conservation areas, and it requires the use of natural materials in those circumstances, it does not limit the use of natural stone and slate only to these situations. Bullet point three of the policy requires that siting and design should be in scale and harmony with its surroundings. Thus, if an area has a predominance of stone and slate it would be appropriate to require the use of such materials in that location. Alternatively, the bullet point provides flexibility for the use of innovative design and materials where appropriate. However, I consider that this intended guidance would be clearer if the bullet point came first, as I have discussed above and recommend below.
- 13.7 In my opinion, it would be inappropriate to require that all new buildings are finished with indigenous stone and slate, since this could stifle appropriate imaginative design, and it could result in the use of materials that are out of keeping in a particular location, where for example, there is a uniformity of buildings that are finished in artificial materials. In my opinion, Policy 13 strikes the right stance between the enhancement and preservation of the area by requiring a balance between the use of materials appropriate to the area and allowing innovation in design. Specific reference to the promotion of sustainable construction techniques, including energy efficiency, was added to the re-deposit version of the policy.
- 13.8 Policy 13 refers to the quality and design of all new development in Pendle, including rural, industrial and commercial buildings. Taking into account the hilly topography of the Borough, I consider that it is appropriate for the policy to provide guidance on the materials to be used for metal framed buildings, which are frequently used for these purposes, in order to safeguard the landscape/townscape

from visually intrusive development. If colours other than muted hues and darker colours are proposed they may, nevertheless, be permitted by the policy, where they would contribute towards the character of the area, in accordance with bullet point three of the policy.

13.9 Amongst other matters, the Tum Hill Residents Association query if it is either relevant or appropriate to include reference to redundant and unfit housing within the reasoned justification for Policy 13. I am satisfied by all of the evidence before me that, within Pendle, there is a significant amount of unfit and low demand housing. I consider that this is an important issue facing the Council and that success in the promotion of a high standard of design in new building will greatly assist in improving the quality of the residential environment. For these reasons, I consider that it is appropriate to make reference to these issues in the supporting text to Policy 13, which deals specifically with design matters.

13.10 The Council acknowledges that the provision of safe and secure developments should be a material consideration in the development control process. Consequently, it accepts that Policy 13 should be amended to include specific reference to incorporating security into the general design criteria of the policy text, in line with its suggested Change No. 39 (CD 193). I generally support this Change, which in my opinion meets the objection. However, I agree with the Council that it would be inappropriate for the policy to also specify precise standards of security that should be achieved.

13.11 The fourth bullet point of Policy 13 refers to the protection of existing trees and hedgerows as part of development proposals. Lancashire Wildlife Trust object that other natural features, such as ponds and water courses are not also highlighted in the policy. However, reference to a requirement for all development proposals to retain other such natural features is included within the re-deposit version of Policy 16 - Landscaping in New Development. Policy 13 makes specific reference to Policy 16 in its fourth bullet point. I consider that in this way, the retention of a wide range of natural features within development is satisfactorily enabled and that there is no need to further amend Policy 13 in response to this objection, which has been conditionally withdrawn.

## **RECOMMENDATIONS (binding)**

13.12 **I RECOMMEND that the plan be modified by re-ordering the bullet points in Policy 13, so that the third bullet point, which refers to siting and design is listed as the first bullet point.**

13.13 I RECOMMEND that the plan be modified by adding a further bullet point after that commencing; 'Sustainable drainage systems...' which reads:

The development shall demonstrate that it incorporates satisfactory standards of security to prevent crime both within the development site and in the surrounding area.

13.14 I RECOMMEND no further modification to the plan in response to these objections.

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## **Policy 14 – Trees, Woodland and Hedgerows**

### **A. Objections to Policy Wording and Approach**

#### **Summary of Key Issues**

- Whether the word ‘appropriate’ should be defined in the context of Policy 14.
- Whether reference to the protection of trees through the ‘designation of Conservation Areas’ should be reinstated in Policy 14.
- Whether the word ‘native’ in the penultimate paragraph of the text of Policy 14 should be substituted by the phrase, ‘native to the locality’.
- Whether Policy 14 should include details of how it will be enforced and what action will be taken against contravention.
- Whether reference should be made in Policy 14 to important hedgerows, in terms of the Hedgerow Regulations.
- Whether paragraph 2 of the reasoned justification to Policy 14 should be amended to clarify that the ancient woodlands that are designated as Biological Heritage Sites are over 2.0 hectares in extent.
- Whether more text regarding hedgerows should be added to the reasoned justification of Policy 14.

#### **Inspector’s Reasoning and Conclusions**

- 14.1 Apart from its first sentence, Policy 14 was re-written at the re-deposit stage. The phrase ‘where appropriate’ still appears in the second paragraph of the amended policy and in the first paragraph of its reasoned justification, although it now only refers to the making of Tree Preservation Orders and not to the designation of conservation areas, as was the case at the first stage deposit, when these objections were made.
- 14.2 However, the Council agrees that clarification of the term, by reference to the DETR publication; Tree Preservation Orders: a guide to the law and good practice (CD 83), and guidance contained within the Hedgerow Regulations (1997), is necessary. It suggests that the second sentence of the reasoned justification should be amended in accordance with suggested Change No. 41 (CD 193). I support this Change, which in my opinion adds necessary clarity to the policy, and which overcomes these objections.

- 14.3 The reference to conservation areas was removed from the first stage deposit in response to other objections received. The main function of a conservation area is to protect areas of special architectural or historical interest. They cannot be designated in respect of trees alone. Tree Preservation Orders are the correct mechanism for tree protection, and the making of these is detailed in Policy 14. For these reasons, I consider that it would be inappropriate to reinstate in Policy 14 reference to conservation areas as a mechanism for protecting trees. Thus, I do not support this objection.
- 14.4 The County Council suggests that the references to 'native' in the penultimate paragraph of the policy text should be amended to; 'native to the locality'. In response, the Council suggests that the two references in the paragraph should be amended, as set out in suggested Change No. 40 (CD 193). I support this Change, which in my opinion adds clarity to Policy 14 and meets the objection.
- 14.5 Pendle CPRE questions if Policy 14 should include details of how the policy will be enforced and what action will be taken against contravention. However, the mechanisms for regulating development generally are set out in the Town and Country Planning Act, and with regards to detailed matters such as unauthorised felling of trees and hedgerows, action is specified in resolutions of the Council.
- 14.6 I consider that to also provide this information within Policy 14 would amount to unnecessary duplication that is warned against in PPG12, which provides guidance on the detail that should be contained in Local Plans. However, at the re-deposit stage, the wording of the policy text was amended for clarity and precision from 'Hedgerow Regulations' to 'Hedgerow Regulations (1997)'.
- 14.7 Lancashire Wildlife Trust points out that whilst there are five ancient woodlands identified in the Borough, the Ancient Woodland Inventory was restricted to woods over 2.0 hectares in extent. Lancashire is a county that contains many smaller fragments of ancient woodland that are less than 2.0 hectares. The Trust considers that the reasoned justification of Policy 14 should be amended to reflect this size threshold.
- 14.8 The 2.0 hectares minimum size qualification for inclusion in the Lancashire Inventory of Ancient Woodlands (Provisional) (CD 105) is a national standard. There are five such areas of ancient woodland in Pendle, which are all included in the list of Biological Heritage Sites designated under Policy 4C and listed in Table 2a of the plan. The Council agrees that for clarity, the third sentence of the second full paragraph of justification text on page 53 should be amended to reflect the size threshold of the ancient woodland

referred to, in accordance with suggested Change No. 42 (CD 193). I support this change, which meets this element of the objection.

- 14.9 The County Council objects that Policy 14 fails to stress that the retention of a hedgerow is a material consideration in the determination of an application for development, and that the weight that should be attached to the consideration should reflect the importance of the hedgerow, as defined in the Hedgerow Regulations 1997. Thus it considers that the policy fails to properly reflect guidance contained in the JLSP Landscape and Heritage SPG.
- 14.10 However, I do not support this criticism. The second sentence of the reasoned justification to the policy refers to the Hedgerow Regulations 1997, which provide criteria that identify if a hedge is important or not. Any proposal to remove a hedgerow, as defined in the Regulations, must be referred to the LPA. The Regulations require that the LPA takes account of the importance of a hedgerow in deciding whether or not to grant planning permission. In addition, Planning Policy Statement 1: Delivering Sustainable Development (PPS1) refers to protecting and enhancing the quality of the natural and historic environment, in both rural and urban areas, and it requires that adverse environmental, social and economic impacts should be avoided, mitigated or compensated for.
- 14.11 In such contexts, I consider that it is clear that hedgerows can be a material consideration in the determination of a planning application, whether defined under the Hedgerow Regulations 1997 or not. I consider that it would be unnecessary duplication to repeat these provisions and guidance within the reasoned justification for Policy 14.
- 14.12 Furthermore, the last sentence of the penultimate paragraph on page 53 of the plan states that planning conditions will be used to protect trees, woodland and hedgerows, in the interests of amenity and to facilitate sensitive management thereafter. I consider that these references in the reasoned justification are sufficient and that no additional text is necessary in this regard.

#### **RECOMMENDATIONS (binding)**

- 14.13 **I RECOMMEND that the plan be modified by amending the penultimate paragraph of Policy 14 to read:**

**Development proposals including the planting of new woodland should ensure that the species to be planted are native to the locality. Development proposals including the planting of new hedgerows at the edge of a settlement or in the open countryside must ensure that the species to be planted are native to the locality.**

14.14 I RECOMMEND that the plan be modified by amending the second sentence of the reasoned justification to Policy 14 to read as follows:

The Council is committed to their protection and will seek to preserve them where appropriate as defined by the DETR publication; Tree Preservation Orders: a guide to the law and good practice, through the creation of Tree Preservation Orders, and guidance contained within the Hedgerow Regulations (1997).

14.15 I RECOMMEND that the plan be modified by amending the third sentence of the second full paragraph of the reasoned justification to Policy 14 given on page 53 of the written statement to read as follows:

There are five ancient woodlands of 2.0 hectares or more in the Borough and one immediately adjacent to but outside the Borough.

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## **B. Objections to Specific Sites**

### **Summary of Key Issues**

- Whether more trees should be planted at Gib Hill, omission site X22.
- Whether the tree planting that has taken place at Gib Hill is protected for 30 years and if, as a consequence, the site should be de-allocated as a safeguarded site for housing.
- Whether the hedge marking the route of Bott Lane should be protected.

### **Inspector's Reasoning and Conclusions**

14.16 Several objections made at the re-deposit stage refer to the fact that Pendle is one of the least wooded areas in the County and that Gib Hill should be considered as a site for more tree planting. Two representations supporting this proposition were made in response to advertisement of the omission site. Other elements of these objections request that omission site X22 is de-allocated as a safeguarded site for housing and alternatively allocated as Green Belt, a Local Nature Reserve or as a Country Park. I consider the merits of de-allocating the site as a site safeguarded for HMR housing and its possible alternative designations elsewhere in my report, in the appropriate Chapters.

- 14.17 The Council acknowledges that Lancashire is one of the least wooded counties in the country, but it points out that Pendle has the fifth highest tree cover of 6.3% within the County (Lancashire Green Audit 1989), (CD 167 and CD 168). Furthermore, since this audit, the Borough Council has planted over 80.0 hectares of new woodland in addition to other private planting schemes, the precise extent of which is unknown.
- 14.18 Tree planting was undertaken at Gib Hill in 1993/94 and later in 2001/02. Both schemes were funded by the Forestry Commission Woodland Grant Scheme. The original scheme involved planting around the perimeter of the site and the later scheme was designed, as far as possible, to be around the perimeters and along the watercourses. Thus it allows for possible future development of the site. A small area of trees was cleared at the end of Marsden Hall Road, but each tree was transplanted within or adjacent to the existing planting, resulting in no net loss of trees. But there is no proposal to plant further trees at the site.
- 14.19 The re-deposit plan safeguards the land for housing under Policy 17. However, this land will only be released if needed to contribute towards regeneration through the Housing Market Renewal (HMR) programme. Nevertheless, the Council has strongly resisted any alternative allocation or proposed use of the land, which would jeopardise the availability of the site for HMR housing, and I have supported the Council on this matter.
- 14.20 The trees which were planted on the site have no protection as there was no payment received from the Farm Woodland Premium Scheme (as it was called at the time), which would have made the trees subject to a condition that the planted woodland cannot be felled within 30 years of the first payment. However, the contract the Council has with the Forestry Commission may result in some monies having to be paid back to the Forestry Commission if the trees are uprooted within 10 years of planting. There are no Tree Preservation Orders on trees at Gib Hill.
- 14.21 The Council concedes that the hedgerow along Bott Lane, which corresponds to the boundary between phases 1 and 2 of the safeguarded area, may be notable, but it points out that it has no power to protect it. However, the Hedgerow Regulations 1997, which are reactive to proposals for removal, could provide some protection, if the hedge was found to fall within criteria specified in the Regulations. I consider that this is a matter that is more appropriately dealt with as part of the development control process if an application is made for the development of the site, rather than being a matter for the Local Plan to address.
- 14.22 It is my conclusion, from the evidence before me, that there are no overriding reasons why omission site X22 should be reserved for

tree planting. Furthermore, I am satisfied that Policy 14 presumes in favour of the retention of the existing trees and hedgerows at the site, and that there is a realistic prospect that through the development control process and the use of planning conditions most of them could be retained, even if the site were developed for housing. Consequently, I do not consider that these objections warrant changing the allocation of the site from that shown in the re-deposit plan.

**RECOMMENDATION (binding)**

14.23 I **RECOMMEND no modification** to the plan in response to these objections.

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## **Policy 15 – Woodland Planting**

### **A. Objections to Policy Wording and Approach**

#### **Summary of Key Issues**

- Whether the title of Policy 15 should be changed to ‘Woodland Creation’ in order to include areas that have been allowed to regenerate naturally.
- Whether Policy 15 should be broadened to promote biodiversity and landscape improvements.
- Whether tree planting targets for Pendle should be quoted in Policy 15 or in its reasoned justification.
- Whether reference to the ‘Pendle Open Space Audit’ in the text of Policy 15 should be supported by further details of the availability of that document.
- Whether specific sites for woodland planting should be identified on the Proposals Map.

#### **Inspector’s Reasoning and Conclusions**

- 15.1 Policy 20 of the JLSP seeks to conserve, enhance, restore or create appropriate new landscape features. On page 78, the JLSP sets Target 20.1, which seeks to increase/protect selected key environmental features by increasing the area of native woodland by 15% by 2016.
- 15.2 First stage deposit Policy 15 sought to encourage woodland planting in areas identified in the Pendle Open Space Audit (CD 47) as being deficient in woodland cover, as well as within the area of the Regional Park (Policy 37 – East Lancashire Regional Park refers). However, Policy 15 was deleted at the re-deposit stage and is now incorporated into Policy 14 of the re-deposit plan.
- 15.3 Consequently, Policy 14 was also substantially re-written at the re-deposit stage and it was re-titled - Trees, Woodlands and Hedgerows. Its reasoned justification, at paragraph 2 on page 54, gives detailed guidance on woodland design and suitability, as well as specifically excluding planting within areas of certain land-use designations. It also advises that new woodland should blend sympathetically and be of suitable scale with the landform, whilst not detracting from the visual, ecological, wildlife or archaeological value of any natural feature. In my opinion, the addition of this supporting text to the re-deposit version of Policy 14 meets the

objections that raise the second issue. I consider that the deletion of Policy 15 makes consideration of its appropriate title irrelevant.

- 15.4 With regards to targets for new tree planting, a goal of a 15% increase in native woodland cover by 2016 is set by the JLSP. However, new tree planting is heavily dependant upon grant funding. Thus the achievement of any targets set would be affected by funding availability, as well as grant application success, the availability of which could compromise the Borough's ability to meet set targets. Thus in my opinion, it would be inappropriate to specify targets within the policy.
- 15.5 Re-deposit Policy 14 refers to Pendle's Open Space Audit (CD 47), by means of a footnote to paragraph 5 of the policy text and in the first paragraph of the reasoned justification on page 54, which is also given a footnote reference. This in turn directs the reader to Appendix 3 of the written statement, which informs how copies of that document may be obtained. In principle, I consider that this meets the objection made regarding the availability of the Pendle Open Space Audit.
- 15.6 However, I note that there are minor inconsistencies in this referencing, for example between the footnote reference numbers given in the text of Policy 14 at paragraph 5 and the footnote itself on page 52, and the dates of the Open Space Audit given in the reasoned justification for Policy 14 and the footnote on page 54, and the date of the Audit given in Appendix 3. These should be corrected for precision and clarity.
- 15.7 With regards to the objection that specific sites for woodland planting should be identified on the Proposals Map, the Pendle Open Space Audit identifies areas which are deficient of woodland planting. The Council envisages that sites for tree/woodland planting will be informed by this information. In addition, the Council is a partner in the East Lancashire Woodland Partnership (ELWOOD) that has identified priority areas for woodland planting, which include the Regional Park. The Council acknowledges that the Regional Park is a priority for such planting. In these circumstances, I consider that duplication of this information on the Proposals Map is unnecessary.

#### **RECOMMENDATION (binding)**

- 15.8 **I RECOMMEND that the plan be modified by correcting minor inconsistencies in the referencing of the Pendle Open Space Audit. Specifically, between the footnote reference numbers given in the text of Policy 14 at paragraph 5 and the footnote itself on page 52, and the dates of the Pendle Open Space Audit given in the reasoned justification for Policy 14**

and the footnote on page 54, and the date of the Audit given in Appendix 3.

## **B. Objections to Specific Sites**

### **Summary of Key Issue**

- Whether more trees should be planted at Gib Hill, omission site X22.

### **Inspector's Reasoning and Conclusions**

15.9 Four objections made at the first stage deposit request that Gib Hill is considered as a site for new tree planting. Two representations supporting this proposition were made in response to advertisement of the site (omission site X22). The reasons that the Objectors give for their request are twofold. Firstly that more trees should be planted in Pendle, and secondly to prevent urban sprawl and the merger of the towns of Nelson and Colne. I deal with this second matter elsewhere in my report in the appropriate Chapters.

15.10 Tree planting was undertaken at Gib Hill in 1993/94 and later in 2001/02. Both schemes were funded by the Forestry Commission Woodland Grant Scheme. The original scheme involved planting around the perimeter of the site and the later scheme was designed, as far as possible, to be around the perimeters and along the watercourses. Thus it allows for possible future development of the site. There is no proposal to plant further trees on the land. The re-deposit plan safeguards the land for housing under Policy 17. However, this land will only be released if needed to contribute towards regeneration through the Housing Market Renewal (HMR) programme.

15.11 The trees which were planted on the site have no protection as there was no payment received from the Farm Woodland Premium Scheme (as it was called at the time), which would have made the trees subject to a condition that the planted woodland cannot be felled within 30 years of the first payment. However, the contract the Council has with the Forestry Commission may result in some monies having to be paid back to the Forestry Commission if the trees are uprooted within 10 years of planting. There are no Tree Preservation Orders on trees at Gib Hill.

15.12 As I have explained above, the plan does not designate land for tree planting, but through it the Council encourages and welcomes such planting. However, the planting of trees is not governed or controlled by the Town and Country Planning Act. Consequently, the Council can neither prevent nor insist upon trees/woodland being planted on any given piece of land, unless associated with a

development proposal. Therefore, for these reasons, I do not support these objections.

**RECOMMENDATION (binding)**

15.13 I **RECOMMEND no modification** to the plan in response to these objections.

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## **Policy 16 – Landscaping in New Development**

### **Summary of Key Issues**

- Whether Policy 16 promotes the conservation or enhancement of biodiversity.
- Whether Policy 16 should include guidance concerning the planting of trees or deep rooted shrubs near to water distribution pipelines, underground/overhead electricity cables and public sewers.

### **Inspector’s Reasoning and Conclusions**

- 16.1 The Lancashire Wildlife Trust objected to the first stage deposit plan on the grounds that Policy 16 does not provide for the retention of environmental features, other than trees, walls and hedgerows. It considers that Policy 16 should also apply to ponds, watercourses, wet grassland, heath, bogs, species-rich grassland and priority species. It objects also that the policy does not contribute to habitat de-fragmentation. In addition, the Trust considers that the policy should promote the creation and enhancement of links and corridors, and should provide an ecological framework.
- 16.2 In response to this objection amendments were made to Policy 16 and its reasoned justification at the re-deposit stage. They include reference in the policy text to other natural features, including ponds, watercourses and other semi-natural habitats. In addition, the revised justification text states that a well-designed landscaping scheme can also help to meet some of the objectives set out in the UK and Lancashire Biodiversity Action Plans. It explains that landscaping can provide new habitats for a range of wildlife species in an area; thereby maintaining and enhancing biodiversity. Furthermore, Policy 4D - Natural Heritage, specifically refers to wildlife corridors, species protection and biodiversity. In my opinion, these changes to the first stage deposit plan meet this objection, which has been conditionally withdrawn.
- 16.3 Another Objector points out that planting trees or deep rooted shrubs should be avoided near to water distribution pipelines, underground/overhead electricity cables and public sewers. It is requested that this is highlighted in Policy 16.
- 16.4 The Council agrees with this request and suggests that additional text should be added to the reasoned justification for the policy in accordance with suggested Change No. 43 (CD 193), which would require landscape schemes to include details of all existing and proposed services in the vicinity of proposed planting. I endorse this Change, which in my opinion, would provide additional useful guidance to developers and would meet the objection.

**RECOMMENDATION (binding)**

16.5 I RECOMMEND that the plan be modified by adding the following additional sentence after the second sentence in the third paragraph of the reasoned justification for Policy 16, which would read:

Submitted schemes must show all existing and proposed services both above and below ground and all planting shown must be in accordance with recommendations of each particular service provider in terms of distance from the particular service.

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# **Policy 17 – Location of New Housing Development**

## **A. Objections to Policy Wording and Approach**

### **Introduction**

- 17.1 Numerous objections were made to the policy wording and approach of Policy 17 at the first stage deposit. However, in response to these, and to newly adopted strategic guidance, which gave rise to a reduction in the net number of additional general market homes to be provided within the Borough during the period 2001-2016, to 1,970, Policy 17 and its reasoned justification were re-written at the re-deposit stage. It is the re-deposit version of Policy 17 that is before me.
- 17.2 However, the re-deposit version of Policy 17 is also the subject of considerable objection. It sets out a sequential approach for the location of new residential development that may be constructed in accordance with the exceptions set out in the policy, or if there is insufficient land with planning permission, as detailed in the Council's most up-to-date Housing Land Availability Schedule, to meet the annual provision rate given in Policy 12 of the JLSP.
- 17.3 To reflect the Council's assumed over-supply for housing against the lowered JLSP requirement and the moratorium imposed on general market housing, the re-deposit Policy 17 is negatively worded and makes no allocations for general market residential development. Thus many first stage objections to the allocation of greenfield sites for general market housing are overcome. However, it designates several sites as safeguarded land that may be used to accommodate replacement dwellings associated with the HMR initiative, if there is insufficient brownfield/white land within the settlement boundary.
- 17.4 A round table session (RTS) was held to consider the main issues raised by many of the Objectors at the first and re-deposit stages. Notes of this session, the factual accuracy of which is agreed by all participants are set out as CD 195.
- 17.5 Since Policy 17 was re-written at the re-deposit stage, many of the objections made at the first deposit stage have been overcome, or are not pertinent to the re-deposit Policy 17. However, for the sake of completeness, I have nevertheless identified below the main issues raised by the first stage deposit objections that are relevant only to that version of Policy 17, but I comment on them only briefly.

## **Summary of Key Issues Pertinent only to the First Stage Deposit Version of Policy 17**

- Whether Policy 17 clearly reflects the specific sequential approach of Policy DP1 of the RSS and Policy 12 of the JLSP.
- Whether the allocation of greenfield sites for residential development is necessary and can be justified in terms of the sequential approach of national, regional, strategic and local policy.
- Whether references to SPG/SPD and Development Briefs should be made the within the reasoned justification rather than in the text of Policy 17.
- Whether Figure 2 accords with guidance of PPG3 and accurately reflects the housing land requirement for Pendle during the period 2001-2016, as set out in the JLSP.
- Whether a contingency allowance should be included within the calculation for the housing land requirement set out in Figure 2 to ensure that Policy 17 allocates sufficient land to meet the Policy 12 JLSP requirement, and if so, at what level should it be set.
- Whether references in the reasoned justification for Policy 17, to the 'Cambridge Study', which refer to 'redundant, low demand, terraced housing', are appropriate, necessary and substantiated.
- Whether the requirement for 2,000 new homes and up to 1,500 demolitions with 40% built on cleared land, as referred to in the reasoned justification for Policy 17, can be justified.

### **Inspector's Reasoning and Conclusions**

- 17.6 Objection is made by GONW that criterion 1 of the text to Policy 17 does not accord with Policy DP1 of the RSS. Furthermore, that 'committed sites' without planning permission should not be afforded the same priority as previously developed land or buildings, and they should not, therefore, appear in criterion 1 of the policy text. GONW and others also question if any greenfield allocations need to be made, and if so, whether they are justified in terms of the sequential approach.
- 17.7 Although not highlighted in PPG3, Policy DP1 of the RSS requires development plans to adopt a sequential approach that gives highest priority to the re-use of existing buildings within urban areas, followed by the use of previously developed land in urban areas. This requirement is reiterated in Policy 12 of the JLSP.

- 17.8 In line with this approach, the re-deposit version of Policy 17 requires new housing to be provided, firstly by the re-use or conversion of existing buildings within a settlement boundary. Secondly, by the redevelopment of previously developed land within a settlement boundary. Then by the development of urban land defined as 'white' land. Therefore, I consider that the objections that raise these issues are generally met. However, I make recommendations concerning the term 'white land' in my consideration of the objections made to the re-deposit Policy 17.
- 17.9 The Council's current Housing Land Availability Report (2005) (CD 36) indicates that the Borough is in a position of over-supply with regards to housing provision. In addition, the annual provision rate set out in the JLSP and amended in the 2004 and then the 2005 Housing Land Availability Reports (CD 35 and CD 36) has been exceeded. Consequently, Policy 17 of the re-deposit plan does not allocate greenfield sites for general market housing. Furthermore, it clarifies that there is no need to allocate such land to meet the JLSP housing provision requirement up to 2016.
- 17.10 The reasoned justification to Policy 12 of the JLSP states under the heading; 'Calculating new housing requirements', that the overall housing provision for each District during 2001-2016, as set out in Policy 12, represents the maximum housing provision which should not be exceeded. In line with PPG3, it goes on to advise that the fundamental aim in releasing sites is to ensure that no more land is used for housing development than is necessary. A Statement of Conformity (CD 114) has been received from the County Council confirming consistency between the re-deposit plan and the JLSP with regard to housing provision in Pendle. In these circumstances, I consider that it is correct that the re-deposit plan does not allocate any greenfield land for general market housing. Thus, such first stage objections are met.
- 17.11 Nor does the re-deposit Policy 17 refer to SPG (or SPD) in its policy text. Reference to Planning Briefs is made in the reasoned justification. Therefore, I consider that the re-deposit policy overcomes this objection also.
- 17.12 Several Objectors question the accuracy of Figure 2, in terms of the net number of dwellings that are required, by the JLSP, to be provided within the Borough up to 2016. However, Figure 2 does not appear in the re-deposit plan. It is replaced by Figure 2a, which relates to a reduced housing supply requirement, and which makes no reference to either urban capacity or windfall sites. Since the Council considers that it has clearly demonstrated that the Borough is in a position of housing over-supply, taking into account completions and sites with extant planning permissions, it sees no need to refer to these additional potential sources of

housing provision in Figure 2a. As I conclude below, I do not dispute its assumptions on these matters, and on this basis, I consider that these objections are met. However, I comment upon Figure 2a further in this Chapter of my report in connection with re-deposit stage objections, and I recommend that it is amended to reflect the most up-to-date information available at the Inquiry.

- 17.13 Figure 2 includes a contingency allowance of +5%, which equates to 100 dwellings. GONW objects that this provision is unnecessary because adjustments to the annual rate of provision should take account of completions as part of the Plan, Monitor and Manage (PMM) process set out in PPG3. However, others argue that there should be a contingency allowance of +10%, and that consequently, the policy under-provides for housing land.
- 17.14 At the time of preparing the first stage deposit plan, the +5% contingency allowance was included as a precautionary measure in case of an under-supply of housing at the end of the plan period (2016). However, the re-deposit replacement Figure 2a sets out the JLSP requirement up to 2016 and indicates the number of completions and sites with planning permission, as of the base date of 31st March 2004. The information contained in the 2004 Housing Land Availability Report (CD 35), as up-dated by the 2005 Report (CD 36), demonstrates that the Council is currently in a position of over-supply in terms of meeting the housing requirements, as set out in the JLSP.
- 17.15 From the evidence before me, I have no reason to dispute this. Therefore, in my opinion, there is no need for a contingency allowance, since it is unlikely that there will be an overall shortfall of residential development at the end of the plan period. Furthermore, paragraph 8 of PPG3 advises that any amendments to the housing supply should be controlled through the PMM approach. Consequently, I consider that it is not appropriate to include a contingency allowance within the calculation for housing land requirement in Pendle up to 2016. The removal of the contingency allowance in Figure 2a overcomes the objection made by GONW.
- 17.16 Policy 17 of the re-deposit plan does not refer to the 'Cambridge Study'. The reasoned justification, under the heading 'Replacement of cleared dwellings', refers to low demand, but this is with reference to Policy 13 of the JLSP, which states that; 'clearance will be undertaken where retention is not economically viable due to stock condition or low demand...'. In this context, I consider that the Council is justified in making this reference, since it is a quote from the JLSP and it sets the context for the Council's approach towards housing provision.

- 17.17 The statement; 'The Housing Market Restructuring Pathfinder is likely to indicate the need to reduce the supply of low demand properties by clearance', does not appear in Policy 17 of the re-deposit plan. Instead, the reasoned justification, under the heading, 'Replacement of cleared dwellings', states that 'support for clearance in the ADFs or through further master planning may result in a loss of some of the Borough's terraced housing'. I consider that the inclusion of this supporting text is justified because the ADFs have, as a matter of fact, identified a need for some demolition. In Colne and Brierfield work is underway to secure properties for clearance (Topic Paper 2: The Need for Safeguarded Land, CD 50).
- 17.18 With reference to requests from Objectors for justification for the requirement for 2,000 new homes and up to 1,500 demolitions, with 40% built on cleared land, this indicated a position that is no longer relevant. The JLSP sets out the housing requirement for each district up to 2016. Its Policy 12 states that for Pendle, the requirement is 1,970 (previous drafts requested 'about 2000'). The Local Plan must comply with the JLSP and as such, I consider that the Council is correct in referring to the 1,970 requirement in the re-deposit Policy 17.
- 17.19 However, Policy 17 of the re-deposit plan does not refer to the amount of proposed clearance, or to the level of replacement dwellings anticipated on any cleared site. The reasoned justification indicates only that support for clearance in the ADFs, or through further master planning may result in a loss of some of the Borough's terraced houses. I consider that the objections are met by the re-deposit version of the policy.

### **RECOMMENDATION (binding)**

- 17.20 **I RECOMMEND no modification to the plan in response to these objections.**

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### **Summary of Other Key Issues Raised at the First and Re-deposit Stages of the Plan**

#### **Provision for Housing Supply**

- Whether Policy 17 makes adequate provision for the gross housing requirement of the JLSP up to 2016, taking into account completions, slippage, windfall allowance and clearance.
- Whether Policy 17 should be positively re-worded.

- Whether reference to the Council's most up-to-date Housing Land Availability Schedule in the second sentence of Policy 17 is misleading.
- Whether the housing policies of the re-deposit plan make satisfactory provision for a 5-year supply of land, as required by Planning Policy Guidance Note 3: Housing (PPG3).
- Whether the assumptions underpinning the Urban Capacity Study are robust.
- Whether the Urban Capacity Study for the Borough is unduly reliant upon industrial sites becoming available for residential development.
- Whether the sequential approach of Policy 17 of the re-deposit plan, which includes a third category - 'white land', accords with the sequence for the location of new housing development set out in PPG3.

### **Replacement of Cleared Dwellings**

- Whether there is a need to safeguard land for possible long term development that will assist with regeneration within the Area Development Framework Areas (ADFs).
- Whether the safeguarding of greenfield sites for residential development is necessary, sustainable and can be justified in terms of the sequential approach.
- Whether the plan should make a more positive commitment to providing replacement housing on cleared sites at a minimum density of 30 dwellings per hectare (dph), in preference to the use of greenfield, safeguarded land.
- Whether, if Policy 17 designates safeguarded sites for housing, such land should be included within the settlement boundary.
- Whether Policy 17 should include a calculation which justifies the extent of and the requirement for safeguarded land for housing.
- Whether the term 'safeguarded site for housing' in the context of Policy 17 introduces inappropriate uncertainty in the plan.
- Whether the sites designated as safeguarded land should be listed in order of priority for release.

- Whether Policy 17 should promote large-scale regeneration with consultation, in preference to clearance and new housing developments.
- Whether the safeguarded land approach would exacerbate housing decline in the HMR area.
- Whether the respective roles/status of and relationships between the JLSP, the Local Plan, Pathfinder and ADFs should be made more explicit in Policy 17.
- Whether the designation of safeguarded land is consistent with the Plan, Monitor and Manage (PMM) approach of PPG3.
- Whether Policy 17 provides a robust monitoring and management mechanism for the release of safeguarded land.
- Whether safeguarded land should be limited to provision for replacement homes within or immediately adjacent to the ADF area from which the original dwellings are cleared.
- Whether, in order to provide certainty, time references should be inserted into Policy 17 for the development of safeguarded land and for the review of the status of such land.
- Whether the plan should guarantee that anyone affected by clearance will be offered the opportunity to relocate into a similar property in the area.
- Whether Policy 17 makes adequate and suitable provision for re-housing people whose homes are demolished in association with the HMR programme.

### **Exceptions to the Policy**

- Whether the range of exceptions to Policy 17 of the re-deposit plan is appropriate and sufficient to enable the provision of a range of house types that will meet the needs of all parts of the community.
- Whether the criteria that apply to exception A. of Policy 17 should be amended to preclude development of greenfield sites.
- Whether exception B. of Policy 17 should be amended to make specific reference to an identified local need.
- Whether the criteria that apply to exception C. of Policy 17 should be amended to preclude development of greenfield sites.

- Whether exception F. of Policy 17 should also refer to non-listed prominent, attractive or historic buildings within conservation areas.
- Whether development permitted by exception G. of Policy 17 should be limited to schemes that would contribute to the regeneration of the area.
- Whether an additional category of exception should be added to Policy 17 that would permit the development of larger type housing to satisfy a special social/cultural need of some residents.
- Whether an additional category of exception should be added to Policy 17 that would permit development within the boundaries of the HMR Priority Action Areas, or which could assist in supporting the proposals within such areas.
- Whether an additional category of exception should be added to Policy 17 to permit any housing need that can be identified within the Borough.

#### **Other Matters**

- Whether an assessment of ecological status, carried out at appropriate times of the year, should be included as part of site design and development briefs, and referred to in Policy 17.
- Whether the Written Statement and the Proposals Map should correspond in terms of references to ADFs and Housing Regeneration Area Boundaries.

#### **Inspector's Reasoning and Conclusions**

##### **Consideration of Provision for Housing Supply**

- 17.21 A considerable amount of the discussion at the housing round table session and at formal and informal hearing sessions revolved around consideration of whether Policy 17 makes adequate provision for the gross housing requirement up to 2016, taking into account completions, slippage, windfall allowance and clearance.
- 17.22 The outcome of these were that it was agreed by the Council and all Objectors raising this issue that the JLSP housing provision figure of 1,970 dwellings for Pendle up to 2016 refers to new dwellings for new households; that is a net figure. It was a further agreed position by all parties that this net housing requirement will be exceeded by completions and extant planning permissions. The precise amount of over-supply was not agreed. Burnley

Council and RAGE are anxious that since the Burnley District and the Pendle Borough areas fall within the same housing market area, the scale of over-supply arising from new permissions granted under the exceptions to Policy 17 should not continue to grow at the expense of the regeneration efforts of neighbouring Districts. However, at the housing round table session, none of the participating parties, including Burnley Council and RAGE, voiced significant concerns over the current over-supply position.

- 17.23 Some Objectors were concerned that in producing its housing supply figures the Council has failed to take into account clearance and demolitions, but those Objectors have subsequently conceded that consideration of these matters should be separate from the net requirement of Policy 12 of the JLSP. I acknowledge, however, that they are likely to be an important component of the gross housing requirement in Pendle, especially in the context of the HMR Pathfinder initiative. I deal with this aspect of supply separately under the sub-heading, 'Safeguarded Land'.
- 17.24 Returning to provision for the net housing requirement, I consider that based on current national, regional and strategic policy, the correct timescale for provision in the plan is up to 2016. Whilst Government guidance, in a consultation document on Planning for Housing Provision, suggests that a fifteen year provision should be made in local plans, as I note below at paragraphs 17.35 and 17.36, I am able to give that document only the weight which is appropriate to the early stage which has been reached in its preparation processes.
- 17.25 I have carefully considered, and I partly accept the arguments of Objectors that irregular monitoring periods and changes in monitoring methods has caused confusion, and that as a result, the precise number of completions is uncertain. However, from all of the evidence before me I am satisfied that any inaccuracies in the information contained in the Housing Land Availability Report 2005 (CD 36) arising from its methodology are slight and inconsequential to the position of over-supply. Nevertheless, as agreed by the Council at a formal hearing session at which this matter was discussed, I recommend that in the interests of clarity Figure 2a should be replaced by that referred to as suggested Change No. 48 (CD 193).
- 17.26 I am satisfied by the calculations of and arguments made by the Council concerning the likely translation of planning permissions into completions, and their impact on the annual requirement, particularly towards the end of the plan period. Taking this into account, and the guidance contained in PPG3, I do not think that provision for slippage is either needed or appropriate.

- 17.27 With regard to windfalls, paragraph 36 of PPG3 requires LPAs to make allowance for them within their plans. However, since Pendle is in a position of over-supply with regard to planning approvals, and it has clearly demonstrated that the stock of current permissions will deliver the annual housing requirement, as set out in the JLSP, and as adjusted in the 2005 Housing Land Availability Report at Appendices 1 and 2 (CD 36), the re-deposit plan does not allocate land for housing.
- 17.28 Furthermore, at any point in time, where there is a stock of planning permissions equal to or greater than 4 years annual requirement, a moratorium is imposed by Policy 17 on the granting of further permissions for residential development. Based on current evidence, windfalls will not be granted planning permission, unless as one of the exceptions to the moratorium listed in Policy 17 of the re-deposit plan. Consequently, I do not consider that there is a need to take account of windfalls in Figure 2a.
- 17.29 The Council states that it is not averse to including a windfall allowance in the calculation (PBCP/226). However, for the reasons that I give above, I consider that this is unnecessary when they are not required to meet the overall JLSP requirement to 2016.
- 17.30 Nevertheless, a windfall figure is given in the Urban Potential Study (UPS) (CD 38), which the Council adopted in July 2005. It identifies sources of capacity from previously developed land, conversions and vacant land, amongst others. It also includes a figure for expected capacity from sub-division of existing houses and flats over shops, based on past trend data. The UPS identifies a non-constrained capacity for around 627 dwellings to 2016. The UPS was prepared following the North West Regional Assembly toolkit using a method that is supported by the County Council (CD 38/1). However, both the methodology and the anticipated yield from the UPS are questioned by Objectors.
- 17.31 I am satisfied that in general terms, the methodology of the UPS is robust and that it is consistent with that used by other LPAs in the North West. However, I agree with Objectors that it is inaccurate in some aspects of its detail. As conceded by the Council, some sites have been double counted because they now have planning permission, and the brownfield land, omission sites X26 and X28, were missed from the UPS. Objectors are also concerned about the distribution of the sites identified in the UPS and the fact that many of them are currently in employment use, which conflicts with the need to protect employment land.

- 17.32 Taking these factors into account, it is the Council's opinion that the actual constrained capacity of windfalls is about 434 dwellings. Persimmon Homes (Lancashire) Ltd. maintains its argument that it may be significantly lower. However, since no windfalls are to be relied upon to meet the JLSP target, I consider that it is unnecessary for me to conclude on this matter. With regards to the distribution of windfall sites, it was agreed at the housing round table session that around 22% are outside the principal urban areas, which is in line with the JLSP requirement of Target 2.1, which requires that 75% of new housing development should take place within the principal urban areas and main towns.
- 17.33 I am satisfied that the Council's monitoring methods are now sufficiently robust to ensure that the over-supply position will not be exacerbated by future permissions.
- 17.34 Thus, to summarise I conclude that Policy 17 of the re-deposit plan will enable the Council to meet the supply of new dwellings for new households required by Policy 12 of the JLSP, during the period 2001-2016. Therefore, I conclude that it is unnecessary to allocate any sites for this purpose, or to make further amendment to Policy 17 in response to these objections, except to update Figure 2a.
- 17.35 However, it should be noted that the re-deposit plan was prepared against the background of national guidance contained in PPG3: Housing, published in March 2000. At around the time when the Inquiry closed in December 2005 the Government published a draft replacement, PPS3: Housing, which sets out significant proposed changes to the planning and delivery system for housing with the aim of ensuring that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. In the context of proposed changes to the strategic planning process, the Government is keen to deliver a better balance between housing demand and supply in every housing market, and to improve affordability where necessary, as well as creating sustainable, inclusive and mixed communities.
- 17.36 This document is subject to consultation with the full range of interested parties, and is a material consideration in the assessment and analysis of the presently proposed plan policies. However, although the emerging PPS3 is a material consideration, I am able to give it only the weight which is appropriate to the early stage which has been reached in its preparation processes. Nevertheless, I consider that the imminence of published new national guidance is such that it is likely that the Council will need to review its policies for overall housing provision and delivery in general, including for affordable housing, at an early stage as part of the new LDF system.

- 17.37 Turning now to consider issues other than supply, objection is made that the re-deposit Policy 17 is negatively worded. It is considered that to restrict new housing until such time as there is a shortage in supply does not acknowledge that maintaining the housing land supply in line with regional guidance is just one objective of planning policy and that there are other objectives which can take precedence, such as the regeneration of derelict sites. It is argued that this view is supported by policies in the RSS and the JLSP, which seek to achieve urban renaissance/regeneration.
- 17.38 I consider that it is clear from the RSS and the JLSP, to which the re-deposit plan must conform, that the emphasis of the regional/strategic planning policies is to adopt a comprehensive approach to housing renewal, clearance and urban regeneration. Policy UR6 of the RSS sets the context and recognises that economic, environmental and social impacts need to be assessed to bring about regeneration in parts of Pendle. Allowing more housing developments, to facilitate regeneration, may not necessarily be the correct solution. This is why the Council is preparing ADFs in order to develop a comprehensive programme to tackle the problems identified.
- 17.39 In my opinion, the negative stance of Policy 17 is appropriate given that the Borough is in a position of over-supply of residential land and that new residential development will only be permitted under the exceptional circumstances specified in the policy. I consider that a positive position would give conflicting messages. For these reasons, I do not support the objection.
- 17.40 GONW requests that the second sentence of the policy text is reworded, because it considers that it is misleading. The sentence states that the annual provision rate is detailed in the Housing Land Availability Schedule, whereas the annual housing provision rate is actually set out in the JLSP.
- 17.41 I acknowledge that Policy 12 of the JLSP sets out annual provision rates, and the methodology for calculating new housing requirements is included on page 51 of the JLSP. The third and sixth bullet points of that calculation advise that where the annual housing provision for a particular year or phase is exceeded, a consequential adjustment will need to be made to the annual provision to be met in subsequent years. The Housing Land Availability Reports (2004 and 2005, CD 35 and CD 36) set out the adjustments to the annual provision rates, taking account of the annual housing provision that has been achieved to date.

- 17.42 I consider that this approach accords with the JLSP and that the Council is justified in making reference to this in the policy text, since the Housing Land Availability Schedule demonstrates the most up-to-date position. Therefore, I do not support the objection.
- 17.43 At the first stage deposit it was objected that a size limitation of 0.4 hectare was attached to the definition of 'white land', as used in the context of Policy 17. More fundamentally, the concept of 'white land' and its place in the sequential approach was objected to at the re-deposit stage. The sequential approach of Policy 17 was also criticised for being less flexible than that set out in PPG3.
- 17.44 In line with the Policy DP1 of the RSS and Policy 12 of the JLSP, and in response to objections made at the first stage deposit, priority is given in the re-deposit Policy 17 to the re-use or conversion of existing buildings, followed by the redevelopment of previously developed land. In my opinion, it is proper that the Local Plan reflects the higher tier elements of the Development Plan in this regard, especially as both are relatively up-to-date and post-date PPG3. Therefore, I do not support objections to the first two categories of the sequential approach contained in the policy.
- 17.45 Regarding the third category, the development of urban land defined as 'white land' within a settlement boundary, the Council accepts that PPG3 does not refer to 'white' land, although the companion guide to PPG3, 'Tapping the Potential' does. PPG2 also refers to 'white land' at paragraph 2.13, but this is in the context of the Green Belt and safeguarded land.
- 17.46 PPG3 informs, at paragraph 30, that in identifying sites to be allocated for housing in local plans and UDPs, LPAs should follow a search sequence, starting with the re-use of previously-developed land and buildings within urban areas identified by the urban housing capacity study, then urban extensions, and finally new development around nodes in good public transport corridors. Furthermore, paragraph 32 advises that the presumption will be that previously-developed sites (or buildings for re-use or conversion) should be developed before greenfield sites.
- 17.47 The Council, therefore, concedes that the use of the term 'white land' in the context of a sequential approach for the location of new housing development is confusing. Also, that the definition included in the reasoned justification for Policy 17 of the re-deposit plan, and included in its glossary, has no support in the JLSP, RSS or PPG3, particularly regarding the size threshold of 0.4 hectare. Consequently, the Council suggests that the reference to 'white land' should be removed from category 3 of Policy 17 text,

the reasoned justification and the plan's glossary. I endorse the Council's view on this matter.

- 17.48 However, whilst the term 'white land' does not have a place in the sequential approach, Policy DP1 of the RSS refers to a third tier, which is greenfield land situated in the most sustainable locations. The JLSP supports this category, as indicated by paragraph 6.3.14 of the reasoned justification to Policy 12, which states that: 'Proposals for new housing development should therefore be considered according to the search sequence, set down in Regional Spatial Strategy'.
- 17.49 Thus, I agree with the Council that a third category is required in Policy 17, between previously developed land and remote greenfield land. The Council suggests that the definition of this category should be wholly in line with Policy DP1 of the RSS, as set out in its suggested Change No. 44 (CD 193). I endorse this suggested Change, together with consequential changes to the first bullet point of the policy text in accordance with suggested Change No. 46 (CD 193). Also to the reasoned justification in accordance with suggested Changes Nos. 47, 49, 52 and 56 (CD 193) and to the glossary given at Appendix 4 of the re-deposit plan, in accordance with suggested Change No. 94.
- 17.50 I consider that these Changes meet the objections that relate to 'white land'. A statement of agreement has been received from MCP Planning (for Persimmon Homes (Lancashire) Ltd), which supports the Council in these suggested Changes and which has conditionally withdrawn its objection concerning this matter on their basis.

### **Consideration of Objections that Refer to Replacement of Cleared Dwellings**

- 17.51 The adopted Pendle Local Plan designates 'Protected Areas' under Policy E2A, with the intention that they remain open during the plan period (1991-2001). This was following a recommendation made by the Planning Inspector at the previous Local Plan Inquiry. These sites represent areas of choice for any future development required to meet long-term housing requirements, whilst at the same time ensuring the protection of the Green Belt. However, Policy E2A clearly states that these Protected Areas should be re-examined as part of the review of the Local Plan and that should pressures for development prove to be less than then anticipated, consideration should be given to the inclusion of those areas within the statutory Green Belt. I consider and make recommendations on this matter in Chapter 3 of my report.

- 17.52 At the time of preparing the first stage deposit, the most recent Housing Land Availability Schedule published was that for October 2002. This identified the amount of land with planning permission and the number of completions since April 2001 (the start of the revised JLSP period). This information, together with the findings of the Urban Capacity Study 2003, revealed the need to find land for an additional 190 dwellings on greenfield sites, in order to meet the deposit edition JLSP housing requirement up to 2016. However, this requirement has subsequently been reduced in the adopted JLSP.
- 17.53 The launch of the HMR Pathfinder programme in 2002, which focuses intervention in those areas that are suffering from acute levels of low demand, was another important factor that influenced the Council's decision to safeguard sites for future housing development in the first stage deposit plan. Paragraph 5.27 of the RSS identifies that clearance will be a necessary part of the regeneration process. It also identifies that clearance will, in particular, take place in areas of low demand notably in parts of East Lancashire.
- 17.54 The aim of the HMR Programme in Pendle is to revitalise the housing market by providing a wider choice of housing types in an attempt to give a better overall balance to the housing stock that will in turn stimulate demand. It also seeks to provide a comprehensive approach to regeneration by considering the provision of quality open space, new employment opportunities and town centre revitalisation.
- 17.55 Pendle's current housing stock contains around 58% high density terrace properties (2001 Census) (CD 55). In creating a wider choice of housing types the Council considers, and I do not disagree, that it may be necessary to replace cleared dwellings at a lower density than those being taken out. This is likely to require some replacement of the cleared dwellings to take place off-site.
- 17.56 Three Area Development Frameworks (ADFs) are planned for Nelson, Colne and Brierfield. Their purpose is to pick out particular problem areas and to identify the potential number of properties to be cleared and replaced. At the time of preparing the first stage deposit plan, the ADFs had not been finalised and there was a high degree of uncertainty with regard to the numbers of dwellings to be cleared and replaced. However, given that there was, at that stage, insufficient brownfield land even to meet the JLSP net housing requirement, it was necessary for the Local Plan to also identify greenfield land that may be required for the replacement of cleared dwellings.

- 17.57 Taking into account this uncertainty over clearance, a number of additional sites, over and above the original E2A Protected Areas, were safeguarded within or close to each of the three ADF areas in Brierfield, Colne and Nelson. These were intended to provide potential off-site replacement sites linked to clearance undertaken through the HMR programme and to provide a greater choice in the type of housing on offer in clearance areas, should this course of action be pursued under the HMR programme. It was considered by the Council to be inappropriate to designate these greenfield sites as formal housing allocations, as this would lead to development pressure outside of the HMR process.
- 17.58 In selecting the safeguarded sites, the Council followed the approach advocated in PPG3, at paragraphs 30-32. It also took into account regeneration issues, including their proximity to the ADF boundaries. By following the process outlined in PPG3 and taking into account the fact that all of the brownfield and other non-designated land within the urban areas identified in the 2003 UPS was then needed to meet the JLSP housing requirement, the option of identifying potential extensions to the existing urban areas was considered, by the Council, to be the most sustainable solution.
- 17.59 However, a number of changes which took place since the publication of the first stage deposit plan led to a need to review the requirement for safeguarded sites for housing. As I discuss above, importantly, the new net housing requirement for Pendle was reduced to 1,970. On this basis, there is no need to provide any housing allocations in Pendle during this plan period for new households.
- 17.60 In addition, the Council concluded that the predicted development pressures outlined by the Planning Inspector at the previous Local Plan Inquiry have not materialised and that the need to safeguard land for the purpose of providing dwellings above and beyond the plan period is no longer relevant. However, for the reasons that I give in Chapter 3 of my report I disagree with the Council on this matter. Consequently, I recommend the retention of the Protected Areas designation of some of these sites for possible future long-term general development needs.
- 17.61 There have also been a number of significant changes with regard to the HMR Pathfinder programme and the preparation of the ADFs for Brierfield, Colne and Nelson, which have now been approved by the Council in principle. However, the scale of clearance and replacement has still to be finalised. Thus the concept and practice of safeguarding land for accommodating development strictly associated with the HMR Pathfinder programme is carried forward in the re-deposit plan.

- 17.62 Objectors criticise the fact that Policy 17 does not include a calculation to illustrate how safeguarded land might be used for new replacement homes. But it is intended that Area Action Plans will identify the amount of clearance to take place, the number of dwellings to be replaced on site and any need for off-site replacement.
- 17.63 However, the Area Action Plan for Southfield (Nelson) will not be completed until June 2008 and similar uncertainties exist in both Colne and Brierfield. As a result of these uncertainties, and given that further work is still to be undertaken in all three ADF areas, I agree with the Council that it is not possible for it to specify in the re-deposit plan the level of development that will occur, if any, on the safeguarded sites. This can only be determined by the future preparation of Area Action Plans, Supplementary Planning Documents or Planning Briefs, the preparation of which is timetabled into the Local Development Scheme (CD 70). Because under the Local Development Framework system, Area Action Plans cannot in themselves allocate land for replacement housing, in the absence of a Core Strategy, I consider that it is appropriate for the Council to identify safeguarded land in the re-deposit plan.
- 17.64 Objectors question why all of the replacement dwellings cannot be provided on previously developed land. Whilst the UPS indicates that up to 365 dwellings could be provided on previously developed land within the three ADFs, over the next 15 years, it indicates that in the short to medium term, few potential sites are likely to come forward. Thus, as a precautionary measure, I agree with the Council that there is a potential need for safeguarded sites for housing, in order to provide new dwellings to aid regeneration.
- 17.65 In reaching this conclusion I have carefully considered the sustainability arguments against designating greenfield land for replacement housing purposes, but I am satisfied by all of the evidence before me that until the precise replacement housing numbers are known, there is no certainty that all such requirements can be accommodated on previously developed land, in the locations that they are required; that is, close to the areas of clearance, and at the time when they are needed.
- 17.66 I have also taken into account that Objectors suggest that the plan should more positively promote imaginative solutions to the re-use of existing buildings, in preference to clearance and replacement. However, Policy 17 of the re-deposit plan advocates the use of a sequential approach in order to ensure that previously developed sites are developed first. The first priority of the sequential approach is the re-use of existing buildings. Also,

Policies 13 - Quality and Design of New Development and 20 - Quality Housing Provision, seek a high quality of design in development that also makes efficient use of land by generally providing replacement housing at a minimum density of 30 dph. However, I do not consider that the plan should be a medium for suggesting new housing schemes. In my opinion, it is for the HMR programme and developers to put forward new housing solutions.

- 17.67 Other Objectors observe that vacancy levels in the Borough (2001) were 6.25%: since there is a need to reduce the vacancy rate to 3.5%, there is no need to replace cleared dwellings. They argue that in 2001 there were around 38,546 dwellings in Pendle, which amounts to a surplus of about 1,058 empty homes, if a vacancy rate of 3.5% is applied. In their opinion, the identification of safeguarded land is, therefore, unnecessary.
- 17.68 In respect of vacancy rates, the Nelson ADF Baseline Study (CD 134) shows that the vacancy rate of the Nelson ADF area (defined by the Census 2001) as a whole is 9.5%, compared with a Pendle average of 6.4%. The Stock Condition Survey undertaken as part of the Nelson ADF focussed on a survey of 7,500 predominantly terraced properties and identified a vacancy rate of 13.3%, equating to around 1,000 properties. Outside the core terraced areas the vacancy rate is around 3%.
- 17.69 A widely accepted assumption as to an acceptable and expected vacancy rate in a normally functioning housing market is 2-3%. The consultants for the Nelson ADF survey considered that 3% was a reasonable vacancy level. They, therefore, assume that there were around 775 more empty properties than would be expected in a well functioning housing market. However, the Survey also indicates that there is no overwhelming concentration of abandonment in any one area (outside Whitefield where properties were bought up in the area proposed for a CPO). However, it is not intended to replace dwellings numerically like for like. Thus some void properties that are cleared will not be replaced. Other vacant properties may be refurbished.
- 17.70 However, the main thrust of the purpose of safeguarding land under Policy 17 of the re-deposit plan is to assist in housing regeneration, if required, over the plan period. In particular, by providing land for off-site replacement of cleared dwellings at a lower density, to assist in the provision of a wider choice and type of housing. I do not consider that reliance on void properties alone is sufficient to ensure a better range of house types, which I agree to be essential to 'kick-start' the housing market in Pendle.
- 17.71 Thus, as a precautionary measure and in accordance with the PMM approach, I consider that the safeguarding of greenfield

land, to be used as a last resort in the sequential approach for Pendle, is essential to ensure that the HMR programme is not jeopardised at the expense of the regeneration of the area. I do not consider that the provision of larger type family homes as replacement dwellings will further harm demand for the stock of existing terraced houses or exacerbate the vacancy rate, because there is a need for a range of house types and sizes in the Borough.

- 17.72 Since the time of the first stage deposit plan there has been increased support at the strategic level for the inclusion of safeguarded land within Local Plans. However, the JLSP indicates, at paragraph 6.3.12, that Districts which include safeguarded greenfield land policies in their Local Plans should clarify that the development of such land will have lower priority than brownfield land included within areas of urban regeneration. In my opinion, Policy 17 of the re-deposit plan (as I recommend to be amended) clearly sets out the sequential approach for new housing development, advocating that the re-use of existing buildings, the redevelopment of brownfield sites and the development of other non-developed land within the settlement boundary should be carried out before development on any of the safeguarded sites can be considered.
- 17.73 With regard to the selection of the safeguarded sites, some of the allocated housing sites in the first stage deposit plan have been retained in the re-deposit plan as safeguarded sites for housing. In addition, some sites that are currently designated as Protected Areas in the adopted Pendle Local Plan are designated as safeguarded land in the re-deposit plan.
- 17.74 So as to follow the sequential approach, as advocated in PPG3, the Council has included all safeguarded land within settlement boundaries. This is in line with Policy SD6 of the RSS, which indicates that where identified local needs up to 2016 cannot be fully met within existing settlement boundaries, development plans will need to review settlement boundaries. Thus the Council has reconsidered and extended the settlement boundary around Gib Hill, Nelson (omission site X22) as part of this review of the Local Plan.
- 17.75 The placing of the safeguarded sites within an existing or proposed settlement boundary, so that they form part of the urban area, is also in line with Policy 2 of the JLSP, which informs that most development should be concentrated in the principal urban areas and main towns. Nelson/Colne (including Brierfield) is identified as a main town. Furthermore, in my opinion, the inclusion of safeguarded land within a settlement boundary

provides greater protection to that land outside of the settlement boundaries.

- 17.76 However, this evolving process for the purpose of safeguarding land in Pendle has given rise to considerable confusion, especially with regard to the terminology used. Therefore, for the avoidance of doubt and to clearly differentiate this land from those sites which I recommend, in Chapter 3 of my report, should retain their Protected Areas designation, I recommend that all references to safeguarded land in the written statement and on the Proposals Maps, in the re-deposit Policy 17 context, should be changed to HMR Reserved Housing Land. However, for consistency in this report, I shall continue to refer to such land as 'safeguarded land'.
- 17.77 Also, since their designation is potentially an important element of the gross supply for housing, and for clarity and transparency in the plan, I consider that the list of sites designated as safeguarded land in this context should be removed from the reasoned justification and placed within the policy text. However, I do not consider that the list should indicate any order of priority, because the land safeguarded for housing is clearly linked to any future development needs directly resulting from the clearance of existing dwellings within the separate ADFs. Work on the three ADFs and any subsequent master planning is progressing at different rates, thus prioritising the list of safeguarded sites would unnecessarily pre-determine the outcome of this ongoing HMR work.
- 17.78 Several Objectors consider that the plan should be more positive in promoting large-scale regeneration with consultation, in preference to new replacement housing development, because they consider that would be more sustainable. However, I consider that the plan adequately does this. Policy 18 – Housing Market Renewal clearly supports at its criterion 1. the improvement, repair and clearance of existing residential property.
- 17.79 Regarding the possible impact of safeguarding land on the existing housing market, I recognise that the housing sub-markets in Brierfield, Nelson and Colne are fragile and that inappropriate development could have an adverse impact on them. There is also a close relationship with the Burnley housing sub-market which needs to be safeguarded in order not to exacerbate the problem of low demand houses that is generic across East Lancashire.
- 17.80 However, it is my opinion that the use of safeguarded sites could enhance those parts of the housing market and provide a stimulus to encouraging a range and choice of housing which would kindle

housing market renewal. I find support for this opinion in the Secretary of State's decision reference APP/E2340/V/04/1141935, concerning proposed development at the safeguarded former Lucas Sports Ground, Reedley. Although the 'called in' application was dismissed, the decision letter concluded that the proposed development would not have an adverse impact on housing market decline, despite the contrary view put forward by Burnley Council.

- 17.81 I consider that the re-deposit plan properly recognises that the issue is not straightforward and that it is not an appropriate approach to simply allow like for like replacement, as a matter of practice. The use of safeguarded land is tied to Area Development Frameworks, Area Action Plans and Supplementary Planning Documents. These would need to support replacement on safeguarded land, and in turn support housing market regeneration. It is my opinion that this form of detailed assessment would ensure that the use of safeguarded land would support and not harm housing market renewal.
- 17.82 Turning now to consideration of the implementation of the safeguarded land concept, objection is made on the grounds that a robust monitoring and management mechanism is required, particularly in relation to the criteria by which safeguarded sites will be released. In particular, the respective roles/status of, and relationships between, the Local Plan, Pathfinder Strategic Plan and ADFs should be made more explicit. Burnley Council is concerned that in practice, it may be difficult to differentiate between general market housing that would count against the JLSP figure and HMR safeguarded land housing, which would not.
- 17.83 Regarding this latter point, under the Planning and Compulsory Purchase Act 2004 (Transitional Arrangements), the Local Plan, together with the JLSP and the RSS form the Development Plan for Pendle. In addition, the Council is committed to preparing full Area Action Plans, Supplementary Planning Documents or Planning Briefs for areas of regeneration. These will be informed and led by the Area Development Frameworks and the Strategic Plan, but would, when adopted, have Development Plan or supplementary planning status. Policy 17 of the re-deposit plan explains in its reasoned justification, under the heading 'Mixed Use Regeneration Project', that any proposed projects must have received prior approval by the Council as a necessary regeneration scheme through the adoption of an appropriate Master Plan, Area Action Plan or Supplementary Planning Document.
- 17.84 With regards to monitoring, the Council acknowledges that it will be difficult, but in its opinion, not unmanageable to ensure that

general market housing is not 'disguised' as HMR replacement housing, because Policies 17 and 18 of the re-deposit plan set a very clear framework for the provision of replacement dwellings. Safeguarded sites can only be used in certain circumstances. They must follow an approved document of the Council, such as an Area Action Plan. These would be the subject of public consultation and for Area Action Plans, independent examination. They would consider in detail the housing market conditions and they would assess where any replacement units should be located. They would also consider whether in fact demolition was necessary, and what levels of replacement would be needed.

- 17.85 I consider that the safeguarding of land in the context of re-deposit Policy 17 relates directly to the PMM approach because the Council can demonstrate through the Area Development Frameworks that there are problems with the housing market in Pendle. There is a planned programme of further work in terms of master planning and the production of Area Action Plans and Supplementary Planning Documents, which will inform in detail how these housing deficiencies will be resolved. That may involve the need for additional housing land on which to provide replacement dwellings over the plan period, when other sites have been discounted.
- 17.86 Furthermore, Policy 17 requires that any off-site replacement of dwellings takes place in a sequential order. Firstly, that they are replaced in existing buildings, then on previously developed land, thirdly on previously undeveloped land within the urban area and lastly on safeguarded land. In all cases, replacement on site must have been considered first. I have no reason to think that the Council's monitoring mechanism is not sufficiently robust to ensure that this process will occur in practice, and that general market and replacement dwellings are separately counted.
- 17.87 Objection is made to the last sentence of paragraph four of the reasoned justification on page 66. This states that: 'Safeguarded land will only be released within or immediately adjacent to, the ADF boundary from within which the dwellings are cleared'. Furthermore, that the sentence contradicts the fifth sentence of the same paragraph, which states that: 'All replacement dwellings must be located within the boundary of the ADF from within which the original dwellings are to be cleared'.
- 17.88 Thus, sentence five refers to the location of replacement dwellings being within the ADF area, whereas the final sentence of the paragraph refers to land being released 'within, or immediately adjacent'. The Council agrees that this is contradictory. In response, it suggests that the fifth sentence of paragraph four on

page 66 should be removed for clarity, in accordance with suggested Change No. 50 (CD 193).

- 17.89 In addition, it suggests at Change No. 51 that another sentence should be added to the end of paragraph four to read: 'Sites within a defined ADF boundary will be given priority for release so long as they are in a location suitable to serve the regeneration needs as identified through any master planning work or Area Action Plan.' I endorse these Changes, which I consider meet these objections and add clarity to Policy 17.
- 17.90 In order to provide certainty, an Objector requests that a timeframe should be included in Policy 17. The end of the period of the emerging Local Plan, that is 2016, is suggested as a possibility. In response, the Council agrees that reference to a review of the safeguarded sites should be included in the reasoned justification to Policy 17, in accordance with suggested Change No. 54 (CD 193). I support this Change, which in my opinion will improve the clarity of the policy, and will meet the objection.
- 17.91 Another Objector requests a guarantee that anyone displaced by clearance will be offered the opportunity to relocate into a similar property in the area. The re-deposit plan sets out the Council's detailed policies and proposals for the future development and use of land. In doing so, it supports Housing Market Renewal activity under Policy 18 - Housing Market Renewal. However, I do not consider that it is the purpose of the plan to provide specific guarantees to individuals with regard to the HMR programme. Thus I do not support this objection.

### **Consideration of Other Objections that refer to the Exceptions to Policy 17**

- 17.92 An objection is made to exception A. of Policy 17 on the grounds that allowing any development outside of an existing settlement boundary would be harmful to the environment, and also that Policy 17 allows for the construction of replacement dwellings on greenfield safeguarded land, which would result in harmful loss of countryside.
- 17.93 The Council does not dispute that new residential development should preferably take place within a defined settlement boundary and that the development of greenfield sites is given a low priority. However, in the re-deposit plan, all of the sites safeguarded by Policy 17 are located within the settlement boundaries, which have been reviewed and adjusted, where necessary to ensure this. In my opinion, this is in line with Policy SD6 of the RSS. The sequential approach of Policy 17 would

ensure that they are only developed as a last resort, if there are no suitable brownfield sites available.

- 17.94 In addition, it is my opinion that the inclusion of safeguarded land within the settlement boundary provides greater protection to that land outside of the settlement boundary. For these reasons, I do not support the objection.
- 17.95 Several Objectors consider that the exceptions to the presumption of Policy 17 against the provision of new residential development should be enhanced to enable the provision of a range of house types that will meet the needs of all parts of the community. But in my opinion, the re-deposit plan makes adequate provision for this consideration by exception B., which permits housing for special needs housing groups, where there is an identified need, as set out in the 'Supporting People Strategy' (CD 43).
- 17.96 Furthermore, I have no reason to think that the substantial pool of extant residential permissions will not result in the provision of a range of house types to meet market demand. Therefore, I do not consider that amendment to the policy is necessary in this regard. Consequently, I do not support these objections.
- 17.97 An objection is made to exception B. of the policy on the grounds that it should refer to an identified *local* need. The Council agrees with this re-deposit objection and suggests that the word 'local' is inserted into the text of exception B. in accordance with suggested Change No. 45 (CD 193). I support this Change, which in my opinion, would add clarity and precision to the policy and would meet the objection, which was conditionally withdrawn on its basis.
- 17.98 In connection with the provision for affordable housing, an Objector wishes to see the regeneration of existing stone built terraces to provide affordable, desirable, quality homes. However, I do not consider that any change to Policy 17 is required to enable this. Policy 18 of the re-deposit plan refers specifically to Housing Market Renewal. Its criterion 1. supports the improvement, repair and clearance of existing residential properties. Furthermore, the re-deposit plan does not restrict the redevelopment of terraced housing for affordable homes. In addition, if buildings are not in residential use at present, conversion to affordable dwellings could be considered, where there is a demonstrated need, under exception G. to Policy 17. For these reasons, I see no need to amend the policy in response to the objection.
- 17.99 An Objector requests that the criteria that apply to exception C. of Policy 17 should be amended to preclude development of

greenfield sites beyond a settlement boundary. However, PPG3 supports such development. It states that the Government is concerned that there should be adequate housing provision in rural areas to meet the needs of local people. It advises, at its paragraph 71, that LPAs should make sufficient land available either within or adjoining existing villages to enable these local requirements to be met. PPG3 goes on to state that the needs of local people for affordable housing may often be best met by an exception policy that would enable the LPA to grant planning permission for land within or adjoining existing villages, which would not normally be released for housing, in order to provide affordable housing to meet local needs in perpetuity. Appendix B to PPG3 gives further advice on this matter.

- 17.100 This approach is further supported by Policy UR9 of the RSS. It states that Development Plans should address the development of affordable housing to meet identified local needs, as an exception to normal planning policies in rural areas, where there is a demonstrable shortage of such housing which cannot otherwise be met. Furthermore, the reasoned justification of Policy 5 of the JLSP informs that Districts will determine the necessary amount of affordable housing developed based on an assessment of local need. Preference will be given to brownfield sites, infill plots and conversion of redundant buildings.
- 17.101 The reasoned justification for re-deposit Policy 17 explains that any proposal for affordable housing should be met in the following order of priority; in previously developed buildings and land within a settlement boundary, followed by white land within a settlement boundary.
- 17.102 However, within rural areas, the policy allows for the development of sites outside of the settlement boundary, but adjoining that boundary, where no other land can be found within the boundary. The reasoned justification further informs that this must be clearly justified by an assessment of housing need and the developer must demonstrate that no alternative sites exist within the settlement boundary. Development must avoid environmental designations and open space. I consider that this approach is in line with the higher tier planning policy referred to above. Consequently, I do not support the objection.
- 17.103 However, I note that in connection with provision for affordable housing, the reasoned justification for Policy 17 and an associated footnote incorrectly refer to the 'Borough of Pendle (2004) Housing Needs Study. For precision and clarity, these typographical errors should be rectified in accordance with suggested Change No. 55 (CD 193) and as referenced as CD 42. Similarly, the incorrect reference to this document given in

Appendix 5 – References, should be corrected in accordance with the Council’s suggested Change No. 96 (CD 193).

- 17.104 It is requested that exception F. of the policy text should be amended to permit the conversion of a building to residential use where it would preserve prominent, attractive or historical buildings within conservation areas. This exception allows the conversion of a building(s) to residential use where it would be the only realistic means of securing the future of a Listed Building. It is supported by Policy 12 of the JLSP.
- 17.105 I consider that widening exception F. to include non-listed buildings in conservation areas could have severe consequences for the Council’s position in terms of over-supply, because there are 23 designated conservation areas in Pendle, some parts of which are also designated as Open Countryside. Furthermore, exception G. permits limited conversion of buildings within a defined settlement boundary to residential. In my opinion, these two exceptions provide sufficient scope for conversions and I see no reason to widen exception F. further as requested. Consequently, I do not support the objection.
- 17.106 However, objection is also made to exception G. It is requested that the policy text should be removed or amended to state that conversions of buildings will only be permitted where they would contribute to the regeneration of an area, because it is thought that the cumulative impact of this exception would be to exacerbate any over-supply.
- 17.107 Whilst I do not disagree with that observation, by its nature, conversion/re-use of buildings is a form of regeneration. Exception G., as listed in Policy 17 of the re-deposit plan aims to bring derelict and neglected buildings back into use. Conversion and re-use of buildings is a priority as identified in PPG3 and the RSS. Thus, on balance, I do not consider that exception G. should be removed or amended in response to this objection.
- 17.108 Several Objectors consider that an additional category of exception should be added to Policy 17 to permit the development of larger type housing to satisfy a special social/cultural need of some residents of the Borough. Such dwellings would typically contain 2 living rooms and 4/5 bedrooms.
- 17.109 However, exception B. of the text of Policy 17 informs that an exception will be made for housing for special needs housing groups where there is an identified need, as set out in the ‘Supporting People Strategy’. In addition, the reasoned justification, under the heading, ‘Special Needs Housing’, details that the ‘Lancashire Supporting People Strategy’ (2002) sets out

the identified needs for special needs housing across the whole of Lancashire for the next five years. The special needs assessment for Pendle set out in the reasoned justification for Policy 17 indicates that there is a high shortage of accommodation for households from black and ethnic minority backgrounds.

- 17.110 Thus, I consider that Policy 17 of the re-deposit plan allows for development to meet ethnic minority needs, as defined in the 'Supporting People Strategy', as an exception to any over-supply situation. Therefore, I consider that the objections are met.
- 17.111 An Objector suggests that an additional category of exception should be added to Policy 17 to permit development within the boundaries of the HMR Priority Action Areas, or which can assist in supporting proposals within such areas.
- 17.112 The HMR Priority Action Areas are detailed in the Area Development Frameworks for Nelson, Colne and Brierfield. However, only some of the Priority Action Areas have been approved by the Council for work to begin. Further master planning has been agreed for other areas and decisions are yet to be taken on some Priority Action Areas.
- 17.113 In these circumstances, I consider that it would be premature to widen the scope of exceptions to Policy 17 to allow an exemption for new build in all Priority Action Areas. Furthermore, the policy already allows for replacement of cleared dwellings (exception A.) and new dwellings which form a key element of a mixed use regeneration project where such a project has been approved by the Council (exception D.). For these reasons, I do not support the objection.
- 17.114 Another Objector wishes Policy 17 to be amended to reflect the supporting text of Policy SD3 of the RSS by expanding the exceptions listed in the text to allow for any housing need that can be identified within the Borough. This text states that: 'Provision for housing and other land uses should therefore be based principally on meeting the needs of the area's current population and its housing needs'.
- 17.115 However, the strategic quantitative housing needs of Pendle are provided for by the JLSP, which sets out an overall housing requirement up to 2016, and by the RSS itself which specifies annual housing provision targets for each sub-region or area within the North West. These targets are generated and based upon a number of sources including national population and household projection figures (1996), outcomes of the North West Regional Housing Need and Demand Research (DETR, 2000) (CD 45), and the anticipated levels of regional economic growth

detailed in 'England's North West - A Strategy Towards 2020', (NWDA, 2000) (CD 44). The Local Plan must be in compliance with the housing requirements set out in the JLSP.

17.116 Specific types of housing need have been defined in Policy 17 of the re-deposit plan, and include affordable housing needs, special needs housing, housing for regeneration (including replacement of cleared dwellings), agricultural or forestry workers dwellings, small scale conversions and change of use of Listed Buildings. I consider that these exceptions will ensure that the housing needs of the community will be adequately met within the context of the RSS and the JLSP. I do not think that it is appropriate to broaden this list of exceptions to Policy 17 further, as all exceptions (except for replacement dwellings) count towards the annual provision rates and will exacerbate the current over-supply in the Borough. Therefore, I do not support the objection.

### **Consideration of Other Matters Raised at the First and Re-Deposit Stages**

17.117 An objection is made on the grounds that an assessment of ecological status, carried out at appropriate times of the year, should be included as part of site design and Development Briefs. These documents are referred to in the reasoned justification for Policy 17 under the section: 'Replacement of cleared dwellings', which states that: 'If there is an identified need for safeguarded land a Planning Brief will be prepared to ensure appropriate development of the site...'. However, I do not support this objection because I do not consider that it is the role of Local Plan policy to specify the issues to be covered in a Planning Brief or similar document. In my opinion, these are for the Brief to stipulate.

17.118 Objections are made that although Policy 17 refers to Area Development Framework boundaries, only the Housing Market Renewal Intervention Area boundary is shown on the Proposals Map. This is thought to be confusing and it is requested that either the text or the Proposals Map should be amended so that they correspond.

17.119 The Council agrees with these objections and it suggests that the Area Development Framework boundaries should be shown on the Proposals Map. This suggested change is referred to as Change No. 102 (CD 193). I endorse this suggested Change, which in my opinion would improve the clarity, consistency and transparency of the plan and would overcome these objections.

## RECOMMENDATIONS (binding)

- 17.120 I RECOMMEND that the plan be modified by deleting the third sequential tier from the text of Policy 17, which refers to 'white land' and by replacing it with a new third tier that reads:

The development of previously undeveloped land within a settlement boundary, where this avoids areas of open space (Policy 33), areas identified as being of defined settlement character (Policy 12) and areas of natural heritage (Policies 4A-4C), where it is demonstrated that the site is well located in relation to houses, jobs, other services and infrastructure, and is or can be made accessible by public transport, walking or cycling.

- 17.121 I RECOMMEND that the plan be modified by amending the first bullet point of the text of Policy 17, which refers to 'white land' so that it reads:

- For replacement dwellings where there is insufficient previously developed land within a settlement boundary to meet the needs of the proposal, development may be permitted on HMR Reserved Housing Land where it can be demonstrated that sites in accordance with 1-3 above are not available (or that the HMR Reserved Housing Site accords with either 1, 2 or 3 above) and the dwellings cannot be replaced on the same site.

- 17.122 I RECOMMEND that the plan be modified by deleting the third paragraph of the reasoned justification of Policy 17 below Figure 2a, which defines 'white land', and by replacing it with a new paragraph which reads:

The sequential approach detailed in 1-3 of this Policy is in accordance with that set out in Policy DP1 of the Regional Spatial Strategy and Policy 12 of the Joint Lancashire Structure Plan.

- 17.123 I RECOMMEND that the plan be modified by deleting the last four sentences of the third paragraph of the reasoned justification of Policy 17, below the heading 'Replacement of cleared dwellings', which start: 'All replacement dwellings...', and by replacing them with justification text which reads:

In accordance with the sequential search set out in Policy 17 (Points 1-3) all replacement dwellings should be located, in the following order of priority; i) in reused or converted buildings within a settlement boundary, ii) previously developed land within a settlement boundary; or, iii) previously undeveloped land within a settlement boundary (as defined by Policy 17 point 3). In respect of replacement dwellings, where it is demonstrated that sites in accordance with the sequential approach (Policy 17 points 1-3) are not available within the ADF boundary (or that the HMR Reserved Housing Site accords with either 1, 2 or 3 above) then consideration will be given to releasing some HMR Reserved Housing Land for new housing development.

- 17.124 I RECOMMEND that the plan be modified by amending the third sentence of the fourth paragraph of the reasoned justification for Policy 17 below the heading 'Replacement of cleared dwellings', which refers to 'white land' so that it reads:

If there is sufficient previously developed land to meet the needs of replacement dwellings within the ADF boundaries over the plan period, the HMR Reserved Housing Land will remain undeveloped.

- 17.125 I RECOMMEND that the plan be modified by amending the first sentence of the second paragraph of the reasoned justification for Policy 17 on page 69, which refers to 'white land', so that it reads:

Any proposal for affordable housing should be met in order of priority in accordance with the sequential search set out in Policy 17 (points 1-3): i) in reused or converted buildings within a settlement boundary; ii) previously developed land within a settlement boundary; or, iii) previously undeveloped land within a settlement boundary (as defined by Policy 17 point 3).

- 17.126 I RECOMMEND that the plan be modified by amending the third sentence of the penultimate paragraph of the reasoned justification of Policy 1 on page 24, which refers to 'white land', so that it reads:

Any proposal for affordable housing should be met in order of priority on previously developed land and buildings within a settlement boundary, followed by

previously undeveloped land within a settlement boundary (Policy 17).

17.127 I RECOMMEND that the plan be modified by deleting the reference to Urban White Land from Appendix 4 – Glossary and Abbreviations.

17.128 I RECOMMEND that the plan be modified by amending the second paragraph of the Sequential Test explanation in Appendix 4, so that it reads:

Adopting a sequential approach to housing means that first preference should be for the re-use or conversion of an existing building within a settlement boundary, previously developed land within a settlement boundary, followed by the development of previously undeveloped land within a settlement boundary, where this avoids areas of open space, areas identified as being of defined settlement character and areas of natural heritage, where it is demonstrated that the site is well located in relation to houses, jobs, other services and infrastructure, and is or can be made accessible by public transport, walking or cycling, and only then allocated greenfield sites.

17.129 I RECOMMEND that the plan be modified by amending exception B. to Policy 17 to read:

Housing for special need housing groups where there is an identified local need as set out in the Supporting People Strategy<sup>31</sup>.

17.130 I RECOMMEND that the plan be modified by replacing Figure 2a with the following table:

Figure 2a – Housing Land Requirement in Pendle 2001-2016

Joint Lancashire Structure Plan requirement	1970
Dwellings completed April 2001 – March 2005	-1317
Number of dwellings to be provided for	653
Dwelling units with planning permission (March 2005)	-1395
Total requirement to 2016	-742

17.131 I RECOMMEND that the plan be modified by replacing all references to 'safeguarded land/sites', as used in the context of Policy 17, throughout the written statement and

on the Proposals Maps to: HMR Reserved Housing Land/Site.

- 17.132 I RECOMMEND that the plan be modified by deleting the definition of 'Safeguarded Housing Sites' from the Appendix 4 – Glossary and Abbreviations and by inserting the following definition of HMR Reserved Housing Land/Site:

Land that is protected for its potential to accommodate off-site replacement dwellings and associated infrastructure, including open space required in connection with residential clearance associated with the HMR Pathfinder Programme (in line with Policy 18). Monitoring will indicate if the sites are, or are not, required for housing development over the plan period.

- 17.133 I RECOMMEND that the plan be modified by amending the first sentence of the last paragraph of the reasoned justification to Policy 17 on page 66 to read:

HMR Reserved Housing Land is land that is protected for possible use for off-site replacement housing associated with the HMR Pathfinder Programme.

- 17.134 I RECOMMEND that the plan be modified by deleting the last sentence of the last paragraph that commences on page 66, which reads: 'The following sites are safeguarded and shown on the proposals map:', and the list of sites designated as safeguarded land given on page 67, from the reasoned justification and by placing them within the policy text after the first bullet point, as amended in accordance with paragraph 17.121, so that it reads:

The following sites are designated as HMR Reserved Housing Land:

Clitheroe Road, Brierfield	2.1 ha <sup>1</sup>
Gib Hill, Nelson (Phased)	12.01 ha
Knotts Lane, Colne (including the former Cement Works)	7.85 ha
Former Lucas Sports Ground, Reedley	2.64 ha <sup>2</sup>
Further Clough Head, Nelson	3.66 ha

- 17.135 I RECOMMEND that the plan be modified by deleting the fifth sentence of the third paragraph under the heading, 'Replacement of cleared dwellings', which reads: 'All replacement dwellings must be located within the

boundary of the ADF from within which the original dwellings are to be cleared’.

- 17.136 I RECOMMEND that the plan be modified by adding a sentence to the end of the third paragraph under the heading, ‘Replacement of cleared dwellings’, as amended in accordance with the recommendations given above which reads:

Sites within a defined ADF boundary will be given priority for release so long as they are in a location suitable to serve the regeneration needs as identified through any master planning work or Area Action Plan.

- 17.137 I RECOMMEND that the plan be modified by adding a sentence at the end of the section of the reasoned justification to Policy 17 titled ‘Replacement of cleared dwellings’, which reads:

A review of the continued need for HMR Reserved Housing Land and the specific sites identified will be considered as part of the Local Development Framework.

- 17.138 I RECOMMEND that the plan be modified by adding the Area Development Framework (ADF) boundaries to the Proposals Maps.

- 17.139 I RECOMMEND that the plan be modified by amending references in the reasoned justification of Policy 17 in the second paragraph under the sub-heading ‘Affordable Housing’ from: ‘The 2003 Housing Needs Study 40’ to ‘The 2003 Housing Needs Survey 40’.

- 17.140 I RECOMMEND that the plan be modified by amending footnote 40 to read:

Pendle Borough Housing Needs Survey (2003). BoP

- 17.141 I RECOMMEND that the plan be modified by amending the reference given in Appendix 5 from ‘Borough of Pendle (2004) Housing Needs Study. BoP to read:

Pendle Borough Housing Needs Survey (2003). BoP

- 17.142 I RECOMMEND that the plan be modified by deleting the fifth sentence of the fourth paragraph under the heading, ‘Replacement of cleared dwellings’, which reads: ‘Many of

**the sites continue the Protected Area designation from the previous Local Plan’.**

**17.143 I RECOMMEND no further modification to the plan in response to these objections.**

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## **B. Objections to Specific Sites**

### **Introduction**

17.144 Figure 2a, as amended in accordance with the Council’s suggested Change No. 48 (CD 193), indicates that taking into account completions up to March 2005 and extant planning permissions, there is sufficient housing land in the Borough to meet the net housing supply figure of 1,970 dwellings up to 2016, in accordance with Policy 12 of the JLSP, without the need to allocate any sites for general market housing. Indeed, there is an over-supply of residential land. The last bullet point of the reasoned justification of Policy 12, under the heading: ‘Calculating new housing requirements’, states that: ‘The overall housing provision for 2001-2016 set out in Policy 12 for each District will represent the maximum housing provision that should not be exceeded.

17.145 This is in line with paragraph 30 of PPG3, which advises that LPAs should seek only to identify sufficient land to meet the housing requirement set as a result of the RPG and strategic planning processes; they should not extend the search further than required to provide sufficient capacity to meet the agreed housing requirement.

17.146 Therefore, I conclude in Part A of this Chapter of my report that it is unnecessary to allocate any sites for general market housing in the re-deposit plan. Consequently, for these reasons, I do not support any objections, or representations that request that the omission sites referred to below be allocated for general market housing.

### **Summary of Key Issues**

- Whether the sites should be allocated for general market housing.
- Whether the sites should be safeguarded for replacement housing associated with the HMR programme.

## **Inspector's Reasoning and Conclusions**

### **BARNOLDSWICK**

Former Barnoldswick Service Reservoir, off Park Hill, omission site X52  
Land behind the Ambulance Station, omission site X54

#### **Former Barnoldswick Service Reservoir, off Park Hill, omission site X52**

17.147 The site is 1.18 hectares in area. It is a former service reservoir, with ancillary buildings and grassed areas situated partly within and partly outside the settlement boundary for Barnoldswick. The part lying within the settlement boundary is non-designated, and that outside is designated as Open Countryside. The Objector notes that Policy 17 states that a sequential approach should be used for the allocation of new sites for development. Since the Barnoldswick Service Reservoir is no longer in operational use and will be available for re-use as a previously developed brownfield site, it is considered that the site should be entirely included within the urban area and re-used for housing. There was no support for this proposition in response to advertisement of the omission site.

17.148 The provision of new housing on previously developed land is in accordance with Government guidance, but the PMM approach of PPG3 states that housing requirements must be met by continual review and management of the housing provision.

17.149 The Housing Land Availability Report, 2005 (CD 36) records that in the period 1st April 2001 to 31st March 2005, 1,317 dwellings were completed in Pendle and that a further 1,395 units had planning permission at the end of the survey period. This leaves Pendle with a surplus of 742 dwellings against the JLSP requirement of 1,970 to 2016. Monitoring has, therefore, demonstrated that there is a current over-supply of housing planning permissions in relation to the annual completion targets set by the JLSP, and that there are already enough permissions that will translate into completions for the entire JLSP period. Thus, the Council will continue to apply a housing moratorium until such time as a future Housing Land Availability Report demonstrates that an over-supply no longer exists. For these reasons, I do not support the objection and I do not recommend that the site is allocated for housing.

#### **Land behind the Ambulance Station, omission site X54**

17.150 This site is a small rectangular piece of land located to the north-west of Barnoldswick. It is surrounded on three sides by

residential development. It is 0.47 hectare in area, and is currently used as agricultural land (greenfield). In the re-deposit plan it is designated as Open Countryside outside the settlement boundary for Barnoldswick. The objection is made on the grounds that this land should be allocated for housing because it is considered to be ideal infill land, the development of which would not intrude into the countryside. There was no support for this proposition in response to advertisement of the omission site.

17.151 However, the Housing Land Availability Report, 2005 (CD 36) records that in the period 1st April 2001 to 31st March 2005, 1,317 dwellings were completed in Pendle and that a further 1,395 units had planning permission at the end of the survey period. This leaves Pendle with a surplus of 742 dwellings against the JLSP requirement of 1,970 to 2016. Monitoring has, therefore, demonstrated that there is a current over-supply of housing planning permissions in relation to the annual completion targets set by the JLSP, and that there are already enough permissions that will translate into completions for the entire JLSP period. Therefore, the Council will continue to apply a housing moratorium until such time as a future Housing Land Availability Report demonstrates that an over-supply no longer exists. For these reasons, I do not support the objection and I do not recommend that the site is allocated for housing.

#### **BARROWFORD & HIGHERFORD**

Barrowford Business Park, omission site X09

Land at Mill Dam, Barrowford Road, omission site X10

Land to the east of St Thomas' Church, Wheatley Lane Road, omission site X13

Former safeguarded site at Barrowford Road, omission site Y02

Land at Trough Laithe Farm, off Wheatley Lane Road, omission site X11

Land at Barrowford Business Park, adjacent to Lower Clough Mill, omission site X71

Land between 30 and 79 Barnoldswick Road and Ralph Laithe, omission site X74

#### **Barrowford Business Park, omission site X09 (Objection conditionally withdrawn)**

17.152 This first stage deposit Objector is concerned that the site is safeguarded for housing. It is considered that further development in Barrowford will be detrimental to the community, in terms of increased traffic and pressure on local services. Also, that once the riverside location is developed there will be pressure to develop the fields at Trough Laithe, which would have a

detrimental effect on the Conservation Area, house prices, views and privacy.

- 17.153 At the first stage deposit, part of the site was designated as a Protected Employment Area (B1 only), but the land to the north of the pylon line was designated as part of the Trough Laithe Safeguarded Site for Housing (Phase 1). At the re-deposit stage the whole site was designated as a Protected Employment Area (B1 only). Furthermore, part of the site north of the pylon line has been granted planning permission for employment development by the First Secretary of State, on appeal. This has been implemented by the construction of a roundabout. Thus, although the site is likely to be developed for employment purposes it is not allocated or safeguarded for housing in the re-deposit plan. Therefore, I consider that the objection is partly met.

#### **Land at Mill Dam, Barrowford Road, omission site X10**

- 17.154 This site is located opposite a residential area and surrounded on three sides by fields (with an extant planning permission for the Barrowford Business Park). It is 1.06 hectares in area. Part of the site is a disused reservoir and is now overgrown scrubland. In the re-deposit plan the site has no designation. It is situated within the settlement boundary for Barrowford. An Objector states that this site is now drained and should be included as a site for future housing development. There was no support for this proposition in response to advertisement of the omission site.
- 17.155 The Housing Land Availability Report, 2005 (CD 36) records that in the period 1st April 2001 to 31st March 2005, 1,317 dwellings were completed in Pendle and that a further 1,395 units had planning permission at the end of the survey period. This leaves Pendle with a surplus of 742 dwellings against the JLSP requirement of 1,970 to 2016. Monitoring has, therefore, demonstrated that there is a current over-supply of housing planning permissions in relation to the annual completion targets set by the JLSP, and that there are already enough permissions that will translate into completions for the entire JLSP period. In this respect, the Council is in a position of over-supply and will continue to apply a housing moratorium until such time as a future Housing Land Availability Report demonstrates that an over-supply no longer exists. For these reasons, I do not support the objection and I do not recommend that the site is allocated for housing.

**Land to the east of St Thomas' Church, Wheatley Lane Road, omission site X13**

17.156 The site lies to the north of Wheatley Lane Road, Barrowford and is bounded by residential properties to the east and St Thomas' Church to the west. It is 3.17 hectares in area and is used as grazing land. In the re-deposit plan the site is designated as Open Countryside and a small part of it in the southern corner is within a Conservation Area. The objection is made on the grounds that the three sites allocated for housing in the first stage deposit plan are not suitable for housing. Instead, the Objector proposes the allocation of omission site X13 as an alternative for residential development. There was no support for this proposition in response to advertisement of the omission site.

17.157 No sites are allocated for housing in the re-deposit plan. Furthermore, the Housing Land Availability Report, 2005 (CD 36) records that in the period 1st April 2001 to 31st March 2005, 1,317 dwellings were completed in Pendle and that a further 1,395 units had planning permission at the end of the survey period. This leaves Pendle with a surplus of 742 dwellings against the JLSP requirement of 1,970 to 2016. Monitoring has, therefore, demonstrated that there is a current over-supply of housing planning permissions in relation to the annual completion targets set by the JLSP, and that there are already enough permissions that will translate into completions for the entire JLSP period. Thus, the Council will continue to apply a housing moratorium until such time as a future Housing Land Availability Report demonstrates that an over-supply no longer exists. For these reasons, I do not support the objection and I do not recommend that the site is allocated for housing.

**Former Safeguarded Site at Barrowford Road, omission site Y02, Land at Trough Laithe Farm, off Wheatley Lane Road, omission site X11 and Land at Barrowford Business Park, adjacent to Lower Clough Mill, omission site X71**

17.158 There were 16 objections to the safeguarding of sites X11/Y02 for housing at the first stage deposit period. There were 5 counter objections to the de-allocation of the sites as safeguarded land at the re-deposit stage. These latter Objectors consider that the site should be designated as a safeguarded housing site in the context of Policy 17, in preference to the site at Gib Hill (X22), the merits of which I consider later in this section of my report.

17.159 The land lies to the south-west of Barrowford. It is located to the rear of what is commonly known as Riverside (Barrowford) Business Park. The site is bounded on two main sides by residential development and the proposed Business Park to the

south-east. The site covers three farms, including their surrounding fields. It is 26.11 hectares in area and is used as grazing land.

- 17.160 At the first stage deposit the land was designated as safeguarded land for housing within the settlement boundary for Barrowford. But at the re-deposit stage it was re-designated as Green Belt outside the settlement boundary for Barrowford. Land to the west of the site is within a Conservation Area.
- 17.161 A small triangle of land (X71) situated to the east of the site is allocated as a Protected Employment Area (B1 only). This piece of land has been included within the Protected Employment Area (B1 only) because it has outline planning permission for B1 use. However, a planning condition prevents the erection of a building on this additional area of land because it is reserved for landscaping. The sites lie outside the HMR Intervention Area and outside the ADF boundary for all the towns of Nelson, Colne and Brierfield. An objection by Brian Whittle was conditionally withdrawn on the basis of the re-deposit re-designation of the site.
- 17.162 In Chapter 3 of my report I recommend that the sites (excluding X71) are de-designated as Green Belt and re-designated as a Protected Area outside the settlement boundary, by a new Policy 3A. This alternative designation would ensure that the sites remain open during the plan period. In my opinion, this designation would meet the first stage deposit objections that wish the site to remain undeveloped.
- 17.163 With regard to the counter-objections, the sites safeguarded under Policy 17 of the re-deposit plan are closely linked to the HMR Intervention boundary, as approved by the ODPM, and they are closely aligned to the strategy and approaches outlined in the ADFs.
- 17.164 In Nelson two sites have been safeguarded; one at Further Clough Head (X20) and the other at Gib Hill (X22), which straddles both the Nelson and Colne ADFs. The ADF Strategy for Nelson, which was approved by the Full Council in February 2005, sets out the approach to be followed for the regeneration of Nelson. It looks at creating between 290 and 410 new dwellings over the 15 year lifetime of the ADF programme and it recognises that in some areas, there will be a need for demolition in order to create sites large enough for comprehensive redevelopment. Four Priority Action Areas (PAA) are identified; Whitefield, Bradley, Nelson Town Centre and Southfield.

17.165 The ADF for Nelson does not identify any PAAs outside of Nelson. The closest one to Barrowford is the Bradley PAA and this stops at Charles Street, Nelson, some distance from the objection site. Furthermore, the ADF boundary for Nelson does not include the objection site, nor does the HMR Intervention Area boundary. Thus, in my opinion, the site is remote from the proposed PAAs in Nelson and is much more closely related to the town of Barrowford, where there are no regeneration requirements. These locational disadvantages of the site account for it achieving much lower weighted and non-weighted scores in the Council's Housing Site Analysis (CD 188), the findings of which I generally concur with, than the site at Gib Hill, and worse than the Further Clough Head site. Therefore, I do not consider that to re-designate omission site X11/Y02 in favour of omission site X22 would better meet the housing regeneration needs of the Borough. Thus, I do not support these objections.

**Land between 30 and 79 Barnoldswick Road and Ralph Laithe, omission site X74**

17.166 The site is located to the east of Barnoldswick Road. It is bounded by residential properties on three sides and open countryside and Green Belt on the other. It is 2.5 hectares in area. It is shown designated as Green Belt outside the settlement boundary in the adopted Pendle Local Plan, and in the first stage and re-deposit plans. It is objected that no allowance has been made for this land to be developed as an infill site. There was no support for this proposition in response to advertisement of the omission site.

17.167 The Housing Land Availability Report, 2005 (CD 36) records that in the period 1st April 2001 to 31st March 2005, 1,317 dwellings were completed in Pendle and that a further 1,395 units had planning permission at the end of the survey period. This leaves Pendle with a surplus of 742 dwellings against the JLSP requirement of 1,970 to 2016. Monitoring has demonstrated that there is a current over-supply of housing planning permissions in relation to the annual completion targets set by the JLSP, and that there are already enough permissions that will translate into completions for the entire JLSP period. Therefore, the Council will continue to apply a housing moratorium until such time as a future Housing Land Availability Report demonstrates that an over-supply no longer exists. For these reasons, I do not support the objection and I do not recommend that the site is allocated for housing.

## **BLACKO**

### **Land between 416 and 440 Gisburn Road, omission site X17**

17.168 This site is located off Gisburn Road, Blacko and is a narrow strip of land situated between two residential properties. It is 0.27 hectare in area. In the re-deposit plan the site is designated as Open Countryside, outside the settlement boundary for Blacko. It is grassland used for grazing. It is objected that no land has been allocated in Blacko to allow for natural village expansion during the plan period. It is argued that PPG3 makes reference to the importance of limited village expansion. Therefore, it is considered that the site should be allocated in the plan for residential development. There was no support for this proposition in response to advertisement of the omission site.

17.169 Like the previous Local Plan Inquiry Inspector, I acknowledge that provided that any development on this site were of a form appropriate to the linear character of this village there would be no objection on environmental grounds to frontage housing development between Nos. 420 and 440 Gisburn Road. However, I also consider that this site is too large to be regarded as the infilling of a 'small gap' within an otherwise developed frontage and, therefore, it would not be appropriate to include this site within the settlement boundary.

17.170 Furthermore, the Housing Land Availability Report, 2005 (CD 36) records that in the period 1st April 2001 to 31st March 2005, 1,317 dwellings were completed in Pendle and that a further 1,395 units had planning permission at the end of the survey period. This leaves Pendle with a surplus of 742 dwellings against the JLSP requirement of 1,970 to 2016. Monitoring has demonstrated that there is a current over-supply of housing planning permissions in relation to the annual completion targets set by the JLSP, and that there are already enough permissions that will translate into completions for the entire JLSP period. Therefore, the Council will continue to apply a housing moratorium until such time as a future Housing Land Availability Report demonstrates that an over-supply no longer exists. For these reasons, I do not support the objection and I do not recommend that the site is allocated for housing.

## **BRIERCLIFFE**

### **Land off Milton Street, Harle Syke, omission site X08**

17.171 This site is a triangular shaped piece of land located at the Borough boundary in the south of Pendle, which protrudes into the Borough of Burnley. The site is bounded on its eastern and western sides by residential properties and allotments. To the

north, there are fields and a footpath. It is 0.7 hectare in area and comprises overgrown scrub land with garages. It is part brownfield and part greenfield in nature. In the re-deposit plan it has no designation, but it is situated within the settlement boundary of Briercliffe. The Objector argues that since the site is partly brownfield it should be placed within the settlement boundary and allocated for housing. There was no support for this latter proposition in response to advertisement of the omission site.

- 17.172 The request that the site should be included within the settlement boundary is met by the re-deposit plan. However, the Housing Land Availability Report, 2005 (CD 36) records that in the period 1st April 2001 to 31st March 2005, 1,317 dwellings were completed in Pendle and that a further 1,395 units had planning permission at the end of the survey period. This leaves Pendle with a surplus of 742 dwellings against the JLSP requirement of 1,970 to 2016. Monitoring has demonstrated that there is a current over-supply of housing planning permissions in relation to the annual completion targets set by the JLSP and that there are already enough permissions that will translate into completions for the entire JLSP period. Hence, the Council will continue to apply a housing moratorium until such time as a future Housing Land Availability Report demonstrates that an over-supply no longer exists. For these reasons, I do not support the objection and I do not recommend that the site is allocated for housing.

## **BRIERFIELD**

Land at Halifax Road, omission site X06

Land at Clay Farm, Kings Causeway, omission site X07

### **Land at Halifax Road, omission site X06**

- 17.173 Omission site X06 is a large triangular shaped parcel of grassland, which is located between Halifax Road and Kings Causeway, Brierfield. It is bounded by residential properties on all three sides and is situated well within the settlement boundary. However, it falls outside both the HMR Intervention Area boundary and the ADF boundaries of Nelson and Brierfield.

- 17.174 It is 13.1 hectares in extent and is used for informal recreation. The site is allocated as a housing site in the adopted Pendle Local Plan, but it is designated as a Site of Settlement Character in the re-deposit plan. The reason for its re-designation is because, in the Council's opinion, omission site X06 contributes to the openness, character and local amenity of the surrounding residential areas. As I discuss more fully in Chapter 12 of my report, I share that view.

- 17.175 Six objections were made to this designation at the first stage deposit, but there were 161 representations of support. A further 62 representations of support were made in response to advertisement of the omission site. Most of the Objectors consider that better use would be made of the site, which is frequently used by dog walkers, if it was re-allocated as a housing site for high quality dwellings. There was no support for this proposition in response to advertisement of the omission site.
- 17.176 However, the Housing Land Availability Report, 2005 (CD 36) records that in the period 1st April 2001 to 31st March 2005, 1,317 dwellings were completed in Pendle and that a further 1,395 units had planning permission at the end of the survey period. This leaves Pendle with a surplus of 742 dwellings against the JLSP requirement of 1,970 to 2016. Monitoring has demonstrated that there is a current over-supply of housing planning permissions in relation to the annual completion targets set by the JLSP and that there are already enough permissions that will translate into completions for the entire JLSP period. Therefore, the Council will continue to apply a housing moratorium until such time as a future Housing Land Availability Report demonstrates that an over-supply no longer exists. For these reasons, I do not support the objections and I do not recommend that the site is allocated for housing.

**Land at Clay Farm, Kings Causeway, omission site X07**

- 17.177 This site comprises the south-eastern part of omission site X06. It is 3.16 hectares in area. One objection has been made to its designation as forming part of a Site of Settlement Character on the grounds that the land should be allocated for housing. In response to advertisement of the omission site, there were no representations supporting the proposition, but there were numerous representations of support for its designation as a Site of Settlement Character, as shown in the re-deposit plan. For the reasons I give concerning omission site X06, I do not support this objection, nor do I recommend that it is allocated for housing.

## **COLNE (including COTTONTREE)**

Land south of South Valley, omission site X23  
Land at Knotts Lane, omission site X26  
Railway Sidings, Knotts Lane, omission site X27  
Land at former Cement Works, omission site X28  
Land at South Valley Drive, omission site Y12 and X29  
Land off Windermere Avenue, omission site X32  
Land at Lidgett Triangle, omission site X33  
Land between Skipton Old Road and Castle Road, Colne, omission site X34  
Land at Red Lane, omission site X35 and Y04  
Nelson and Colne College site, Barrowford Road, omission site X43 and Y03  
Land off Trawden Road, Cottontree, omission site X50

### **Land south of South Valley, omission site X23**

17.178 Omission site X23 is 123.0 hectares in area and extends across the south of Colne through the ward of Waterside. The site is designated as Open Countryside outside the settlement boundary, with the exception of the parts of it known as Knotts Lane (omission site X26, which contains omission site X27) and the former cement works (omission site X28), which are allocated as safeguarded land for housing, and the surrounding land to site X28 (omission site X29). These sites fall within the settlement boundary, as they do in the adopted Pendle Local Plan. However, I recommend in Chapter 1 of my report that site X29 should be removed from the settlement boundary and designated as Open Countryside.

17.179 An Objector requests that the whole site be designated as Open Countryside. The majority of it is; but for the reasons that I give below, I conclude that the re-deposit plan designations of sites X26, X27 and X28 are appropriate. Thus, I support this objection only in part.

### **Land at Knotts Lane, omission site X26**

17.180 Omission site X26 lies to the west of a new housing development at Knotts Drive, Colne. It is bounded at its north-eastern edge by the Colne – Blackpool railway line and it incorporates a further omission site within its boundary (X27), which I discuss separately below. Site X26 is around 7.8 hectares in area and comprises part railway sidings (brownfield) and part grazing land. The site is in private ownership. In both the first stage and the re-deposit plans it is safeguarded for housing in accordance with Policy 17. The site is within the settlement boundary for Colne. It is also within the Housing Market Renewal Intervention Area boundary for Colne, to which Policy 18 applies. Objections made

to its designation as a safeguarded site at both stages raise the following key issues:

- Objections were made at the first stage deposit on the grounds that until the outcome of the Public Inquiry (into a planning application) is known, the land should not be included in the Local Plan. At the re-deposit stage it is objected that the land is safeguarded following dismissal of that appeal.
- The designation of the site should be removed as there is plenty of brownfield land in Pendle to build upon.
- The site should be used for community facilities, as this was a condition of the original planning permission.
- The site should be protected as Green Belt.
- The land should be designated as an Environmental/Heritage Protection site.
- The site should be protected as a Local Nature Reserve.
- The land should be designated as a Site of Settlement Character under Policy 12.

17.181 For the avoidance of doubt, the site is safeguarded under Policy 17 solely for use for accommodating replacement dwellings and associated infrastructure that arise from clearance linked to the HMR programme. In the first part of this Chapter of my report, which deals with policy related issues, I consider and give my support to the concept of this designation. However, I recommend that such sites should be re-named as HMR Reserved Housing Land.

17.182 The re-deposit plan identifies five such sites, one of which is site X26, that is referred to in the plan as, 'Knotts Lane, Colne (including the former Cement Works)'. The reasoned justification for Policy 17 clarifies that it is intended that the safeguarded sites should relate closely to the ADF area in which the original dwellings are to be cleared. Also, that such replacement dwellings must be justified through the ADFs or further master plans, and they should be located in accordance with the sequence set out in Policy 17.

17.183 The Council has sought to justify the selection of the five safeguarded sites by assessing, scoring and comparing their characteristics having regard to; physical characteristics and environmental constraints, site infrastructure and accessibility,

sustainability issues and regeneration potential. The final score given to each site has been weighted to reflect its suitability to meet the needs of the nearest identified Priority Action Area (PAA). The results of this analysis are contained in, 'Pendle Housing Site Analysis' (CD 188).

- 17.184 In this analysis, site X26 including site X27 scores very well, and indeed, second best only to the Cement Works site X28. Although, in some cases Objectors have questioned the actual scores and the weightings that pertain to individual sites, the overall positions of the sites shown in the comparison table of the analysis reflect my own visual assessments of the sites. In my opinion, the analysis, in most cases, fairly assesses the suitability of each of the sites to meet the needs of the nearest identified PAA. Thus I conclude that, based on that analysis, the safeguarding of site X26 is justified. However, I turn now to consider the matters raised by Objectors to the selection of this site.
- 17.185 A planning application for 198 general market dwellings on the site (including site X27 – the Railway Sidings) was dismissed on appeal in March 2005 (CD 138). The First Secretary of State concluded that the proposal accorded with the adopted Structure Plan and Local Plan, but as the relevant policies in these plans (at that time) were out-of-date, the weight to be attached to them should be reduced accordingly. After considering the lower housing figures set out in the then emerging JLSP, the First Secretary of State considered that there was no need for development in this location at that time.
- 17.186 The appeal was, therefore, dismissed for reasons of housing requirements and supply. However, these arguments do not apply to the safeguarding of the land for HMR purposes, because replacement dwellings do not count against the net housing requirement for Pendle up to 2016, as set out in the now adopted JLSP. In my opinion, Policies 17 and 18 would ensure that any dwellings built on such land could not be used for general market housing. Furthermore, the Inspector reporting on the appeal case concluded that; 'the scheme, with its mitigation and compensation measures would protect wildlife interests'. The Secretary of State agreed that the nature conservation measures of the proposal would have been of benefit. Thus, I do not support objections that refer to that planning appeal as a reason for not safeguarding the site for HMR housing.
- 17.187 Nor do I support the view that there is sufficient brownfield land for this purpose. As Topic Paper 2 (CD 50) indicates, the potential to provide replacement homes on brownfield sites, in the right place and at the right time is small. The UPS (2005) (CD 38)

identifies that 627 dwellings can be provided on previously developed land across Pendle. However, to assist regeneration a suitable supply is needed within the ADF boundaries. The UPS shows that up to 365 dwellings could be provided on previously developed land within the three ADF areas over the next 15 years.

17.188 However, in the short term (0-5 years) the Study indicates that few potential sites are likely to come forward for development. Furthermore, some of these sites have already gained planning permission since the base date for the study (31<sup>st</sup> March 2004) and must now be excluded from this assessment. The revised figures, which I reproduce from Topic 2 illustrate that in the next five years, and even in the longer term, the potential to develop on brownfield sites within the ADF areas is extremely limited.

Topic Paper 2 - Table 6

ADF Area	0-5 Years Short Term	5-10 Years Medium Term	10-15 Years Long Term	Total No. dwellings
Brierfield	3	0	79	82
<b>Colne</b>	<b>4</b>	<b>18</b>	<b>0</b>	<b>22</b>
Nelson	38	0	27	65

17.189 In its submissions to a formal hearing session at which its objection to sites X26 and X27 were considered, Persimmon Homes (Lancashire) Ltd., indicated that it is satisfied with the re-deposit plan designation of site X26 (excluding site X27), but it considers that the form and clarity of Policy 17 should be improved in accordance with its suggested changes, which would split it into two separate policies. The Objector's suggested new Policy 17B refers to HMR Reserved Housing. However, I consider that this suggested policy, which except for its title, makes no reference to clearance or replacement, is less robust than the re-deposit Policy 17 as amended in accordance with my recommendations in Part A of this Chapter.

17.190 Concerning an objection that the site should be used for community facilities, I saw that there is an existing local convenience shop on the corner of Knotts Lane, Colne. In addition, the Council informs that other facilities are in the process of being put into place in the vicinity. A planning permission, which incorporates the provision of a retail convenience unit nearby, is being implemented. Also, a signed Section 106 Agreement linked to the second phase of development at Knotts Lane, Colne (the Knotts Drive development) ensures that land is available for an area of open

space to the south of the original housing allocations (as shown on the adopted Pendle Local Plan).

- 17.191 The Council's Parks and Cemeteries department are intending this open space to be available for full community use within the next 18 months. Furthermore, funds have been accrued through a Section 106 Agreement attached to the existing development at Knotts Drive to contribute to the provision of a Local Equipped Area for Play (LEAP).
- 17.192 The original intention, before the planning appeal on the site was dismissed, was to extract commuted sums from this proposed site (X26) and also through a planned development at the former Cement Works (off Knotts Lane X28). The Council are currently looking to identify a site for the LEAP, as prior to the dismissal of the appeal, it was originally envisaged that the LEAP would form part of the proposed general market housing development at site (X26). I consider that the safeguarding of this site for HMR housing would be beneficial to that process.
- 17.193 In Chapter 3 of my report I conclude that the site, as part of the much larger omission site X23 should not be designated as Green Belt. In Chapter 4, I conclude that it is not the place of this Inquiry to make recommendations on the designation of Environmental/Heritage Protection Sites or Local Nature Reserves. I also consider objections concerning site X26 in Chapter 12 of my report. There, I conclude that the designation of site X26 as a Site of Settlement Character would undermine the purpose of safeguarding land at Knotts Lane and in delivering the HMR programme.
- 17.194 Thus to summarise, I endorse the designation of omission site X26 as safeguarded land. Hence, I do not support objections to that designation.

### **Railway Sidings, Knotts Lane, omission site X27**

- 17.195 Omission site X27 lies to the west of new residential development at Knotts Drive, Colne. It is bounded at its north-eastern edge by the Colne – Blackpool railway line and forms part of a larger omission site (X26). It is a brownfield site that is 2.73 hectares in extent and comprises redundant railway sidings. In the adopted Pendle Local Plan the site is allocated as a housing site, as part of the larger allocation at Knotts Lane. It is within the settlement boundary for Colne. At the first stage deposit, the site was designated as safeguarded land for housing under Policy 17, as part of the larger site X26. It falls within the settlement boundary for Colne and it is within the Housing Market Renewal Intervention Area boundary. The site retained these designations at the re-deposit stage.

- 17.196 Objections are made on the grounds that the site is of BHS/LNI quality and, therefore, that development would conflict with its wildlife value. However, another Objector requests that the site should be allocated as a general market housing site.
- 17.197 I am aware that since the close of the Inquiry, the BHS Partnership Review Panel has designated the site as a BHS; thus those objections which seek this designation of the site have been met. I consider that it is inevitable that this designation will have implications for the capacity of the site to accommodate HMR replacement dwellings, but I have insufficient information before me to conclude that this environmental designation will preclude the residential development on any part of the site. Therefore, I have not recommended that the site is de-designated as a safeguarded site.
- 17.198 I turn now to consider the objection seeking the allocation of the land as a housing site. At the formal hearing session at which this site was considered, Persimmon Homes (Lancashire) Ltd. argued strongly that there is both a quantitative and qualitative need for the site to be allocated for general market housing.
- 17.199 The Objector re-worked the housing supply figures several times during the course of the Inquiry, but their final position appears to be that the figure should take account only of provision for new dwellings for new households (not clearance replacements), and that up to 2016 there will be an over-supply of just over 100 dwellings. It is argued that this is not a significant over-supply, especially if completions do not come forward as anticipated by the Council. Also, that the yield from this relatively small site would not unacceptably exacerbate that over-supply situation. Furthermore, that there is a compelling qualitative need to provide more new dwellings in the area to provide an adequate range of dwellings types. In addition, the Objector contends that the site is outstandingly suitable for residential development.
- 17.200 Taking into account of all of the evidence before me, I find none sufficient to convince me that the statement given in the JLSP, at the last bullet point on page 51, is not imperative. It says that: 'The overall housing provision for 2001-2016 set out in Policy 12 for each District will represent the maximum housing provision that should not be exceeded'. This clearly accords with the guidance given at paragraph 30 of PPG3, which advises LPAs that; 'they should not extend the search (for sites to be allocated for housing) further than required to provide sufficient capacity to meet the agreed housing requirement'.
- 17.201 I have balanced this consideration of over-supply against the concession made by the Council's representative under cross-

examination that, in support of the Objector's view, there is a qualitative need for a greater range and choice of house types in the area; although this was not obviously apparent to me from my inspections of the surrounding area. But I do not consider that, either individually or cumulatively, this qualitative consideration is sufficient to weigh the balance in favour of allocating the site for general market housing, in the face of a non-disputed over-supply against the JLSP requirement and the now confirmed environmental value of the site.

**Land at former Cement Works, omission site X28**

**Land at South Valley Drive, omission sites Y12 and X29**

- 17.202 Omission site X28 is contained within the larger site X29 and lies off the western side of Knotts Lane, Colne to the south of Knotts Farm. It is 0.29 hectare in area and comprises the redundant cement/brick works. In the adopted Pendle Local Plan the site was allocated for housing within the settlement boundary for Colne. At the first stage deposit it was designated as safeguarded land for housing under Policy 17, within the settlement boundary for Colne and within the Housing Market Renewal Intervention Area boundary. These designations are retained in the re-deposit plan.
- 17.203 Some objections refer to the larger site X29 rather than expressly to site X28 and concern greenfield sustainability, Green Belt and nature conservation considerations. However, with regards to site X28 specifically, Crown Way Homes Ltd. considered in its original objection that the land should be allocated as a general market housing site. But at the formal hearing session at which this objection was considered, it was recognised by the Objector that the revised, reduced JLSP housing requirement figure precludes this. The objection was amended to a request that site X28, together with the larger X29 site, should be safeguarded for HMR housing, or for long term general market housing in the context of PPG2.
- 17.204 Site X29 is around 3.0 hectares in extent and comprises part grazing land and part redundant cement/brick works (X28). At the first stage deposit, the land was safeguarded for housing under Policy 17. In the re-deposit plan, the former Cement Works part of the site (X28) is safeguarded for housing. The remaining part of the site has no allocation. The whole of site X29 is within the settlement boundary for Colne and it is within the Housing Market Renewal Intervention Area boundary, to which Policy 18 refers.
- 17.205 First stage deposit Objectors wish the omission site X29 to be de-allocated as a safeguarded site for housing. However, in the re-deposit plan, the land excluding omission site X28 is shown as non-designated land falling within the settlement boundary.

Furthermore, I recommend in Chapter 1 of my report that this land should be excluded from the settlement boundary. Thus, those objections are partly met by the re-deposit change of designation.

- 17.206 With regards to the former Cement Works, site X28, I do not consider that this land fulfils any of the characteristics that would warrant an environmental designation. Furthermore, as indicated by the 'Pendle Housing Site Analysis' (CD 188), it scores better than any of the other sites considered in that comparative exercise. Consequently, I consider that its designation as a safeguarded housing site, as defined in Policy 17 of the re-deposit plan, is appropriate. Thus I do not support this aspect of those objections.
- 17.207 Crown Way Homes Ltd. objects that the safeguarded land designation has been removed from the larger part of site X29, which in its opinion makes the development of site X28 in isolation unviable, but no detailed evidence has been submitted to substantiate that claim. It also considers that the western boundary of site X28 illogically excludes brownfield land associated with the former brick works.
- 17.208 At the hearing session, at which the objection was heard, there was considerable discussion regarding the extent of the brownfield part of the whole site X29 and of the conclusions on this matter of an Inspector who dismissed an appeal for general market housing on 2.77 hectares of land at this site in 2004.
- 17.209 However, the greenfield/brownfield nature of land is not the determining factor in the designation of safeguarded land for HMR replacement housing. Furthermore, I accept the Council's arguments that the larger site X29 is not required for this purpose, which are reinforced by the evolving ideas for regenerating the housing markets within HMR Pathfinder areas that are moving away from clearance and demolition as the main solution.
- 17.210 I saw that the boundary between the two sites appears to coincide with the distinctive change in levels between them. In my opinion, this is an appropriate boundary, because it would assist the assimilation of any development on the lower road frontage part of the site (X28) into the landscape, particularly in long views from the south. I consider that this would be more difficult with regards to the more visually prominent X29 land to the west.
- 17.211 I acknowledge that the whole of site X29 scores well in the Pendle Housing Site Analysis and that it scores better than most other safeguarded sites, including Gib Hill. But in my opinion, the

significantly adverse visual affect, which I consider the development of this site would have on the open countryside to the south, and the impact of extending the built-up part of Colne southwards, has not been given sufficient weight in that analysis.

17.212 With regards to another of the aspects of Crown Way Homes Ltd. objections to these sites, which refers to safeguarded designation in the context of PPG2 guidance, I do not consider that it would be appropriate to give site X29 Protected Areas status in accordance with my recommended new Policy 3A. (see Chapter 3 of this report). This is because whilst I consider that the site is sustainably located and capable of efficient development, the land does not relate well to existing or proposed Green Belt land. Thus, if it is not required for long term future development it is unlikely that it would alternatively be designated as Green Belt, unlike the other sites which I recommend in Chapter 3 should be designated as Protected Areas.

17.213 For all of these reasons, I do not support these objections made by Crown Way Homes Ltd.

#### **Land off Windermere Avenue, omission site X32**

17.214 This site is located at the eastern edge of Colne within its settlement boundary, to the north of Skipton Old Road and to the east of Windermere Avenue. It is bounded by dwellings on its western and southern sides and a footpath runs along part of its eastern boundary. It is 3.92 hectares in area. It is designated as a Site of Settlement Character under Policy 12. There were numerous representations in support of this designation made in response to advertisement of the omission site.

17.215 The Objector contends that the Settlement Character designation of this site is inappropriate because the site is on the edge of the urban area and, in his opinion, serves no special purpose compared with other open land around the settlement. He also comments that the Inspector at the last Local Plan Inquiry concluded that the site was correctly included within the settlement boundary, that it should not be included within the Green Belt and that it could be considered for future housing development. The Objector requires the Site of Settlement Character designation to be removed and the site to be allocated for housing. In Chapter 12 of my Report, I conclude that the designation of the site as a Site of Settlement Character is appropriate. For the following reasons, I conclude that allocation of the site for housing is inappropriate in this review of the Local Plan.

17.216 The Housing Land Availability Report, 2005 (CD 36) records that in the period 1st April 2001 to 31st March 2005, 1,317 dwellings

were completed in Pendle and that a further 1,395 units had planning permission at the end of the survey period. This leaves Pendle with a surplus of 742 dwellings against the JLSP requirement of 1,970 to 2016. Monitoring has, therefore, demonstrated that there is a current over-supply of housing planning permissions in relation to the annual completion targets set by the JLSP, and that there are already enough permissions that will translate into completions for the entire JLSP period. In this context, the Council will continue to apply a housing moratorium until such time as a future Housing Land Availability Report demonstrates that an over-supply no longer exists. Therefore, I do not support this objection.

### **Land at Lidgett Triangle, omission site X33**

- 17.217 The site is agricultural land that lies to the south-east of Skipton Old Road and to the rear of properties on Keighley Road, Colne. It is 6.15 hectares in extent (including existing properties on Skipton Old Road, Colne). In the adopted Pendle Local Plan the site is designated as a Protected Area under Policy E2A outside the settlement boundary and within the Lidgett and Bents Conservation Area. In the re-deposit plan it is designated as Green Belt outside the settlement boundary and within the Lidgett and Bents Conservation Area. In response to advertisement of the omission site, numerous representations of support for these designations were made.
- 17.218 The original objection is made on the basis that the Green Belt designation should be removed and the site should, instead, be designated as safeguarded land under Policy 17. However, at the informal hearing session at which the objection was discussed, the Objector indicated that the site should be safeguarded in the PPG2 context, rather than as a HMR Reserved Housing site.
- 17.219 In Chapter 3 of my report I support the Objector's view on this matter and I recommend that the site is designated as a Protected Area by new Policy 3A. Therefore, I consider that the objection is met.
- 17.220 For the avoidance of doubt, I do not consider that the site should be designated as a safeguarded site in the context of Policy 17; that is, as a HMR Reserved Housing site for the following reasons. I consider that like most other greenfield sites close to the urban area, the protection of the site from development during the period of the re-deposit plan will assist in urban regeneration, by encouraging the recycling of derelict and other previously developed urban land within the Borough. It is remote from the intended areas of housing intervention associated with the HMR

programme and consequently, in my view, the site would be unsuitable for and would detract from that initiative.

17.221 Nor for the following reasons, do I consider that it should be allocated as a general market housing site. The Housing Land Availability Report, 2005 (CD 36) records that in the period 1st April 2001 to 31st March 2005, 1,317 dwellings were completed in Pendle and that a further 1,395 units had planning permission at the end of the survey period. This leaves Pendle with a surplus of 742 dwellings against the JLSP requirement of 1,970 to 2016. Monitoring has demonstrated that there is a current over-supply of housing planning permissions in relation to the annual completion targets set by the JLSP, and that there are already enough permissions that will translate into completions for the entire JLSP period. In this context, the Council will continue to apply a housing moratorium until such time as a future Housing Land Availability Report demonstrates that an over-supply no longer exists.

#### **Land between Skipton Old Road and Castle Road, Colne, omission site X34**

17.222 Omission site X34 is agricultural land that lies to the north-west of Skipton Old Road and to the south-east of Castle Road. It is 10.92 hectares in extent. In the adopted Pendle Local Plan the site is designated as a Protected Area under Policy E2A outside the settlement boundary. In the re-deposit plan it is designated as Green Belt outside the settlement boundary. The most southern part of the site also lies within the Lidgett and Bents Conservation Area. In response to advertisement of the omission site, numerous representations of support for these designations were made.

17.223 The objection is made on the basis that the designations of the adopted Pendle Local Plan should be retained because the considerations that applied at that stage remain largely unchanged. Therefore, that the removal of the Protected Area designation is illogical and will not assist with the longer term planning of the area. It is requested that the site should be retained as safeguarded land as defined in PPG2.

17.224 In Chapter 3 of my report I support the Objector's view on this matter and I recommend that the site is designated as a Protected Area by new Policy 3A. Therefore, I consider that the objection is met.

17.225 For the avoidance of doubt, I do not consider that the site should be designated as a safeguarded site in the context of Policy 17; that is, as a HMR Reserved Housing site, for the following reasons.

I consider that like most other greenfield sites close to the urban area, the protection of the site from development during the period of the re-deposit plan will assist in urban regeneration, by encouraging the recycling of derelict and other urban land within the Borough. It is remote from the intended areas of housing intervention associated with the HMR programme and consequently, in my view, the site would be unsuitable for and would detract from that initiative.

- 17.226 Nor for the following reasons, do I consider that it should be allocated as a general market housing site. The Housing Land Availability Report, 2005 (CD 36) records that in the period 1st April 2001 to 31st March 2005, 1,317 dwellings were completed in Pendle and that a further 1,395 units had planning permission at the end of the survey period. This leaves Pendle with a surplus of 742 dwellings against the JLSP requirement of 1,970 to 2016. Monitoring has demonstrated that there is a current over-supply of housing planning permissions in relation to the annual completion targets set by the JLSP and that there are already enough permissions that will translate into completions for the entire JLSP period. In this context, the Council will continue to apply a housing moratorium until such time as a future Housing Land Availability Report demonstrates that an over-supply no longer exists.

#### **Land at Red Lane, omission site X35 and Y04**

- 17.227 The site lies to the south of Red Lane, Colne between Great House Farm and The Meadows. To the north and south of the site are dwellings, the Sacred Hearts School lies to the east, with Green Belt to the west. The site is 2.58 hectares in extent and comprises grassland. In the adopted Pendle Local Plan the site is designated as a Protected Area outside the settlement boundary and in an Area of Special Landscape. At the first stage deposit the site was safeguarded for housing and placed within the settlement boundary. There were around 78 objections to that designation. However, at the re-deposit stage, the site was de-allocated as a safeguarded housing site and it was re-designated as Green Belt outside the settlement boundary and within the open countryside. There were 6 representations supporting these designations in response to advertisement of the omission site.
- 17.228 One objection was made on the basis that the site should be allocated for general market housing. However, at the informal hearing session at which it was heard, the Objector conceded that this objection had been overtaken by events regarding the reduced housing supply requirement of the JLSP. Consequently, the objection was amended to a request that the land should be safeguarded.

- 17.229 The other Objectors request that the site should retain its designations of the adopted Pendle Local Plan, or that it be allocated for the previously identified needs of education to serve the present community. These latter objections have been conditionally withdrawn on the basis of the re-deposit plan designation as Green Belt. However, in Chapter 3 of my report I recommend that the site is designated as a Protected Area by new Policy 3A. I nevertheless consider that the spirit of all of the objections concerning this site would be met by this designation.
- 17.230 However, for the avoidance of doubt, I consider that the site is suitable neither for HMR reserved housing nor for general market housing for the following reasons. I consider that like most other greenfield sites close to the urban area, the protection of the site from development during the period of the re-deposit plan will assist in urban regeneration, by encouraging the recycling of derelict and other previously developed urban land within the Borough. It is remote from the intended areas of housing intervention associated with the HMR programme and consequently, in my view, the site would be unsuitable for and would detract from that initiative.
- 17.231 Nor for the following reasons, do I consider that it should be allocated as a general market housing site. The Housing Land Availability Report, 2005 (CD 36) records that in the period 1st April 2001 to 31st March 2005, 1,317 dwellings were completed in Pendle and that a further 1,395 units had planning permission at the end of the survey period. This leaves Pendle with a surplus of 742 dwellings against the JLSP requirement of 1,970 to 2016. Monitoring has demonstrated that there is a current over-supply of housing planning permissions in relation to the annual completion targets set by the JLSP and that there are already enough permissions that will translate into completions for the entire JLSP period. In this context, the Council will continue to apply a housing moratorium until such time as a future Housing Land Availability Report demonstrates that an over-supply no longer exists.

**Nelson and Colne College Site, Barrowford Road, omission site X43 and Y03**

- 17.232 This site is located to the west of Colne, between Colne and Barrowford in the ward of Vivary Bridge. It is bounded by residential properties to the north and east, and by farmland to the west and south. The site also abuts Green Belt on three sides. It is 7.66 hectares in area. It comprises a Further Education College and associated playing fields. At the first stage deposit the site was designated as part Safeguarded Site for Housing and part

Open Space within the settlement boundary for Colne. In the re-deposit plan it is designated as Open Space within the settlement boundary for Colne.

- 17.233 Objections are made on the grounds that the site should be de-allocated as a safeguarded site for housing because it lies outside the settlement boundary and within the Open Countryside, and because it is considered that the building should be retained for education purposes.
- 17.234 These objections are partly met by the re-deposit plan designations. However, outline planning permission has been granted for the conversion of the College building to apartments and for the erection of 32 dwellings to the rear. The educational facility is to be relocated. In my opinion, the implementation of this permission will ensure the conservation of this fine, prominent building and the Open Space designation of the playing fields will make certain that the openness of the remainder of the site is preserved. Thus I endorse the re-deposit plan designations for the site. I do not consider that any modification should be made to the plan in response to these objections.

#### **Land off Trawden Road, Cottontree, omission site X50**

- 17.235 The site is a cleared industrial mill site with an extensive hard standing. It lies to the south of the bridge over Colne Water. To the north there are areas of terraced housing and to the immediate south there is a small factory unit, beyond which and to the east and west is open countryside. The site lies outside a settlement boundary and it is designated as Green Belt.
- 17.236 The County Council considers that it should be included in the settlement boundary and should be allocated either for housing or for employment purposes. I conclude in Chapter 1 of my report that the site should remain excluded from the settlement boundary and in Chapter 23, that the Council has identified sufficient employment land to satisfy the Structure Plan requirements for this plan period, without the need to allocate additional industrial sites.
- 17.237 There was no support for and considerable objection to the County Council's propositions resulting from advertisement of this omission site. In addition to the reasons that I give in Chapter 1 for the retention of the site within the settlement boundary, I do not consider that it should be allocated as a general market housing site for the following reasons.
- 17.238 The Housing Land Availability Report, 2005 (CD 36) records that in the period 1st April 2001 to 31st March 2005, 1,317 dwellings

were completed in Pendle and that a further 1,395 units had planning permission at the end of the survey period. This leaves Pendle with a surplus of 742 dwellings against the JLSP requirement of 1,970 to 2016. Monitoring has demonstrated that there is a current over-supply of housing planning permissions in relation to the annual completion targets set by the JLSP and that there are already enough permissions that will translate into completions for the entire JLSP period. In this context, the Council will continue to apply a housing moratorium until such time as a future Housing Land Availability Report demonstrates that an over-supply no longer exists. Therefore, I do not support the objection.

## **EARBY**

Land next to Hodge Syke House, Earby, omission site X65  
Land at White House Farm, Salterforth Road, omission site X67  
Bawhead Road, omission site X84

### **Land next to Hodge Syke House, Earby, omission site X65**

17.239 The site lies approximately 1.5 kilometres east of Earby town centre and is situated to the north of Birch Hall Lane. It is bounded on three sides by open countryside. The fields to the north and east form part of the Birch Hall Lane Biological Heritage Site. To the west is Hodge Syke House, which marks the end of the ribbon development along Mill Brow Road and Birch Hall Lane. It is around 0.03 hectare in extent and comprises an overgrown former domestic garage site. At the first stage deposit the site was designated Open Countryside. In the re-deposit plan it is non-designated within the Settlement Boundary for Earby and it lies within Earby Conservation Area.

17.240 The Objector states that the site, which is currently outside the Settlement Boundary, should be considered for the building of a house or bungalow. The Council agreed, in part with this first stage deposit objection, and as a result, the Settlement Boundary for Earby was extended in the re-deposit plan to include the residential areas off Mill Brow Road and Birch Hall Lane, and the garage site referred to by the Objector (Omission Site X65). I consider that this partly meets the objection.

17.241 However, the Council is currently in a position of over-supply with regards to meeting the JLSP housing requirement. Therefore, in order to comply with the JLSP, the re-deposit plan does not allocate any land for housing. Consequently, I consider that it is unnecessary to allocate this or any other site to meet the JLSP requirement to 2016. For this reason I do not support this part of the objection.

## **Land at White House Farm, Salterforth Road, omission site X67**

- 17.242 The site lies approximately 0.5 kilometres south of Earby town centre in the separate area of North Holme. It is situated between Salterforth Road to the west and the former Colne to Skipton railway line to the east. To the north there is a small area of semi-detached housing. To the south-west are a number of detached dwellings and farm buildings, and to the south-east is an area of open countryside extending south from the site, which separates Earby from the nearby village of Sough. This omission site is around 0.6 hectare in area and comprises a grassed area. In the re-deposit plan it has no designation, but it falls within the Settlement Boundary for Earby. The site benefits from an extant planning permission for development comprising seven houses and associated garages.
- 17.243 An Objector states that the site is urban white land in excess of 0.4 hectare that has recently had outline planning permission for residential development, and has been developed in part. As such, it should be allocated in the Local Plan for residential development.
- 17.244 As I conclude in Part A of this Chapter of my report, the use of the term 'white land' in Policy 17 is confusing. Also, that the definition included in the reasoned justification of Policy 17 of the re-deposit plan has no support in the JLSP, the RSS or in PPG3. Therefore, I have recommended that reference to it should be removed from the policy.
- 17.245 With regard to the allocation of the site for residential development, the Housing Land Availability Report, 2005 (CD 36) records that in the period 1st April 2001 to 31st March 2005, 1,317 dwellings were completed in Pendle and that a further 1,395 units had planning permission at the end of the survey period. This leaves Pendle with a surplus of 742 dwellings against the JLSP requirement of 1,970 to 2016. Monitoring has demonstrated that there is a current over-supply of housing planning permissions in relation to the annual completion targets set by the JLSP and that there are already enough permissions that will translate into completions for the entire JLSP period.
- 17.246 In this context, the Council will continue to apply a housing moratorium until such time as a future Housing Land Availability Report demonstrates that an over-supply no longer exists. For these reasons, I do not support the objection and I do not recommend that the site is allocated for housing.

## **Bawhead Road, omission site X84**

- 17.247 Omission site X84 is a greenfield site in agricultural use. It is 1.66 hectares in area. It is bounded by residential development on its western and southern sides, by educational uses on its northern side and by open countryside on its eastern side. The site has the benefit of an extant outline planning permission for residential development. Both in the adopted Pendle Local Plan and in the first stage deposit plan, the site was designated as a housing allocation within the Settlement Boundary. At the re-deposit stage the housing allocation was removed from the site in response to the reduced housing requirement of the JLSP. The site remains within the Settlement Boundary, but it is not designated for a specific use. This position reflects the fact that there is a live planning permission for residential development at the site.
- 17.248 This re-deposit Objector states that he opposes the proposed development of Bawhead Field as there are plenty of brownfield sites available in Earby and Pendle to allow for any amount of development, without using agricultural land. He does not accept that the fact that it has been allocated as 'building land' for several years has any basis. In his opinion, the development of greenfield land goes against Government guidelines and the Council's 'green' policies.
- 17.249 I have no reason to think that the extant planning permission will not be implemented following approval of its reserved matters details. Therefore, I consider that it is prudent that the likelihood of the development of this site is reflected in the position of the Settlement Boundary, which is intended to show the extent of the built form. Consequently, I consider that it would be illogical to designate the site as Open Countryside.
- 17.250 Consideration of revoking the planning permission does not fall within the remit of this Inquiry. However, taking into account the over-supply of housing land within the Borough and the greenfield nature of the site, if the extant planning permission was not implemented, the sequential test of Policy 17 would give the site a very low priority for development. For these reasons, I do not consider that the objection warrants modification to the plan.

## **LANESHAW BRIDGE**

- Land opposite Hartley Hospital, Keighley Road, omission site X45  
Land to the east of Emmott Lane, omission site X47  
Land off Alma Road, omission site X48

### **Land opposite Hartley Hospital, Keighley Road, omission site X45**

17.251 Omission site X45 is around 1.97 hectares in extent. It comprises grazing land and two dwellings. It is situated on the southern side of the A6068. There are dwellings to the east, west and north. From the road, the open aspect of the land to the south provides extensive views across open countryside towards the Winewall and Cottontree Conservation Area, and the South Pennine Moors. In the adopted Pendle Local Plan the site falls outside the Settlement Boundary and it is designated as an Area of Special Landscape and Green Belt. In the re-deposit plan it is designated as Open Countryside and Green Belt, and it remains outside the Settlement Boundary for Laneshaw Bridge.

17.252 Objection was made to these designations at the first stage deposit. However, there were several representations of support made to the designations in response to advertisement of the omission site. An Objector states that the housing regeneration objectives of Policy 17 recognise the need for the provision of quality housing. It is considered that the use of the land opposite the former Hartley Hospital in Laneshaw Bridge, for residential purposes, would support measures to widen the choice of housing within Pendle and in particular, would assist with the provision of quality housing. It is contended that the land should, therefore, be removed from the Green Belt and allocated for housing.

17.253 I consider the Green Belt merits of the site in Chapter 3 of my report. With regards its merits as a housing site, the Housing Land Availability Report, 2005 (CD 36) records that in the period 1st April 2001 to 31st March 2005, 1,317 dwellings were completed in Pendle and that a further 1,395 units had planning permission at the end of the survey period. This leaves Pendle with a surplus of 742 dwellings against the JLSP requirement of 1,970 to 2016. Monitoring has demonstrated that there is a current over-supply of housing planning permissions in relation to the annual completion targets set by the JLSP and that there are already enough permissions that will translate into completions for the entire JLSP period.

17.254 In this context, the Council will continue to apply a housing moratorium until such time as a future Housing Land Availability Report demonstrates that an over-supply no longer exists. For these reasons, I do not support the objection and I do not recommend that the site is allocated for housing.

### **Land to the east of Emmott Lane, omission site X47**

17.255 Omission site X47 lies to the east of the village of Laneshaw Bridge and is situated behind cottages along the eastern side of

Emmott Lane. To the south-east of the site there is a housing development under construction. To the north and east are areas of uninterrupted open countryside. The southern boundary is defined by a public house and by the A6068. Except for the service road running along the rear of dwellings in Emmott Lane, the site is excluded from the Settlement Boundary and is designated as Open Countryside.

- 17.256 The Objector states that the aims of the Housing Chapter of the plan, which are; 'to provide a range of good quality, affordable mixed tenure housing in order to meet the changing needs of the community', and, 'to provide a choice of housing which will retain and attract population', have not been achieved. As such, the parcel of land off Emmott Lane in Laneshaw Bridge should be identified within Policy 17 as a site for open market and affordable housing development.
- 17.257 It is argued that such a designation would accord with emerging Government guidance given in draft PPS3, on the size, type and affordability of housing, which indicates that the aim of the proposed PPS3 is to provide a policy framework that will secure more affordable housing as part of the timely delivery of agreed housing numbers. It encourages local authorities, in setting out their Local Plan, to take steps to meet affordable housing targets. One of the strategies recommended for doing this is to identify sites on which affordable housing will be expected as part of residential or mixed use development, taking into account rural as well as urban needs, and indicating the amount of affordable housing to be provided from residential or mixed use developments, as a proportion of the overall dwelling provision on the site.
- 17.258 However, as I have noted earlier in this Chapter of my report, this consultation document should be given less weight than the statutorily adopted Development Plan, which in this case, is relatively up-to-date with regard to its regional and strategic elements. The Housing Land Availability Report 2005 (CD 36) indicates that in the period 1st April 2001 to 31st March 2005, 1,317 dwellings were completed in Pendle, and that a further 1,407 units had planning permission at the end of the survey period. This leaves Pendle with a surplus of 754 dwellings against the JLSP requirement of 1,970 dwellings to 2016.
- 17.259 In line with the PMM approach set out in PPG3, monitoring has demonstrated that there is currently an over-supply of housing permissions in relation to the annual completion targets set by the JLSP. The over-supply demonstrates that there are already enough permissions that will translate into completions for the entire JLSP period. In this context, the Council will continue to

apply a housing moratorium until such time as a future Housing Land Availability report demonstrates that an over-supply no longer exists. Therefore, there is no need to allocate the land off Emmott Lane for general market housing.

17.260 However, affordable housing may be permitted as an exception provided by Policy 17, where there is an identified need for such housing. No specific sites have been allocated for affordable housing in the plan and no need has been demonstrated for affordable housing in Laneshaw Bridge. On this basis, I consider that it would be inappropriate to allocate the site for general market housing. Proposals for affordable housing would be treated on their merits if a need can be shown. For these reasons I do not support the objection.

#### **Land off Alma Road, omission site X48**

17.261 The site lies to the north of the village of Laneshaw Bridge, which is a linear settlement that has developed west along the A6068 Keighley Road from the crossroads with Emmott Lane/School Lane. It is a greenfield site that is 0.82 hectare in extent and which is used as grazing land. In the re-deposit plan the site is designated as Open Countryside falling outside the Settlement Boundary. In response to advertisement of this omission site there were eight representations supporting these designations.

17.262 An Objector considers that additional housing land should be allocated, in order to meet housing requirements at the end of the plan period. It is thought that the land off Alma Road in Laneshaw Bridge is ideally suited for residential use and should be allocated accordingly.

17.263 The Housing Land Availability Report, 2005 (CD 36) records that in the period 1st April 2001 to 31st March 2005, 1,317 dwellings were completed in Pendle and that a further 1,395 units had planning permission at the end of the survey period. This leaves Pendle with a surplus of 742 dwellings against the JLSP requirement of 1,970 to 2016. Monitoring has demonstrated that there is currently an over-supply of housing planning permissions in relation to the annual completion targets set by the JLSP and that there are already enough permissions that will translate into completions for the entire JLSP period.

17.264 Thus, the Council will continue to apply a housing moratorium until such time as a future Housing Land Availability Report demonstrates that an over-supply no longer exists. For these reasons, I do not support the objection and I do not recommend that the site is allocated for housing.

## **NELSON**

Former Reservoir at Lowthwaite Drive, omission site X18

Riverside Mill, off Reedyford Road, omission site X19

Further Clough Head, omission site X20

James Nelson's Sports Ground, omission site X86/Y11

Gib Hill, omission site X22

### **Former Reservoir at Lowthwaite Drive, omission site X18**

17.265 The site lies 1.2 kilometres south of Nelson town centre within a relatively modern housing development. It is bounded on two sides by housing. To the north lies the Hulton Care Nursing Home and to the south is a grassed area providing Public Open Space. The site is 0.83 hectare in area. Part of it was formerly occupied by the Waidshouse (Halifax Road) underground reservoir. In the re-deposit plan the site has no designation, but it falls within the Settlement Boundary for Nelson.

17.266 An Objector notes that paragraph 30 of PPG3 informs that previously developed sites, in sustainable locations, within main settlements should be the preferred location to meet the housing needs of local authorities. Therefore, it is considered that the site should be allocated as housing land.

17.267 The provision of new housing on previously developed land does indeed accord with Government guidance, but the PMM approach detailed in PPG3 states that housing requirements must be met by continual review and management of the housing provision. The Housing Land Availability Report, 2005 (CD 36) records that in the period 1st April 2001 to 31st March 2005, 1,317 dwellings were completed in Pendle and that a further 1,395 units had planning permission at the end of the survey period. This leaves Pendle with a surplus of 742 dwellings against the JLSP requirement of 1,970 to 2016. Monitoring has demonstrated that there is a current over-supply of housing planning permissions in relation to the annual completion targets set by the JLSP and that there are already enough permissions that will translate into completions for the entire JLSP period.

17.268 Therefore, the Council will continue to apply a housing moratorium until such time as a future Housing Land Availability Report demonstrates that an over-supply no longer exists. For these reasons, I do not support the objection and I do not recommend that the site is allocated for housing.

### **Riverside Mill, off Reedyford Road, omission site X19**

17.269 The site forms part of an established employment area, approximately 0.6 km to the north of Nelson town centre. The

main vehicular access is directly off the A6068 (Reedyford Road), which connects with the M65 motorway at Junction 13, 0.75 kilometres to the north. The site is 2.8 hectares in area and is occupied by the remains of multi-storey mill buildings with adjacent single-storey structures. The main building was damaged by fire in June 2003 and has subsequently been demolished. Previous demolition work means that hard-standing now forms approximately 40% of the total site area. The north-western boundary of the site (Charles Street) adjoins an established employment area, situated alongside the Leeds and Liverpool Canal. This area includes the Hodge Bank Business Park, developed in 2002/03. Semi-detached housing occupies an elevated position alongside Reedyford Road, on the north-eastern boundary of the site, whilst high-density, late nineteenth century terraced housing and Bradley County Primary School lie to the south.

- 17.270 The south-western part of the site lies within Flood Zone 3, which covers areas with the highest probability of flooding, where the annual probability is greater than or equal to 1% for river flooding. Part of the site also lies within Flood Zone 2, which covers areas with an annual probability of flooding of between 0.1% and 1 % in the case of river flooding.
- 17.271 In the adopted Pendle Local Plan the site is designated as an Essential Employment Area within the Settlement Boundary for Nelson. At the first stage deposit it was designated as a Protected Employment Area (Mixed Use) under Policy 22. It lies within the Market Restructuring Intervention Area and within the Settlement Boundary for Nelson. In the re-deposit plan, the site retained those designations as a Protected Employment Area (Mixed Use) under Policy 22, falling within the Housing Market Renewal Intervention Area and within the Settlement Boundary for Nelson.
- 17.272 There were three objections made to the designations of the site during the first stage deposit period. There were a further two objections made at the re-deposit stage. Objectors consider that the redevelopment of the site for housing is fully in accordance with PPG3. In their opinion, there is no justification for the Protected Employment Area designation of the site; furthermore, that its alternative designation for housing would allow other greenfield housing allocations in the first stage deposit plan to be removed.
- 17.273 Since no land, either brownfield or greenfield, is allocated for general market housing in the re-deposit plan, I consider that this element of the objections is met. However, further representations comment that if this site was developed for housing, residents from renovation/demolition areas could be

decanted into it, leaving vacant properties. Therefore, as the HMR programme progresses, there would always be a supply of new properties for people to move into.

- 17.274 I acknowledge that considerations of access and noise sometimes mean that employment land does not sit comfortably in close proximity to residential areas. However, PPG13, which seeks to promote accessibility to jobs, by public transport, walking and cycling and thereby reducing the need to travel, especially by car, advises that it is important to retain existing industrial or business premises in such areas, where they benefit from good access and their setting does not render them incongruous. I consider that the site satisfies these criteria and hence, that in principle, its protection from redevelopment for other uses is appropriate.
- 17.275 Specifically, as I discuss in more detail in Chapter 23 of my report, in Pendle there is a particular shortage of employment sites over 1.0 hectares, as demonstrated by the latest Industrial and Business Land Availability Report (March 2005) (CD 41). I am convinced by the Council's arguments that such sites are vital, if the Borough is to attract inward investment that will help to strengthen and diversify its local economy, which presently remains heavily dependent on a declining manufacturing sector, and to allow for the expansion of indigenous businesses that offer the potential for employment growth.
- 17.276 Furthermore, the Council is currently in a position of over-supply with regards to meeting the JLSP housing requirement. Therefore, the allocation of the site for general market housing would conflict with Policy 12 of the JLSP. Consequently, I conclude that the allocation of the Riverside Mill site for general market housing is not only unnecessary, but could be considered to undermine regional and local strategies for economic development and regeneration, which would be contrary to PPG3.
- 17.277 I acknowledge that the omission site is at the heart of the Nelson ADF and could potentially make a significant contribution to the HMR Pathfinder for Pendle. However, flood risk is a constraint to residential development at this site, which has to be weighed, together with the importance of the site for employment purposes, against its potential value as a site for HMR replacement homes. Taking account of this balance, I consider that it would be inappropriate to remove the Protected Employment Areas status from the site.
- 17.278 However, the exceptions of Policy 22 would permit such residential development of the site to take place if an applicant could demonstrate that the site is obsolete for employment purposes and that adequate flood risk mitigation measures could

be demonstrated. In which case, this brownfield site would take precedence over greenfield safeguarded sites in the Nelson ADF. For these reasons, I do not consider that the objections warrant modification of the plan.

### **Further Clough Head, omission site X20**

17.279 The site lies to the south of Trent Road, Nelson and adjoins a new development of mostly detached housing (to the south of Pinewood Drive and Hartley Drive). It is 1.5 km from Nelson town centre, but it is close to a parade of local shops on Barkerhouse Road and a main bus route, which links the site to Nelson town centre and beyond. The site is 3.67 hectares in area and is currently used as grazing land. In the first stage deposit plan the site was allocated for housing, within the settlement boundary for Nelson. At the re-deposit stage it is safeguarded land for housing within the settlement boundary for Nelson. The site is adjacent to the ADF boundary for Nelson.

17.280 There were five objections made to the designations of the site during the first stage deposit period. There were no further objections made at the re-deposit stage. The objections were made on the grounds that the first stage deposit plan unnecessarily allocated greenfield land for housing, contrary to PPG3. The priority location for new housing should be previously developed land in sustainable locations within the urban area. Therefore, Objectors consider that the three greenfield sites which have been identified in Policy 17, including the land at Further Clough Head, Nelson, should be removed.

17.281 They comment that the site is very remote from the existing built-up area, and that physically and visually, it relates more to the open countryside beyond, rather than to existing development. In their opinion, the land is very steep, therefore, development would be visually dominant and it would open up the opportunity for further unnecessary housing developments, which would spoil areas of natural beauty. They request that alternative sites should be considered, and in this regard, sites X13 and X19, upon which I have already commented and dismissed in this Chapter of my report, are recommended.

17.282 The re-deposit plan does not allocate any land for new housing development to meet the JLSP requirement to 2016. As a consequence, the three greenfield sites (including the land at Further Clough Head, Nelson), which were allocated for new housing development in the first stage deposit plan are not allocated for this purpose in the re-deposit plan. The re-deposit plan does not allocate any land for housing (whether greenfield or brownfield) because the Council is currently in a position of over-

supply for general market housing. Since the three greenfield sites which were allocated for housing in Policy 17 of the first stage deposit plan have been removed, I consider that some of these objections are overcome.

- 17.283 Turning specifically to the site at Further Clough Head, Nelson, it is not identified as an Area of Outstanding Natural Beauty nor does it have any other environmental or landscape designation. It was identified in the Trent Road Development Brief (CD 124), which was adopted by the Council in 1999 after full public consultation, as land suitable for housing. The site is adjacent to the Southfield Conservation Area and hence, any development would need to be sympathetically designed to reflect this.
- 17.284 I do not consider that the site is very remote from the existing built-up area, or that physically and visually it relates more to the open countryside beyond rather than to existing development. In my opinion, the site is in a sustainable location and it forms a natural extension to an already established housing development. In the re-deposit plan the site is, in my opinion, appropriately designated as safeguarded land for housing. However, it will only be released if required to assist in the regeneration of Nelson. Furthermore, its release would be through the sequential approach detailed in Policy 17 of the re-deposit plan.

#### **James Nelson's Sports Ground, omission site X86/Y11**

- 17.285 The site is located in the Southfield area of Nelson. It is 2.73 hectares in area and contains the buildings of the former sports club, together with a disused bowling green, tennis court and a former works sports ground. The site is bounded by grassed areas on all sides. New housing developments comprising detached and semi-detached dwellings adjoin the northern boundary and the south-eastern corner of the site. A small area of terraced housing adjoins the south-western corner. It was allocated as a housing site in the first stage deposit plan and it lies within the Settlement Boundary for Nelson. However, in the re-deposit plan it is designated as Open Space falling within the Settlement Boundary for Nelson. The site lies partly within the ADF boundary for Nelson, but outside of the defined Housing Market Renewal Intervention Area boundary.
- 17.286 Planning permission was granted in October 2005 for the mixed use development of part of the site; as a sports pavilion to provide a gymnasium on the lower ground floor, a licensed restaurant/bar on the ground floor, offices at first floor level and five apartments on a new second floor, together with the reinstatement of sports facilities at the site.

- 17.287 There were two objections concerning the site made during the first stage deposit period and there was one further objection received at the re-deposit stage. In addition, there were three representations of support for the Open Space designation of the site and two of objection in response to advertisement of this omission site.
- 17.288 The first stage deposit Objectors comment that the James Nelson Sports Club is a war memorial and should not be developed for housing. It is considered that the facility should be re-opened to provide a major sports area and community facility for the people of Nelson. The Objection at the re-deposit stage notes that the James Nelson Sports Ground was allocated for housing in the first stage deposit plan and that it should be re-allocated, as previously, for residential development. Alternatively, it should be considered as a safeguarded site until plans can be put into place for a more suitable use.
- 17.289 With regards to the first stage deposit objections, in the re-deposit plan the site is de-allocated as a housing site and is instead, identified as Existing Open Space, under Policy 33. As such, it would be protected unless a proposal for development provided for the replacement of open space provision as compensation, and would result in no net less to the community it serves. I consider that this change in designation would have overcome these objections to the development of the site for housing.
- 17.290 Turning to the re-deposit objection, the Housing Land Availability Report, 2005 (CD 36) records that in the period 1st April 2001 to 31st March 2005, 1,317 dwellings were completed in Pendle, and that a further 1,395 units had planning permission at the end of the survey period. This leaves Pendle with a surplus of 742 dwellings against the JLSP requirement of 1,970 to 2016. Monitoring has demonstrated that there is currently an over-supply of housing planning permissions in relation to the annual completion targets set by the JLSP and that there are already enough permissions that will translate into completions for the entire JLSP period. In these circumstances, I consider that it would be inappropriate to designate the land for general market housing.
- 17.291 Nevertheless, I consider that the site is well located in terms of access to jobs, schools, shops and public transport. It is within the settlement boundary for Nelson and it lies partly within the ADF boundary for Nelson. In the Pendle Housing Site Analysis (CD 188) it scores significantly better, especially with its weighted score, than the nearby safeguarded site X20 at Further Clough

Head, but the Council discounted it as being a suitable site to safeguard because of its previous use as a sports facility.

- 17.292 However, I find this argument to be somewhat inconsistent for several reasons. The site was considered suitable for allocation for housing at the first stage deposit. It was recommended for safeguarding by Officers of the Council at the re-deposit stage. The site is not included in the Pendle Open Space Audit 2003 (CD 47), to which Policy 33 – Existing Open Space refers. However, the Former Lucas Sports Ground, omission site X02, which was safeguarded at the re-deposit stage, is of a similar size and like site X86/Y11, it comprises a private sports ground that has been redundant for approximately ten years. However, this latter site is referred to in the Open Space Audit.
- 17.293 I acknowledge that the Southfield ward, in which the site is located, has below average (for Pendle) provision for open space and that PPG17 presumes against the loss of sports pitches. However, unlike many of the other omission sites, this site has not attracted much public attention at any of the consultation stages on the evolving plan, which could indicate that it is not a facility that is highly valued by the public.
- 17.294 I have also taken into consideration that the Council does not intend to acquire or manage the site as a recreational facility, or to make any sort of financial contribution towards its maintenance. Consequently, I have no reason to doubt the Objector's statement made at the informal hearing session at which the objection was heard, that it will be left derelict under its proposed designation.
- 17.295 In contrast, I see no reason why a requirement for the provision of a sports pitch on part of the site could not be included in a Development Brief, if the site were safeguarded for HMR replacement housing. Furthermore, I consider that a further benefit of safeguarding the site would be to provide flexibility for replacement housing in the Nelson ADF to compensate for the reduction in the site area safeguarded at Gib Hill, omission site X22, which I recommend in Chapter 4 of my report, to take account of the recent BHS designation of part of that site.
- 17.296 Therefore, on balance I conclude that the potential benefits of safeguarding this site for HMR housing, to be used as a 'last resort' for that purpose, outweigh the constraint of its former private recreational use. However, in order to encourage the implementation of the mixed use planning permission recently granted on part of the site, which in my opinion would provide significant community benefits, I consider that part of the site should be excluded from the safeguarded area.

## **Gib Hill, omission site X22**

17.297 Omission site X22 comprises land at Gib Hill that extends to 12.44 hectares. It is situated to the south-east of Nelson. On the west, the site is bordered by residential properties. To the north it abuts two schools and to the east it opens out to open countryside. Part of it comprises forestry plantations and part is used for grazing. Several public footpaths cross the site and it is used for informal recreation. In the adopted Pendle Local Plan the site lies outside the Settlement Boundary and it is designated as an Area of Special Landscape. However, at the first stage deposit the settlement boundary was amended to include the site and it was safeguarded for housing. These designations were retained at the re-deposit stage.

17.298 Over four hundred objections have been received to these designations at the first and re-deposit stages. In addition, a further four representations objecting to the designations were made in response to advertisement of this omission site. The objections raise the following main issues:

- There is no need for more houses.
- There are alternative brownfield sites available, including former industrial sites.
- The allocation of this greenfield site conflicts with PPG3 and PPS7, which favour the development of brownfield sites.
- The safeguarding of Gib Hill will increase the number of vacancies in existing houses and further weaken the fragile housing market in Pendle.
- There should be certainty regarding future proposals for the site.
- Development would give rise to increased traffic congestion.
- It is a pleasant natural area that should be retained as such for the benefit of future generations.
- The Settlement Boundary for Nelson should not be amended to include Gib Hill within the urban area.
- Development of the site will result in urban sprawl and coalescence with Colne.
- The area should be designated as Green Belt.
- The site lies within an Area of Special Landscape Quality.
- Development would be visually intrusive.
- There should be more trees planted on the site; not houses built.
- The site should be designated as a Site of Settlement Character.
- The site should be added to the list of Environmental Protection Sites.

- The area should be designated as an animal sanctuary.
- It is an important area for recreation that should be retained.
- There are special local connections to the site that should be preserved.
- The site should be designated as a country park or used as an extension to the municipal golf course.
- The naturalness of the area provides an important educational resource.

I now consider these issues.

17.299 The current Housing Land Availability Study (2005) (CD 36) demonstrates that the Council is in a position of over-supply with regards to housing provision required by the JLSP. Due to the over-supply there is no need to allocate land for general market housing. However, Policy 12 of the JLSP states that the overall housing requirement figure for Pendle is net of any clearance and replacement. It recognises that other, additional dwellings may be required to replace those cleared during the plan period. Furthermore, Policy 13 of the JLSP clarifies that replacement dwellings are in addition to those required by Policy 12. It is in this context that Policy 17 of the re-deposit plan safeguards land at Gib Hill for housing.

17.300 As indicated by the policy, the site has been safeguarded for housing, only to be released if a need arises through activities directly related to the HMR programme, and as a 'last resort', since any proposed development on safeguarded land must also follow the sequential approach of Policy 17.

17.301 Objectors refers to figures quoted in the Nelson ADF Executive Summary (CD 66) that between 800 and 1,100 dwellings may need to be demolished, and that between 290 and 410 replacement dwellings may need to be built. They interpret this to mean that, in the worst case scenario, 410 houses will need to be accommodated on land formerly occupied by 800 houses. But, in my opinion, this interpretation of the ADF Executive Summary is not entirely accurate.

17.302 It may not be feasible for the replacement of dwellings demolished to be built on the same sites, as lost dwellings may result from conversions, merging two dwellings into one, or to make room for open space, for example. This will not be clear until the master planning exercises are complete. Until this time, the Council cannot be certain exactly how much land will be required in each of the ADF areas. Therefore, in my opinion, it is appropriate that land is safeguarded for this purpose, as a precautionary measure.

17.303 Nevertheless, Objectors rightly observe that there are a significant number of potential brownfield sites for new housing in the Borough, as identified in the Urban Potential Study 2005 (CD 38). However, as Topic Paper 2 (CD 50) indicates, the potential to provide replacement homes on brownfield sites, in the right place and at the right time, is small. The UPS identifies that 627 dwellings can be provided on previously developed land across Pendle. However, to assist regeneration a supply is needed within the ADF boundaries. The UPS shows that up to 365 dwellings could be provided on previously developed land within the three ADF areas over the next 15 years.

17.304 However, in the short term (0-5 years), the study indicates that few potential sites are likely to come forward for development. Furthermore, some of these sites have already gained planning permission since the base date for the study (31<sup>st</sup> March 2004) and must now be excluded from this assessment. For the reasons that I give in Chapters 22 and 23 of my report, I consider that former industrial sites that are within a Protected Employment Area (Policy 22) should be retained for employment use, in order to assist the regeneration of the economy of the area. Thus, the revised figures, which I reproduce below from Topic Paper 2 illustrate that in the next five years, and even in the longer term, the potential to develop brownfield sites with replacement houses, within the ADF areas is limited.

Topic Paper 2 - Table 6

ADF Area	0-5 Years Short Term	5-10 Years Medium Term	10-15 Years Long Term	Total No. dwellings
Brierfield	3	0	79	82
<b>Colne</b>	<b>4</b>	<b>18</b>	<b>0</b>	<b>22</b>
<b>Nelson</b>	<b>38</b>	<b>0</b>	<b>27</b>	<b>65</b>

17.305 Objectors are concerned that further development on greenfield sites such as Gib Hill, on the boundary of Nelson and Colne, may have detrimental impacts on other areas of the housing market in Pendle, as well as making brownfield sites less desirable and sustainable. However, any development on this site will be linked to the HMR initiative, which is designed to provide the framework for creating sustainable communities based on a choice of quality housing, economic success, improved education and health facilities, crime reduction and environmental improvement. In addition, the sequential test of Policy 17 of the re-deposit plan will

ensure that brownfield sites are used prior to greenfield sites, in accordance with Government guidance.

- 17.306 ELEVATE East Lancashire covers the Boroughs of Blackburn with Darwen, Burnley, Hyndburn, Pendle and Rossendale. As noted by Objectors, none of these other Boroughs has deemed it necessary to allocate safeguarded sites in their Local Plans, in connection with the HMR programme. However, I consider that it is unfair to make this comparison, because only Burnley has gone through a Local Plan review since the announcement and set up of the HMR scheme and ELEVATE. It has not been brought to my attention an over-supply of housing and a housing moratorium are considerations in Burnley.
- 17.307 The Council has sought to justify the selection of the five safeguarded sites by assessing, scoring and comparing their characteristics having regard to; physical characteristics and environmental constraints, site infrastructure and accessibility, sustainability issues and regeneration potential. The final score given to each site has been weighted to reflect its suitability to meet the needs of the nearest identified Priority Action Area (PAA). The results of this analysis are contained in, 'Pendle Housing Site Analysis' (CD 188). In this analysis, land at Gib Hill, site X22, scores better than any of the other sites considered or selected to serve the Nelson ADF, but least well of those for the Colne ADF. I turn now to consider the merits the site in the light of the numerous constraints contended by Objectors.
- 17.308 Access to the site and the impact of development on the local highways network is a matter that would be considered at the time of an application for development, but I have no reason to think that it would be a significant constraint. Policy 29 - Creating an Improved Road Transport Network of the re-deposit plan requires the submission of a transport assessment and a travel plan for any development proposal that will considerably impact on the capacity/demand of the road network. In addition, the policy requires the provision of traffic calming measures both on and around sites for developments over 0.4 hectare in area. Furthermore, a regular bus service operates in the vicinity, so residents of and visitors to the site would not be reliant on private transport.
- 17.309 With regards to Objectors' comments that the site is a pleasant natural area that should be retained as such for the benefit of future generations, it is my interpretation that the re-deposit plan is based on the concept of sustainable development. However, the Council has a duty to provide a decent home for everyone. Therefore, the land at Gib Hill has been safeguarded for HMR replacement housing under Policy 17. The ADF strategy identifies

that in order to 'kick start' the restructuring of the housing market in Pendle, there needs to be an increase in housing choice. However, at this time, it is not known what level of clearance and replacement will be necessary. This will be identified by Area Action Plans. As a consequence, I consider that it is necessary to safeguard sites for possible housing development in the event that the Area Action Plans identify a need for such land. But the land will only be released as a last resort, in accordance with the sequential approach of Policy 17. I consider that these considerations justify the safeguarding of the site.

- 17.310 I agree with Objectors that retaining the openness of the site could potentially check the sprawl of development at Nelson, and that the designation of the site as Green Belt would assist in safeguarding the countryside from encroachment. But I do not think that a Green Belt designation of the site would assist in urban regeneration. In my opinion, it would actually hinder the HMR programme, if there were insufficient land available for decanting and replacement housing for the Nelson ADF. Nor do I support the coalescence argument, because the site does not extend any further eastwards than the school to the north-east of the site. Furthermore, as I discuss in more detail in Chapter 3 of my report, I consider that there are compelling policy considerations against Green Belt designation of the site, which in my opinion would amount to a substantial change to the extent of the Green Belt. Therefore I do not support these arguments.
- 17.311 Furthermore, as I discuss in detail in Chapter 1 of my report, I consider that it is a sensible practical matter to include the site within the settlement boundary for Nelson, if it is potentially to be developed for HMR housing, because otherwise such development would conflict with Policy 1 – Development in the Open Countryside. The RSS supports such review of settlement boundaries.
- 17.312 The site is designated as an Area of Special Landscape under Policy E3 of the adopted Pendle Local plan. However, the County Council has issued a statement of non-conformity of this policy with the JLSP. Therefore, it would be inappropriate to attach this designation to the site in the re-deposit plan. From my observation and the evidence before me, I do not consider that the landscape quality of the site is worthy of any other landscape protection designation. The aesthetics of any proposed development is a matter that would be considered at the planning application stage, in the light of Policy 13 – Quality and Design of New Development, and all other policies of the plan.
- 17.313 Regarding the contention that there should be more trees planted on the site in preference to building houses, I reiterate that in my

opinion, it is necessary to safeguard land for HMR replacement dwellings as a precautionary measure to ensure that the HMR programme is not jeopardised. In my assessment from observation and the evidence before me, and as illustrated in the Pendle Housing Site Analysis (CD 188), land at Gib Hill is, in principle, suitable for this purpose, but it would only be used if suitable brownfield sites were not available.

- 17.314 Tree planting was undertaken at the site in 1993/94, and later in 2001/02. Both schemes were funded by the Forestry Commission Woodland Grant Scheme, but there is no proposal to plant further trees at the site. Since the Council own the site, there is, therefore, no mechanism whereby more trees would be planted at the site. The original scheme involved planting around the perimeter of the site and the latter was designed, as far as possible, to be around perimeters and along water courses. Therefore, with sensitive design, development of the site should not necessitate significant clearance of these trees.
- 17.315 In Chapter 12 of my report, I give my reasons why I do not support the designation of the site as an area of Settlement Character, and in Chapter 4 I explain that I do not consider that this review of the Local Plan is the appropriate forum for making environmental protection designations. However, since the close of the Inquiry, fields numbers 750, 461 and 462 have been designated as a BHS by the BHS Partnership.
- 17.316 As discussed at the relevant informal hearing session, these fields impinge only marginally on the area of the designated safeguarded site. Therefore, I conclude that it would be expedient, in the interests of nature conservation, to exclude those fields from the HMR safeguarded area. I make recommendations accordingly in Chapter 4 of my report.
- 17.317 Concerning the value of the site as a recreational resource, although it is currently used as an area for informal recreation; for walking, running, walking dogs and informal children's play, the land is not designated as open space and there is no public access over it, except for along the several public footpaths that criss-cross the site. There is no children's play area on the site, but there is an Equipped Area for Play at the nearby Marsden Park. Any proposed development would be expected to incorporate the public footpaths or to re-route them through the site, so there should be no net loss in recreational value of the footpaths.
- 17.318 I see no reason why other informal desire routes could not be incorporated in the layout of any development at the site. Similarly, the marking of the site of a local tragic event could be incorporated into the design of a development scheme for the

site, if that was in accordance with the wishes of the family and community concerned.

- 17.319 A Country Park is proposed under Policy 37 – East Lancashire Regional Park of the re-deposit plan. The site is within the intensive park area of the East Lancashire Regional Park, which is a concept introduced for East Lancashire by the East Lancashire Partnership and supported by Policy UR12 of the RSS. The proposed Country Park lies outside of the main urban area and away from the main towns identified in Policy 2 of the JLSP. I support this venture and consequently, I do not consider that it is necessary to designate a second Country Park at site X22.
- 17.320 The Council informs that there has never been an application for a Golf Course at Gib Hill. The Council own and manage the municipal Marsden Golf Course that lies adjacent to the site, and which was extended to the maximum 18 holes in about 1974. In these circumstances, I consider that the creation of another golf course at Gib Hill, in such close proximity to the Marsden Golf Course, to be unnecessary.
- 17.321 Several Objectors comment that the naturalness of the area provides an important educational resource. However, the County Council is the education authority for Pendle. The County Council has been consulted through two deposit periods of this review of the Local Plan, but it has raised no objection to the safeguarding of land at Gib Hill for housing, nor has it indicated that it would wish to use the land for education purposes.
- 17.322 To summarise, whilst I fully acknowledge the very considerable local objection to the safeguarding of the site for possible HMR replacement housing and the numerous issues which those objections raise, I do not consider that they are individually or collectively sufficient to justify its de-designation.

## **REEDLEY**

### **Former Lucas Sports Ground, omission site X02**

- 17.323 The site of the former Lucas Sports Ground is located to the south of Brierfield town centre within the ward of Reedley and close to the Borough boundary where it adjoins with Burnley. The site is surrounded by residential properties on three sides and it is bounded by an open space designation to the east. This open space designation covers part of the site of the former Lucas Sports Ground. It is 2.64 hectares in area and comprises a sports ground that has been redundant for approximately ten years. At the first stage deposit the site was allocated as a housing site within the settlement boundary. In the re-deposit plan it is

safeguarded land for housing under Policy 17, within the settlement boundary.

- 17.324 Two objections were made to the site during the first stage deposit period. One objects that the three greenfield sites which were identified in Policy 17 (including the former Lucas Sports Complex in Reedley, Brierfield) should be removed. The site was previously earmarked for open space, therefore in their opinion, recognising its community benefit. They do not consider that there is suitable vehicular access into the site. Therefore, they contend that alternative sites should be considered; in particular, omission site X13.
- 17.325 Another objection is made on the grounds that the first stage deposit plan unnecessarily allocated greenfield land for housing, contrary to PPG3. It is stated that the priority location for new housing should be previously developed land in sustainable locations within the urban area. It is requested that the three greenfield sites, including the former Lucas Sports Ground, should be removed. The Objector proposes the alternative brownfield site, omission site X19. There were no further objections made at the re-deposit stage, but two representations made in response to advertisement of the omission site also object to the housing designation of the site.
- 17.326 The re-deposit plan does not allocate any land, whether greenfield or brownfield, for new housing development to meet the JLSP requirement to 2016. As a consequence, the three greenfield sites, including the former Lucas Sports Ground, which were allocated for new housing development in the first stage deposit plan, have been de-allocated. This is because the Council is currently in a position of over-supply for general market housing. Thus, in my opinion the objections are partly met by the re-deposit plan.
- 17.327 Nevertheless, the plan allocates part of the former playing fields as safeguarded land for HMR replacement housing. Therefore, I consider that it is appropriate to consider other issues, which the objections raise.
- 17.328 The site was allocated as private open space in the adopted Pendle Local Plan. However, the site has lain vacant for over ten years and this matter has recently been tested. A recent planning application for residential development was 'called in' for decision by the Secretary of State. The Council received his decision in January 2005, which dismissed the appeal, because there are sufficient planning permissions to meet the housing requirements of both the adopted Structure Plan and the then emerging JLSP. However, the Secretary of State also commented that

development at the site could, 'enable the regeneration of the derelict sports field, which would offer benefits...'. Access was not raised as an issue by the Secretary of State when considering the planning application. Indeed, he concluded that; 'the site is in a highly sustainable location, with a good choice of means of transport'.

17.329 With regards to greenfield/brownfield concerns about the residential development of this site, any such development would have to follow the sequential approach of Policy 17, and the site would only be used as a last resort, if no other sequentially preferable sites were available. In my opinion, this approach follows the guidance of PPG3, which does not entirely preclude the use of greenfield sites in these circumstances. The site scores well in the Council's Housing Site Analysis (CD 188) and in my opinion, it is appropriate to designate it as safeguarded land.

#### **RECOMMENDATIONS (binding)**

17.330 **I RECOMMEND that the plan be modified by designating land at James Nelson's Sports Ground, Nelson (omission site X86/Y11), as HMR Reserved Housing Land, excluding the part of the site that is the subject of planning application reference 13/05/0558P. This site should be added to the list HMR Reserved Housing Land sites referred to at paragraph 17.132 above and the Proposals Map should be amended accordingly.**

17.331 **I RECOMMEND no further modification to the plan in response to these objections.**

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## **Policy 18 – Housing Market Renewal**

### **A. Objections to Policy Wording and Approach**

#### **Summary of Key Issues**

- Whether Policy 18 inappropriately stresses that the Housing Market Renewal programme should encourage clearance and demolition.
- Whether the emphasis of Policy 18 on the replacement of terraced houses, rather than their refurbishment, contravenes the guidance of PPG3, the principles of developing sustainable communities and recent Government statements concerning HMR Pathfinders.
- Whether reference in Policy 18 to new residential development in the HMR Intervention Area should be removed.
- Whether the Council should re-negotiate with the ODPM the boundaries of the Intervention Areas, by reducing them to exclude greenfields and to coincide with the urban settlement area boundaries.
- Whether Policy 18 should clarify that land outside the settlement boundary and open space will not be affected by the HMR programme.
- Whether Policies 17 and 18 appropriately reflect the sequential approach of PPG3 in the Pendle context, having regard to the use of greenfield sites.
- Whether the allocation of land and the replacement of dwellings on distant greenfield sites are contrary to the aims of the HMR Pathfinder programme and PPG3.
- Whether criterion 2. of Policy 18 should clarify that additional dwellings provided in excess of the one for one basis will be counted against the housing provision figure of Policy 12 of the JLSP.
- Whether Policy 18 is prejudicial to the outcome of the public consultation exercise on the ELEVATE/pathfinder programme.
- Whether Policy 18 is sufficiently linked or integrated with other policies of the plan, specifically Policies 21, 23 and 26.
- Whether Policy 18 should clarify the level of priority to be given to HMR housing in relation to competing policies of the plan.

- Whether Policy 18 should clarify if housing development will continue to be supported in HMR areas even if the JLSP housing targets have been met.
- Whether Policy 18 should make specific reference to implementation, monitoring and the delivery of sustainable communities.
- Whether Policy 18 should include clearer references to other delivery vehicles and monitoring mechanisms, and their respective roles.
- Whether Policy 18 should promote the removal and rebuilding of large quantities of pre-1919 housing stock, on the fringes of the town and selected areas.
- Whether the Council should consult with local developers on a regular basis to find out their future plans for housing provision.
- Whether Policy 18 should include guidance as to the circumstances where appropriate historical and townscape assessments will be required.

### **Inspector's Reasoning and Conclusions**

- 18.1 Two Objectors to the first stage deposit plan are concerned that, in their opinion, Policy 18 and its reasoned justification inappropriately stress the importance of clearance and demolition in the HMR programme. They consider that the plan as a whole, overstates the Council's perception that the terraced housing is unpopular and obsolete, and that Pendle's housing market is in a state of collapse. In their opinion, the plan's emphasis on clearing terraced houses and replacing them with new dwellings, rather than refurbishing them, contravenes the guidance of PPG3, the principles of developing sustainable communities and recent Government statements concerning HMR Pathfinders.
- 18.2 However, I consider that the re-deposit plan properly recognises the shift in the Government's emphasis towards HMR Pathfinders, which places reduced importance on clearance and replacement. At the re-deposit stage, Policy 18 was re-named from 'Housing Market Restructuring' to 'Housing Market Renewal'. In addition, criterion 1. of the text of Policy 18, and its reasoned justification at paragraph 3, clearly indicate that improvement and repair of existing housing, together with clearance and new development will be used to help tackle the problems of low demand, provided that they conform to other policies within the plan. In my opinion, this represents a balanced approach to regeneration.

- 18.3 I note, however, that in the Key to the proposed Map Changes reference to, 'Market Restructuring' has not been deleted. To avoid confusion, this reference should be removed from the key of the adopted Proposals Map, in accordance with suggested Change No. 97 (CD 193).
- 18.4 The additional linkage to the Area Development Frameworks for Brierfield, Nelson and Colne (ADFs) added to the policy text at the re-deposit stage aims to ensure that the most appropriate solution for a given location is brought forward. Furthermore, the Strategy section of the plan was also amended at the re-deposit stage. For example, the first paragraph of the supporting text to the Housing Policy Direction on page 12 of the plan has been qualified to inform that some of Pendle is suffering from housing market collapse.
- 18.5 From the information before me and from my observations, I consider that this statement and references elsewhere in the Strategy and in the reasoned justification to Policy 18 are backed up by robust evidence obtained in 2000 by consultants for the East Lancashire Partnership, and from national Land Registry statistics. I consider that it is appropriate to make such statements, in order to provide a context for the plan and its policies.
- 18.6 Policy 18 acknowledges that improvement and repair of existing housing will help to tackle the problems of low demand. However, from what I have heard, read and seen, I do not consider that refurbishment alone will be sufficient. This view is supported by the Government in their response to the Select Committee's Eighth Report on Empty Homes and Low Demand Pathfinders (2005) (CD 162), in which it is stated that there should be a proper balance between a range of intervention, including in some cases, demolition. In my view, Policy 18 of the re-deposit plan appropriately balances the need to improve and repair some terraced houses in the Borough against the potential need for some clearance and new development, to help improve the choice of available housing. For these reasons, I do not support these objections.
- 18.7 Reference to new residential development in the HMR Intervention Area is objected to. Several Objectors also request that the boundaries of the Intervention Areas should be amended/reduced to exclude greenfield sites and to coincide with the urban settlement area boundaries.
- 18.8 However, since the HMR programme seeks to replace some housing that will be removed, for reasons that I discuss more fully in Chapter 17 of my report, I consider that it is inevitable that there will be new residential development within the Intervention

Area. Where on-site replacement is not possible, due to issues of phasing, density or rationalising land-use, it is intended that necessary replacement will take place elsewhere within the area covered by the ADF. Thus I do not support the objection which seeks the removal of this reference from the policy text and reasoned justification.

- 18.9 With regards to the boundaries of the Intervention Areas, the HMR Pathfinder area for Pendle was originally identified by the Office of the Deputy Prime Minister (ODPM) based on statistical information at their disposal. It was then refined by individual local authorities and resubmitted for final consideration by the ODPM. The final HMR Intervention Area boundary for Pendle was approved by the ODPM in December 2002.
- 18.10 It follows a combination of ward, Enumeration District and partial Enumeration District boundaries, as these are the areas for which raw data was available for analysis. The boundaries of these areas are not confined to the urban area and, therefore, extend beyond the settlement boundary, as defined in the re-deposit plan. In a few locations, the HMR Intervention Area covers parts of the open countryside, as defined in the plan. This anomaly occurs where the Enumeration District covers a large geographical area.
- 18.11 However, although the HMR Intervention Area extends beyond the settlement boundary, this does not mean that the need for planning applications to comply with policies outlined in the re-deposit plan is wavered. Policy 1 – Development in the Open Countryside of the re-deposit plan clearly sets out the restrictions and exceptions to developing in the open countryside. In addition, Policy 33 seeks to protect designated areas of existing open space. Any development associated with the HMR programme is not included as an exception to either of these policies. I conclude that it is neither necessary nor within the scope of this review of the Local plan to amend these boundaries as requested by Objectors.
- 18.12 Objectors question if Policies 17 and 18 appropriately reflect the sequential approach of PPG3 in the Pendle context, having regard to the use of greenfield sites, and whether the allocation of land and the replacement of dwellings on distant greenfield sites is contrary to the aims of the HMR Pathfinder programme and PPG3.
- 18.13 As I discuss in Part A of Chapter 17 of my report, proximity to the ADFs in Brierfield, Colne and Nelson was one of the determining factors in selecting the safeguarded sites for HMR housing. However, these sites are only allocated as a precautionary measure, if they are required to allow for future housing development that is clearly allied to regeneration activity in the HMR and ADF areas and, where after applying the sequential

approach outlined in Policy 17 of the re-deposit plan, there is a clearly proven need for such land to be released for development. Thus, the safeguarding of land does not guarantee that a site will be developed, only that it could be developed if the need for development is proven to exist, otherwise the safeguarded land will remain undeveloped. I conclude in Chapter 17 of my report that the sequential approach of Policy 17 conforms to higher tier planning policy and guidance.

- 18.14 Currently, the need to safeguard land rests with the preparation and part approval of three ADFs in Pendle. The Vision, Strategy and Objectives of the ADF, which have been approved by the Council aim to retain, revitalise and re-present the existing terraced housing stock for owner occupation. As stated at paragraph 4.35 of 'East Lancashire HMR Pathfinder Colne Area Development Framework' (CD 65), they also recognise that there will be an additional need for clearance and new build in those areas where, 'vacancy, degradation and social malaise have severely undermined confidence and where local morale is too weak to provide a platform on which to build re-investment and renewal of the existing stock'.
- 18.15 For these reasons, I conclude that Policies 17 and 18 of the re-deposit plan appropriately reflect the sequential approach of PPG3 in the Pendle context, having particular regard to the use of greenfield sites, and that they conform to the aims of the HMR Pathfinder programme and PPG3 in this respect.
- 18.16 An objection made by the County Council at the re-deposit stage requests that criterion 2. of Policy 18 is amended to clarify that additional dwellings in excess of a one for one replacement will count against the JLSP provision as set out in its Policy 12. The Council agrees with this objection and suggests that the text of Policy 18 should be amended and a footnote should be added to the policy to clarify this, in accordance with suggested Change No. 57 (CD 193). I support this clarification to the policy, on which basis the objection was conditionally withdrawn.
- 18.17 The Tum Hill Residents Group object that the plan assumes the outcome of the ELEVATE public consultation exercise, even though it was written before that process began. However, I disagree with this criticism. In my opinion, the re-deposit plan recognises that it would be inappropriate to pre-judge the outcome of the East Lancashire HMR Pathfinder (ELEVATE) findings, nor does it actively encourage clearance. The appropriate solution in any given location will be based on the findings of the extensive public consultation, which forms part of the master planning exercises to be carried out in each of the three areas covered by the ADFs.

- 18.18 The text of Policy 18 was amended at the re-deposit stage to inform that within the ADF boundaries the Council will grant planning permission, where needed, for specified actions provided that; they are in line with all other policies of the plan, they are supported by the ADF for the area and, in particular, any Area Action Plan or SPD. I do not consider that the wording of the re-deposit plan pre-empts or binds the outcome of the master planning exercises.
- 18.19 In the opinion of English Partnerships, Policy 18 has insufficient links to Policies 21, 23 and 26. It is concerned also that the level of priority to be given to HMR development in relation to competing policies is not made clear. It considers that the policy should clarify if new housing development will continue to be supported in HMR areas.
- 18.20 However, I consider that changes made to Policy 18 at the re-deposit stage mainly overcome these concerns. The policy text in the re-deposit plan states that: 'Within the ADF boundaries the Council will grant planning permission, where needed, for the following actions so long as they are in line with all other Local Plan policies and are supported by the ADF for the area and, in particular, any Area Action Plan or SPD'. The criteria that follow this statement identify the linkages to Policy 21 - Provision of Open Space in New Housing Development and Policy 23 - Location of New Employment Development.
- 18.21 Furthermore, after reconsidering this objection, the Council suggests that reference to a linkage to Policy 26: Non - Shopping Uses in Town Centres and Local Shopping Areas should also be made. I endorse this suggested further change, which in my opinion improves the clarity of the policy and fully meets the objection.
- 18.22 Objection is made that Policy 18 should make specific reference to implementation, monitoring and the delivery of sustainable communities. However, I do not consider that this objection is justified, because in my opinion, the reasoned justification for Policy 18 makes adequate reference to matters that go towards creating sustainable communities. Also, further references are made elsewhere in the plan, for example in the Strategy section, to the need to create sustainable communities and to linkages to other strategies prepared by the Council and other organisations. I am also satisfied that adequate monitoring mechanisms are in place. For these reasons, I do not support the objection.
- 18.23 Another Objector considers that Policy 18 should promote the removal and rebuilding of large quantities of pre-1919 housing stock, on the fringes of the town and selected areas, and that replacement homes should be of good quality to encourage high

earners to reside in the Borough. It is also commented that the Council should consult with local developers on a regular basis to find out their plans over the years, to promote delivery.

- 18.24 The issue of housing market renewal and the condition of properties is a major concern for the Government. It is being addressed principally through the Pathfinder process, which is looking at a whole range of options for addressing low demand and poor quality housing. In this context, I do not consider that it would be appropriate to include a policy which would blandly result in the removal of large areas of pre-1919 housing. In my opinion, that could have serious consequences in terms of destroying communities and the loss of historically important areas.
- 18.25 I acknowledge, however, that there may be situations where conditions are such that demolition and replacement are appropriate. In my opinion, Policy 18 provides a balanced approach to this issue. It recognises the important role that the ADFs have in defining the problem and that schemes for development should be undertaken in accordance with the ADFs, Area Action Plans and Supplementary Planning Documents.
- 18.26 The public can be fully involved in the preparation of such Development Plan Documents, and in my view that is the correct forum for engaging public participation in connection with housing market renewal, and the level and location of demolition. I do not consider that a Local Plan review is the appropriate debate for determining whether Housing Associations or private builders should be employed in any particular re-development scheme. For these reasons, I do not support the objection.
- 18.27 Another Objector suggests that Policy 18 should include guidance as to where appropriate historical and townscape assessments will be required. I agree that such clarity to the policy is needed. Therefore, I endorse the inclusion of additional text to the end of the reasoned justification for Policy 18, in line with that set out at paragraph 3.28 of the Council's written representation rebuttal reference PBCW/018. In my opinion, this would meet the objection.

## **RECOMMENDATIONS (binding)**

- 18.28 **I RECOMMEND that the plan be modified by amending criterion 2. of Policy 18 as follows:**
- 2. New residential development (in line with Policy 17)<sup>1</sup>**
- 18.29 **I RECOMMEND that the plan be modified by adding the following footnote to Policy 18:**

1 Additional dwellings in excess of a one for one replacement will count against the Joint Lancashire Structure Plan (JLSP) requirement (Policy 12).

18.30 I RECOMMEND that the plan be modified by amending criterion 4. of Policy 18 as follows:

4. Community facilities and employment opportunities (in line with Policies 23, 26 and 32)

18.31 I RECOMMEND that the plan be modified by adding text to the end of the reasoned justification for Policy 18, which would read:

When considering options for the future of an area, it is important that any decisions are based on an informed understanding of the historic environment. Whilst programmes of repair and refurbishment, clearance or remodelling in a relatively small compact area (i.e. a few blocks of terraced housing), or one that is not physically related to an adjoining area, will not normally require a townscape or historical assessment to be undertaken, for those areas that are clearly of historical interest or are of sufficient size and coherence to warrant consideration (i.e. a neighbourhood), an appropriate townscape or historical assessment will be required.

Such an assessment should be undertaken before detailed proposals are drawn up for the regeneration of the area. As well as identifying assets which are protected through listing, scheduling or conservation area designation, the character of the area, its development over time and its relationship to the surrounding area should also be considered. Some areas may also retain significant buried archaeological remains and these will need to be investigated in advance of any future development. The scope for any additional recording work should be identified as part of any assessment.

18.32 I RECOMMEND that the plan be modified by deleting reference to 'Restructuring' from Policy 18 key text.

18.33 I RECOMMEND no further modification to the plan in response to these objections.

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## **B. Objections to Specific Sites**

### **COLNE (including COTTONTREE) and NELSON**

Henry Street, omission site Y15

Land at Knotts Lane, omission site X26

Land at Gib Hill, Nelson, omission site X22

#### **Summary of Key Issues**

- Whether dwellings in Henry Street, Colne, omission site Y15 should be renovated rather than being demolished.
- With particular reference to omission sites X26 (Land at Knotts Lane, Colne) and omission site X22 (Land at Gib Hill), whether large scale demolition and replacement of dwellings will put further pressure on the fragile housing markets in areas where there is a concentration of terraced houses.

#### **Inspector's Reasoning and Conclusions**

##### **Henry Street, omission site Y15**

18.34 The site lies to the east of Knotts Lane and is bounded by housing on three sides; to the east is an area of Public Open Space. It is 0.16 hectare in area and is in residential use. In the re-deposit plan the site is non-designated, and lies within the Settlement Boundary for Colne and within the Housing Market Renewal Intervention Area. Objections made at the first stage deposit are concerned that property in the Knotts Lane area, including Henry Street, has been blighted as a result of the uncertainty created by the HMR Pathfinder programme. It is considered that the houses in this area require renovation, to place them on a par with new housing developed in the area, rather than the demolition that is proposed.

18.35 However, at the time of preparing the first stage deposit plan the ADF for Colne had not been finalised and there was a significant degree of uncertainty with regard to the numbers of dwellings to be cleared and replaced. However, the ADF has now been published. It sets general strategic guidelines and further consultation will take place to refine these plans, and to add more detail. Nevertheless, it indicates that no demolition is proposed in the Knotts Lane area.

18.36 Furthermore, it is anticipated in the ADF that the areas around Knotts Lane will benefit from one or more of the following proposals:

- Establishment of a 'rotten tooth' scheme to deal with empty, problem houses in otherwise sound terraces and streets.
- Group repair and facelift of properties.
- Renovation schemes.
- Public realm and townscape improvements.
- Provision of a range of new homes.
- Master-planning.

Thus, in my opinion, the objections are overcome.

**Land at Knotts Lane, omission site X26**

**Land at Gib Hill, Nelson, omission site X22**

- 18.37 Objectors are concerned that large scale demolition and replacement of dwellings will put further pressure on the fragile housing markets in areas where there is a concentration of terraced houses. They make particular reference to omission sites X26 (Land at Knotts Lane, Colne) and X22 (Land at Gib Hill).
- 18.38 Both of these sites are safeguarded in the re-deposit plan as land for HMR Replacement Housing. I consider the merits of this designation of the sites in Chapter 17 of my report. There, I also consider the impact of building new replacement homes in the Colne and Nelson ADFs. I conclude that the sites are suitable for safeguarding.
- 18.39 The main reason for safeguarding land under Policy 17 of the re-deposit plan is to assist in housing market regeneration, by providing land for off-site replacement of cleared dwellings, if required over the plan period. In particular, they are needed to assist in the provision of a wider choice and type of housing at a lower density than the terraced houses they would replace. In my opinion, the provision of larger family homes as replacement dwellings will not further harm the stock of terraced houses, since there remains a need for these smaller types of houses.
- 18.40 This was a consideration of the Secretary of State in his determination of the 'called-in' planning application (13/03/0434P) concerning the former Lucas Playing Fields complex in Reedley, Brierfield (omission site X02). The Secretary of State refused the application on housing requirement/supply issues, but he concluded that the proposal would 'bring forward larger upper market dwellings ... and that because there appears to be a demand for such properties, the proposed development is unlikely to materially affect the problems of low demand for the smaller traditional housing in the Borough' (CD 130). I consider that the same issues apply to the land at Knotts Lane, Colne and at Gib Hill, Nelson.

18.41 I conclude that the sensitive clearance and replacement of areas of traditional terraced house in the Colne and Nelson ADFs will not put undue pressure on the fragile housing markets those areas. For these reasons, I do not support these objections.

**RECOMMENDATION (binding)**

18.42 **I RECOMMEND no modification to the plan in response to these objections.**

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## **Policy 19 – Affordable Housing in Rural Areas**

### **Introduction**

19.1 There were eight objections received to Policy 19 during the first stage deposit period. There were no further objections received at the re-deposit stage because Policy 19 was deleted between the first and re-deposit stages. The issue of affordable housing in rural areas is now covered in Policy 17 of the re-deposit plan. Criterion C. of Policy 17 of the re-deposit plan states that an exception to any over-supply will be made for affordable housing where there is an identified local need, as set out in an up-to-date housing needs assessment.

### **Summary of Key Issues**

- Whether Policy 19 and the overall strategy for housing in the rural areas is too restrictive.
- Whether, in the absence of stimulus from limited associated general market housing, Policy 19 is sufficiently attractive to deliver affordable housing in the rural settlements.
- Whether Policy 19 should allocate sites which will provide affordable housing during the plan period, in order to provide certainty for the provision of such housing in the rural areas.
- Whether the term 'small scale' should be defined in the context of criterion 2. of Policy 19.
- Whether reference in the reasoned justification for Policy 19, to rural exception sites being limited to a maximum of 5 dwellings, is too restrictive.
- Whether references to 'housing market collapse' in the reasoned justification for Policy 19 are damaging, unsubstantiated and unnecessary.
- Whether, in the absence of an up-to-date Housing Needs Survey, Policy 19 should provide criteria against which applications for affordable housing will be judged.
- Whether Sites for Social Diversity should be allocated in small settlements where there is a socio-economic imbalance compared to the national or county average.
- Whether a clear definition of 'affordable' housing should be given in Policy 19 to provide contextual clarity.

## **Inspector's Reasoning and Conclusions**

- 19.2 An objection is made on the grounds that Policy 19 is too restrictive and will not assist with sustaining facilities in key settlements. However, Policy 19, and now criterion C. of Policy 17 is not designed to assist in sustaining all facilities in key settlements in rural areas. These matters are also covered by Policies 24 - Employment in Rural Areas, 28 - Retail and Service Provision in Villages and 32 - New Community Facilities, of the re-deposit plan. I consider that this overcomes that part of the objection.
- 19.3 The Objector also questions whether, in the absence of stimulus from limited associated general market housing, Policy 19 is sufficiently attractive to deliver affordable housing in the rural settlements. However, all new housing in Pendle, with the exception of replacement dwellings, will contribute towards the overall housing requirement, as set out in Policy 12 of the JLSP.
- 19.4 As I conclude in Chapter 17 of my report, the Council are currently in a position of housing over-supply. As a result, the re-deposit plan does not allocate any land for housing to meet the JLSP requirement. Instead, Policy 17 of the re-deposit plan makes exception for specified special requirements for housing, including affordable housing in rural and urban areas, which is based on the demonstration of need. Sites for affordable housing must be within or adjacent to an existing settlement. This does not preclude the development of affordable housing in key settlements, so long as a need is demonstrated.
- 19.5 I consider that this approach is in line with the JLSP, which states in the reasoned justification to Policy 5 that most housing developments outside of Principal Urban Areas, Main Towns and Key Service Centres (Market Towns) will be affordable housing or accommodation to meet the specific needs of a section of the local community.
- 19.6 An Objector considers that developers should be given more certainty in providing affordable housing in the rural areas. Therefore, it is requested that Policy 19 is amended to require the provision of some affordable housing as part of the development of all allocated sites during the plan period. Or to allocate rural affordable housing sites.
- 19.7 However, as I note above, the Council is currently in a position of over-supply for housing. As a result, the re-deposit plan does not allocate any land for housing and provision for affordable housing counts against the JLSP requirement. Thus, Policy 17 of the re-deposit plan makes exceptions for specified, special requirements for housing, including affordable housing, which is based on the

demonstration of need. In this context, I consider that it would be inappropriate to allocate affordable housing sites in the rural areas.

- 19.8 In my opinion, my conclusion on this matter conforms to the guidance of the PPG3: Housing Update Planning for Sustainable Communities in Rural Areas, because it informs that exception sites within and adjoining existing small rural communities may be allocated or released over the plan period. For this reason, I do not support the objection.
- 19.9 A further criticism of Objectors is that it is unclear if the term 'small scale' in criterion 2. of Policy 19 corresponds to the 'small site' – less than 5 dwellings - definition given in the reasoned justification for the policy. Another Objector considers that limiting rural exception sites to a maximum of 5 dwellings is too restrictive.
- 19.10 However, criterion C. of the text of Policy 17, which refers to provision for affordable housing makes no reference to 'small scale'. The reasoned justification to Policy 17 of the re-deposit plan refers to small sites, but 'small' in this context is not defined any further in the policy or its reasoned justification. I consider that this is acceptable because all rural settlements are different, and are situated in different landscape settings. In addition, since the housing needs of every community will also vary, in my opinion, it would be unwise to put a rigid number to defining small sites. Therefore, I consider that both of these objections are met in the re-deposit plan.
- 19.11 Statements about 'housing market collapse' in Policy 19 are objected to. However, Policy 17 of the re-deposit plan makes no reference to 'housing market collapse' in relation to its exception for affordable housing. The reasoned justification of the re-deposit Policy 17 refers to 'low demand' under the heading, 'Replacement of cleared dwellings', but as I discuss in Chapter 17 of my report, this is in reference to Policy 13 of the JLSP, which states that; 'clearance will be undertaken where retention is not economically viable due to stock condition or low demand...'. Thus I consider that the objection is overcome.
- 19.12 It is questioned if, in the absence of an up-to-date Housing Needs Survey, Policy 19 should provide criteria against which applications for affordable housing will be judged. However, the issue of affordable housing is now covered as an exception of Policy 17 of the re-deposit plan. Its reasoned justification, under the heading 'Affordable Housing', refers to the Council's Housing Needs Study (2003). This research assessed both urban and rural areas and its key findings are included in the reasoned

justification to Policy 17. Therefore, I consider that the objection is met.

- 19.13 However, I have noted in Chapter 17 of my report that those references to the research, both in the text of the reasoned justification and in a footnote on page 68 of the plan incorrectly quote its title. In order to avoid confusion, I have recommended in that Chapter that this is rectified by amending these references to, 'Pendle Borough Housing Needs Survey 2003', in accordance with the Council's suggested Change No. 55 (CD 193).
- 19.14 Another Objector suggests that Policy 19 should include a Countryside Agency initiative for mixed tenure, 'Sites for Social Diversity', as an alternative to the exceptions policy. Also, that a clearer definition of affordable housing should be provided.
- 19.15 The Consultation Paper on a new 'Planning Policy Statement 3 (PPS3) Housing' does indeed, at paragraphs 32 and 33, recommend that Local Development Documents should set out an approach to planning for affordable housing in rural communities that contributes to the creation of mixed and sustainable rural communities, in addition to a rural exception policy. However, as this is a consultation document, it should not be afforded the full weight of published policy at this stage. In any case, I consider that criteria B. and C. of policy 17 of the re-deposit plan would enable the spirit of that draft recommendation to be met.
- 19.16 Furthermore, the reasoned justification for Policy 17 of the re-deposit plan comprehensively defines affordable housing; therefore, I consider that this part of the objection is also met in the re-deposit plan.

#### **RECOMMENDATION (binding)**

- 19.17 **I RECOMMEND no modification to the plan in response to these objections.**

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## **Policy 20 – Quality Housing Provision**

### **Summary of Key Issues**

- Whether the residential density requirements of Policy 20 adhere to the guidance of PPG3.
- Whether the caveat ‘where appropriate’ in connection with minimum residential density should be clarified/removed from the reasoned justification to Policy 20.
- Whether Policy 20 should place more emphasis on the desirability of new residential development achieving a higher density than 30 dph where the location is sustainable and appropriate.
- Whether reference to Development Briefs should be removed from the text of Policy 20 and included in the reasoned justification instead.
- Whether Policy 20 should promote high quality residential development that will attract professional and mid-to-high earners into the Borough.
- Whether Policy 20 would prejudice the provision of adequate community space, especially for terraced houses.
- Whether reference should be made in Policy 20 to the importance of HMR replacement housing achieving a high quality of design that integrates well with existing communities.

### **Inspector’s Reasoning and Conclusions**

- 20.1 Several Objectors, including GONW, are concerned that Policy 20 is not sufficiently robust in seeking to achieve a minimum density of 30 dph in new residential development, as required by paragraph 58 of PPG3 and Target 12.4 of the JLSP. In particular, concern is raised to the exceptions provided by the policy that would justify development in conservation areas and for larger house types being provided at a density lower than 30 dph.
- 20.2 It is the Council’s argument that neither Policy DP3 of the RSS nor PPG3 prohibit development at a density of less than 30 dph, where local circumstances indicate that a lower density would be appropriate. However, in my interpretation, they do not support ‘blanket’ relaxation in conservation areas, which the wording of Policy 20 infers, or for the provision of larger family homes, as indicated in the reasoned justification to Policy 20.

- 20.3 In my opinion, paragraph 58 of PPG3 is very clear in its statement that: 'Local planning authorities should therefore avoid developments which make inefficient use of land (those of less than 30 dwellings per hectare net...)'. Target 12.4 of the JLSP is even more emphatic in its statement that: 'Housing sites to be developed at a minimum density of 30 dwellings per hectare, rising to at least 50 dwellings per hectare at sites with good public transport, 2001-2016'. I consider that the permissive stance of Policy 20 and its supporting text towards development that makes inefficient use of land is contrary to prevailing higher tier planning policy and guidance.
- 20.4 I acknowledge that there may be a very few circumstances that might warrant a relaxation of a minimum density requirement for 30 dph net, but taking into account that PPG3 advocates innovative design solutions in order achieve efficient use of land (30 dph), I consider that these would be small in number, and should be fully justified on an individual basis, in a Planning Brief or a design statement accompanying a planning application.
- 20.5 For these reasons, I support these objections and I make recommendations for modification to Policy 20 and its reasoned justification accordingly.
- 20.6 In response to an objection made at the first stage deposit, the qualification to the required minimum residential development; 'where appropriate', was removed at the re-deposit stage. Therefore, this objection is met.
- 20.7 Furthermore, the Council agrees with criticisms that Policy 20 does not place sufficient emphasis on the desirability of new residential development achieving a density higher than 30 dph where the location for higher density development is appropriate, for example adjacent to transport routes and the canal corridor. In response, it suggests that additional text should be added to the reasoned justification to Policy 20 in accordance with suggested Change No. 59 (CD 193). I endorse this Change, which would bring the policy into line with PPG3 in this regard, and it would overcome the objection.
- 20.8 In response to an objection to mention of Development Briefs in the text of Policy 20, such reference was removed at the re-deposit stage. Planning Briefs are now referred to in the reasoned justification for the policy. In my opinion, this change brings the policy in line with PPG12 and it meets the objection.
- 20.9 An Objector observes that Pendle needs more housing to encourage professionals and mid-to-high earners into the community, along with the opportunity for families and individuals

to better themselves. It is inferred that Policy 20 would prevent this.

- 20.10 I agree that it is important that a wide range of family homes are provided over the plan period. But in my opinion, Policy 20 seeks to ensure that the quality of new housing is high and that in larger developments comprising ten units or more, a mix of dwelling types are provided. This is in line with the advice contained in PPG3.
- 20.11 Whilst the re-deposit plan does not allocate any general market housing sites, planning permission exists for a further 1,395 dwellings to be provided in Pendle during the plan period. These range from units to be provided in key canal-side developments in the form of conversions, to whole scale redevelopment of brownfield sites such as the former Simpson's Garage site, which is being developed at the entrance to the Knotts Drive development, to greenfield sites that will be built to a similar pattern of design to that on the estate to the north of the site at Knotts Drive. Table 1 of the Housing Land Availability Report (2005) (CD 36) lists the sites that are partially completed or which have planning permission. I have no reason to think that they do not include a wide range of dwelling types and sizes, or that they would not be classified as quality developments. Therefore, I see no reason to amend Policy 20 in response to this objection.
- 20.12 I agree with Objectors that it is important that suitable provision is made for adequate community space in residential developments, particularly for terraced houses. But I do not consider that the implementation of Policy 20 would preclude such provision. In my opinion, it is part and parcel of creating a quality environment, as required by the third bullet point of the policy. In addition, Policy 21 - Provision of Open Space in New Housing Development requires developers to provide new open space, or a commuted sum for off-site provision for developments of ten units or more. Also, Policy 34 - Improved Open Space Provision supports the creation of new open space, especially in those areas that have a deficiency of provision. For these reasons, I do not support the objections.
- 20.13 Another Objector considers that Policy 20 should make reference to the importance of good quality design specifically in relation to HMR areas, where an Urban Design Framework should be used as a tool for ensuring that re-developed areas integrate with the existing urban fabric, and are in line with the Pathfinder Strategic Plan and the ADFs. However, the reasoned justification to Policy 20 refers to the importance of retaining quality in existing residential areas. It also specifically informs that this approach will

be followed in Housing Market Renewal areas. I consider that this reference is sufficient.

- 20.14 Urban Design Frameworks provide physical interpretations of local visions and strategies. Such Frameworks are likely to be adopted through master planning work, which is now in progress, or is planned to inform Area Action Plans for parts of the HMR area. The Council has indicated that where Area Action Plans are not to be prepared, appropriate Planning Briefs will be provided as Supplementary Planning Documents. In my opinion, this planned action is appropriate. I do not consider that the Local Plan is the correct place for this level of detail, particularly in areas where further master planning has yet to be carried out. For these reasons I do not consider that amendment to Policy 20 is required in response to this objection.

#### **RECOMMENDATIONS (binding)**

- 20.15 **I RECOMMEND that the plan be modified by deleting the second sentence of the first bullet point of Policy 20 so that the new bullet point reads:**

- **Density – New housing development should be provided at a minimum density of 30 dwellings per hectare net.**

- 20.16 **I RECOMMEND that the plan be modified by deleting the words ‘excluding the identified exceptions’ from the third sentence of the second paragraph of the reasoned justification to Policy 20.**

- 20.17 **I RECOMMEND that the plan be modified by amending the second paragraph of the reasoned justification for Policy 20 from the third sentence onwards so that the remainder of that paragraph reads:**

**It is recognised that in order to create choice in the local housing market, there may be a need for some lower density housing development in order to provide larger family homes with gardens, and exceptionally at other particularly visually sensitive sites, for example, in parts of some conservation areas. In these cases, a relaxation of the minimum 30 dwellings per hectare net requirement may be permitted where it is specifically, clearly justified by a Development Brief or design statement.**

- 20.18 **I RECOMMEND that the plan be modified by adding text at the end of the amended second paragraph of the reasoned justification for Policy 20, which reads:**

In some situations it may be possible to deliver higher density development. In line with PPG3 this would be appropriate in areas of high accessibility such as adjacent to main public transport corridors or within town centres. In these locations the Council will seek to maximise development by encouraging development of up to, or in excess of, 50 dwellings per hectare.

20.19 I RECOMMEND no further modification to the plan in response to these objections.

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## **Policy 21 – Provision of Open Space in New Housing Development**

### **Summary of Key Issues**

- Whether Policy 21 should require on-site open space provision for new housing developments of 10 units or more.
- Whether Policy 21 should enable the management of open space by a private management company.
- Whether Policy 21 should direct monies secured from commuted sums concerning the housing development in the Knotts Lane area towards enhancing the land at the Railway Sidings as a Local Nature Reserve.
- Whether Policy 21 should take account of Accessible Natural Green Space Standards (ANGSt).
- Whether Policy 21 should be strengthened to ensure that the provision and retention of open space secured through Policy 21 is enforced.

### **Inspector's Reasoning and Conclusions**

- 21.1 An objection made at the first stage deposit requests that Policy 21 is amended to require on-site open space provision for new housing developments of 10 units or more, where there is an identified deficiency of open space. At the re-deposit stage the first sentence of the policy was amended by adding the words, 'on site' at the end. Therefore the objection is met.
- 21.2 PPG17 requires local authorities to assist in the promotion of social inclusion and community cohesion through well planned and maintained open spaces. In addition, Policy UR10 of the RSS requires local authorities to develop appropriate strategies for the management and maintenance of green spaces. In line with this policy, the purpose of the maintenance payment sought by Policy 21 of the re-deposit plan is to ensure continued management and maintenance of any new open space provided as part of new residential development. The developer is expected to provide monies for maintenance for the first ten years. Thereafter, the Council will fund the maintenance costs in perpetuity. The aim is to ensure adequate and continued maintenance of the open space.
- 21.3 In my opinion, this can only be ensured if the Council are responsible for the maintenance. If maintenance were taken on by a private management company, as suggested by the

Objector, there would be no guarantee that maintenance would continue in perpetuity. In my opinion, long term enforcement through planning conditions or legal agreements could be onerously problematic in some cases. For this reason, I do not support the objection.

- 21.4 Another Objector considers that the commuted sums of money paid to the Council for open space provision as part of the housing development in the Knotts Lane area should be used to enhance/compulsorily purchase the former Railway Sidings as a Local Nature Reserve. However, I do not support that objection because Policy 21 is a general and not site specific policy; issues of detailed implementation are not contained within it. Furthermore, Circular 05/2005 Planning Obligations requires that the provisions of a Section 106 (of the Town and Country Planning Act) agreement, through which commuted sums would be obtained, must amongst other tests, be directly related to the proposed development, and be fairly and reasonably related in scale and kind to the proposed development.
- 21.5 With regards to the specific case cited by the Objector, the majority of the money obtained through the provisions of Section 106 agreements related to residential development at Knotts Lane has to be spent on constructing a play area. Thus, legally it could not be used to pay for a Local Nature Reserve.
- 21.6 Lancashire Wildlife Trust objects that Policy 21 does not refer to the Government's Accessible Natural Greenspace Standards (ANGSt) as an integral part of open space provision. In the Objector's opinion, these have a role to play in delivering Lancashire's Biodiversity Action Plan, and the creation of new habitats and linkages, so as to contribute to the establishment of ecological frameworks required by Policy ER5 of the RSS.
- 21.7 In response, the Council argues that paragraph 7 of PPG17 indicates that local authorities should use the information gained from their own assessments of needs and opportunities to set locally derived standards for the provision of open space, sports and recreational facilities in their area. Thus, the Council has an adopted Pendle Open Space Audit (CD 47), which sets the local standards for the Borough in respect of areas with a surplus or deficiency of the different typologies of open space. Given the guidance in PPG17, I consider that this approach is appropriate and that it is unnecessary to alter Policy 34 - Improved Open Space Provision and, therefore, the requirements of Policy 21, to take account of any standards other than those derived locally through the Pendle Open Space Audit.
- 21.8 Policy ER5 of the RSS promotes the restoration and re-establishment of habitats and species populations in accordance

with the targets set out in the UK and Local Biodiversity Action Plans. The policy also requires local authorities to set out a coherent and functional ecological framework, which identifies priority biodiversity resources and areas of land which have the potential for returning these resources to viable levels, and wildlife corridors. In my opinion, the re-deposit plan adequately recognises the importance of both protecting important species and increasing the levels of those species and habitats, through re-deposit Policies 4A, 4B, 4C and 4D.

21.9 The Objector also makes reference to the 'no net loss' approach advocated in Policy 21 of the JLSP, arguing that in order to have 'no net loss', the starting point has to be known, hence the need to establish how much natural green space there is in Pendle. In support of that contention, reference is made to the Burnley Local Plan (2004). The Inspector's Report recommended that the Burnley Local Plan should be modified to refer to natural green space in its targets.

21.10 However, I do not entirely support the Objector's argument on this matter. Whilst I consider that it would be desirable that a full audit of typologies of natural green space within the Borough were carried out as part of the next review of the Pendle Open Space Audit, I do not consider that it is essential in order to ensure that JLSP Policy 21 is met, because in my opinion, the 'no net loss' approach can be implemented by using the Council's case by case method. For these reasons I do not consider that the objection warrants amendment to Policy 21.

21.11 An objection is made on the grounds that the Council should more robustly enforce the requirement of Policy 21 for open space provision. The policy enables that adequate open space is sought on all residential development of ten units or more (cumulative), where there is an identified deficiency in that location. I see no reason why the Council would not enforce the policy through planning permissions granted and/or conditions attached to those permissions. In cases where a commuted sum is sought, Appendix 1 of the plan, which relates to the Open Space Fund, applies. Monies will be secured through the use of Section 106 agreements, which are legally binding. However, I do not consider that any suitable amendments could be made to Policy 21 to ensure that its requirements are stringently applied by the Council.

## **RECOMMENDATION (binding)**

21.12 **I RECOMMEND no modification to the plan in response to these objections.**

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## **Policy 22 – Protected Employment Areas**

### **A. Objections to Policy Wording and Approach**

#### **Summary of Key Issues**

- Whether additional policy wording or a new policy is needed that would require unallocated existing industrial sites to be considered, on merit, for continued employment use or for more appropriate/suitable uses, such as residential.
- Whether Policy 22 should be amended to reduce the vacancy criterion, for over four years, and to allow more flexibility for the re-use of existing employment sites.

#### **Inspector’s Reasoning and Conclusions**

- 22.1 The role of Policy 22 is to identify and protect those employment sites that are of strategic importance to the Borough in terms of both their location and long-term suitability for employment generating activity. Manufacturing businesses, which predominantly fall into the B2 Use Class, continue to provide 11,200 (35.2%) of all employees’ jobs in Pendle (Annual Business Inquiry, 2003) (CD 77). This is almost three times the national average (12.6%). For the foreseeable future I, therefore, consider that it is important for the stability and growth of the local economy that Pendle seeks to protect those areas that provide an appropriate environment for manufacturing businesses.
- 22.2 In my opinion, this approach will not only help to provide indigenous businesses with a choice of locations where they can relocate and/or expand their local operations, but it will also help to attract new businesses to the area, which will help to diversify and strengthen the local economy. I conclude that to undermine the integrity of the Protected Employment Areas by allowing for an increase in the range of alternative uses, such as housing, would seriously undermine the purpose of the policy.
- 22.3 However, industrial sites and premises that are not within these designated areas may continue in employment use, but any proposals for their redevelopment or conversion to other uses, including residential, will be considered on their individual merit, since there is no extra protection afforded to those sites and premises outside the Protected Employment Areas covered by Policy 22 of the re-deposit plan.

- 22.4 I consider that this policy approach is entirely consistent with PPG Note 3: Housing Update Supporting the Delivery of New Housing, issued in January 2005. This guidance, which provides the policy context sought by an Objector for permitting alternative use of industrial sites, states that local planning authorities should give favourable consideration to planning applications for housing or mixed-use developments on land allocated for industrial or commercial use, or redundant land or buildings in industrial or commercial use that are no longer needed for such use.
- 22.5 However, in my opinion, this presumption in favour of allowing unneeded employment sites to be put to other uses, particularly housing, could put significant pressure on the Council to release industrial uses, to the detriment of the strength of the local economy. In this context, I do not consider that the criterion of Policy 22 that requires evidence of vacancy for over four years is unjustified or unreasonable. For these reasons, I do not support these objections.

#### **RECOMMENDATION (binding)**

- 22.6 **I RECOMMEND no modification to the plan in response to these objections.**

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#### **B. Objections to Specific Sites**

##### **BARROWFORD & HIGHERFORD**

Riverside Business Park, Barrowford Road, omission site Y16

Barrowford Business Park, omission site X09

Land at Barrowford Business Park, adjacent to Lower Clough Mill, omission site X71

##### **Summary of Key Issues**

- Whether the extent of the area of land shown on the Proposals Map as a Protected Employment Area (B1 only) should reflect that shown in the adopted Pendle Local Plan as an area with planning permission for a science park.
- Whether lack of interest in developing Barrowford Business Park, omission site X09, justifies the revocation of the planning permission for B1 development.
- Whether Barrowford Business Park, omission site X09, should be designated for mixed use comprising; housing, B1 and riverside parkland.

## Inspector's Reasoning and Conclusions

- 22.7 The Barrowford Business Park, omission site X09, (previously marketed as the Riverside Business Park, omission site Y16) lies approximately 1.0 km north-west of Nelson town centre. Vehicular access is off a roundabout on the A6068 (Barrowford Road), which connects with the M65 motorway at Junction 13, 0.4 kilometres to the east. It is a greenfield site comprising 9.26 hectares. There are areas of private housing to the north and south and the campus of Nelson & Colne College lies across Pendle Water to the east. To the north-west are a series of fields, sloping down from Wheatley Lane Road. The site is designated as a Protected Employment Area (B1 only) in the re-deposit plan.
- 22.8 The adjoining area to the east, omission site X71 is also greenfield land being 2.46 hectares in extent that is designated as a Protected Employment Area (B1 only) in the re-deposit plan. Both sites are within the settlement boundary for Barrowford. In response to advertisement of the omission sites there were two representations made supporting Objector's requests for the removal of the B1 designation of the combined site.
- 22.9 Objection is made on the grounds that the extent of the area of land shown on the Proposals Map for the first stage deposit plan does not reflect the extent of the land for which outline permission for a B1 development was granted in 1993, on appeal, by the Secretary of State.
- 22.10 In response, the Council acknowledges that the omission of this area of land from the Protected Employment Area (B1 only) at Barrowford Road, Barrowford was a cartographic error. The Proposed Map Changes booklet, accompanying the re-deposit plan shows that the area to the north of the pylon line, omission site X71, (Map Change No. 7) is now included within the Protected Employment Area (B1 only), because this gained outline planning permission for B1 use. The designated Protected Employment Area now reflects the area with planning permission for B1 use. The objection was conditionally withdrawn on the basis of this change and explanation.
- 22.11 However, the Map Change has given rise to counter objections from people who wish the area, omission site X71, to be designated as Open Countryside or Green Belt. In Chapter 3 of my report I conclude that it would be inappropriate to designate the site as Green Belt. Furthermore, a condition on the outline planning permission prevents the erection of a building on site X71, which is reserved for landscaping. This will, therefore, retain the openness of the land. Therefore, I consider that the spirit of these re-deposit stage objections is met.

- 22.12 A first stage Objector considers that the Protected Employment Area (B1 only) designation should be removed from land at Barrowford Business Park, as it would appear that there has been insufficient interest in the site. However, the latest Industrial and Business Land Availability Report (March 2005) (CD 41) indicates that the 7.3 hectare site at Barrowford Business Park makes a substantial contribution to meeting the JLSP requirement for 40.0 hectares of new employment land to 2016. In the light of all of the evidence presented to this Inquiry, I do not disagree.
- 22.13 Furthermore, persuasive evidence presented in support of another objection indicates that those with an interest in the site have every intention of developing the site as a Business Park in the near future. I note that a technical start has been made on site and that the planning permission has, therefore, been implemented. In my opinion, the permitted development of the site will make a positive contribution towards the achievement of one of the key economic objectives of the Pendle Community Strategy 2003-2018: A Place with a Future for Everyone (CD 68) and the Regional Economic Strategy: England's North West – A Strategy Towards 2020 (CD 44), of diversification away from manufacturing and the promotion of growth sectors to help to strengthen the local and regional economy. For these reasons I do not support the objection.
- 22.14 Whilst I support the B1 development of the site, I do not support a suggestion that it should be designated for a mix of uses that includes housing, because as I conclude in Chapter 17 of my report, the Borough is in a position of over-supply for general market housing and the site is poorly located to accommodate replacement HMR housing.

## **RECOMMENDATION (binding)**

- 22.15 **I RECOMMEND no modification to the plan in response to these objections.**

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## **BRIERFIELD**

### **Lomeshaye Marshes, omission site Y17**

#### **Summary of Key Issue**

- Whether Lomeshaye Marshes, omission site Y17, which is designated as a Biological Heritage Site and should be de-designated as a Protected Employment Area.

## **Inspector's Reasoning and Conclusions**

22.16 The site is located in the middle of the Lomeshaye Industrial Estate. It is 2.02 hectares in area and is used as a nature reserve. In the first stage deposit plan the site was designated as being within the settlement boundary, as a Biological Heritage Site and as a Protected Employment Area.

22.17 However, at the re-deposit stage, this latter designation was removed and the site was additionally designated as a Local Nature Reserve. These changes were made in response to the objection and taking into account guidance contained in PPS9. I consider that the changes meet the objection, upon which basis it was conditionally withdrawn.

## **RECOMMENDATION (binding)**

22.18 **I RECOMMEND no modification to the plan in response to this objection.**

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## **EARBY**

West Craven Business Park, omission site X04

### **Summary of Key Issue**

- Whether the designation of land at West Craven Business Park, omission site X04, as a Protected Employment Area prevents other potentially suitable uses of the site.

## **Inspector's Reasoning and Conclusions**

22.19 This site is bounded by open countryside on three sides. To the south lies a large manufacturing complex and Earby Waste Water Treatment Works (omission site X66). It is 6.6 hectares in area. In the re-deposit plan the site is designated as a Protected Employment Area falling within the Settlement Boundary for Earby.

22.20 Objection to this designation is made on the grounds that it restricts the wide variety of possible end-users and subsequently limits the opportunities for school leavers and younger people in Earby. It is argued that employment can be generated from a wide variety of land uses. Also, should the proposed A56 Village Bypass be built, the site will be positioned alongside the main regional road network thereby making it attractive to many end-users, including the tourist trade. Therefore, the Objector considers that the classification of this land should be sufficiently

wide to keep the options of a variety of possible uses open. In response to advertisement of this omission site there was one other representation made in support of the removal of the Protected Employment Areas designation.

22.21 I consider that to help maintain a diverse economy and to help protect Pendle against a downturn in a particular sector, the re-deposit plan should seek to safeguard a range of suitable sites to meet varying employment and development needs, in accordance with Policy B1. Within the Protected Employment Areas, Class B1 (office and light industrial), B2 (general industrial) and B8 (storage and distribution) will be permitted by Policy 22. However, it also permits limited specified exceptions, which allow for alternative use of such sites, in appropriate circumstances.

22.22 I consider that if no protection were afforded to these employment areas, higher value competing uses may prevail. Although, in the case of retailing and other town centre uses, paragraph 2.44 of PPS6 requires that locations are considered in the following sequential order: first in locations in appropriate existing centres where suitable sites or buildings for conversion are, or are likely to become, available within the plan period; then edge-of-centre locations, with preference given to sites that are, or will be well-connected to the centre; and finally out-of-centre sites, with preference given to those which are, or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with it. This approach is also reflected in Policy 25 - Location of Service and Retail Development, in the re-deposit plan.

22.23 Furthermore, in accordance with the JLSP and Policy 40 - Tourism, of the re-deposit plan, hotels and major tourism developments are also required to comply with a sequential test, which requires them to be located, in order of priority; within a town centre, on the edge-of-centre, or elsewhere within the settlement boundary, provided that the site is readily accessible by public transport. In my opinion, the omission site would not score highly in these sequences.

22.24 Nevertheless, I consider that it is appropriate to retain the Protected Employment Areas designation at the omission site in order to ensure provision for B2 (general industrial) uses that still make a significant contribution to the local economy, but which are not readily accommodated in residential areas. Therefore, I do not support the objection.

#### **RECOMMENDATION (binding)**

22.25 **I RECOMMEND no modification to the plan in response to this objection.**

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## **NELSON**

Riverside Mill, off Reedyford Road, omission site X19

Manor Mill, Hallam Road, omission site X77

### **Summary of Key Issues**

- Whether Riverside Mill, off Reedyford Road, omission site X19, should be designated as a Protected Employment Area.
- Whether Manor Mill, Hallam Road, omission site X77, should be designated as a Protected Employment Area.

### **Inspector's Reasoning and Conclusions**

#### **Riverside Mill, off Reedyford Road, omission site X19**

22.26 The site, which forms part of an established employment area, is situated approximately 0.6 km to the north of Nelson town centre. The main vehicular access is directly off the A6068 (Reedyford Road), which connects with the M65 motorway at Junction 13, 0.75 kilometres to the north. The site is 2.8 hectares in area and is occupied by the remains of multi-storey mill buildings with adjacent single-storey structures. The main building was damaged by fire in June 2003 and has subsequently been demolished. Previous demolition work means that hard-standing now forms approximately 40% of the total site area. The north-western boundary of the site (Charles Street) adjoins an established employment area, situated alongside the Leeds and Liverpool Canal. This area includes the Hodge Bank Business Park, developed in 2002/03. Semi-detached housing occupies an elevated position alongside Reedyford Road, on the north-eastern boundary of the site, whilst high-density, terraced housing and Bradley County Primary School lie to the south.

22.27 The south-western part of the site lies within Flood Zone 3, which covers areas with the highest probability of flooding, where the annual probability is greater than or equal to 1% for river flooding. Part of the site also lies within Flood Zone 2, which covers areas with an annual probability of flooding of between 0.1% and 1% in the case of river flooding.

22.28 In the adopted Pendle Local Plan the site is designated as an Essential Employment Area within the Settlement Boundary for Nelson. At the first stage deposit it was designated as a Protected Employment Area (Mixed Use) under Policy 22, in the HMR Intervention Area and within the Settlement Boundary for Nelson. In the re-deposit plan, the site has retained its designations as a Protected Employment Area (Mixed Use) under Policy 22, situated

in the HMR Intervention Area and within the Settlement Boundary for Nelson.

- 22.29 There were two objections made to the designation of the site as a Protected Employment Area. In the Objectors' opinions, there is no justification for this designation of the site, because its close proximity to existing housing development makes it unsuitable for employment use. It is suggested that the site should be designated as a new 'Development Opportunity Site', where an appropriate range of uses, including residential, employment, community and commercial would be supported.
- 22.30 I agree that considerations of access and noise often mean that employment land does not sit comfortably in close proximity to residential areas. However, PPG13, which seeks to promote accessibility to jobs, by public transport, walking and cycling and thereby reducing the need to travel, especially by car, advises that it is important to retain existing industrial or business premises in such areas, where they benefit from good access and their setting does not render them incongruous.
- 22.31 I consider that the site satisfies these criteria and hence, that in principle, its protection from redevelopment for other uses is appropriate, particularly, as I discuss in Chapter 23 of my report, in Pendle there is a shortage of employment sites over 1.0 hectare, as demonstrated by the latest Industrial and Business Land Availability Report (March 2005) (CD 41). Moreover, I am convinced by the Council's arguments that the availability of such sites is vital, if the Borough is to attract inward investment that will help to strengthen and diversify a local economy, which presently remains heavily dependent on a declining manufacturing sector, or to allow for the expansion of indigenous businesses that offer the potential for employment growth.
- 22.32 Furthermore, the Council is currently in a position of over-supply with regards to meeting the JLSP housing requirement. Therefore, the allocation of the site for general market housing, as suggested by the Objectors, would conflict with Policy 12 of the JLSP. Consequently, I conclude that the development of such housing on the Riverside Mill site is not only unnecessary, but could also undermine regional and local strategies for economic development and regeneration, which would be contrary to PPG3.
- 22.33 I acknowledge that the omission site is situated in the heart of the Nelson ADF and could potentially make a significant contribution to the HMR Pathfinder for Pendle. However, flood risk is a constraint to residential development at this site, which has to be weighed together with the importance of the site for employment purposes, against its potential value as a site for HMR replacement homes. Taking account of this balance, I consider

that it would be inappropriate to remove the Protected Employment Areas status from the site.

- 22.34 However, the exceptions of Policy 22 would permit such residential development of the site to take place if an applicant could demonstrate that the site is obsolete for employment purposes and that adequate flood risk mitigation measures could be provided. In which case, this brownfield site would take precedence over greenfield safeguarded sites in the Nelson ADF.
- 22.35 With regards to the suggestion that a new 'Development Opportunity Site' designation, which would support a wide range of alternative uses of the site, should be created for the site, I consider that such a designation would conflict with guidance contained in PPG12. At paragraph 2.24 the PPG informs that plans should support the objectives of the plan-led system of providing certainty for quicker, rational and consistent decisions; and a reduction in the number of misconceived planning applications and appeals. In my opinion the suggested new designation would fail to provide necessary certainty and would, therefore, conflict with that guidance.
- 22.36 For these reasons, I do not support the objections.

#### **Manor Mill, Hallam Road, omission site X77**

- 22.37 Manor Mill is located on Hallam Road in Nelson. It forms part of an established employment area situated approximately 0.6 km north of Nelson town centre. The site is around 1.4 hectares in area. Its principal vehicular access is off Hallam Road. Junction 13 on the M65 motorway lies approximately 1.6km to the north-west and is accessed via Hallam Road, the A682 (Leeds Road) and A6068 (Reedyford Road).
- 22.38 The premises are occupied by textile yarn importers and beamers. These companies relocated to Manor Mill in 2003, supported by grant assistance from the Council, from premises in Colne and Rossendale respectively. The previous owners of the premises, a textile weaver company, also continue to manufacture in part of the building.
- 22.39 Manor Mill comprises a multi-storey building alongside Hallam Road with a large north light shed to the rear and a large open yard area to the east. The site is bounded by housing on three sides, although only the terraced houses on Hendon Street to the west directly abut the premises. To the north a number of former cotton mills, built alongside or over Hendon Brook, remain in employment generating uses. In the re-deposit plan, the site is designated as a Protected Employment Area within the Housing

Market Renewal Intervention Area and within the Settlement Boundary for Nelson.

- 22.40 An Objector contends that the site should not be designated as a Protected Employment Area because it suffers from obsolescence, it is not suited to modern industrial processes and it is unlikely to be suitable for sub-division or re-use for new industrial processes. The Objector points out that the site is located in a predominantly residential area and is closely surrounded on three sides by housing. The Objector argues that the protection of employment sites should apply to those in good locations and unlikely to cause problems with residential amenity. In addition, that the Nelson ADF has identified an adjoining site to Manor Mill as a suitable development site, further raising the issues of residential amenity. Therefore, it is thought that the allocation of this site as a Protected Employment Area is premature in advance of the master plan for the Southfield area, which is intended to be available in 2006.
- 22.41 I acknowledge that the Manor Mill site lies within the Nelson ADF and could potentially contribute to the Housing Market Renewal Pathfinder for Pendle, but it is designated as an industrial improvement area in the Nelson ADF Strategy. Therefore, until further master planning has been undertaken, I consider that it would be premature to remove the Protected Employment Area designation from the site.
- 22.42 I do not consider that the Objector's claim that the mill suffers from obsolescence has been convincingly demonstrated because recent industrial relocations into site X77 appear, to me, to contradict this statement. Notwithstanding the availability of specialist equipment at the site, as part of the relocation package of the current businesses at the site, the owner invested in the sub-division and modernisation of the site, demonstrating that this is a feasible option for continuing the employment use on the land. Furthermore, it was clarified at the informal hearing session, at which this objection was heard, that for the purposes of Policy 22 the Council intends that the word 'premises' should be regarded as being synonymous with the word 'site'. Thus, even if the existing buildings are unsuitable for modern industrial use, the site itself may, nevertheless, be suitable for employment use. I make a recommendation below that this is clarified.
- 22.43 At the re-deposit stage, the Council considered the suitability of existing employment sites for designation as Protected Employment Areas. In accordance with the thrust of PPG3, this was a deliberate action to release those sites in less sustainable locations, or with reduced employment potential, to be considered for alternative uses. As a result of this exercise I consider that the level of protection that should be applied to those remaining sites

is particularly high, especially in the cases of employment sites over 1.0 hectare in area, of which the Council acknowledges that there is a particular shortage within the Borough.

22.44 I have taken into account the close proximity of housing, with dwellings directly abutting the mill on one side, with a distance of only 20.0 metres separating the mill from housing on the south side, and with a distance of 50.0 metres on the east side. However, this juxtaposition of industrial uses and housing is not unusual in the Pendle context and it is supported, in principle, by PPG13. I have no reason to think that the Manor Mill site has a significantly greater adverse impact on residential amenity than other areas of the Hallam Road Protected Employment Area, for example, at Hendon Mill, Malvern Mill and Glenfield Park. These sites have housing as close as, or closer than, Manor Mill. In my opinion, the omission site should not, therefore, be treated differently on these grounds.

22.45 On balance, for these reasons, I consider that the re-deposit plan designations of the site are appropriate and I do not support the objection.

#### **RECOMMENDATIONS (binding)**

22.46 **I RECOMMEND that the plan be modified by adding a footnote to the word 'premises' where it is used for the first time in the text of Policy 22. The footnote should read:**

**In the context of Policy 22 the word 'premises' includes the buildings and land within the curtilage of the existing industrial site that is protected by the policy.**

22.47 **I RECOMMEND no further modification to the plan in response to these objections.**

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## **Policy 23 – Location of New Employment Development**

### **A. Objections to Policy Wording and Approach**

#### **Summary of Key Issues**

- Whether Policy 23 should be amended to reflect the sequential approach of regional and strategic planning policy regarding the location of office development.
- Whether the plan makes sufficient provision for new employment development to meet the Borough's strategic requirement.
- Whether Figure 3a correctly interprets strategic guidance on the calculation of new employment land requirements up to 2016.
- Whether the plan makes sufficient provision to enable local businesses to expand and relocate within the Borough.
- Whether the plan should reflect the findings of the 'Cambridge Study'.
- Whether there should be increased dialogue between the Council and local business groups to ensure that local policy enables the acceleration of inward investment and meeting the needs of local businesses.

#### **Inspector's Reasoning and Conclusions**

- 23.1 Objectors question the sequential approach of Policy 23 regarding the employment supply provision. Policy DP1 of the RSS requires that new development and infrastructure should, amongst other considerations, be located so as to make the most effective use of land and transport facilities, and to assist in meeting local needs. It also sets out the sequential approach that should be adopted in development plans, which prioritises the effective use of existing buildings and infrastructure within urban areas, the use of previously developed land and finally the development of previously undeveloped land, subject to criteria.
- 23.2 Similarly, Policy 1 of the JLSP requires development to be located: in the principal urban areas; main towns and key service centres; to contribute, amongst other things, to the efficient use of land and buildings; to have good accessibility; to comprise a balance of uses that achieves patterns of sustainable development and urban regeneration, and which gives priority to the re-use of existing buildings and brownfield sites.

- 23.3 I consider that Policy 23 of the re-deposit plan clearly reflects these criteria. Furthermore, it is my opinion that the actual provision for employment land, which includes vacant sites in Protected Employment Areas, other vacant employment sites as well as sustainable employment allocations in the adopted Pendle Local Plan, will enable the delivery of the preferred sequential approaches of the RSS and the JLSP. Therefore, I do not support objections that argue otherwise.
- 23.4 An objection made by GONW at the first stage deposit, points out that Policy 23 should be amended so that it reflects RSS Policy EC8 and paragraph 2.44 of PPS6, regarding the sequential approach that should be applied to new commercial and office development. However I consider that this objection is met by a change made at the re-deposit stage, which adds the words; 'or at transport hubs or public transport accessibility corridors within the urban area', to the most preferred category of location for new B1 (a) uses.
- 23.5 Issues concerning the sufficiency and suitability of the employment land supply up to 2016 were discussed in depth at a round table session (RTS) held on 27 September 2005, as well as at subsequent formal and informal hearing sessions.
- 23.6 Policy 14 of the JLSP states that, in Pendle, provision will be made for 40.0 hectares of business and industrial land (B1-B8 uses) over the period 2001-2016. Objective (6) of Table 3 of the JLSP indicates that this required provision includes a 25% targeted increase upon previous average annual take-up rates, which will allow for inward investment.
- 23.7 Paragraph 6.3.36 of the reasoned justification for Policy 14 informs that the amount of provision in each District relates to new land required for business, general industrial, storage and distribution uses (Classes B1, B2 and B8). It clarifies that land with planning permission for Use Classes B1, B2 and B8 at the base date of April 2001 will contribute towards provision and that, in addition, change of use from other land uses or previously vacant land will also count towards the figure. The paragraph further stresses that over-provision should be avoided.
- 23.8 Figure 3a of the re-deposit plan, which refers to Industrial and Business Land requirement in Pendle 2001-2016, and the reasoned justification to Policy 23 which follows it, indicate that that at March 2004 there was 6.69 hectares of unconstrained employment land available, and a total net requirement for 22.99 hectares of such land to 2016. Thus, apparently giving rise to a significant shortfall of employment land. However, no provision for making up this JLSP requirement deficit is given in Policy 23 or elsewhere in the plan, except for a statement made in the

reasoned justification that the requirements for new employment land are to be met within the existing stock of land and premises.

23.9 Another inconsistency of the re-deposit plan with Policy 14 of the JLSP is that the second paragraph of reasoned justification beneath Figure 3a states that potential (employment) land was discounted if work had commenced as at 31<sup>st</sup> March 2004, whereas the JLSP clearly states that land with planning permission at the base date of April 2001 will contribute towards provision. In its submissions to the employment RTS, the Council agrees that it had misinterpreted Policy 14 of the JLSP in this regard.

23.10 Consequently, and in response to objections made, the Council has revisited its assessment of its employment land supply. Based on its most up-to-date data on the employment land supply position at 31<sup>st</sup> March 2005, and taking into account; completion figures, sites with planning permission, vacant sites and premises in Protected Employment Areas, employment sites allocated in the 1999 adopted Pendle Local Plan which remain undeveloped, and sites >0.5 hectare outside Protected Employment Areas, where previous employment permissions have lapsed but the site remains vacant, a revised Figure 3a has been devised. This is presented as Table 1 in the Council's proof of evidence, reference RTS/PBC/03. This Table, which I reproduce below, demonstrates that in overall quantitative terms, the Council has sufficient land to meet its JLSP requirement up to 2016, without the need to allocate new sites.

23.11 **Table 1: Employment Land supply at 31<sup>st</sup> March 2005**

<b>Supply at 31 March 2005</b>	<b>Requirement</b>
Employment requirement of the Structure Plan 2001-2016	40.00 Ha
Industrial take up 2001-2005 (completions) (source PBC Employment Land Study 2005)	-10.92 Ha
Under construction at 31 March 2005 (source PBC Employment Land Study 2005)	-1.66 Ha
<b>Land available at March 2005</b>	
Outline, full or reserved matters permission, with no discounting (source PBC Employment Land Study 2005, as corrected)	-18.54 Ha
Vacant sites in Protected Employment Areas	-13.36 Ha
1999 adopted Local Plan allocations (still vacant)	-3.90 Ha
Sites >0.5 Ha outside of Protected Employment Areas where previous employment consents have lapsed but still remains vacant	-0.82 Ha
<b>Requirement (Surplus)</b>	<b>+9.2 Ha</b>

- 23.12 The Table shows that of the 40.0 hectares JLSP requirement, only 29.08 hectares remains to be found, taking into account that since 2001, 10.92 hectares of employment development has taken place. The table shows that within the Borough, there is around 18.5 hectares of land with planning permission for employment purposes, of which about 16.9 hectares is on sites in excess of 0.5 hectare and which are readily available for development in the short term. There is a further 13.36 hectares of land available in the Protected Employment Areas, much of which lies in sites cleared and ready for development. However, in the event of some sites not coming forward, there is also a supply of land arising from adopted Pendle Local Plan allocations which remain vacant and not allocated for other uses and sites over 0.5 outside the Protected Employment Areas hectare with lapsed planning permissions. These are available for indigenous or inward investment. Together, these sources indicate an apparent over-supply of around 9.0 hectares of employment land within the Borough.
- 23.13 However, as discussed at length at the RTS, some of this identified supply may not fall within the definition of new industrial land, for example very small extension sites, but cumulatively these are likely to account only for around 3.8 hectares. There was also some concern by some Objectors/Participants about possible double counting of some sites within more than one category. Nevertheless, the consensus of all attending the employment RTS, including representatives of the County Council and Peel Investments (North) Ltd., was that the quantitative requirement for employment land supply is met within the Borough.
- 23.14 However, at a subsequent formal hearing session, at which objections made by Peel Investments (North) Ltd. were heard, the Objector re-opened the debate regarding the employment land supply situation. It was argued that the Council's Table 1 is flawed because it includes double counting of sites amounting to 1.66 hectares, extensions to existing employment premises/site of less than 1000 sq m amounting to 0.61 hectares and sites which were previously in employment use which should not be classified as 'new' employment sites, amounting to 13.37 hectares. Cumulatively, these considerations would result in a shortfall of 6.45 hectares of employment land. After further consideration, the Council conceded the first two of these elements, but not the third relating to 'new' employment sites.
- 23.15 The Objector argues that land which already has, or had, an employment use as its last beneficial use should not be considered as 'new' employment land. However, at the RTS I specifically asked the County Council's representative for his interpretation of JLSP Policy 14 on this matter. With reference to

paragraph 2.1.2 of the notes of the RTS session (CD 196), which were agreed by all participants to be factually correct, the County Council's representative said that: "Land subject to change of use, including employment land if previously vacant, to employment uses will also be included towards the requirement." I consider his statement to be squarely in line with paragraph 6.3.36 of the JLSP.

- 23.16 Nevertheless, in principle, I agree that there is merit in both arguments and that both interpretations are reasonable. But in the context of the North West region and of Pendle in particular, where there is a priority for new development to re-use sustainable brownfield sites ahead of greenfield sites, in order to assist urban regeneration, I fully understand and accept the approach of the JLSP in its definition of 'new' employment land. Therefore, I do not support the Objector on this matter. On this basis, I consider that there is an over-supply of employment land in the Borough amounting to around 7.7 hectares.
- 23.17 I do not consider that this relatively small over-supply raises matters of conformity with the JLSP because it is possible that some of the sites identified may be constrained to the extent that they may not come forward during the plan period.
- 23.18 Therefore, from all that I have read, seen and heard; I conclude that the plan makes adequate provision to meet the employment land requirement set out in Policy 14 of the JLSP. To clarify this and to bring the reasoned justification for the policy in line with paragraph 6.3.36 of the JLSP, I generally endorse the Council's suggestion set out at Change No. 109 (CD 193), which replaces existing Figure 3a with the details contained in Table 1 above, and which amends the reasoned justification text and footnote. These changes would also meet those objections which raise supply and JLSP interpretation issues.
- 23.19 For consistency, I consider that the first sentence of the last paragraph of the Employment Strategy, which appears on pages 15 and 16, should also be deleted. Since there is a proven adequate supply, I consider that this sentence is superfluous and detracts from the clarity of the plan. These changes would also meet those objections which raise supply and JLSP interpretation issues.
- 23.20 Notwithstanding that it was acknowledged at the employment RTS that the quantitative requirement is met, some attendees nevertheless remain of the opinion that the employment land portfolio is inadequate with regards to the types and range of size of sites that are relied upon by the Council.

- 23.21 PPG4 indicates at paragraph 6 that planning authorities should provide for choice, by ensuring that there is a variety of sites available to meet differing needs for industry and commerce. However, the identified supply includes brownfield and greenfield sites, and it includes a range of size of sites from under 0.1 hectare to the larger Barrowford Business Park site, which is 7.3 hectares in extent. In my opinion, the employment land supply portfolio contains a range of sites that are suitable for the expansion or relocation of indigenous firms and also new sites for small, medium and large scale inward investment.
- 23.22 Numerically, most of the available sites are small, but I consider that this reflects the nature of the local economy, which is analysed and summarised in The Pendle Economy and Future Outlook report (Cambridge Study) (CD 78). It identifies that 78% of firms in Pendle are single site firms of which 82% employ less than 10 people. These characteristics are also reflected in the Land and Premises Enquiries: Pendle 2002-2005 (CD 185), which shows that over 57% of enquiries were for sites of less than 0.5 hectare in area and over 90% were for sites and premises under 2.5 hectares.
- 23.23 I consider that this match between demand and supply also demonstrates that the Council is attuned to the need to ensure that the Local Plan employment policies will enable the acceleration of inward investment and will meet the needs of local businesses. Thus indicating that there is effective dialogue between the Council and local business groups.
- 23.24 I am satisfied that both quantitatively and qualitatively there is an adequate supply and quality of employment land up to 2016 that reflects the specific needs of Pendle. Consequently, I conclude that there is no need to allocate any additional land for employment purposes as part of this review of the Local Plan, in order to make adequate provision for the expansion of existing firms and for inward investment in a manner that conforms to the JLSP. For these reasons, I do not support these objections.
- 23.25 However, as acknowledged by the Council there is not a tremendous choice of larger employment sites within the Borough that are over 1.0 hectare in extent. Whilst I do not consider that this is a concern that needs to be addressed as part of this Local Plan review, in my opinion, it is matter that is likely to become more acute in the long term and its remedy should be considered as part of the forthcoming LDF process.
- 23.26 Burnley Council is concerned that the first paragraph on page 16 of the re-deposit plan written statement, which forms part of the Employment Strategy of the plan and which refers to the allocation of sites through the ADF process, is inappropriate,

because the ADF documents will not be statutory planning documents. I agree with the Objector's view on this matter. Furthermore, because this reference was made partly in the context of a perceived under-supply of employment land at the re-deposit stage, which I conclude to be incorrect, I consider that this reference is unnecessary and confusing. I recommend that it is removed.

- 23.27 Other Objectors consider that the plan should reflect the findings of the Cambridge Study (CD 78). However, that Study, which was prepared in 2001/2002 is not a statutory document and as such, it carries less weight than the JLSP, which in any case, post dates it. Nevertheless, I consider that the re-deposit plan reflects the spirit and the purpose of the Cambridge Study, which was used to inform the preparation of the plan. The Study sets out a number of scenarios for economic growth, one of which recommends the allocation of around 26.0 hectares of employment land. But in the light of the revised supply figures, which I discuss above, the implementation of that recommendation would result in a substantial over-supply of employment land and would not conform to the requirements of the JLSP. Therefore, I do not support those objections.

### RECOMMENDATIONS (binding)

- 23.28 **I RECOMMEND that the plan be modified by amending Figure 3a contained within the reasoned justification for Policy 23, so that it reads:**

**Figure 3a – Industrial and Business Land Requirement in Pendle 2001-2016 <sup>49</sup>**

<b>Supply at 31 March 2005</b>	<b>Requirement</b>
Employment requirement of the Structure Plan 2001-2016	40.00 Ha
Industrial take up 2001-2005 (completions) (source PBC Employment Land Study 2005)	-10.92 Ha
Under construction at 31 March 2005 (source PBC Employment Land Study 2005)	-1.66 Ha
<b>Land available at March 2005</b>	
Outline, full or reserved matters permission, with no discounting (source PBC Employment Land Study 2005, as corrected)	-19.03 Ha
Vacant sites in Protected Employment Areas	-11.26 Ha
1999 adopted Local Plan allocations (still vacant)	-4.0 Ha
Sites >0.5 Ha outside of Protected Employment Areas where previous employment consents have lapsed but still remains vacant	-0.82 Ha
<b>Requirement (Surplus)</b>	<b>+7.69 Ha</b>

23.29 I RECOMMEND that the plan be modified by amending footnote 49 to Policy 23 so that it reads:

49Figures for take-up and availability taken from the Industrial and Business Land Availability Report (2005) as of 31 March 2005, up-dated to account for errors and omissions.

23.30 I RECOMMEND that the plan be modified by amending paragraph 3 of the reasoned justification for Policy 23 so that it reads:

Figure 3a indicates the total supply of employment land as at 31 March 2005 having regard to employment land supply as defined in paragraph 6.3.36 of the Joint Lancashire Structure Plan. It includes land with planning permission for Class B use, land or vacant premises available for employment purposes within Protected Employment Areas, land or vacant buildings previously in employment use which have not been allocated for alternative land use, and which remain available for employment development. It excludes windfall sites, i.e. those not identified for employment purposes or those which the Council are not currently aware of as being available for development.

23.31 I RECOMMEND that the plan be modified by deleting the last paragraph of the Employment Strategy, which appears on pages 15 and 16 of the plan.

23.32 I RECOMMEND no further modification to the plan in response to these objections.

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## **B. Objections to Specific Sites**

### **BARROWFORD & HIGHERFORD**

#### **Land at Trough Laithe Farm, off Wheatley Land Road, omission site X11**

#### **Summary of Key Issues**

- Whether land at Trough Laithe Farm, omission site X11, is suitable, in principle, for B1 employment use.
- If so, whether the site should be allocated as such before 2016.

## Inspector's Reasoning and Conclusions

- 23.33 Omission site X11 lies to the south-west of Barrowford, approximately 1.0 km north-west of Nelson town centre. It is situated to the north of the Barrowford Business Park. The site incorporates the fields and buildings of three farmsteads: Trough Laithe Farm, Laund Farm and Higher Parrock Farm. To the east and west are areas of residential development and the campus of Nelson and Colne College lies across Pendle Water to the east. It is around 26.1 hectares in extent and is currently used as grazing land.
- 23.34 The site is designated in the adopted Pendle Local Plan as a Protected Area (Policy E2A) and within an Area of Special Landscape outside the Settlement Boundary for Barrowford. At the first stage deposit, the majority of the site was designated as a safeguarded housing site within the settlement boundary. In the re-deposit plan, the site is designated as Green Belt within the Open Countryside and outside the settlement boundary for Barrowford. The western part of the site lies within the Carr Hall Road, Wheatley Lane Conservation Area and a small triangle of land in the eastern section of the site is allocated as a Protected Employment Area (B1 only). Seventeen representations in support of these re-deposit designations were submitted in response to advertisement of the omission site.
- 23.35 In Chapter 3 of my report I acknowledge that when assessed against the purposes of Green Belt set out in PPG2, the site could serve the Green Belt purposes of assisting in safeguarding the countryside from encroachment and of assisting urban regeneration, by encouraging the recycling of derelict and other urban land. However, I conclude that sensitive development of the land could be appropriate if there was a pressing need for development land in the Borough. In reaching that conclusion I have carefully considered all of the arguments put to me, both for and against, particularly with regard to environmental and visual impact. In addition, I take the Council's designation of the site, as a safeguarded housing site at the first stage deposit, as its endorsement of this opinion.
- 23.36 Furthermore, I consider that well designed and carefully landscaped B1 development would have no greater visual impact in short, medium or long views of the site than would well designed and carefully landscaped residential development. Nor have I any reason to think that the infrastructure, including the highways system, would be unacceptably overloaded by B1 development. Consequently, provided that any office element of a B1 development met the sequential tests of PPS6, the RSS, the JLSP and Policy 23 of the re-deposit plan, I conclude that B1

development at this site could be acceptable in principle. But, I do not think that the net developed area should be restricted to around 7.0 hectares, as suggested by the Objector. In my opinion that would be an inefficient use of the land.

- 23.37 However, as I conclude in Part A of this Chapter of my report, despite the arguments of the Objector to the contrary, the Council has demonstrated to my satisfaction that it has a small over-supply of employment land against the JLSP requirement for 40.0 hectares up to 2016. Therefore, in quantitative terms, there is no need to allocate any employment land during this plan period.
- 23.38 I have carefully considered the Objector's opinion of the quality of that portfolio of sites. Whilst I agree that the choice of available larger sites, above 1.0 hectare, is limited, I am not convinced by the evidence before me that there is a significant mismatch between demand for large B1 sites and the availability of such sites in Pendle that warrants the allocation of the omission site in the context of an over-supply situation.
- 23.39 The adjacent greenfield Barrowford Business Park is over 7.0 hectares in area and has been available for B1 development for some time, without any buildings having been built on the site to date. From the Objector's own evidence, the only interest in the site is speculative. Furthermore, the density of development at that Protected Employment Area site could be increased. Therefore, I have no reason to think that the Objector's unsubstantiated contention that the allocation of the site would be so attractive to inward investors to warrant exacerbating this over-supply situation and non-conformity with the JLSP, is justified.
- 23.40 For all of these reasons, I do not agree with the Objector that there is a need to allocate this site for B1 development during this plan period. Turning now to the post 2016 period, I conclude in Chapter 3 of my report that omission site X11 should be 'Protected' for possible long term development needs, including for employment purposes, in accordance with new Policy 3A, which I set out in part A of Chapter 3 of my report. This is broadly in line with the Objector's suggested new policy for safeguarding land for possible long term general development needs. Therefore, I consider that the objection is partly met.

### **RECOMMENDATION (binding)**

- 23.41 **I RECOMMEND no modification to the plan in response to these objections. (See my recommendations for omission site X11 given in Chapter 3 of this report.)**

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## **COLNE (including COTTONTREE)**

### **Land at Barrowford Road, omission site X31**

#### **Summary of Key Issue**

- Whether land at Barrowford Road, omission site X31, should be allocated as employment land in accordance with a recommendation of the Cambridge Study.

#### **Inspector's Reasoning and Conclusions**

- 23.42 Omission site X31 comprises around 23.0 hectares of open farmland situated on the eastern edge of Colne. It is attractive countryside bisected by Wanless Water. Part of its eastern boundary abuts part of the proposed route of the A56 Village Bypass. The site is allocated in the adopted Local Plan as Green Belt and as a Special Landscape Area. In the re-deposit plan it is designated as Green Belt beyond the settlement boundary and in the Open Countryside. Ten representations of support for these designations were made. In addition, a further nine representations supporting the Green Belt designation of the site were made in response to advertisement of the omission site. Three objections request the designation of the site for employment purposes.
- 23.43 The Objectors contend that exceptionally, the site should be released from the Green Belt to provide employment land, in order to enhance the economic development of the Borough. Reference is made to the Cambridge Study, which identifies the omission site as being of sufficient quality and suitable location to provide for the employment needs of the Borough, as anticipated by the Study.
- 23.44 The regeneration aim of the Strategy section of the plan seeks to balance economic, social and environmental well-being. As I conclude in Part A of this Chapter of my report, the Council can demonstrate that it has an adequate supply of new employment land to meet the 40.0 hectares of land required by the JLSP, up to 2016. The Cambridge Study is not a statutory document and consequently, it carries significantly less weight than the JLSP, which also post dates the Study.
- 23.45 Nevertheless, I consider that the re-deposit plan reflects the spirit and the purpose of the Cambridge Study, which was used to inform the preparation of the plan. Its findings are also echoed in the RSS. However, the Study did not recommend that a large site should be allocated; rather it set out scenarios, one of which recommended the allocation of around 26.0 hectares of

employment land. But in the light of the identified supply, no further greenfield sites are required. Nor do I consider that there is a need to safeguard land specifically for employment purposes.

23.46 PPG2 discourages changes to the Green Belt, except where exceptional circumstances can be demonstrated. Furthermore, the RSS and the JLSP indicate that the Green Belt boundaries in Lancashire should only be reviewed in response to a strategic study, which will not be undertaken before 2011. Thus, in my opinion, any long term need for this site, for employment, purposes should be considered as a part of the future LDF process.

23.47 Notwithstanding this adverse policy context, I do not consider that this site is, in any case, particularly suitable for employment development. I consider that this greenfield site would score poorly in the sequential approaches of the RSS, the JLSP and the re-deposit plan Policy 23. Furthermore, because of the undulating nature of the land, development upon it would be prominent in some views, and it is overlooked by housing development. In my opinion, the site is not very sustainable in terms of access to facilities or proximity to other industry, shops and services. At this stage, the construction of the A56 Village Bypass cannot be relied upon and the site has only average accessibility to public transport. In addition, part of the site lies within the Wanless Water floodplain, which has a chance of flooding greater than 1 in 75 years.

23.48 For all of these reasons, I do not support these objections. As I conclude in Chapter 3 of my report, I consider that the Green Belt designation of the site is appropriate.

#### **RECOMMENDATION (binding)**

23.49 **I RECOMMEND no modification to the plan in response to these objections.**

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#### **EARBY**

#### **Proposed extension to West Craven Business Park, omission site X63**

#### **Summary of Key Issue**

- Whether the West Craven Business Park should be extended to include omission site X63

## Inspector's Reasoning and Conclusions

- 23.50 The site is located at the extreme north-eastern edge of the Borough adjoining the West Craven Business Park to the south. It is 3.6 hectares in area and is designated in the re-deposit plan as Open Countryside, lying beyond the Settlement Boundary for Earby.
- 23.51 A first deposit stage Objector considers that the allocation of sufficient employment land is of equal, if not of more importance than having an adequate supply of housing land. He suggests that if there is a shortfall in employment land provision, this could be alleviated by the allocation of an extension to the West Craven Business Park, at omission site X63. The Objector considers that this peripheral location is appropriate, because it is close to neighbouring North Yorkshire and it would further strengthen the case for re-opening the railway line and/or the A56 Village Bypass.
- 23.52 However, as I have concluded in Part A of this Chapter of my report, Pendle has an adequate supply of employment land to meet the JLSP requirement up to 2016. The sites that have been identified as contributing to this supply are in sustainable urban locations and range in size from 0.1 hectare to 7.3 hectares, and are suitable for new and existing businesses. Therefore, there is no need to allocate further employment land, as that would lead to an over-supply, which Policy 14 of the JLSP expressly warns against.
- 23.53 Furthermore, this site is an attractive greenfield parcel of land set at the fringe of Earby. In my opinion, it is not a highly sustainable site and it would score poorly in the sequential approaches of the RSS, the JLSP and Policy 23 of the re-deposit plan. In addition, I think that its development would adversely affect the landscape and the visual amenity of the area. Consequently, I consider that its development would not meet the requirements of Policy DP1 of the RSS or of Policy 1 of the JLSP. For these reasons, I do not support the objection.

## RECOMMENDATION (binding)

- 23.54 **I RECOMMEND no modification to the plan in response to these objections.**

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## **KELBROOK & SOUGH**

### **Land off the A56 between Kelbrook and Sough, omission site X82**

#### **Summary of Key Issue**

- Whether land off the A56 between Kelbrook and Sough, omission site X82, should be allocated as an employment site.

#### **Inspector's Reasoning and Conclusions**

- 23.55 Omission site X82 lies to the west of the A56 and to the north-west of the village of Kelbrook. It is 4.93 hectares in extent and is used as grazing land. In the adopted Pendle Local Plan it is designated as an Area of Special Landscape outside the Settlement Boundary for Kelbrook. In the re-deposit plan, it is designated as open countryside outside the Settlement Boundary.
- 23.56 Allocation of the land for employment purposes is sought by an Objector who wishes to consolidate his business on one site. After an extensive search, site X82 has been identified as the only suitable site available of around the 5.0 hectares required. The Objector accepts that the Council can demonstrate theoretical compliance with the 40.0 hectares requirement of Policy 14 of the JLSP, but maintains that some of this land may not be genuinely available, and in any case, it is contended that there are exceptional, overriding circumstances in this case.
- 23.57 I have concluded in Part A of this Chapter of my report that Pendle has an adequate supply of employment land to meet the JLSP requirement up to 2016. The sites that have been identified as contributing to this supply are in sustainable urban locations. They range in size from 0.1 hectare to 7.3 hectares and they are suitable for new and existing businesses. Therefore, there is no need to allocate further employment land, as that would lead to an over-supply, which Policy 14 of the JLSP expressly warns against.
- 23.58 I have considered the arguments against the genuine availability of the identified employment land in the light of several objections to Policy 23. I have similarly considered qualitative arguments, but I have not been convinced that there is either a quantitative or qualitative shortfall in the supply, that would necessitate the allocation of any employment land during this plan period. I turn now to consider the exceptional circumstances pleaded by this Objector.
- 23.59 I sympathise with his position and recognise the inconvenience that is caused from operating from several sites, also the impact on the local highways network of traffic generated by vehicles

travelling between the sites. Clearly this situation is far from ideal. However, it is not contended that it is fatal to the continued viability of the business.

23.60 I acknowledge that the availability of sites of suitable size identified by the Council is limited, and that they do not ideally meet the Objector's operational requirements. I recognise that the omission site would be suitable to meet the Objector's business needs, that it would be reasonably sustainable in terms of access for employees to public transport. Also, that highways and flood risk constraints could probably be overcome.

23.61 However, the requested development of this greenfield site would amount to a significant loss of open countryside and it would contribute to the merger of Kelbrook with Sough. Furthermore, I am not convinced that an alternative of consolidating the business in one location could not be achieved on some of the company's expansion land and adjoining vacant brownfield land. Whilst this solution would be more challenging and possibly more financially costly, no evidence has been submitted that indicates that these considerations would be prohibitive.

23.62 On balance, I conclude that the personal circumstances cited in this case do not weigh in favour of allocating omission site X82 for employment purposes. For these reasons, I do not support the objection.

#### **RECOMMENDATION (binding)**

23.63 **I RECOMMEND no modification to the plan in response to this objection.**

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## **Policy 24 – Employment Land in Rural Areas**

### **Introduction**

24.1 Significant objections were made, at the first stage deposit, to the clarity of Policy 24 and its conformity with national guidance; in particular, with PPG2 and PPS7. As a result, the policy text was re-written and its reasoned justification was substantially amended at the re-deposit stage. A considerable number of further changes to the policy and its reasoned justification are also suggested by the Council in response to objections made to those re-deposit amendments.

### **Summary of Key Issues**

- Whether Policy 24 is sufficiently precise and unambiguous, and in conformity with Government guidance contained in PPG2 and PPS7.
- Whether Policy 24 should be amended to clarify that any development within the rural areas should take place within a settlement boundary, or should utilize an existing building.
- Whether Policy 24 should be amended to clarify that full planning considerations will apply to proposals for employment development in the rural areas.
- Whether paragraph 3 of Policy 24 should be amended to clarify the types of development covered under 'farm diversification projects'.
- Whether Policy 24 should be amended to clarify that development should be capable of being accessed safely and should meet the adopted parking standards.
- Whether the term 'easily accessible', as it is used in the context of Policy 24 should be defined in a manner that is consistent with the use of the term, 'suitably and safely accessed', in Policy 25.
- Whether reference should be made in the text of Policy 24 to the need for development to be accessible by cycling, walking and public transport.

### **Inspector's Reasoning and Conclusions**

24.2 Objectors question the clarity of the first stage deposit draft of Policy 24 in terms of its format and the precision of terms used in the policy, and its reasoned justification, and compliance of the policy with national guidance.

- 24.3 In response, the paragraphs and sub-paragraphs of Policy 24 in the re-deposit plan are numbered to clearly indicate sub-ordination. In my opinion, this goes some way to meeting these objections. Additional changes proposed by the Council, which I endorse and make recommendations upon below, will in my opinion further improve the clarity of Policy 24, in response to the objections.
- 24.4 With regards to the use of specific terms in the policy, in the re-deposit plan the phrase, 'relates well to', in the section on touring caravan or tent sites, has been replaced with the wording; 'is easily accessible to' in sub-paragraph 3(iv) of the policy text. I consider that this change overcomes part of a first stage objection.
- 24.5 Sub-paragraphs 2A and 2B of the text of re-deposit plan Policy 24 state that new development is permissible where the re-use of an appropriately located and suitably constructed, existing building in the countryside is proposed or replaces a building in the countryside, which is suitably located and is of permanent design and construction. I consider that this reflects Government guidance contained in paragraph 19 of PPS7, which is supportive of the replacement of suitably located existing buildings of permanent design and construction in the countryside, for economic development purposes. In my opinion also, it is reasonable to restrict replacement development to the footprint of the original building, to ensure that any development in support of rural regeneration is undertaken at a scale that is appropriate to the rural environment. I consider that these changes effectively address most of the objections concerning ambiguity of the policy.
- 24.6 The re-deposit Policy 24 does not require bed and breakfast establishments to be located close to existing settlements. Nor does it impose a minimum 75% threshold for the sale of produce created at the farm, which were subjects of objection at the first stage deposit. However, I do not support an Objector who requests that a further criterion is added to Policy 24, which would inform that proposals for farm diversification should comply with Policies 1, 2 and 4 of the re-deposit plan, because in my opinion, that would infer that compliance with other policies of the plan is less important, when they are not. All relevant policies of the plan should be taken into account in the determination of planning applications.
- 24.7 However, counter Objectors are concerned that, as re-worded at the re-deposit stage, Policy 24 now allows for any development to take place on greenfield sites in the open countryside, including in the Green Belt.

- 24.8 The purpose of Policy 24 of the re-deposit plan is to support proposals for economic development purposes in the open countryside, Green Belt and Areas of Outstanding Natural Beauty; provided that they meet sustainable development objectives and they are of a design and scale appropriate to their rural surroundings. In line with the guidance of PPG2, the Council now agrees with first and re-deposit stage Objectors that Policy 24 should not allow for new build in the Green Belt. It, therefore, recommends that any such references should be removed from both the policy text and the reasoned justification in accordance with suggested Changes Nos. 61, 62 and 66 (CD 193). I support these suggested changes
- 24.9 However, Government advice contained in PPS7, at paragraph 21, indicates that where appropriate, planning policies should support suitably located and designed development necessary to facilitate the economic and social well-being of ... designated areas (including in Areas of Outstanding Natural Beauty) and their communities. Furthermore, PPS7 supports the re-use of appropriately located and suitably constructed existing buildings and is supportive of the replacement of appropriately located, existing buildings of permanent design and construction in the countryside for economic development purposes.
- 24.10 PPG2 makes a general presumption against inappropriate development within Green Belts, except in very special circumstances. Whilst PPS7 notes, at paragraph 26, that the policies in PPG2 continue to apply in Green Belts, it recommends that planning policies should address the particular land use issues and opportunities to be found in the countryside around urban areas. In recognition of the fact that diversification into non-agricultural activities is vital to the continuing viability of many farm enterprises, the PPS further advises that policies should, where relevant, give favourable consideration to proposals for diversification in Green Belts, where the development preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.
- 24.11 In the context of this national guidance, I consider that to restrict all development to within a settlement boundary, as requested by Objectors, would severely limit farm diversification projects or small-scale developments that help to create a sustainable rural economy. It is my opinion that the re-use of derelict buildings in the Green Belt and Areas of Outstanding Natural Beauty, to provide rural employment opportunities in support of rural regeneration and diversification, is preferable to allowing those buildings to remain empty and unproductive.
- 24.12 Thus, in response to this and other objections, the Council has suggested changes, which I endorse, that the policy should not

allow for new build in the Green Belt. These are contained in suggested Changes Nos. 61, 62 and 66 (CD193). Furthermore, in reply to an objection made by Kelbrook and Sough Parish Council, concerning employment development beyond settlement boundaries, which was considered at an informal hearing session, the Council agreed that further re-formatting of Policy 24, in accordance with suggested Change No. 67 (CD 193) would clarify that any new build employment development in the open countryside should relate to farm diversification projects only. The Parish Council confirmed that the suggested re-wording of the policy would meet their objection.

- 24.13 I support this further suggested Change to the policy. In my opinion, it considerably improves its clarity and precision and it also further meets first stage deposit objections to non-conformity of the policy with PPG2 guidance.
- 24.14 In addition, Pendle CPRE requests that the wording of the policy text, and the reasoned justification are amended to say, 'planning permission may be granted', rather than, 'planning permission will be granted'. In line with this objection, the Council agrees that, bearing in mind, there should be other policy and material considerations in any planning decision the re-deposit policy is too positively worded. But to say, 'may be', as suggested by the Objector, is too weak for a policy direction. The Council, therefore, suggests the amendment of the first sentence of the text of Policy 24, in accordance with suggested Change No. 60 (CD 193).
- 24.15 It also suggests that the footnote 52 referred to in that sentence is amended to reflect recent changes to the Use Classes Order, as set out in suggested Change No.64 (CD 193). I support both of these Changes, which I consider improve interpretation of the policy and meet the objection.
- 24.16 GONW requests that Part 3 of the text of re-deposit Policy 24 is amended to clarify what types of development are considered to be 'farm diversification projects', and whether these include new build, conversion and/or the re-use of buildings.
- 24.17 The policy states that B1, B2, B8, recreational and other relevant uses will be supported, and a list of farm diversification projects is provided in the penultimate paragraph of the reasoned justification. Thus I consider that it is clear which range of uses may be considered as being acceptable farm diversification projects within the context of Policy 24. Furthermore, suggested Change No. 62 (CD 193) would amend the first sentence of the text of Policy 24 to read: 'Proposals for new build (with the exception of Green Belt) and the conversion or re-use of existing buildings for farm diversification projects for B1, B2, B8, recreational, or other relevant uses will be supported so long as

the following criteria are met:-'. In my opinion, this suggested Change adds clarity to the policy in this regard, and it meets the objection.

- 24.18 The County Council is concerned that the wording of criterion 3(iii) of Policy 24 implies that it may not be necessary for developments to meet the parking standards of the JLSP. The Council agrees that this re-deposit objection is justified and it considers that the policy should be re-worded to state; 'the development must be suitably and safely accessed and parking must be provided in line with the car and cycle parking standards', as set out in suggested Change No. 63 (CD 193). I consider that this adds further clarity to the policy and will overcome this objection.
- 24.19 In a further objection to this policy, the County Council notes that there is an inconsistency between Policies 24 and 25 of the re-deposit plan with regard to access requirements. However, this is rectified by suggested Change No. 63 (CD 193) that I refer to above. The County Council has conditionally withdrawn the objection on the basis of this Change.
- 24.20 The County Council also considers that the term, 'easily accessible', in criterion 3(iv) of Policy 24 is unclear. In response, the Council considers it appropriate that the criterion should be re-worded to state that, 'the proposal is within easy access, by walking, cycling or public transport, of an existing settlement ...' in accordance with its suggested Change No. 65 (CD 193). I support this Change, which in my opinion aids interpretation of Policy 24 and meets the objection, which was conditionally withdrawn on its basis.
- 24.21 Also in connection with Policy 24, the County Council states that the policy should require development to be accessible by cycling, walking and public transport. Whilst I consider that it is reasonable that touring caravan and tent sites should have access to an existing settlement by cycling, walking or public transport, I do not consider that it is appropriate to require this for all development in rural areas, because, for example, those that facilitate farm diversification may not reasonably be capable of meeting this requirement. For this reason I do not support the objection.
- 24.22 Finally, in connection with Policy 24, I note that there is a typing error in the last sentence of the second paragraph of the reasoned justification on page 85 of the re-deposit plan. Although not the subject of an objection, I suggest that it should be corrected for clarity, so that the word 'marked' is replaced by the word 'marketed', in accordance with the Council's suggested Change No. 68 (CD 193).

## **RECOMMENDATIONS (binding)**

24.23 **I RECOMMEND** that the plan be modified by amending Policy 24 to read:

Within rural areas, a wide range of economic activity<sup>52</sup> will be supported provided that proposals for development meet the following criteria: -

1. The development is small scale for B1, B2, B8 or recreational uses.

**AND**

A. would re-use an appropriately located and suitably constructed existing building in the countryside which was;

(i) in scale and design in keeping with its surroundings,

**OR,**

B. is a replacement building in the open countryside (excluding the Green Belt), which is suitably located and of permanent design and construction which would bring about an environmental improvement in terms of the impact of the current development on its surroundings and landscape and which was;

(i) on the footprint of the existing building,

(ii) not proposing any large scale extensions<sup>53</sup>,

**OR,**

C. is within the settlement boundary of an existing village.

In addition, the proposal must be suitably and safely accessed and parking must be provided in line with the car and cycle parking standards in a location and for a use which does not adversely affect residential amenity. In addition Policies 28, 32 and 40 apply.

2. Proposals for new build (with the exception of the Green Belt) and the conversion or re-use of existing buildings for farm diversification projects for B1,

**B2, B8, recreational, or other relevant uses will be supported so long as the following criteria are met:-**

- (i) either the form, bulk and general design of the building is in keeping with its surroundings, or where a building currently detracts from the rural character and appearance of the locality, its appearance can be satisfactorily improved,**
- (ii) the proposal does not have a materially greater impact than the present use on the openness and function of the Green Belt, or the character of the AONB, or that of the surrounding countryside having regard to the scale, size, intensity and type of use proposed,**
- (iii) the development must be suitably and safely accessed and parking must be provided in line with the car and cycling parking standards,**
- (iv) and in the case of touring caravans or tent sites, the proposal is within easy access, by walking, cycling or public transport, of an existing settlement which can provide necessary facilities without detriment to the local economy.**

**New build in the Open Countryside, (excluding the Green Belt) and AONB areas may be permitted provided that sustainable development objectives are met, and they are of a design and scale appropriate to their rural surroundings.**

**Any noise or light pollution from a development must be kept to a minimum.**

**The loss of employment (B1, B2 or B8) uses from villages or rural areas will be resisted in the LRRAP priority area (see proposals map). Any proposal to re-develop sites/buildings for an alternative use must show that no employment use can be accommodated on the site. Tourist facilities will be permitted in line with Policy 40.**

**24.24 I RECOMMEND that the plan be modified by amending footnote 52 on page 83 of the plan to read:**

<sup>52</sup> Economic activity refers to Use Classes A1, A2, A3, A4, A5, B1, B2, B8, D1, D2 and some Sui Generis. Additional Criteria apply to certain of these Use Classes within Policies 28 and 40.

- 24.25 I RECOMMEND that the plan be modified by amending the reasoned justification for Policy 24 by adding the following clause to the fourth sentence of the first paragraph so that it reads:

Whilst supporting new economic activity there is recognition that in Pendle new development for employment should be small in scale and respect the size and character of the village or be accommodated within an existing building in the countryside (with the exception of the Green Belt) without the need for large scale extension.

- 24.26 I RECOMMEND that the plan be modified by deleting the words 'Green Belt' from the seventh sentence of the first paragraph of the reasoned justification for Policy 24 so that it reads:

New build will be permitted in the AONB provided that sustainable development objectives are met...

- 24.27 I RECOMMEND no further modification to the plan in response to these objections.

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## **Policy 25 – Location of Service and Retail Development**

### **A. Objections to Policy Wording and Approach**

#### **Summary of Key Issues**

- Whether the sequential approach of Policy 25 reflects that of PPS6.
- Whether the definition of edge-of-centre sites should be amended to reflect the advice of PPS6.
- Whether Policy 25 should make reference to the demonstration of need for new retail and leisure development.
- Whether Policy 25 appropriately takes account of the impacts on the vitality and viability of other nearby town centres when considering new major retail proposals.
- Whether the plan should allocate more than one retail site within the Borough.
- Whether the level of parking required for service and retail development should be clarified.
- Whether Policy 24 and Policy 25 should be amended so that they consistently refer to suitable and safe access.
- Whether Policy 25 should be amended to reflect that accessibility should be by a choice of means of transport including walking and cycling.
- Whether the last paragraph of the reasoned justification for Policy 25 should be amended to improve its clarity.

#### **Inspector's Reasoning and Conclusions**

- 25.1 Objections are made that the sequential approach of Policy 25 does not reflect that of PPS6, in that it gives existing out-of-centre shopping areas priority over other out-of-centre sites. An Objector wishes point 4 of the text of the policy to be removed, and instead to be referred to within the reasoned justification.
- 25.2 PPS6 applies to town centres and main town centre uses. In paragraph 2.44 it requires that locations for such development are considered in the following sequential order: first, in appropriate existing centres where suitable sites or buildings for conversion are, or are likely to become available within the plan period; then

edge-of-centre locations, with preference given to sites that are, or will be well-connected to the centre; and then out-of-centre sites, with preference given to sites which are, or will be well served by a choice of means of transport, and which are close to the centre and have a high likelihood of forming links with it.

- 25.3 Given this advice in PPS6, I consider that it is appropriate to give preference to a new development in an allocated edge-of-centre site before a non-allocated edge-of-centre site, because the allocated site in Pendle has been chosen following the sequential approach and is well connected to Nelson town centre and recent developments on the edge-of-centre, namely Morrisons superstore and Nelson Health Centre.
- 25.4 The Council argues that it is appropriate that established out-of-centre shopping areas are also given preference over brand new out-of-centre shopping areas, because a choice of means of transport is already available to the existing out-of-centre retail sites (as defined on the Proposals Map at Boundary Mill/Asda, Colne and at B&Q/Junction 15 Retail Outlet, Nelson/Brierfield), and through this, these sites have good links with the centres they are closest to.
- 25.5 I fully accept that the existing out-of-centre retail sites are well served by a choice of means of transport and that they have good links with the centres they are closest to, but PPS6 says with regards to this sequential tier; 'are or will be', thus not stating such a distinction or presumption, indeed, directly allowing for the situation where a new out-of-centre shopping area could provide better choice of means of transport than an existing centre. Therefore, I support the Objector's criticism that point 4. of Policy 25 does not correctly reflect the sequential approach of PPS6. I recommend that it should be amended accordingly. But in practical terms, I acknowledge that the implementation of the policy would most probably give preference to the existing out-of-centre shopping areas as specified on the Proposals Map.
- 25.6 GONW also objects to Policy 25 on the grounds that the definition of edge-of-centre sites given in the third paragraph of the reasoned justification of the policy does not reflect the advice in PPS6 (Annex A, Table 2), which defines edge-of-centre sites as: for retail purposes; a location that is well connected to and within easy walking distance (i.e. up to 300 metres) of the primary shopping area, and for all other main town centre uses this is likely to be within 300 metres of a town centre boundary. A footnote to the Table informs that for office development, locations outside the town centre, but within 500 metres of a public transport interchange including railway and bus stations, within the urban area should be considered as edge-of-centre locations for the purposes of the sequential approach.

- 25.7 The Council agrees with this re-deposit objection and is of the opinion that the definition of edge-of-centre given in the reasoned justification should be up-dated in line with Table 2, Annex A of PPS6, as stated in suggested Change No. 72 (CD 193). I support this suggestion, which will bring the policy in line with national guidance and will meet the objection.
- 25.8 Objectors consider that Policy 25 should make reference to the demonstration of need for new retail development. Indeed, paragraph 3.9 of PPS6 informs that need must be demonstrated for any application for a main town centre use in an edge-of-centre or out-of-centre location.
- 25.9 Policy 25 of the re-deposit plan states that proposals not within town centres will be required to demonstrate that a need exists, following which the sequential approach will be applied to site selection. I consider that this re-deposit change correctly reflects PPS6 guidance and overcomes the objections.
- 25.10 The Countryside Agency questions if Policy 25 appropriately takes account of the impacts on the vitality and viability of other nearby town centres when considering new retail proposals. In this regard, PPS6 states that local planning authorities should define a network and hierarchy of centres. The scale of development should relate to the role and function of the centre within the wider hierarchy and the catchment served. In addition, Policy 16 of the JLSP defines a hierarchy of town centres in Lancashire. Its reasoned justification informs that the policy seeks to ensure that the scale and type of development is in keeping with the scale and function of the centre it seeks to serve. The hierarchy set out in the JLSP reflects the size, function and catchment area of the centres, which is broadly commensurate with the settlement hierarchy and it reflects the town centres' relative importance as public transport hubs.
- 25.11 Specifically, Policy 16 of the JLSP classifies Nelson and Colne as Tier 2 centres and Barnoldswick as a Tier 3 centre, and it advises that development should reflect the position of the town centre in the hierarchy. Also, that Local Plans should identify smaller centres.
- 25.12 I consider that Policy 25 of the re-deposit plan recognises this hierarchy since it specifies that priority should be given to locating major development in Nelson and Colne. It also recognises that Barnoldswick can support larger development than Brierfield, Barrowford and Earby. In my opinion, this is consistent with the definition of centres included in Table 1 of Annex A to PPS6 and the approach of JLSP Policy 16.

- 25.13 Furthermore, Policy 25 of the re-deposit plan highlights that any proposal for significant retail development should take into consideration the vitality and viability of neighbouring towns, districts or local centres. In my opinion the concerns of the Objectors are, therefore, satisfied.
- 25.14 An objection is made to Policy 25 on the grounds that further town centre and edge-of-centre retail allocations should be provided within the Local Plan area. In this regard, paragraph 2.4 of PPS6 states that local planning authorities should seek to ensure that the number and size of sites identified for development or redevelopment are sufficient to meet the scale and type of need identified. Thus, LPAs should assess the need for new floor space for retail, leisure and other town centre uses. These assessments will provide the basis for identifying the need for additional development and the appropriate scale of development in the centres within the authority's area, bearing in mind their role and function.
- 25.15 A retail capacity study was undertaken for Pendle Borough Council in 2002 by Development, Land and Planning Consultants Ltd (CD 80), in conjunction with Sheffield Hallam University. The Pendle Retail Study was prepared in order to inform this review of the Local Plan. It considered both the demand and supply sides of retailing, and it made projections up to the year 2011. It concludes that the majority of expenditure on personal and household goods (e.g. clothes, furniture and electrical) takes place outside the Borough. In this regard, the Study identifies a need for additional personal and household floor space over and above that available in the Borough's centres, in an attempt to try to retain some of the expenditure currently being lost (as of 2001).
- 25.16 The Study recommends capacity and need for a further 10,800 square metres of personal and household floor space. In contrast, it recommends that no further convenience (food) floor space should be developed, unless it involves adaptation or restructuring within an existing town or local centre. Recent food-store developments have been successful at 'clawing' back expenditure which was previously spent outside the Borough. However, the Study concludes that the introduction of further convenience floor space could have an adverse impact on existing floor space in the town and local centres.
- 25.17 Policy 25 refers to the edge-of-centre retail allocation at Clayton Street, Nelson. Details of this are included in Policy 27 - Retail and Service Land Provision. This site is allocated for non-food retail or leisure only, in line with the results of the Pendle Retail Study. The allocated site is 15,900 square metres, which includes a 25% provision for ancillary uses such as A2, A3, (A4 and A5 see

below) or B1a, and any related infrastructure needs. The Council considers that this site will provide sufficient land to meet the need for personal and household goods as identified in the Pendle Retail Study. I have no reason to dispute the findings of the Study. Therefore, I support the Council's opinion that there is no need to allocate further retail sites in the re-deposit plan.

- 25.18 It should be noted, however, that the sequential approach, as set out in Policy 25, does not preclude developers putting forward development proposals for alternative sites, so long as a need is demonstrated and the sequential approach is followed. Furthermore, if the allocated site is subject to a leisure proposal instead of a non-food retail application, then the need for non-food retail identified through the Pendle Retail Study will still apply and developers can propose appropriate sites for this use following the sequential approach, and taking account of the hierarchy and role of the different centres. For these reasons, I do not support the objection.
- 25.19 However, changes were made to the Use Classes Order after the publication of the re-deposit plan, which amend the sub-divisions of Class A. I consider that these changes should be reflected in Policy 25, in order not to exclude its application to public houses and hot food take-aways, which are clearly intended to be covered by the policy. Therefore, I support the Council's suggestion that the policy is updated in accordance with its Change No. 69 (CD 193) to reflect relevant changes to the Use Classes Order. Furthermore, PPS6 replaced PPG6 in 2005. Reference to PPG6 in the reasoned justification for Policy 25 should, therefore, also be updated accordingly. In addition, consequential changes should be made to Policies 24, 26, 27, 28 and 32 and to Appendix 4 of the re-deposit plan. I make detailed recommendations in respect of these in the relevant Chapters of my report.
- 25.20 The GONW considers that the level of parking required for service and retail development should be clarified in Policy 25. However, the re-deposit plan states that parking must be provided in line with the car and cycle parking standards. These are maximum standards and are included in Appendix 2 of the plan. Therefore, I consider that the objection is met.
- 25.21 In response to the County Council's request that Policy 24 and Policy 25 should be amended so that they consistently refer to suitable and safe access, the Council suggests Change No. 70 (CD 193), which would amend the second last paragraph of the text of Policy 25 text to bring it in line with Policy 24 (as recommended to be modified). I support this Change, which in my opinion, would improve the consistency of the plan and would overcome the objection, which has been conditionally withdrawn on its basis.

- 25.22 The County Council made a further objection to Policy 25 on the grounds that the last paragraph of the policy text should be reworded to reflect that accessibility should be by a choice of means of transport, including walking and cycling. In response, the Council suggests that the last sentence of the policy text should be reworded in accordance with Change No. 71 (CD 193), which reads: 'Any new service or retail development must be accessible by a choice of means of transport, including walking and cycling'. I support this Change, which puts greater emphasis on sustainable modes of transport, and which overcomes the objection that has been conditionally withdrawn on this basis.
- 25.23 The GONW considers that the meaning of the first sentence of the last paragraph of the reasoned justification for Policy 25, should be clarified by inserting the words; 'replaced by' after 'can be retained or', and deleting the word 'allowed' at the end of the sentence. These changes were made at the re-deposit stage, thereby meeting the objection.

#### **RECOMMENDATIONS (binding)**

- 25.24 **I RECOMMEND that the plan be modified by amending point 4. of the text of Policy 25 to read:**

**4. Elsewhere outside of a defined town centre or local shopping centre, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre.**

- 25.25 **I RECOMMEND that the plan be modified by replacing the last sentence of the third paragraph of the reasoned justification to Policy 25 with the following sentences:**

**Edge-of-centre is defined as: for retail purposes; a location that is well connected to and within easy walking distance (i.e. up to 300 metres) of the primary shopping area, and for all other main town centre uses this is likely to be within 300 metres of a town centre boundary. For office development, locations outside the town centre but within 500 metres of a public transport interchange, including railway and bus stations, within the urban area should be considered as edge-of-centre locations for purposes of the sequential approach.**

- 25.26 **I RECOMMEND that the plan be modified by amending the first line of the text of Policy 25 so that it reads:**

**New retail and service development (Use Classes A1, A2, A3, A4, A5, D1, D2 and specified Sui Generis) should be located (in order of priority) (subject to Policy 26):**

- 25.27 **I RECOMMEND that the plan be modified by amending the second sentence of the penultimate paragraph of the text of Policy 25 so that it reads:**

**Any ancillary uses (A2, A3, A4, A5, B1 (a) and D1) must be confined to 25% of the total developable area.**

- 25.28 **I RECOMMEND that the plan be modified by deleting reference to PPG6: Town Centres and Retail Developments in the last sentence of the reasoned justification for Policy 25 and by replacing it with reference to PPS6: Planning for Town Centres.**

- 25.29 **I RECOMMEND that the plan be modified by amending the last sentence of the penultimate paragraph of the text to Policy 25 to read:**

**The development must be suitably and safely accessed and parking must be provided in line with the Car and Cycle Parking Standards.**

- 25.30 **I RECOMMEND that the plan be modified by amending the last sentence of the text of Policy 25 to read:**

**Any new service or retail development must be accessible by a choice of means of transport, including walking and cycling.**

- 25.31 **I RECOMMEND no further modifications to the plan in response to these objections.**

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## **B. Objections to Specific Sites**

### **BARNOLDSWICK**

#### **Barnoldswick Town Centre, omission site Y32**

#### **Summary of Key Issue**

- Whether retail allocations should be made in and around Barnoldswick.

## **Inspector's Reasoning and Conclusions**

- 25.32 Barnoldswick has a population of 10,038. It is the principal town in the largely rural area of West Craven, situated in the north of the Borough. The town lies approximately 8.0 kilometres north of the M65 corridor and the main East Lancashire conurbation, and 11.0 kilometres west of the Yorkshire Dales Market Town of Skipton. Barnoldswick has a relatively small hinterland comprising the villages of Bracewell, Salterforth, Kelbrook, Thornton-in-Craven and Earby. Transport connections with the latter settlement, which has a population of 4,083, are relatively poor.
- 25.33 An Objector considers that as Barnoldswick is defined as a town centre in both the adopted and the emerging Pendle Local Plans, acknowledgement of its status should be made with regard to future retail provision. To permit trade to be 'clawed back' from Colne and Nelson, and to reduce the need for residents within and around Barnoldswick to travel substantial distances to undertake their main food shop, convenience retail allocations are requested within and around Barnoldswick. None are identified by the Objector.
- 25.34 The Council argues that although Barnoldswick is categorised as a Market Town by the Countryside Agency, in reality, it has never served as such. Barnoldswick is isolated from the principal road network and is accessed only via three B Class roads. Many of the small settlements within its apparent hinterland benefit from more direct links to the larger nearby market towns of Colne and Skipton. This relative isolation also means that Earby, which has no direct link to Barnoldswick, and which is situated alongside the A56, has managed to retain a relatively vibrant local shopping centre.
- 25.35 I have no reason to dispute these facts, or consequently, that the extensive public consultation exercise undertaken as part of the 'health-check' process to help inform the drawing-up and implementation of an Action Plan for the future development of Barnoldswick, did not identify the need for a new supermarket either in the town centre or at an edge-of-centre location.
- 25.36 In 2002, Sheffield Hallam University undertook research to establish the trends in both supply and demand of retailing in Pendle and to inform decisions on future town centre and out-of-town facilities. The Pendle Retail Study (CD 80) analyses current, and estimates future retail expenditure by the population of Pendle and it identifies the locations where these people go to shop.

- 25.37 One of the conclusions of the Study was that there is likely to be an excess of retail floor space to meet spending requirements for food in the Borough. The report recognised that it was an option for the Borough to try to 'claw back' some of this expenditure, but it noted that this could have adverse effects on existing town centre floor space. Given this situation, and the predicted decline in expenditure on food, the report concluded that no further convenience floor space should be developed in the Borough, unless it involves adaptation or restructuring within an existing town centre.
- 25.38 The Pendle Retail Study acknowledges that there is capacity for additional floor space for the sale of household and personal goods, but development in town centres was favoured in that it would comply with the sequential approach and may improve the performance of existing retail businesses through linked trips.
- 25.39 If new retail floor space were to be developed in Pendle, PPS6 requires at paragraph 2.44 that the search for appropriate locations accords with the sequential approach and the town centre hierarchy. For all of these reasons, I do not support the objection.

#### **RECOMMENDATION (binding)**

- 25.40 **I RECOMMEND no modification to the plan in response to this objection.**

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#### **COLNE (including COTTONTREE)**

##### **Vivary Mill, omission site X42**

##### **Summary of Key Issue**

- Whether omission site X42 should be allocated as an edge-of-centre/out-of-centre shopping site.

##### **Inspector's Reasoning and Conclusions**

- 25.41 The site lies approximately 0.65 kilometres west of Colne town centre. The principal vehicular access is off a roundabout on the A6068 (North Valley Road), which offers a direct link to Junction 14 on the M65 motorway a further 1.0 kilometre to the west. To the north, the site is bounded by the A6068 (North Valley Road). To the west the North Valley Public House stands in the centre of a large traffic island that marks the gateway to the North Valley Retail area, which has been developed progressively, on the site of a series of former cotton mills, since 1999. To the south of the

site is a succession of terraced residential streets and Colne Lord Street Primary School. To the west there is a former landfill site known as the Coal Wharf.

- 25.42 The site is 1.4 hectares in area and is used for assembly, storage and sale of gymnasium equipment. In the re-deposit plan, the site is non-designated and lies within the Housing Market Renewal Intervention Area and within the Settlement Boundary for Colne. The Objector considers that the site forms part of a linear retail/leisure area along North Valley Road and that it should be designated as an out-of-centre or edge-of-centre shopping site.
- 25.43 The town centre boundary for Colne is 155 metres from Vivary Mill (omission site X42) at its closest point. However, I consider that a more logical pedestrian approach, along Spring Lane is approximately double this distance. Both approaches require pedestrians to negotiate a relatively steep slope that accounts for the 20.0 metres difference in levels between Albert Road (at the top of the slope) and the objection site. Vivary Mill is physically separated from the primary shopping area of the town centre by an area of terraced housing, a public car park and commercial/civic buildings. On this basis, I consider that the objection site, although it is within 300 metres of the shopping area, should be regarded as being physically separated from the town centre and it does not, therefore, fulfil the criteria for an edge-of-centre location, as set out in PPS6 at Annex A, Table 2. Therefore, I consider that the site should be regarded as an out-of-centre.
- 25.44 The North Valley Retail Park was opened in 2000 and offers a range of stores which compliment the services available in nearby Colne town centre. In addition, with the permitted expansion of the retail services available at White Walls Retail Park (Boundary Mill Stores/Asda and others) and the new non-food retail development proposed on the Vivary Way site (shown as Bunkers Hill on Ordnance Survey maps), both of which are located close to Junction 14, 1.0-1.5 kilometres to the west of the objection site, there is currently an extensive retail provision in and around the Colne area. No evidence of additional need has been submitted by the Objector. For these reasons, I do not support the objection.
- 25.45 However, the absence of an allocation for the omission site does not necessarily prevent its redevelopment, since the policy allows any proposal to be considered, on its individual merits, through the development control process. Nevertheless, guidance in PPS6 requires the application of a sequential approach and the demonstration of 'need' for the proposed development.

## **RECOMMENDATION (binding)**

25.46 **I RECOMMEND no modification to the plan in response to this objection.**

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## **EARBY**

### **Earby Local Shopping Centre Boundary, omission site X83.**

#### **Summary of Key Issue**

- Whether the local shopping centre boundary should be re-located to include the area of land between Victoria Road/Albion Road and Skipton Road.

#### **Inspector's Reasoning and Conclusions**

- 25.47 Omission site X83 is situated on Albion Road in the heart of the village of Earby, which has a population of 5,260 (2001 Census). The village itself is in the mainly rural area of West Craven, in the north of the Borough. Until local government reorganisation in 1974, it was part of the West Riding of Yorkshire and there is still a local loyalty to the White Rose County. Although the village is geographically close to the nearby market town of Barnoldswick, the lack of a direct access between the two settlements means that Earby retains a number of local shops and services, centred on Colne Road and Victoria Road.
- 25.48 The site is 0.65 hectare in area and is used as a marketing material warehouse and a mail order distribution centre. In the re-deposit plan, it is an unallocated site within the Earby Conservation Area and it lies within the Settlement Boundary for Earby. The site is located opposite the primary shopping frontages along Victoria Road, but it has never formed part of the defined local shopping centre.
- 25.49 The Objector considers that the local shopping centre boundary should be extended to include the area of land in between Albion Street, Victoria Road, Albion Road and Skipton Road, in order to provide land for future retail needs that has been lost as a result of development on Victoria Road, within the defined town (local shopping) centre boundary.
- 25.50 However, the Council does not consider that there is a proven need to extend the local shopping centre boundary in Earby. Over the last three years, Pendle Borough Council's Regeneration Unit has operated a programme of grant assistance to support the

installation of residential frontages on former retail properties along the secondary shopping frontages in Earby. This programme aims to help overturn the poor image that the centre was developing as a result of the many vacant retail premises.

- 25.51 Planning permission was granted in 2004 for the construction of 33 dwellings on a site off Victoria Road, within the defined local shopping centre boundary. This area of land was previously the site of a former textile mill, which was demolished in the early 1990s. Kwik Save then constructed a new store on the site. However, it was never occupied and after several years on the open market it was acquired by a local manufacturing company for expansion purposes. Again the building remained unoccupied until it too was demolished. Development of the new housing started in 2005.
- 25.52 I consider that this sequence of events demonstrates an absence of need for further retail floor space in Earby. Nor has the Objector demonstrated the need for additional retail provision in Earby. Furthermore, the premises at the omission site remain in productive employment use. For all of these reasons, I do not support the objection.
- 25.53 Nevertheless, because the omission site is unallocated in the re-deposit plan, any proposal may be considered, on its individual merits, through the development control process. However, guidance in PPS6 would require the application of its sequential approach to any proposal for retail/town centre uses and for the applicant to demonstrate the 'need' for such a development.

#### **RECOMMENDATION (binding)**

- 25.54 **I RECOMMEND no modification to the plan in response to this objection.**

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#### **NELSON**

Nelson Town Centre Boundary, omission site X75

#### **Summary of Key Issue**

- Whether the Nelson town centre boundary should be redrawn up to the Leeds and Liverpool Canal, to include the existing Morrison's superstore and the Clayton Street retail allocation.

## Inspector's Reasoning and Conclusions

- 25.55 The site comprises the Morrison's superstore, which was opened on the site of Seed Hill and Laurel Bank Mills in 1999, and the remaining parts of Albert Mills, which are still in business use. These sites separate Nelson town centre, to the south, from the Leeds and Liverpool Canal. The principal vehicular access is via Every Street, which connects to the A682 Scotland Road 0.25 kilometre from Junction 13 on the M65 motorway. The site is 3.2 hectares in area and comprises a food superstore and mixed B1, B2 and B8 uses. In the re-deposit plan, part of the site is allocated as an edge-of-centre retail allocated site within the Housing Market Renewal Intervention Area and the Settlement Boundary for Nelson.
- 25.56 Objectors consider that the boundary for Nelson town centre should be extended to the Leeds and Liverpool Canal, to include the Morrison's supermarket and the Clayton Street edge-of-centre retail allocation. It is argued that the Pendle Retail Study identifies that Morrison's both aids the retention, and increases the convenience expenditure in the Borough. It is pointed out that the store is linked to two secondary shopping frontages connecting it to the town centre. Also, that other food stores within Nelson and a number of other leisure and commercial uses are included within the town centre boundary. In addition, that the town centre boundary includes a large part of Morrison's car park and pedestrian linkage takes place between the store and the rest of the town centre. Furthermore, that the store itself is situated within 130.0 metres of the nearest secondary shopping frontage. In the Objectors' opinions, the store and car park should be treated as one and given that PPS6 advises that defined town centres should include uses within or adjacent to the primary shopping area, the Morrison's store should be included within the defined secondary shopping frontage.
- 25.57 At the last Local Plan Inquiry in 1996, the Inspector concluded that Reedyford Mill represented an 'out of town' location, as only the Pendle Street frontage was within 300 metres of the town centre boundary. The objection site lies between Reedyford Mill and the town centre boundary. At its northern end, the Albert Mills section of the site is separated from the town centre by a series of terraced residential streets. At its southern part, the Morrison's store car park is within the town centre boundary, reflecting its dual role of serving both the store and the town centre.
- 25.58 However, the store itself is physically separated from the primary shopping area by the car park and Every Street, which is a busy local distributor road connecting the A682 with the M65 motorway. On this basis, I consider that the objection site, which

lies within 300 metres of the shopping area, but is physically separated from it, fulfils the criteria for an edge-of-centre location, as set out in PPS6 at Annex A, Table 2.

- 25.59 As such, I consider that the lack of any formal allocation for the site of the Morrison's store and the identification of the Albert Mills site as an edge-of-centre retail allocation are appropriate. In my opinion, to continually re-define the town centre boundary, in order to include new developments in edge-of-centre locations is not sustainable. I consider that such an approach is likely, in the future, to place greater pressure for development on sites that are more remote from the town centre.
- 25.60 Concerning the logic of including other sites, referred to by Objectors, in the town centre, I consider that the inclusion of Kwik Save and Lidl within the boundary is justified, as they are both better related to the primary shopping area. As I have commented above, it is my opinion that the Morrison's store is much more detached from the primary shopping area of the town centre.
- 25.61 With regards to other commercial and leisure facilities, which are included within the town centre boundary, PPS6 informs that a diversity of uses in centres makes an important contribution to their vitality and viability. When defining town centres, Annex A of PPS6 indicates that they should include the primary shopping area and areas of leisure, business and other main town centre uses.
- 25.62 In response to an Objector's request to include Morrison's superstore as a secondary shopping frontage, it is stated in PPS6 that secondary frontages should provide greater opportunities for a diversity of uses. I do not consider that the Morrison's store will allow for a variety of uses. Furthermore, as I have discussed above, it is a separate entity from the rest of the town centre and other shopping frontages.
- 25.63 I acknowledge that the town centre boundary may be described as being an irregular shape; however the Council defends its extent because it represents the limits of the defined primary shopping areas, together with adjacent leisure, business and main town centre uses. This can be seen in the latest Pendle Retail Study (2001) (CD 80). I do not agree that Morrison's constitutes a defined town centre use in PPS6 terms because the PPS informs that the 'centre' for a retail development constitutes the primary shopping area. The store is not situated within the primary shopping area and, therefore, it does not constitute town centre retail. For all other main town centre uses the 'centre' should be regarded as the area embraced by the town centre boundary.

- 25.64 Although PPS6 may encourage the growth of town centres, equally it advises that development should be focused in existing centres, in order to strengthen and, where appropriate, regenerate them. In line with this guidance, the sequential test in Policy 25 of the re-deposit plan is structured to aid the regeneration of vacant retail units. Nelson town centre has historically suffered high vacancy rates and, similar to the latest retail survey, I saw that although there are no specific clusters of vacant premises there are several vacancies within the town centre boundary. Therefore, for all of these reasons, I do not support these objections.
- 25.65 However, as part of the discussion that took place at an informal hearing session for one of these objections, the Council conceded that the Proposals Map of the re-deposit plan does not define the extent of the primary shopping area and the town centre for Nelson, as advised in the fourth bullet point of paragraph 2.16 of PPS6. I recommend that for clarity and conformity with PPS6, the Proposals Map should be amended accordingly.

**RECOMMENDATION (binding)**

- 25.66 **I RECOMMEND that the plan be modified by amending the Proposals Map to define the Primary Shopping Area in Nelson town centre, in accordance with the Inquiry document (map) reference PBCP/200/1.**
- 25.67 **I RECOMMEND no further modification to the plan in response to these objections.**

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## **Policy 26 – Non-Shopping Uses in Town Centres and Local Shopping Areas**

### **Introduction**

26.1 Changes were made to the Use Classes Order after the publication of the re-deposit plan, which amend the sub-divisions of Class A. As I discuss in paragraph 25.19 of my report, I consider that these changes should be reflected in Policy 26, in order not to exclude its application to public houses and hot food take-aways, which are clearly intended to be covered by the policy. Therefore, I recommend that the Policy 26 of the re-deposit plan is updated in accordance with the Council's suggested Change No. 73 (CD 193) to reflect relevant changes to the Use Classes Order. Furthermore, as PPS6 replaced PPG6 in 2005, for precision and consistency, I also recommend that references to PPG6 in the reasoned justification for Policy 26 should be updated accordingly.

### **Summary of Key Issue**

- Whether Policy 26 should require hot food take-aways to make suitable provision for litter bins in the locality.

### **Inspector's Reasoning and Conclusions**

26.2 Objectors are concerned that Policy 26 should require operators of hot food take-away establishments to provide robust, rat-proof litter bins. However, I disagree because I consider that this would be unnecessary duplication of other legislation.

26.3 All waste arising from hot food take-aways is the responsibility of the owner/operator, who would be liable to prosecution if waste were not disposed of appropriately. This matter is dealt with by the Council under the provisions of the Environmental Protection Act rather than the Town and Country Planning Act. The Environmental Protection Act requires producers of waste to have the appropriate type of receptacle for its storage. The Council also has powers to serve litter abatement notices on owners of shop front areas. For these reasons, I do not consider that this issue should be covered in planning policy. Therefore, I do not support the objection.

### **RECOMMENDATIONS (binding)**

26.4 **I RECOMMEND that the plan be modified by amending the first sentence of the second paragraph of the reasoned justification for Policy 26 so that it reads:**

Non-shopping uses acceptable on shopping frontages are defined as Use Classes A2, A3, A4, A5, B1 (a), D1, D2 and Sui Generis uses appropriate to a town centre location:...

- 26.5 I RECOMMEND that the plan be modified by deleting reference to PPG6: Town Centres and Retail Development in the first sentence of the reasoned justification for policy 26 and by replacing it with a reference to PPS6: Planning for Town Centres.
- 26.6 I RECOMMEND no further modification to the plan in response to these objections.

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## **Policy 27 – Retail and Service Land Provision**

### **Introduction**

27.1 Changes were made to the Use Classes Order after the publication of the re-deposit plan, which amend the sub-divisions of Class A. As I discuss at paragraph 25.19 of my report, I consider that these changes should be reflected in Policy 27, in order not to exclude its application to public houses and hot food take-aways, which are clearly intended to be covered by the policy. Therefore, in addition to making recommendations in response to some objections made to Policy 27, I also recommend that for consistency and clarity, it is updated in accordance with the Council's suggested Change No. 74 (CD 193) to reflect relevant changes to the Use Classes Order.

### **Summary of Key Issues**

- Whether Policy 27 should allow retail development in accordance with the sequential test where there is a proven need in the locality.
- Whether the word 'adequate' should be removed from the fifth criterion of the text of Policy 27.

### **Inspector's Reasoning and Conclusions**

27.2 An Objector considers that the Council should assess individual proposals for retail development with regard to quantitative and qualitative need, as outlined in the Ministerial Statement of April 2003.

27.3 Policy 27 is closely linked to Policy 25, which refers to the application of a sequential approach to proposals for new retail and service development. Furthermore, Policy 25 of the re-deposit plan states that proposals not within town centres will be required to demonstrate that a need exists, following which the sequential approach will be applied to site selection. As a link to that policy, the reasoned justification to Policy 27 states that where a proposal is outside a town centre, the application must demonstrate a proven need for the service or retail provision in line with Policy 25 and PPG6. (This reference should be updated to PPS6, which replaced PPG6 in 2005).

27.4 However, it is also necessary to consider the retail capacity of the Borough as recommended in PPS6. The Pendle Retail Study (CD 80) highlights the need for an increase in capacity of personal and household floor space. The study also recommends that no further convenience (food) floor space should be developed, unless it

involves adaptation or restructuring within an existing town or local centre. Therefore, proposals for edge-of-centre or out-of-centre retail development will be considered in line with the sequential approach set out in Policy 25, where there is a demonstrated need, but only where there is capacity to accommodate the proposal as detailed in the Pendle Retail Capacity Study. However, in accordance with PPS6, the capacity issue does not apply within town centres or local shopping centres.

- 27.5 Policy 27 refers to the allocation of an edge-of-centre site in Nelson, but in my interpretation, it does not preclude development elsewhere. However, the reasoned justification to the policy, quite rightly in my opinion, refers to the findings of the Pendle Retail Study and states that no further convenience floor space can be accommodated unless, as an adaptation or restructuring within an existing town or local centre. For these reasons, I do not support the objection.
- 27.6 Objection is also made to Policy 27 on the grounds that the Parking Standards are maximum standards and, as such, they should not be 'adequately' applied, as stated in criterion 5 of Policy 27. The County Council requests that the word 'adequate' is removed from the policy.
- 27.7 The Council agrees with this objection and suggests that the word 'adequate' should be removed from criterion 5 of Policy 27, as set out in its suggested Change No. 75 (CD 193). I support this Change which, in my opinion, adds precision and certainty to the policy, and which overcomes the objection that was conditionally withdrawn on its basis.

#### **RECOMMENDATIONS (binding)**

- 27.8 **I RECOMMEND that the plan be modified by deleting the word 'Adequate' from the beginning of the fifth criterion of Policy 27.**
- 27.9 **I RECOMMEND that the plan be modified by amending the third criterion of the text of Policy 27 so that it reads:**
- Any ancillary uses (A2, A3, A4, A5, B1 (a) or D1) are confined to 25% of the total developable area.**
- 27.10 **I RECOMMEND that the plan be modified by deleting reference to PPG6: Town Centres and Retail Developments in the second paragraph of the reasoned justification for Policy 25, and by replacing it with reference to PPS6: Planning for Town Centres.**

27.11 I RECOMMEND no further modification to the plan in response to these objections.

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## **Policy 28 – Retail and Service Provision in Villages**

### **Summary of Key Issue**

- Whether private facilities such as public houses should be positively encouraged by Policy 28.

### **Inspector's Reasoning and Conclusions**

- 28.2 Subject to criteria specified in the text, Policy 28 - Retail and Service Provision in Villages supports new retail, service and community facilities in villages. The Council's suggested Change No. 76 (CD 193) clarifies that, subsequent to recent changes to the Use Classes Order, it is intended that public houses and hot food take-aways are also supported by the policy. Suggested Change No. 95 (CD 193) would similarly update Appendix 4 – Glossary and Abbreviations. I support these Changes, which I consider clarify the scope of the policy.
- 28.3 Policy 28 seeks to protect existing village facilities including public houses and the reasoned justification for the policy acknowledges that insufficient services, including public houses can threaten the viability of village communities. However, in order to promote sustainable planning solutions in environmentally sensitive rural areas, the policy requires, where practical, new community facilities or services to be provided in public houses and other private facilities that are situated in villages with the greatest levels of accessibility in a particular locality.
- 28.4 This approach is reflected in the successful 'Pub is the Hub' initiative set up in 2001 through the Rural Action Programme of Business in the Community. The initiative encourages breweries, pub owners, licensees and local communities to work together to help retain and enhance rural pubs. The 'Pub is the Hub' scheme specifically aims to keep pubs that have, 'traditionally provided a centre/heart to the hamlet or village', trading by finding additional uses for it, thereby improving its financial viability.
- 28.5 In my opinion, Policy 28 positively encourages private facilities such as public houses and no further amendment to it is necessary in response to this objection.

### **RECOMMENDATIONS (binding)**

- 28.6 **I RECOMMEND that the plan be modified by amending the first paragraph of the text of Policy 28 to reflect the changes made to the Use Classes Order in 2005, with reference to Class A uses, so that it reads:**

Proposals to introduce new retail (A1), service (A2, A3, A4, A5) and community facilities (D1, D2 or specified Sui Generis – launderette, sale of fuel for motor vehicles) to the villages will be supported where:...

- 28.7 I RECOMMEND that the plan be modified by amending the Town and Country Planning (Use Classes) Order 1987 (Summary) given in its Appendix 4 – Glossary and Abbreviations, by deleting ‘public houses’ and ‘wine bars and shops for the sale of hot food’ from the A3 Use Class row. The description should read:

Restaurants, cafes and snack bars

- 28.8 I RECOMMEND that the plan be modified by amending the Town and Country Planning (Use Classes) Order 1987 (Summary) given in Appendix 4 - Glossary and Abbreviations, by inserting a row for Use Class A4 beneath A3. The description should read:

Pubs and bars

- 28.9 I RECOMMEND that the plan be modified by amending the Town and Country Planning (Use Classes) Order 1987 (Summary) given in Appendix 4 - Glossary and Abbreviations, by inserting a row for Use Class A5 beneath A4. The description should read:

Take-Aways

- 28.10 I RECOMMEND no further modification to the plan in response to this objection.

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## **Policy 29 – Creating an Improved Road Transport Network**

### **A. Objections to Policy Wording and Approach**

#### **Summary of Key Issues**

- Whether reference should be made in Policy 29 to the need for developers to provide basic infrastructure.
- Whether Policy 29 should clarify the purpose of Transport Assessments and the policy's approach towards development next to congested junctions.
- Whether the term, 'will considerably impact', in the text of Policy 29 should be defined.
- Whether the reasoned justification for Policy 29 should reflect that Circular 1/97 has been superseded by Circular 05/2005.
- Whether Policy 29 should encourage investment in public transport.
- Whether Policy 29 should require the provision of traffic calming measures for developments on sites of less than 0.4 hectare.
- Whether the reference in Policy 29 to the A56 Village Bypass should be amended to read, 'Link from Colne to North Yorkshire border'.
- Whether text should be added to Policy 29 and reflected on the Proposals Map, to indicate the possibility of rail re-instatement on the route of the former Colne-Skipton railway line.
- Whether the reasoned justification for Policy 29 should be amended to reflect the reduced priority that will be given to the A56 Village Bypass scheme in the next Local Transport Plan.

#### **Inspector's Reasoning and Conclusions**

29.1 The County Council considers that Policy 29 should include reference to the need for developers to provide adequate basic highway infrastructure. But in my opinion, this is unnecessary, because such provision is a requirement of all development proposals that will be considered through the development control process. Furthermore, the County Highways Authority is consulted on planning applications affecting classified roads and acceptable infrastructure is agreed through this procedure.

- 29.2 The County Council also requests that Policy 29 is amended to clarify the reasons for Transport Assessments and the policy's approach towards developments next to congested junctions. However, in my opinion the reasons for requiring the submission of Transport Assessments and Travel Plans are adequately explained in the last paragraph of the reasoned justification for policy 29 in the re-deposit plan.
- 29.3 It clarifies that; 'Transport Assessments will be required where a proposed development will be of a scale that will have a significant impact upon existing users and transport infrastructure in the vicinity of the site. The Transport Assessments should provide details on a range of transport conditions and related issues before, during and following construction of the proposed development'. Further advice on this matter is contained in Appendix 2 of the re-deposit plan – Car and Cycle Parking Standards.
- 29.4 In my opinion, the approach to be taken for developments next to congested junctions is a matter of technical detail which should be considered as part of any planning application. For classified roads the views of County Highways Authority will be sought. The Borough Council's Highways Officers provide advice on applications that affect non-classified roads. I do not consider that the plan can pre-determine where congested junctions will occur over the plan period. Therefore, I do not support this objection.
- 29.5 The Car and Cycle Parking Standards included in Appendix 2 of the plan, which accord with the JLSP Parking Standards, define the thresholds for when simple and comprehensive Transport Assessments will be required and when Travel Plans will be required. To clarify the term; 'will considerably impact', the Council's suggested Change No. 77 (CD 193) would add a final sentence to the reasoned justification to read; 'the requirement for both Transport Assessments and Travel Plans are detailed by way of floor space thresholds in Table F of Appendix 2'. I consider that this suggested Change overcomes the objection made by the County Council, which was conditionally withdrawn on its basis.
- 29.6 The County Council also points out that at the time when the re-deposit plan was produced, the Government had recently consulted on a revision to Circular 1/97, which proposed amendment to guidelines for developer contributions. Consequently, it considers that as a minimum, the reasoned justification for Policy 29 should be amended to reflect that Circular 1/97 is proposed to be modified.
- 29.7 However, Circular 1/97: Planning Obligations was in fact superseded by Circular 05/2005: Planning Obligations, in July 2005. Therefore, I support the spirit of this objection and recommend that reference to Circular 1/97 in the reasoned justification for Policy 29

and throughout the plan should be replaced by reference to Circular 05/2005.

- 29.8 Pendle CPRE considers that Policy 29 should seek to reduce or ease the current path of traffic rather than to encourage more traffic through Pendle. In its opinion, investment should be put into alternative public transport. In response, the Council points out that significant investment is being placed into public transport in Pendle. This includes initiatives such as; the Quality Bus Route Scheme, promoting improvements to interchange and terminal facilities, together with improved reliability and journey times, and the Rapid Transit initiative, which is designed to provide transport improvements, including the use of through ticketing and integrated systems of public transport. These improvements to public transport are covered in Policy 30 - Sustainable Travel Modes. I consider that it is unnecessary to repeat these details in Policy 29. Therefore, I do not support this objection.
- 29.9 An Objection is made on the grounds that the reference to, 'improved road network', does not mention cycling. The Objector considers that cyclists should be included in considerations for Policy 29, and not simply as 'sustainable transport' under Policy 30 - Sustainable Travel Modes. In addition, it is requested that cycle provision requirements should be extended to development significantly smaller than 0.4 hectare.
- 29.10 However, I do not support this objection because Policy 29 focuses mainly on improvements to the physical road network; particularly in relation to car travel, but it also refers to other forms of travel, if this is not covered elsewhere, for example, to the protection of a route for road and/or rail travel. However, the encouragement of cycling is included within Policy 30 - Sustainable Travel Modes, which specifically supports the rollout of the Pendle Cycle Network.
- 29.11 In addition, Policy 30 encourages the provision of cycle access and cycle routes as part of any new development. Furthermore, the Parking Standards, as set out in Appendix 2 (and in line with the JLSP Parking Standards), set a minimum requirement of 1 cycle parking space per 10 car spaces for all developments, with a requirement for long-stay covered cycle parking on all developments employing 30 or more full or part-time staff. I consider that it would be unnecessary duplication to repeat these requests in Policy 29.
- 29.12 The requirements for developments over 0.4 hectare refer to traffic calming only. For the reasons that I give above, I see no reason to include reference to cycle requirements in Policy 29. The cycle requirements of Policy 30 have no size threshold.

29.13 With regards to the County Council's concerns about references to the A56 Village Bypass, the policy text for Policy 29 in the re-deposit plan refers to a 'link from Colne to the North Yorkshire border', and it states that the former route of the Colne-Skipton railway line will be protected for future transport use. The reasoned justification has also been amended to remove the reference to the priority given to the project in the Local Transport Plan for Lancashire and in the Provisional Lancashire Local Transport Plan. I consider that these changes overcome the objection, which has been conditionally withdrawn on their basis.

#### **RECOMMENDATIONS (binding)**

29.14 I **RECOMMEND** that the plan **be modified** by deleting the final bracketed clause of the reasoned justification for Policy 29, which reads:

(See Appendix 2 –Table F)

29.15 I **RECOMMEND** that the plan **be modified** by adding a sentence to the end of the reasoned justification for Policy 29, which reads:

The requirement for both Transport Assessments and Travel Plans are detailed by way of floor space thresholds in Table F of Appendix 2.

29.16 I **RECOMMEND** that the plan **be modified** by replacing reference to Circular 1/97 with reference to Circular 05/2005, in the reasoned justification for Policy 29 and throughout the plan.

29.17 I **RECOMMEND** **no further modification** to the plan in response to these objections.

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#### **B. Objections to Specific Sites**

##### **ROUTES**

Former Colne-Skipton railway line, omission site X69  
Former proposed route of M65 to Keighley, omission site X70  
Route of A56 Village Bypass, omission site Y18

##### **Summary of Key Issues**

- Whether the former Colne-Skipton railway, omission site X69, should be protected as a rail route.

- Whether, as an interim measure, minimal work should be carried out to the route of the former Colne-Skipton railway line to make it suitable for use as a cycle path.
- Whether the former Colne-Skipton railway should be designated as a Local Nature Reserve (LNR).

## **Inspector's Reasoning and Conclusions**

### **Former Colne-Skipton railway line, omission site X69**

29.18 The Colne to Skipton railway opened in the autumn of 1848 and closed in February 1970. The intermediate station at Foulridge closed in 1959. Omission site X69 is 9.5 kilometres in length and now comprises disused rail track. The Strategic Rail Authority/British Rail Property Board owns the section of track between Colne and Lancashire Gill (north of Foulridge). The remaining stretch to the North Yorkshire border is owned by Lancashire County Council. Craven District Council in North Yorkshire has a policy of protecting the section from the border with Lancashire to Skipton, although much of this stretch is in private ownership.

29.19 At the first stage deposit, the site was designated as part of the proposed route of the A56 Village Bypass, as a Biological Heritage Site, part Green Belt, part Open Countryside and partly within the Settlement Boundaries for Colne and Earby. In the re-deposit plan it is designated as a Protected Route for Transport Use, a Biological Heritage Site, part Green Belt, part Open Countryside, partly within the Earby Conservation Area and partly within the Settlement Boundaries for Colne and Earby.

29.20 In 2003, Lancashire County Council and North Yorkshire County Council commissioned the study, 'Future of the Skipton-Colne Railway Formation' (Steer Davies Gleave) (CD 86). This sets out and describes the various options and the costs and benefits accruing to each one. The study concluded that reinstatement of a single-track railway, together with construction of the road scheme was technically feasible. A double-track railway with the road option would have significant costs, and in this case the road and railway should follow different routes. A case for re-opening the railway was considered to be difficult to make in the short to medium term, but it was felt to have some potential in the longer term, beyond the JLSP period. The Strategic Rail Authority set out its plans for the railways in its Strategic Plan of 2002, 'The Priorities short, medium and long term' (CD 164), which makes no reference to re-opening the line within the 10-year plan period.

29.21 As a result of the conclusions of the initial report, further work was commissioned from Steer Davies Gleave on possible alternative

road alignments, in particular the section between Colne and Foulridge. The document, 'Future of the Skipton-Colne Railway Formation: Assessment of an Alternative Alignment for the A56' (CD 163), includes broad cost estimates and an initial assessment of the environmental impact of alternative schemes. However, the study is indicative only, as full engineering and topographic information was not available. The report indicates that the major problem for accommodating both a new road and re-instatement of the railway occurs between Colne and Foulridge. Use of corridors other than the disused railway for a bypass between these locations would be both more environmentally damaging and have higher costs.

- 29.22 The supporting text to Policy 10 of the JLSP identifies the omission site as the preferred route of the A56 Village Bypass between Colne and Kelbrook, subject to rail re-instatement not being precluded. The Local Transport Plan for Lancashire (2001-2006) (CD 125) states that the main part of the strategic highway network through Pendle is the M65 and A6068/A56 route. It identifies that the A56 Village Bypass is required to provide an effective continuation of the strategic road network into Yorkshire. At the time of the first stage deposit plan, this scheme was allocated as second priority for major schemes in Lancashire. The scheme is still identified in the Provisional Lancashire Local Transport Plan (2006-2010) (CD 87) and is expected to be brought forward during the period of this emerging Local Plan.
- 29.23 The proposed route of the Bypass, approved by the County Council and North Yorkshire County Council after public consultation, follows part of the former Colne to Skipton rail track bed. Policy 10 in the JLSP protects the rail track bed for transport, rather than road use, to allow for the possible reinstatement of the railway line and to reflect guidance contained in the RSS relating to the protection of disused rail track beds.
- 29.24 Thus, the Council is required to protect the line of the route in the Local Plan. Therefore, the re-deposit plan protects the former route of the Colne to Skipton railway line for future transport use in accordance with the policy position of the JLSP and it avoids prejudicing the re-opening of a rail or road link along its route. Furthermore, Policy 30 - Sustainable Travel Modes promotes improvements to the rail and bus networks in Pendle. In particular, criterion 2 of this policy text encourages improved bus services.
- 29.25 For these reasons, I do not support objections that wish the former Colne-Skipton railway track bed should be protected solely as a rail route.
- 29.26 With regards to an Objector's request that, as an interim measure, a minimal amount of work should be done to the former railway line

between Colne and Skipton to render it more suitable as a cycle path, Policy 29 specifically addresses improvements to the road network in relation to vehicular traffic. Any new provision for cyclists falls within the remit of Policy 30 - Sustainable Travel Modes, through the support afforded to the Council's Cycling Strategy. Therefore, I do not support this objection.

29.27 Nor do I support a request that the site is designated as a LNR. The site is designated as a Biological Heritage Site (BHS), and in addition, it passes through or close to the BHS's at Wanless Bridge Triangle, Leeds and Liverpool Canal, Sandhole Clough and Sough Pasture. However, to receive the level of protection afforded to a LNR, the site should not only make a useful contribution to nature conservation, but it should also provide opportunities for the public, so they can see and learn about wildlife. The former track-bed is largely owned by the County Council, which has indicated in the JLSP, and in the Provisional Lancashire Local Transport Plan, that the route is safeguarded for a transport link from Colne to the North Yorkshire Border. As such, public access along its route is, at present, restricted.

29.28 Nevertheless, as I discuss in Chapter 4 of my report, the Council has a duty to consider appropriate sites for designation as LNRs. If sufficient survey evidence is presented to demonstrate that the site fulfils the criteria for designation as a LNR then the Council will consider this with English Nature. The relevant criteria for assessment are set out in English Nature's document entitled, 'Local Nature Reserves in England' (CD 137). However, a fundamental criterion for designation of a site as a LNR is that the Council must have an interest in the site.

29.29 Furthermore, such designation of sites cannot be done through the Local Plan review because it involves negotiation and approval by an outside body; English Nature. However, Policy 4C – Natural Heritage – Local Sites recognises that new designations may be made during the life time of the plan and that the same level of protection will be afforded to any new site or areas designated by the appropriate agency.

### **RECOMMENDATION (binding)**

29.30 **I RECOMMEND no modification to the plan in response to these objections.**

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## **Former proposed route of M65 to Keighley, omission site X70**

### **Summary of Key Issue**

- Whether the original route of the M65 extension should be the preferred route for the A56 Village Bypass.

### **Inspector's Reasoning and Conclusions**

29.31 The former proposed line of the M65 motorway continued east from Junction 14, passing through the Greenfield area of Colne, under the railway viaduct into the South Valley. From there it followed Colne Water through open countryside to the south of Colne and the Green Belt, separating the town from its satellite villages of Trawden and Laneshaw Bridge, before crossing the border into North Yorkshire. Omission site X70 is 7.5 kilometres in length and passes through residential and industrial areas before heading into open countryside, part of which forms the Green Belt to the east of Colne. The route also passes through Biological Heritage Sites at Colne Water Pastures. It has no other designation in the re-deposit plan.

29.32 An Objector states that the A56 Village Bypass is un-necessary and follows a poorly selected route. It is argued that any extension of the M65 motorway should follow the originally proposed route of the M65. Furthermore, it is thought that improved traffic management from Junction 14 of the M65 would significantly reduce traffic congestion, which is only a problem during peak traffic times during the school terms.

29.33 However, as I have discussed above, the importance of improving transport links north-east from Colne to the North Yorkshire border is recognised in both the RSS and the JLSP. The re-deposit plan, therefore, protects the former route of the Colne to Skipton railway line, and a proposed route through the open countryside to the west of Earby, for future transport use. This accords with the policy position of the JLSP and it avoids prejudice to the re-opening of a rail or road link along its route.

29.34 Following publication of the Government's White Paper, 'Roads for Prosperity', in May 1989, the Department of Transport commissioned consultants to undertake a comprehensive study of Trans-Pennine road traffic to examine the provision of additional road capacity to cater for present and future demand. The central conclusion of their report, published in June 1992, was that major improvement of the M62 motorway was necessary and that only limited relief could be afforded by improvements to other routes. However, the report indicated that a strong case could be made for some such improvements, including a route from the end of the M65 motorway at Colne, through Skipton towards the A1.

29.35 Following representations from Lancashire County Council, the consultants were commissioned by the Department of Transport to examine the effects of a number of alternative options in the A59/A6068 corridor between Lancashire and Yorkshire. In November 1993, the Minister for Roads and Traffic announced that having considered all replies to the consultation on the Trans-Pennine Study, no new schemes would be added to the national Roads Programme at that stage. He made it clear that the M62 would be regarded as the main Trans-Pennine route, and with respect to specific road issues, no improvements would be made to the routes east of the M65 at Colne.

29.36 Policy 18(b) of the Deposit Edition of the Lancashire Structure Plan was considered in depth at the Examination in Public, held in May 1995. The Structure Plan EIP Panel eventually concluded that the environmental damage that would be caused by the extension of the M65 motorway in the vicinity of Winewall and on Reedshaw Moss was not outweighed by the potential benefits that would accrue. Thus the County Council resolved to remove the protected route for the M65 extension east of Colne from Policy 18 (b) of the deposit edition of the Lancashire Structure Plan stating that; 'the policy base for protection of a Trans-Pennine Route having been removed, there is no reason to protect the land for that purpose'.

29.37 The RSS, the JLSP and the Draft Lancashire Local Transport Plan (2006-2010) make no mention of the need to improve transport links east towards West Yorkshire. Therefore, I consider that it is inappropriate to designate the former route of the M65 motorway in the emerging Pendle Local Plan, as the A56 Village Bypass is not programmed to take place within the next ten years. To do so would contravene Government guidance contained in PPG12, which at paragraph 5.17 informs that all plans should include an indication of the timescale and priorities for proposed transport developments, especially major road and railway projects, which should reflect the specific priorities and timescale set out in the Local Transport Plan. Furthermore, the proposed route of the Bypass was approved by Lancashire County Council and North Yorkshire County Council after public consultation.

29.38 For all of these reasons, I do not support the objection.

#### **RECOMMENDATION (binding)**

29.39 **I RECOMMEND no modification to the plan in response to this objection.**

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## **Route of A56 Village Bypass, omission site Y18,**

### **Summary of Key Issues**

- Whether the A56 Village Bypass would result in unacceptable damage to the landscape and to the environment.
- Whether the A56 Village Bypass proposal would conflict with Policy 6 - Development and Flood Risk, the protection of Biological Heritage Sites, public transport strategies, and is not proven to be necessary.
- Whether it is appropriate for the Proposals Map of the re-deposit plan to show the route for the A56 Village Bypass between Colne and Kelbrook, when it is not shown in the JLSP.

### **Inspector's Reasoning and Conclusions**

29.40 The Protected Route of the A56 Village Bypass, omission site Y18 follows the line of the former railway north from the A6068 (Vivary Way) in Colne, towards the B6383 (Kelbrook Road) just west of the village of Kelbrook. At this point, the route deviates into open countryside, passing to the west of the villages of Kelbrook, Sough and Earby, before rejoining the line of the former railway just to the north of the latter settlement.

29.41 The A56 represents the eastern continuance of the M65/A56/M66 corridor, offering a direct link to the M6 and M62, which form part of the Trans-European Networks (TENs) and two other strategic routes, in the form of the M60 and M61. It is 9.5 kilometres in length and comprises disused rail track and open countryside.

29.42 The former railway line is designated as a Biological Heritage Site (BHS) and in addition passes through or close to the BHS's at Wanless Bridge Triangle, Leeds and Liverpool Canal, Sandhole Clough and Sough Pasture. A section of the route to the north-west of Colne passes through Flood Zone 3 for Wanless Water, which denotes areas with the highest probability of flooding, where the annual probability is greater than or equal to 1% for river flooding. In the re-deposit plan the site is designated as a Protected Route for Transport Use in Open Countryside, part Biological Heritage Site, part Green Belt, part Earby Conservation Area and partly within the Settlement Boundaries for Colne and Earby.

29.43 Several Objectors are of the opinion that the A56 Village Bypass would be a 'major environmental disaster'. They consider that it is contrary to the Council's policies on Areas of Outstanding Natural Beauty, Green Belt, natural heritage, areas of historic importance and tourism. In their opinion, its construction would result in the creation of an 'urban corridor' from Brierfield to Thornton-in-

Craven, which would have a disastrous long-term effect on traditional town centres, a general collapse of settlement boundaries and destruction of the Green Belt. They consider that the re-opening of the railway would be a much more sustainable option.

- 29.44 The re-deposit plan protects the former route of the Colne to Skipton railway line for future transport use, in line with policies in the RSS and the JLSP. It thereby avoids any prejudice to the reinstatement of a rail link along its route. In accordance with Policy 4C - Natural Heritage - Local Sites and in line with Policy 20 of the JLSP, environmental mitigation measures would be required in order to ensure that there was 'no net loss' of habitat arising from its construction.
- 29.45 The Protected Route for transport does not pass through the Forest of Bowland Area of Outstanding Natural Beauty. The line of the former railway passes through Earby, but in my opinion, it would have no impact on the Conservation Area. Furthermore, I consider that improved transport links, in the form of either a new road or a re-opened railway line, are likely to open up the West Craven area to tourists rather than have the opposite effect.
- 29.46 The re-deposit plan does not propose any amendment to either the Green Belt or to Settlement Boundaries along the line of the Protected Route for transport. Therefore, I consider that taking into account the significant level of protection afforded to the open countryside by Policy 1 of the re-deposit plan, it would be highly unlikely that the A56 Village Bypass would result in the creation of an 'urban corridor' as predicted by Objectors. For all of these reasons, I do not support these objections.
- 29.47 Salterforth Parish Council is concerned that the proposal for the A56 Village Bypass is contradicted by Policy 6 - Development and Flood Risk and the environmental protection policy for Biological Heritage Sites. In addition, that it does not take into account public transport strategies, and its necessity is unproven.
- 29.48 However, any planning application for the reinstatement of the railway line between Colne and Skipton, or for the construction of the A56 Village Bypass would require the inclusion of a detailed Flood Risk Assessment. Provided that the proposed scheme included appropriate flood alleviation measures to overcome any problems highlighted by the Flood Risk Assessment and any comments made by the Environment Agency, it would accord with Policy 6 - Development and Flood Risk of the re-deposit plan.
- 29.49 The County Council, in conjunction with other organisations, is responsible for identifying and designating Biological Heritage Sites. I consider, therefore, that it is reasonable to assume that in the

opinion of the County Council, improving transport links along the protected route between Colne and the border with North Yorkshire represents the exceptional circumstances referred to in Policy 21 of the JLSP that are necessary to justify the 'unavoidable loss or damage to a site' of nature heritage. Furthermore, in line with the 'no net loss' approach to heritage conservation outlined in the JLSP and in Policy 4C of the re-deposit plan, any development will be required to include mitigation measures, which may include the creation of appropriate new heritage resources, on or off-site.

29.50 I am convinced by the Council's arguments that improving transport links through West Craven into North Yorkshire will contribute towards creating a 'vibrant economy' and to leaving the area's residents 'feeling safer', which are two key goals identified in the Pendle Community Strategy (CD 68). I now consider that improved transport links will potentially help to attract new businesses to the area, thereby helping to diversify and strengthen the local economy. In my opinion, any reduction in traffic along the A56, arising from road improvements, rail reinstatement or improvements to public transport will considerably improve safety for pedestrians, cyclists and local traffic in Colne, Foulridge, Kelbrook, Sough and Earby. Indirectly, it could also reduce traffic flows in the village of Barrowford, on a route used to avoid congestion in the A56 corridor.

29.51 On this basis, I consider that the benefits that are likely to accrue from improved transport links between Colne and the North Yorkshire border will outweigh any damage that may be caused to natural habitats, especially as these would be largely overcome by mitigation measures that seek to ensure that there is 'no net loss' of nature heritage.

29.52 The A56 Village Bypass was approved by Lancashire County Council and North Yorkshire County Council after public consultation. Policy 10 of the JLSP protects the rail track bed for transport, rather than road use, to allow for the possible reinstatement of the railway line and to reflect guidance contained in the RSS. Consequently, the Council is required to protect the line of the route in its Local Plan for future transport use. This avoids prejudice to the re-opening of a rail or road link along the route. For these reasons, I do not support the objection.

29.53 I turn now to SELRAP's objection on the grounds that it considers that it is inappropriate for the Proposals Map of the re-deposit plan to show the route for the A56 Village Bypass between Colne and Kelbrook when it is not shown in the JLSP. As required by planning policy guidance, the Proposals Map accompanying the re-deposit plan is the same as that issued with the first stage deposit plan, but it was supplemented with a booklet outlining Proposed Map Changes at the re-deposit stage. Map Change No. 35 illustrates

that the annotation, 'proposed Route of the A56 Village Bypass' has been replaced with the phrase 'Protected Route for Transport Use.' I consider that this amendment overcomes the objection.

**RECOMMENDATION (binding)**

29.54 I **RECOMMEND no modification** to the plan in response to these objections.

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## **Policy 30 – Sustainable Travel Modes**

### **A. Objections to Policy Wording and Approach**

#### **Summary of Key Issues**

- Whether Policy 30 should be amended to clarify that contributions made to public transport will be sought, but not required, where they meet the tests of (Circular 1/97) Circular 05/2005.
- Whether the term 'where necessary' as used in part 3. of Policy 30 should be defined.
- Whether Policy 30 lacks commitment to sustainable transport.
- Whether Policy 30 provides sufficient detail to effectively support improvements to public transport.
- Whether Policy 30 should be strengthened by ensuring that the infrastructure of the rapid transit rail scheme is upgraded for freight, as well as for passenger use.
- Whether Policy 30 should be strengthened by supporting the linking of the rapid transit rail scheme to the eventual re-opening of the Colne-Skipton railway.
- Whether Policy 30 should be amended to reflect the most up-to-date position regarding the rapid transit rail scheme.
- Whether footnote 60 to Policy 30 should be amended to clarify that the south Lancashire Rural Transport Partnership only has funding until April 2006.
- Whether Policy 30 should be strengthened to acknowledge the importance of rail as a sustainable mode of travel and by making reference to other transportation documents.
- Whether Policy 30 should refer to the need for development to be located within 400 metres of a bus stop.
- Whether the formation of a Community Rail Partnership should be referred to in the text and reasoned justification for Policy 30.
- Whether the Nelson interchange should be referred to in the reasoned justification for Policy 30.

## **Inspector's Reasoning and Conclusions**

- 30.1 In response to an objection made by GONW at the first stage deposit, concerning the requirements of Policy 30 for developers to make contributions towards public transport improvements, the words, 'where necessary', were added at the re-deposit stage. I consider that this amendment brings the policy in line with Circular 05/2005, and overcomes the objection.
- 30.2 However, this re-deposit amendment gave rise to a counter objection from the County Council, which considers that the term, 'where necessary', should be defined. In response, the Council suggests Change No. 79 (CD 193) to clarify that developers' contributions will only be sought on sites of 0.4 hectare or more. I support this suggested Change, which in my opinion, is consistent with guidance given in Appendix 1 of the re-deposit plan and which would meet these two objections. The County Council's objection was conditionally withdrawn on the basis of the suggested Change.
- 30.3 Concerning objections that Policy 30 is too vague and lacks commitment towards sustainable transport, which refer also to the re-opening the Colne-Skipton railway line, I consider that the text of Policy 30 provides support for a wide number of initiatives ranging from improvements in public transport (bus routes and rapid transit) through to cycling, walking (safe routes to school) and the use of Section 106 agreements. Specific details for each initiative are provided in the reasoned justification for the policy.
- 30.4 Those issues not covered within the reasoned justification for Policy 30, such as road safety and air quality are covered elsewhere in the re-deposit plan, in Policy 29 and Policy 8 – Contamination and Pollution. Together with Policy 29 - Creating an Improved Transport Network and Policy 31 - Parking, I consider that Policy 30 provides a clear commitment to the promotion of sustainable transport solutions in Pendle. In my opinion, the policy offers sufficient support to be effective in its delivery of sustainable transport within the Borough.
- 30.5 SELRAP have made several objections to Policy 30. One of these suggests that the policy would be strengthened if the rapid transit rail scheme were developed to carry freight, as well as passengers. However, in March 2003, rail consultants completed an East Lancashire Rail Infrastructure Feasibility Study (CD 123) for the East Lancashire Partnership. This involved a detailed evaluation and costing of the rail infrastructure improvements required to deliver the enhanced service frequencies, as defined in the Rapid Transit pre-feasibility study. This report concluded that the existing rail freight system was sufficient to support any

increase in demand. Consequently, I consider that this objection is met.

- 30.6 The Objector also states that Policy 30 should support the linking of the rapid transit rail scheme to the eventual re-opening of the Colne to Skipton railway, to provide more sustainable transport choices, as required by PPG13.
- 30.7 The RSS advises local authorities to consider the potential of disused rail track beds for possible transport schemes and to apply appropriate protection policies where justified. Policy 10 of the JLSP acknowledges the value of the former Colne-Skipton railway line for the possible long-term potential for rail reinstatement, as well as being the preferred route for the A56 Village By-pass. Consequently, Policy 29 of the re-deposit plan safeguards the former rail route from Colne to the North Yorkshire Border for future transport use. However, the County Council is no longer considering light rail vehicles as a viable option in East Lancashire. Therefore, I do not consider that linking the proposed rapid transit rail scheme to the re-opening of the former Colne-Skipton railway is appropriate. The Objector accepted this point at the informal hearing session at which the objection was heard.
- 30.8 Also in connection with the rapid transit rail system, the County Council suggests that Policy 30 should be up-dated to reflect that Lancashire County Council, together with Blackburn with Darwen Borough Council, and not the East Lancashire Partnership, will lead on rapid transit development, and that the scheme will not involve the use of light rail vehicles.
- 30.9 In response to this re-deposit objection, the Council proposes that footnote 61 to the policy should be amended to state that; 'Further information on the Rapid Transit initiative can be obtained from Lancashire County Council', in accordance with suggested Change No. 81 (CD 193). As I recommend in the Introduction and Strategy Chapter of my report, suggested Change No. 78 (CD 193) would also amend criterion 2 of the policy to read; 'improvements to the rail and bus network in terms of new and segregated routes, increased frequencies, through ticketing, integrated systems and better customer environments, and the introduction of Community Rail Partnerships'.
- 30.10 In addition, I recommend that the third sentence of the third paragraph of the reasoned justification for Policy 30 should be amended by deleting reference to 'trams', in accordance with suggested Change No. 82 (CD 193). I consider that these suggested Changes will overcome the objection, which was conditionally withdrawn on their basis.

- 30.11 For increased precision, the County Council suggests that Policy 30 should also be up-dated to reflect that the South Lancashire Rural Transport Partnership only has funding until April 2006. The Council agrees with this re-deposit objection and proposes that footnote 60 to the policy should be amended in accordance with suggested Change No. 80 (CD 193) to state that: 'Further information on the Quality Bus Routes and the South Lancashire Rural Transport Partnership can be obtained from Lancashire County Council. The South Lancashire Rural Transport Partnership currently has funding until April 2006'. I endorse this Change, which I consider will overcome the objection, which has been conditionally withdrawn on its basis.
- 30.12 SELRAP considers that Policy 30 should be strengthened by acknowledging the importance of rail as a sustainable mode of travel and by making reference to other transportation documents. However, as I have previously discussed in this Chapter and in Chapter 29 of my report, I consider that the re-deposit plan makes appropriate reference to the importance of rail as a sustainable mode of travel.
- 30.13 I also think that it makes sufficient reference to related guidance and major initiatives operating in the Pendle area, which seek to promote sustainable travel modes. I consider that to simply list a series of publications and/or organisations in the policy or the reasoned justification that are in favour of rail reinstatement, would serve no practical purpose. It would also be contrary to advice given in PPG12, which emphasises that plans should be clear, succinct, relevant, easily understood and avoiding over-elaborate and unnecessary detail. For these reasons I do not support this objection.
- 30.14 In another of its objections to Policy 30, the County Council suggests that reference should be made within the policy to the desirability of development being within 400 metres of a bus stop. This threshold is derived from a recommendation made by the Institute of Highways and Transport that is replicated in Target 1.2 of the JLSP, which seeks to achieve 90% of all new development within 400 metres of an existing or proposed bus stop. The target relates to all developments across all policies within the JLSP. However, as this figure is a target rather than a policy I do not recommend that this figure is included within Policy 30, as a requirement. Nevertheless, since the JLSP is part of the Development Plan for Pendle, the target must be considered as part of any planning application.
- 30.15 The County Council also considers that reference to the formation of a Community Rail Partnership, to promote better services on the Colne-Preston rail line, should be included in the reasoned justification for Policy 30. The Council agrees with this re-deposit

objection and proposes that the reasoned justification for the policy should include an additional paragraph (after the third paragraph), in accordance with suggested Change No. 84 (CD 193), which would clarify this. Together with suggested Change No. 78 (CD 193), to which I have already referred above, I consider that the objection, which has been conditionally withdrawn, is overcome by these suggested Changes. (I recommend suggested Change No. 84 in the Introduction and Strategy Chapter of my report).

- 30.16 The County Council further suggests that the proposed Nelson bus-rail interchange should be mentioned in the reasoned justification for Policy 30. The Council agrees with this re-deposit objection also, and proposes that the end of the second paragraph of the reasoned justification should be amended in accordance with suggested Change No. 83 (CD 193), which would refer to support for new and improved terminal facilities, with a possibility of renewing or upgrading existing bus stations, and to highlight that proposals are already in place for a new bus/rail interchange in Nelson. I support this Change, which would add clarity to Policy 30 and would meet the objection, which has been conditionally withdrawn on its basis.

#### **RECOMMENDATIONS (binding)**

- 30.17 **I RECOMMEND that the plan be modified by amending the footnote 61 to Policy 30 to read:**

**61 Further information on the Rapid Transport initiative can be obtained from Lancashire County Council.**

- 30.18 **I RECOMMEND that the plan be modified by amending criterion 3 of Policy 30 to read:**

**3. Section 106 Agreements - Developers will be required to contribute towards public transport improvements in the vicinity of the development, where necessary, on sites of 0.4 hectare or more.**

- 30.19 **I RECOMMEND that the plan be modified by amending the footnote 60 to Policy 30 to read:**

**60 Further information on the Quality Bus Routes and the South Lancashire Rural Transport Partnership can be obtained from Lancashire County Council. South Lancashire Rural Transport Partnership currently has funding until April 2006.**

30.20 I RECOMMEND that the plan be modified by amending the last sentence of the second paragraph of the reasoned justification of Policy 30 to read:

In addition the scheme will support new and improved terminal facilities, with a possibility of renewing or upgrading existing bus stations. Proposals are already in place for a new bus/rail interchange in Nelson.

30.21 I RECOMMEND that the plan be modified by amending the third sentence of the third paragraph of the reasoned justification for Policy 30 by deleting reference to 'trams'.

30.22 I RECOMMEND no further modification to the plan in response to these objections.

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## **B. Objections to Specific Sites**

### **COLNE (including COTTONTREE)**

#### **Un-adopted private road from Briercliffe Avenue, omission site Y21**

##### **Summary of Key Issue**

- Whether the practicalities of using the un-adopted private road from Briercliffe Avenue, omission site Y21, as part of a proposed cycleway network have been properly investigated.

##### **Inspector's Reasoning and Conclusions**

30.23 The site is located at the end of Briercliffe Avenue, Colne. It is a private road which leads to Bankfield House and it is 0.22 kilometres in length. In the re-deposit plan, part of the site forms a section of the proposed cycle network. The rest of the site has no designation. Part of the site is within the Settlement Boundary, and the remainder of the site follows the line of the Settlement Boundary. Footpaths FP 177 and FP 179 run along the site.

30.24 An objection is made on the grounds that the route of the proposed cycle network has not been properly surveyed. Specifically, that the route from the top of Briercliffe Avenue, Colne over the railway bridge consists of a narrow private road with no room for passing motor vehicles. It is stated that there is a large drop on both sides of the road and that the width of the road is further restricted over the bridge. There are no vehicular rights of way on this route at present. It is, therefore, considered

that engineering surveys should be carried out to investigate the possible need for widening the road.

- 30.25 However, only the north-eastern end of this private road is included as part of the proposed cycle network. Policy 30 of the re-deposit plan supports cycling as a sustainable transport mode and will encourage the rollout of the Pendle Cycle Network. Pendle's Cycling Strategy (CD 147) is the mechanism used for proposing the route.
- 30.26 Since the site is a private road, any upgrading would need to be approved by the Council's Highways' Department. The RSS states that priority should be given to the maintenance, management and selective improvement of regionally significant highway routes. This private road is not considered to be of regional significance. Furthermore, I note that this length of the cycle route is only the proposed route for part of the cycle network at this stage, and implementation of the scheme is dependent upon funding coming forward.
- 30.27 The proposed cycle network was originally identified through a desktop study and the route has not been physically surveyed because it is uncertain as to whether funding will ever become available to implement the scheme.
- 30.28 The Council informs that consultation on the proposed network has been undertaken with the cycle forum and other cycling groups, and that further consultation, including with the land owner, will be carried out before the implementation of any part of the proposed network. Upgrading of part of this road may be possible through the implementation of the cycle network, but this will not be done through the Local Plan review process. For these reasons, I do not support the objection.

### **RECOMMENDATION (binding)**

- 30.29 **I RECOMMEND no modification to the plan in response to this objection.**

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### **SALTERFORTH**

#### **Land at Spen Farm, omission site X57**

#### **Summary of Key Issue**

- Whether the route of the proposed cycle network should be moved from the railway bank at Spen Farm, Salterforth, omission site X57, to run alongside the field edge.

## Inspector's Reasoning and Conclusions

- 30.30 The omission site is located to the south-east of Salterforth. It is a narrow stretch of the dismantled railway line, around 0.35 hectare in length, and is mainly surrounded by fields. In the re-deposit plan the site lies outside the Settlement Boundary for Salterforth, within Open Countryside. It is designated as a Biological Heritage Site (BHS) and part of a proposed cycle network. An Objector considers that the route of the proposed cycle network should be removed from the railway embankment, and that the BHS should run alongside the field edge.
- 30.31 However, PPG13 encourages the use of disused railway track beds for new cycle routes. The proposed cycle route, at omission site X57, would run along the former track bed of the railway line, not the railway embankment, as stated by the Objector. Although this site is designated as a BHS, the proposed cycle route is deemed an appropriate use within this specific BHS, due to its former use as a railway line. I consider that the impact of a cycle route on this site would be minimal.
- 30.32 Furthermore, the proposed cycle route was adopted by the Council through the Pendle's Cycling Strategy, in 2000 (CD 147), and, therefore, it could not be altered through the Local Plan review process. However, this route is only the proposed route for part of the cycle network at this stage, and it is dependent upon funding coming forward in order to implement the scheme.
- 30.33 The proposed cycle network was originally identified through a desktop study and the route has not been physically surveyed, because it is uncertain if funding will ever become available to implement the scheme. Consultation on the proposed network has been undertaken with the cycle forum and other cycling groups, and further consultation will be carried out before the implementation of any part of the proposed network. For these reasons, I do not support the objection.

### RECOMMENDATION (binding)

- 30.34 **I RECOMMEND no modification to the plan in response to this objection.**

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## **ROUTES**

### **Former Colne-Skipton railway line, omission site X69**

#### **Summary of Key Issue**

- Whether the plan should clearly commit to sustainable transport within Policy 30, by promoting the extension of the rail link to Skipton.

#### **Inspector's Reasoning and Conclusions**

- 30.35 The Colne to Skipton railway opened in the autumn of 1848 and closed in February 1970. The intermediate station at Foulridge closed in 1959. Omission site X69 is 9.5 kilometres in length and now comprises disused rail track. The Strategic Rail Authority/British Rail Property Board owns the section of track between Colne and Lancashire Gill (north of Foulridge). The remaining stretch to the North Yorkshire border is owned by Lancashire County Council. Craven District Council in North Yorkshire has a policy of protecting the stretch from the border with Lancashire to Skipton, although much of this stretch is in private ownership.
- 30.36 At the first stage deposit, the site was designated as part of the proposed route of the A56 Village Bypass, as a Biological Heritage Site, part Green Belt, part Open Countryside and partly within the Settlement Boundaries for Colne and Earby. In the re-deposit plan it is designated as a Protected Route for Transport Use, a Biological Heritage Site, part Green Belt, partly Open Countryside, partly within the Earby Conservation Area and partly within the Settlement Boundaries for Colne and Earby.
- 30.37 Objection is made on the grounds that the re-deposit plan should clearly commit to sustainable transport by promoting the extension of the rail link to Skipton within Policy 30.
- 30.38 However, the Local Transport Plan for Lancashire (2001-2006) states that the main part of the strategic highway network through Pendle is the M65 and A6068/A56 route. It identifies that the A56 Village Bypass is required to provide an effective continuation of the strategic road network into Yorkshire. At the time of the first stage deposit, this scheme was allocated as second priority for major schemes in Lancashire. The scheme is still identified in the Provisional Lancashire Local Transport Plan 2006/07-2010/11, and is expected to be brought forward during the period of the plan.
- 30.39 The proposed route of the Bypass, approved by Lancashire County Council and North Yorkshire County Council after public

consultation, follows part of the former Colne to Skipton rail track bed. Policy 10 of the JLSP protects the rail track bed for transport, rather than road use, to allow for the possible reinstatement of the railway line and to reflect guidance contained in the RSS relating to the protection of disused rail track beds.

30.40 As such, the Council is required to protect the line of the route in its Local Plan. Therefore, the re-deposit plan protects the former route of the Colne to Skipton railway line for future transport use, in accordance with the policy position in the JLSP. For these reasons, I do not support the objection.

**RECOMMENDATION (binding)**

30.41 **I RECOMMEND no modification to the plan in response to this objection.**

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## **Policy 31 - Parking**

### **A. Objections to Policy Wording and Approach**

#### **Summary of Key Issues**

- Whether Policy 31 and Appendix 2 require amendment in order to better reflect national guidance on parking provision in the Pendle context.
- Whether Policy 31 and Appendix 2 should be amended to refer to the parking standards of the JLSP rather than to maximum car and cycle parking standards.
- Whether Policy 31 makes appropriate provision for cyclists.
- Whether the parking requirements of Policy 31 for taxi and private hire vehicles are appropriate.
- Whether Policy 31 will secure sufficient car parking provision for new development in Nelson town centre.

#### **Inspector's Reasoning and Conclusions**

- 31.1 An Objector considers that Policy 31 should be amended to reflect the fact that parking standards should be set in accordance with national and regional planning guidance. However, I consider that the parking requirements of the re-deposit plan are generally in line with national and regional guidance on this matter.
- 31.2 PPG13 requires that local authorities should ensure that their strategies on parking are consistent with their overall strategy on planning and transport. PPG13 also notes that Government guidance contained in PPG3 informs that local authority parking policies should not be expressed as minimum standards, and that they should allow for significantly lower levels of off-street parking provision, particularly for developments in locations, such as town centres, where services are readily accessible by walking, cycling or public transport.
- 31.3 As required by PPG13 and the RSS, the JLSP uses maximum thresholds for various types of development. The parking standards referred to in Policy 31 of the re-deposit plan relate to those contained in the JLSP Appendix 2: Parking Standards (2005). The first paragraph of the reasoned justification for Policy 31 clarifies that the parking standards outlined in Appendix 2 of the re-deposit plan are the same as those given in the JLSP and, therefore, that they are also in line with national and regional car parking requirements.

- 31.4 The County Council considers that Policy 31 should refer to the Joint Structure Plan Authorities' parking standards, not maximum car parking and cycling standards. However, as I discuss above, the maximum standards referred to in Policy 31 relate to the JLSP Appendix 2: Parking Standards (2005), which uses maximum thresholds for various types of development. On this basis, I do not consider that there is any need to amend the policy in response to these objections.
- 31.5 Another Objector considers that proposals for new development should include provision for cycle parking, in accordance with PPG13, and should seek the provision of new cycle ways to connect existing cycle networks. However, I support the Council's stance on this matter that it is impractical to impose a requirement to provide cycle parking for all new developments.
- 31.6 The re-deposit plan requires the provision of cycle parking on all new developments employing 30 or more full or part-time staff. This is in general accordance with the requirement of the JLSP. However, to improve the clarity of the required provision, the Council suggests that the text in the second paragraph of the policy should be amended in accordance with Change No. 85 (CD 193) to read: 'and covered secure provision will be required on all developments employing 30 or more full or part-time staff.' The objection of the County Council was conditionally withdrawn on the basis of this change.
- 31.7 Policy 31 deals specifically with parking and not the cycle network, which is covered under Policy 30 - Sustainable Transport Modes. Furthermore, I do not consider that it would be reasonable to require a developer to provide a link to a cycle route, if there was no existing cycle route within close proximity of the proposed development. For these reasons, I do not support this aspect of an objection to the provision made for cyclists in the re-deposit plan.
- 31.8 Another objection is made on the basis that the provision of additional and/or dedicated parking should be considered before planning permission is granted for any new development, particularly in town centre locations such as Nelson, where existing provision is thought to be inadequate. However, Government guidance contained in PPG3 and PPG13 allows for significantly lower levels of off-street parking provision, particularly for developments in locations, such as town centres, where services are readily accessible by walking, cycling or public transport.
- 31.9 The guidance emphasises that an important part of the planning system is to improve accessibility for all and to reduce social

exclusion. Whilst acknowledging that parking is an essential part of any new development and that providing places for cars within the boundaries of a site helps to ensure that parking problems on local streets are reduced, the guidance stresses that it is important to ensure that car parking requirements do not dominate the design of a development or unduly limit the re-use of existing buildings.

- 31.10 The JLSP sets out a framework for parking in different levels of town centre. The County Council's Supplementary Planning Guidance: Access and Parking requires all developments with a ground floor area of over 500 square metres to provide a simple Transport Assessment. A full assessment is required for all applications for development above the thresholds given in Table E of the JLSP Appendix 2: Parking Standards (2005), and these must also be accompanied by a Travel Plan. Such Transport Assessments and Travel Plans will assist in determining the ease at which a site may be reached by alternatives to the car. They, in turn, will inform decision making on the level of parking required.
- 31.11 The car parking standards of the re-deposit plan are, therefore, set at a maximum level, which differs according to the type of development proposed, in order to encourage the use of environmentally friendly means of travel, particularly if there is good public transport provision and cycling infrastructure on or near the site. The parking standards, therefore, consider access to new developments by all types of transport. However, parking levels for cycles, motorcycles and mobility impaired users are set out at minimum levels to ensure that their needs are fully taken into account in the design of proposals.
- 31.12 Thus, in my opinion, to amend Policy 31 to require developers to provide additional off-site car parking would be contrary to Government guidance contained in PPG3 and PPG13, and in the JLSP. For these reasons, I do not support the objection.
- 31.13 A taxi operator objects that the car parking standards for taxi booking offices set out in Table A: Parking Standards, of Appendix 2 to the re-deposit plan are too onerous; especially for small firms operating up to five vehicles, and that the standards fail to take account of modern radio technology. The 100 metre rule, in particular, is objected to.
- 31.14 Policy 31 and Appendix 2 of the re-deposit plan includes the standards given in the JLSP, which requires 1 space for every 1.5 cars, to be located within 100 metres of the hire office. The main purpose of the 100 metre rule is not to ensure that vehicles can be parked near to the hire office, but to make certain that passengers do not have to walk far to access a private hire

vehicle. I consider that this is a reasonable consideration and an appropriate maximum standard.

31.15 Furthermore, given that the parking standards of the plan are maximum levels that may be allowed, it follows that there should be scope for taxi firms to operate below this maximum level, where circumstances indicate that a lower level of parking provision is acceptable and appropriate. Thus the parking requirements of the plan enable flexibility for provision at a lower level, the exact amount being dependant upon individual site and operational circumstances. Therefore, I do not consider that there is any need to amend Policy 31 or Appendix 2 in response to this objection.

### **RECOMMENDATIONS (binding)**

31.16 **I RECOMMEND that the plan be modified by amending the first sentence of the second paragraph of the text of Policy 31 to read:**

**Cycle parking in new development will be provided at a minimum of 1 per 10 car spaces and covered secure provision will be required on all developments employing 30 or more full or part-time staff, in line with the Parking Standards.**

31.17 **I RECOMMEND no further modification to the plan in response to these objections.**

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### **B. Objections to Specific Site**

#### **BARROWFORD & HIGHERFORD**

##### **Rushton Street, omission site X14**

##### **Summary of Key Issue**

- Whether land at Rushton Street, omission site X14, should be protected as a car park.

##### **Inspector's Reasoning and Conclusions**

31.18 This site is located on the corner of Rushton Street and Gisburn Road, Barrowford, adjacent to Barrowford County Primary School. It is 0.11 hectare in area and is used as a car park. At the first stage deposit, the site was a Protected Car Park, within the Settlement Boundary for Barrowford, within a Local Shopping Centre boundary and within a Conservation Area. However, in the

re-deposit plan it has no designation, but it remains within the Settlement Boundary for Barrowford, within a Local Shopping Centre boundary and within a Conservation Area.

- 31.19 Objections were made to the designation of the site as a Protected Car Park at the first stage deposit on the grounds that the site is used in planning appeals to justify the lack of parking spaces within developments in the vicinity. The land is on a short-term lease to the Borough Council and the school intends to use the land as play space when funds become available. I consider that these objections are met by the de-designation of the site at the re-deposit stage.
- 31.20 A counter Objector at the re-deposit stage argues that the protected car park allocation should not be removed from this site, because it is a heavily used car park which serves wide sectors of the local community: it allows children to be dropped off at school safely and with increased retailing provision in Barrowford it also provides off road parking from this busy road.
- 31.21 However, the site is owned by the County Council and is leased to the Borough Council on a short-term basis, for use as a car park. Although this site is well used as a car park and Policy 31 states that well used car parks will be protected from development, protecting the site for such a use would impede its long term use for educational purposes. The Protected Car Park designation shown at the first stage deposit has been removed in response to an objection from the County Council, in which they expressed their intention for the educational use of the site in the long term. I have no reason to doubt this intention.
- 31.22 Any new development in Barrowford is required to meet the parking standards as outlined in Appendix 2 of the re-deposit plan. Therefore, for all of these reasons, I do not support the counter objection to the re-deposit Policy 31.

#### **RECOMMENDATION (binding)**

- 31.23 **I RECOMMEND no modification to the plan in response to these objections.**

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## **Policy 32 – New Community Facilities**

### **A. Objections to Policy Wording and Approach**

#### **Summary of Key Issue**

- Whether private facilities such as public houses should be positively encouraged by Policy 32.

#### **Inspector’s Reasoning and Conclusions**

- 32.1 Policy 32 - New Community Facilities specifically identifies a number of sites for new community facilities, which the policy defines as uses falling within Use Classes C2, D1, D2 and Sui Generis of the Town and Country (Use Classes) Order, 1987, as amended, and the criteria that should be followed in identifying future sites for community facilities. At the time of the first stage deposit, when this objection was made, public houses fell within Use Class A3, which is listed as a non-community use in the reasoned justification for Policy 32. Therefore, it is not intended that the provision of public houses should fall within the scope of this policy.
- 32.2 Public houses and other private facilities located in villages are covered by Policy 28 - Retail and Service Provision in Villages, which seeks to help retain, protect and improve retail and service facilities in villages throughout Pendle. Whilst I acknowledge that pubs often play an important part in engendering a sense of community in a village, I consider that as their Use Class designation suggests, they are more correctly described as being a retail use. Therefore, I consider that it would be inappropriate and unnecessary duplication to also refer to these private facilities within Policy 32. Therefore, I do not support the objection.
- 32.3 However, the Use Classes Order was amended in 2005 and Class A was further sub-divided to put public houses into Class A4. I consider that it would be helpful if Policy 32 were updated to reflect these Changes in accordance with the Council’s suggested Changes No. 87 (CD 193). For consistency, I have recommended that similar changes should also be made to Policies 25 - Location of Service and Retail Development and to Policy 28 – Retail and Service Provision in Villages. I note also that there is a typing error in the second exception of Policy 32 that refers to the re-use of existing community facilities, which I suggest should be corrected to improve the clarity of the policy, in accordance with the Council’s suggested Change No. 86 (CD 193).

## RECOMMENDATIONS (binding)

32.4 I RECOMMEND that the plan be modified by amending the third sentence of the final paragraph of the reasoned justification to Policy 32 to reflect the changes made to the Use Classes Order in 2005, with reference to Class A uses, so that it reads:

Non community use will be regarded as A1, A2, A3, A4, A5, B1 (a), (b), (c), B2, B8, C1 or C3 and non-specified Sui Generis (Policy 25).

32.5 I RECOMMEND no further modification to the plan in response to this objection.

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## B. Objections to Specific Sites

### COLNE (including COTTONTREE)

Park High School, omission site Y22  
Land at Waterside Ward, omission site X23  
Land at Knotts Lane, omission site X26

### Summary of Key Issues

- Whether new community facilities should be provided at Park High School, omission site Y22, in accordance with Policy 32.
- Whether a site for new community facilities should be allocated in the Waterside ward, in accordance with Policy 32.

## Inspector's Reasoning and Conclusions

### Park High School, omission site Y22

32.6 This site is located to the east of Park High School, Colne. It is 1.66 hectares in area and comprises part meadow land and part grazing land. It is included in the larger omission site X34. In the adopted Pendle Local Plan, omission site Y22 is designated as a Protected Area under Policy E2A. It lies outside the Settlement Boundary in an Area of Special Landscape. At the first stage deposit, the site was a New Community Facilities allocation under Policy 32 (Dual Use Leisure Facility). It was also designated as being outside the Settlement Boundary and within Open Countryside, to which Policy 1 refers. At the re-deposit stage, the site was re-designated as Green Belt lying outside the Settlement Boundary and within Open Countryside.

- 32.7 There are 37 outstanding objections to the designation of the site as a dual use leisure facility made during the first stage deposit period. One of these includes a petition containing 28 signatures. These objections were made on the grounds that there is poor access to the site by public transport, the proposed use would be detrimental to nearby residential amenity and, in particular, floodlighting would be intrusive, the development would result in increased traffic and parking congestion in the vicinity, the development would result in loss of moor land, the site is outside the settlement boundary and there is an existing sport centre in Colne that could be utilised.
- 32.8 I support the removal of the Dual Use Leisure Facility allocation in the re-deposit plan. This overcomes these objections. However, reference should be made to Chapter 3 of my report, where I recommend that omission site X34, which contains site Y22 should be designated as a Protected Area under new Policy 3A instead of Green Belt. In my opinion, the objections would still be met by this revised designation.

#### **Waterside Ward, including omission sites X23 and X26**

- 32.9 Objections are made on the grounds that there are no specific areas for community facilities identified in Waterside ward. This concern was supported by two representations made in response to advertisement of the omission sites X23 and X26.
- 32.10 Policy 32 of the re-deposit plan only identifies proposed Council owned community facilities and makes provision for them accordingly in the policy text and on the Proposals Map. But this does not preclude other community facility proposals coming forward over the plan period and to this end, Policy 32 introduces a sequential approach for the identification of appropriate sites.
- 32.11 In line with this approach, most community facilities should be accommodated in the town centres or local shopping centres of the Borough, as set out in Policy 25 - Location of Service and Retail Development of the re-deposit plan. In addition, Policy 32 requires community facilities to be located within a settlement boundary.
- 32.12 With regards to the Objector's perceived absence of community facilities in the Waterside ward, I saw that there is already an existing local convenience shop on the corner of Knotts Lane, Colne. In addition, surrounding community facilities are in the process of being put into place, in association with proposed residential development at the former Simpson's Garage off Knotts Lane, and with the second phase of residential development at Knotts Lane, Colne. Furthermore, funds have been accrued through a Section 106 Agreement attached to the

existing development at Knotts Drive that will contribute to the provision of a Local Equipped Area for Play (LEAP) in the vicinity.

- 32.13 Through these developments, it appears to me that adequate provision is being made for community facilities in the Waterside ward and that no change is required to Policy 32 in response to the objections.

## **LANESHAW BRIDGE**

### **Land to the east of Emmott Lane, omission site X47**

#### **Summary of Key Issue**

- Whether land to the east of Emmott Lane, omission site X47, should be allocated for a mix of uses including a new Community Resource Centre, by the provisions of Policy 32.

#### **Inspector's Reasoning and Conclusions**

- 32.14 Omission site X47 lies to the east of the village of Laneshaw Bridge and is situated behind cottages along the east side of Emmott Lane. To the south-east of the site there is a housing development under construction. To the north and east are areas of uninterrupted open countryside. The southern boundary is defined by a public house and by the A6068. Except for the service road running along the rear of dwellings in Emmott Lane, the site is excluded from the settlement boundary and is designated as Open Countryside.
- 32.15 An objection is made that the site is not allocated for a mix of uses including a new Community Resource Centre in the re-deposit plan. However, it is not the purpose of Policy 32 to allocate land for a mix of uses. It identifies proposed Council owned community facilities and makes provision for them accordingly in the policy text and on the Proposals Map. The policy also introduces a sequential approach for the identification of an appropriate site for community facilities. This indicates that, amongst other considerations, a site for new community facilities should be located within a defined settlement boundary, unless there are exceptional circumstances. The site at Emmott Lane is not located within the settlement boundary for Laneshaw Bridge.
- 32.16 Policy 32 exceptionally permits the development of community facilities outside the settlement boundary, based upon evidence of need. This should be demonstrated, followed by application of the sequential approach referred to in the Policy and outlined in Policy 25 - Location of Service and Retail Development. But no evidence has been provided by the Objector to demonstrate that

a new community facility is required in Laneshaw Bridge. Nor is Laneshaw Bridge recognised as being a service centre for the surrounding rural area, or containing a defined centre referred to in Policy 25 of the re-deposit plan.

32.17 For these reasons, I do not support the objection, nor do I recommend the allocation of land off Emmott Lane in Laneshaw Bridge for a new community facility or for a mix of uses that include a community facility.

**RECOMMENDATION (binding)**

32.18 **I RECOMMEND no modification to the plan in response to these objections.**

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## **Policy 33 – Existing Open Space**

### **A. Objections to Policy Wording and Approach**

No objections were made to the wording or approach of Policy 33.

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### **B. Objections to Specific Sites**

#### **BARNOLDSWICK**

#### **Land at Applesgarth, omission site X81**

#### **Summary of Key Issue**

- Whether land at Applesgarth should be designated as open space.

#### **Inspector's Reasoning and Conclusions**

- 33.1 Omission site X81 is situated opposite the Rolls Royce factory in Barnoldswick, running alongside the Leeds and Liverpool Canal and rising uphill from the canal to Lockfield Drive. The site is located approximately 1.0 kilometre from Barnoldswick town centre. Access is via Applesgarth, which narrows into a track, bisecting the site from north to south. It is 1.68 hectares in extent and comprises woodland, grass land and allotments. The site is within the settlement boundary and is open in character.
- 33.2 An objection is made to its designation as Open Space because it is considered that the site is little known locally, it is thought to be only used for dog walking and it does not fall within any of the typologies of open space referred to in the Pendle Open Space Audit (CD 47). However, there was a considerable amount of support for the Open Space designation of the site in response to advertisement of the omission site, which could indicate that the land is more highly valued by the public than contemplated by the Objector.
- 33.3 At the informal hearing session at which this objection was heard, the Council clarified that the Open Space designation at this site does not include the gardens of Bank Edge, Deerstones or Landsdown. In addition, that the designation is not for amenity Open Space; rather it is classified as urban woodland in the Pendle Open Space Audit. The designation runs adjacent to and parallel with the Leeds and Liverpool canal, at a width varying from 25 to 35 metres.

- 33.4 The Council's designation of this site as urban woodland open space was taken from the Pendle Woodland Survey conducted in 1992 (CD 153). However, due to the volume of sites concerned, the Pendle Open Space Audit did not involve site visits for every designation and, therefore, where legacy data and systems were used, errors were not necessarily picked up.
- 33.5 The Council agrees that the lower section of the area designated as Open Space designation of the site does not contain woodland, except for the occasional tree, shrub and hedgerow growing along the river bank. It therefore conceded, at the informal hearing session at which the objection was heard, that the Open Space designation of the site should be amended to include only the upper portion of the site, to correspond with the extent of tree cover.
- 33.6 From my inspection of the site, I agree with the Council's amended position on this matter. I conclude that the actual extent of tree cover at the site should be reflected in the next review of the Pendle Open Space Audit, but more immediately also on the Proposals Map, in accordance with the Council's suggested Change No. 108 (CD 193). However, for the avoidance of doubt, as I conclude in Chapter 12 of my report, the entire site should retain its designation as a Site of Settlement Character.

### **COLNE (including COTTONTREE)**

Land at Greenfield, omission site X38

Land at Exchange Street/Damside, omission site X39

Knotts Lane Allotments, omission site X37

### **Summary of Key Issues**

- Whether land at Greenfield, Colne, omission site X38, should be designated as Open Space under Policy 33.
- Whether land at Exchange Street/Damside, omission site X39, should be designated as Open Space under Policy 33.
- Whether the Knotts Lane Allotments, omission site X37, should be designated as Open Space under Policy 33.

### **Inspector's Reasoning and Conclusions**

#### **Land at Greenfield, omission site X38**

- 33.7 The site is located to the north of Greenfield Farm House and Greenfield House. It is 0.59 hectare in area and is bounded on three sides by green fields. A Public Right of Way (FP 171) runs through the middle of this site from north to south. In the

adopted Pendle Local Plan the site falls outside the Settlement Boundary and within the Area of Special Landscape, and within the Greenfield Conservation Area. At both the first and re-deposit stages, the site is located within the Settlement Boundary for Colne and within the Greenfield Conservation Area.

- 33.8 An objection is made on the basis that two areas of land within the Greenfield Conservation Area are designated as Open Space, with another two equally open and contiguous areas left non-designated. It is requested that consideration is given to designating the remaining two areas of land as Open Space also.
- 33.9 The Council argues that through Policy 10 - Areas of Special Architectural or Historic Interest of the re-deposit plan, both the buildings and surrounding fields contained within the Conservation Area boundary will be preserved or enhanced, because they form an integral part of the setting of the Conservation Area. Therefore, any application for development on this land would be assessed with this important consideration in mind. Consequently, it is the Council's opinion that the designation of the land as Open Space would have little impact on any development control decision. I agree with the Council on this matter.
- 33.10 The Council further contends that the designation of Open Space can only be applied to public land that is maintained either by Pendle Borough Council or by the County Council, or on land in private ownership where there is certainty that the land will be made available as open space in perpetuity. The western part of the omission site is not a publicly owned space and, therefore, in my opinion, it should not be considered for Open Space designation. The larger, eastern part of the site is owned by the County Council, but in my opinion, this area should not be designated as Open Space either. It is currently let for grazing by the County Council and I consider that a designation of Open Space on this site would conflict with that use.
- 33.11 This consideration also applies to the adjoining land to the east of the omission site, which is designated as Open Space, but is incorrectly identified as urban woodland within the Open Space Audit. Although trees run along the border of the site, no significant woodland is present. In addition to this, access to the site as a recreational area is restricted by the grazing of horses on this land. Therefore, I support the Council's suggested Change No. 101 (CD 1963) that would remove the Open Space designation from the field east of the omission site. For these reasons, I do not support the objection.

### **Land at Exchange Street/Damside, omission site X39**

- 33.12 The site is located at the eastern end of South Valley in the Waterside ward of Colne, between Waterside Road and Exchange Street. It is 0.67 hectare in area and it comprises a playground, youth club, open space play area and woodland. The site lies within both the Housing Market Renewal Intervention Area and the Area Development Framework boundary for Colne. In the re-deposit plan it is designated as part Open Space and an Equipped Area for Play.
- 33.13 The County Council considers that the site constitutes previously developed land and that, as such, it should be allocated for housing to accord with existing housing north of Damside. However, the site was identified as being one of the highest scoring play areas in the Borough through the quality assessment of the Pendle Open Space Audit (CD 47). Furthermore, although Waterside ward demonstrates a surplus of play areas overall, it has a deficiency of the closely related outdoor and park areas. In my opinion, the high quality of this site as a play area, deficiencies of closely related typologies in the ward, and advice contained in PPG17 all support my view that it should remain designated as Open Space.
- 33.14 With regards to its merits for allocation as a housing site, I conclude in Chapter 17 of my report that the Borough is currently in a position of over-supply with regards to housing provision, as set by the JLSP. Therefore, in order to comply with the JLSP, the re-deposit plan does not allocate any land for residential development. For these reasons, I do not support the objection.

### **Knotts Lane Allotments, omission site X37**

- 33.15 The site lies to the west of Knotts Lane in Colne, surrounded by housing development. It is 1.17 hectares in area. It is non-designated in the re-deposit plan, but it lies within the Settlement Boundary for Colne and within the Housing Market Renewal Intervention Area. An Objector considers that the site, which is referred to as allotment gardens on the Proposals Map should be identified as Open Space and included in the Pendle Open Space Audit.
- 33.16 The southern part of the site is owned by the Borough Council, but the land immediately behind the terraced properties on Knotts Lane is leased to the residents in the form of garden or allotment tenancies. The remainder of the site is in private ownership, with private gardens and garages occupying the land immediately behind the terraced properties on Knotts Lane. The remainder of the site is in an unkempt state. On this basis, and as the majority

of the site is clearly in private ownership and not accessible to the public, it was not identified by the Council as Open Space.

- 33.17 From my observation, the majority of the omission site does not seem to perform any of the functions of Open Space identified in the Pendle Open Space Audit, nor does it appear to make a significant contribution to the quality of life of the residents of Pendle in a public capacity. For this reason, I do not support the objection.

## **SALTERFORTH**

Salterforth School Playing Fields, omission site Y23

Land at Sand Hills Close, omission site Y24

Salterforth Leisure Gardens, omission site Y25

Klondyke (Land adjacent to Park Avenue/Alpha Street), omission site Y26

Land at Lane Head Common, omission site Y27

Garden Land at Hillside View, Cross Lane, omission site Y28

Canal Allotments, omission site Y29

### **Summary of Key Issues**

- Whether Salterforth School Playing Fields, omission site Y23, should be designated as Open Space under Policy 33.
- Whether land at Sand Hills Close, omission site Y24, should be designated as Open Space under Policy 33.
- Whether Salterforth Leisure Gardens, omission site Y25, should be designated as Open Space under Policy 33.
- Whether Klondyke (land adjacent to Park Avenue/Alpha Street), omission site Y26, should be designated as Open Space under Policy 33.
- Whether land at Lane Head Common, omission site Y27, should be designated as Open Space under Policy 33.
- Whether garden land at Hillside View, Cross Lane, omission site Y28, should be designated as Open Space under Policy 33.
- Whether the Canal Allotments, omission site Y29, should be designated as Open Space under Policy 33.

### **Inspector's Reasoning and Conclusions**

#### **Salterforth School Playing Fields, omission site Y23**

- 33.18 The site is situated behind the Salterforth County Primary School. It is 0.18 hectare in area and comprises school playing fields. At

the first stage deposit, the site was part designated as school playing fields Open Space within the Settlement Boundary for Salterforth. At the re-deposit stage it was designated in its entirety as Open Space within the Settlement Boundary for Salterforth. An objection made at the first stage deposit requests that the site is designated as Open Space. I consider that the objection is met by the re-deposit change of designation of the site.

#### **Land at Sand Hills Close, omission site Y24**

33.19 This site comprises a small piece of land that is 0.12 hectare in area and which is bounded by residential properties to the north, east and west, and by a field boundary to the south. It contains grassland with trees and is used as amenity open space. At the first stage deposit it was non-designated within the Settlement Boundary for Salterforth. At the re-deposit stage it was identified as amenity Open Space in the Pendle Open Space Audit.

33.20 An objection made at the first stage deposit requests that the site is designated as Open Space. Since the site is less than 0.2 hectare, I consider that it is impractical to identify it on the Proposals Map as Open Space. However, it is included within the Pendle Open Space Audit (Site Reference Number: 849) (CD 47) and, therefore, the site is afforded the same protection under Policy 33 of the re-deposit plan which states that: 'The Council will seek to protect those areas of open space as allocated on the proposals map, and defined in the Council's Open Space Audit.' In my opinion the objection is, therefore, met.

#### **Salterforth Leisure Gardens, omission site Y25**

33.21 This site comprises a narrow strip of land bounded by residential properties on one side, and open space and open countryside on all others. Access to the site is via a track running along the south-eastern corner of the site. It is 0.34 hectare in area and is used as private allotments. At the first stage deposit, the site fell outside the Settlement Boundary and within Open Countryside, to which Policy 1 applies. At the re-deposit stage, the site was designated as Open Space, outside the Settlement Boundary and within Open Countryside. A first stage deposit Objector considers that the site should be designated as Open Space. However, since the site was designated as Open Space in the re-deposit plan the objection has been overcome by this change.

#### **Klondyke (Land adjacent to Park Avenue/Alpha Street), omission site Y26**

33.22 This site is a small, square piece of land located to the north of Earby Road, Salterforth. It is bounded by residential properties to

the north and west. It is 0.03 hectare in area and comprises grassland, used as amenity Open Space. At the first stage deposit it was non-designated within the Settlement Boundary for Salterforth. At the re-deposit stage, the site was identified as amenity Open Space in the Pendle Open Space Audit and falling within the Settlement Boundary for Salterforth. An objection made at the first stage deposit requests that the site is designated as Open Space.

- 33.23 However, since the site is less than 0.2 hectare in extent, it is not shown on the Proposals Map as Open Space, but since it is included within the Pendle Open Space Audit (Site Reference Number: 850) (CD 47) it is afforded the same protection under Policy 33 of the re-deposit plan, which states that: 'The Council will seek to protect those areas of open space as allocated on the proposals map, and defined in the Council's Open Space Audit.' I consider that this re-deposit change overcomes the objection.

#### **Land at Lane Head Common, omission site Y27**

- 33.24 The site is a narrow strip of land approximately 300.0 metres in length and around 40.0 metres at its widest point. It is 0.82 hectare in area and comprises woodland and open grassland. It is surrounded by open countryside. At the first stage deposit the site fell outside the Settlement Boundary and within Open Countryside. At the re-deposit stage it was designated as Open Space outside the Settlement Boundary and within Open Countryside. An objection made at the first stage deposit requests that the site is designated as Open Space. I consider that since the site was designated as Open Space in the re-deposit plan the objection has been overcome.

#### **Garden Land at Hillside View, Cross Lane, omission site Y28**

- 33.25 This site is a narrow piece of land located off Cross Lane, Salterforth adjacent to the residential property named Hillside View. It is 0.13 hectare in area and forms part of the garden attached to that residential property. At the first stage deposit the site was designated as Open Space within the Settlement Boundary for Salterforth. At the re-deposit stage it was non-designated within the Settlement Boundary for Salterforth. An Objector considers that the site has been incorrectly mapped as Open Space, because it is a private garden. The Open Space designation should, therefore, be removed.
- 33.26 In the re-deposit plan the site is included within the Settlement Boundary with no designation. The Open Space allocation has been removed. Therefore, in my opinion, the objection is met.

## **Canal Allotments, omission site Y29**

- 33.27 This site runs alongside the Leeds and Liverpool Canal for a distance of 200.0 metres. It is bounded by the canal on one side (a designated Biological Heritage Site) and open countryside on two others. Canal Cottage, adjoining the site, represents the most southerly part of the Salterforth settlement. The omission site is 0.27 hectare in extent and is used as private allotments. At the first stage deposit, it was non-designated and fell partly within the Settlement Boundary for Salterforth and within Open Countryside. At the re-deposit stage the site was designated as Open Space, falling partly within the Settlement Boundary for Salterforth and within Open Countryside.
- 33.28 A first stage deposit objection was made on the basis that the canal allotments in Salterforth should be designated as Open Space. However, since the site is designated as Open Space in the re-deposit plan the objection has been overcome.

## **NELSON**

### **James Nelson's Sports Ground, omission site X86**

#### **Summary of Key Issue**

- Whether the James Nelson's Sports Ground, omission site X86, should be de-designated as Open Space.

#### **Inspector's Reasoning and Conclusions**

- 33.29 The site is located in the Southfield area of Nelson. It is 2.73 hectares in area and contains the buildings of the former sports club, together with a disused bowling green, tennis court and a former works sports ground. The site is bounded by grassed areas on all sides. New housing developments comprising detached and semi-detached dwellings adjoin the northern boundary and the south-eastern corner of the site. A small area of terraced housing adjoins the south-western corner. It was allocated as a housing site in the first stage deposit plan and within the Settlement Boundary for Nelson. However, in the re-deposit plan it is designated as Open Space within the Settlement Boundary for Nelson. The site lies partly within the ADF boundary for Nelson, but outside of the defined Housing Market Renewal Intervention Area boundary.
- 33.30 An objection was made at the re-deposit stage on the grounds that the site was allocated for housing in the first stage deposit plan and that it should be re-allocated, as previously, for residential development. Alternatively, it should be considered as

a 'safeguarded' site until plans can be put into place for a more suitable use.

- 33.31 In support of this objection, I conclude in Chapter 17 of my report that the potential benefits of safeguarding this site for HMR housing outweigh the benefit contended by the Council of its former private recreational use, given that the evidence presented to this Inquiry indicates that it is highly unlikely that the majority of this privately owned site will be made available for recreational use. However, in order to encourage the implementation of the mixed use planning permission recently granted on part of the site, which I consider would provide significant community benefits, I also conclude that the part of the site, which is the subject of the planning application, should retain its open space designation.

#### **RECOMMENDATIONS (binding)**

- 33.32 **I RECOMMEND that the plan be modified by amending on the Proposals Map the open space designation on land at Applesgarth, Barnoldswick, omission site X81, to that shown on the plan attached as Appendix 2 of the Inquiry document PBCP/205. This change should also be reflected in the next review of the Pendle Open Space Audit.**
- 33.33 **I RECOMMEND that the plan be modified by removing on the Proposals Map the Open Space (Woodland) designation from the field east of Greenfield, Colne. This change should also be reflected in the next review of the Pendle Open Space Audit.**
- 33.34 **I RECOMMEND that the plan be modified by removing on the Proposals Map the Open Space designation from the James Nelson's Sports Ground, omission site X86, except for that part of the site which has the benefit of planning permission for mixed-use development.**
- 33.35 **I RECOMMEND no further modification to the plan in response to these objections.**

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## **Policy 34 – Improved Open Space Provision**

### **Summary of Key Issues**

- Whether Policy 34 should contain details of its locally derived standards for the provision of open space, sports and recreational facilities.
- Whether Policy 34 should refer to the Government's Accessible Natural Greenspace Standards (ANGSt) as an integral part of open space provision.

### **Inspector's Reasoning and Conclusions**

- 34.1 At paragraphs 7 and 8, Planning Policy Guidance Note 17: Planning for Open Space, Sport and Recreation (PPG17) requires LPAs to undertake assessments of need and audits of existing open space provision to inform standards of future open space, sport and recreation facilities. Such standards will form the basis for redressing quantitative and qualitative deficiencies through the planning process and should be included in development plans. The PPG advises that LPAs should use the differing typologies of open space, which include parks, green corridors and amenity areas.
- 34.2 Policy UR10 of the RSS requires LPAs to identify urban areas in need of more greenspace and to develop strategies for the design, management and enhancement of the public realm and urban greenspace. In response, the Council undertook and adopted the Pendle Open Space Audit (CD 47), which identifies areas deficient or in surplus of specific typologies and which forms the basis of the locally derived standards for the Borough.
- 34.3 Policy 34 received extensive support during the consultation periods for the emerging plan. However, GONW objects that although the Council has an adopted Open Space Audit based upon guidance contained in PPG17, it has not incorporated standards within Policy 34, as advised by the PPG. In response to this criticism, the Council states that this is not practical, because the findings of and the typologies included in the Audit will be reviewed on a regular basis and consequently, may change throughout the life time of the plan. Thus, it considers that it is more appropriate that these standards are contained within a Supplementary Planning Document, as opposed to the Local Plan, to enable annual review and a regular update to take place. It also argues that it would be unnecessary to duplicate this detail in Policy 34.

- 34.4 I support the Council's stance on these matters. Furthermore, I also consider that it is in line with the guidance of PPG17, which does not specifically state that locally derived standards should be included within the Local Plan. Paragraph 8 of PPG17 states that standards should be included in development plans. For these reasons, I do not support the objection.
- 34.5 Lancashire Wildlife Trust objects that Policy 34 does not refer to the Government's Accessible Natural Greenspace Standards (ANGSt) as an integral part of open space provision. In the Objector's opinion, these have a role to play in delivering Lancashire's Biodiversity Action Plan, and in the creation of new habitats and linkages, so as to contribute to the establishment of ecological frameworks required by Policy ER5 of the RSS.
- 34.6 In response, the Council argues that paragraph 7 of PPG17 indicates that local authorities should use the information gained from their own assessments of needs and opportunities, to set locally derived standards for the provision of open space, sports and recreational facilities in their area. Thus, the Council has an adopted Pendle Open Space Audit, which sets the local standards for the Borough in respect of areas with a surplus or deficiency of the different typologies of open space. Given the guidance in PPG17, I consider that this approach is appropriate and that it is unnecessary to alter Policy 34 to take account of any standards other than those derived locally through the Pendle Open Space Audit.

#### **RECOMMENDATION (binding)**

- 34.7 **I RECOMMEND no modification to the plan in response to these objections.**

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## **Policy 35 – Countryside Access**

### **Summary of Key Issue**

- Whether an additional paragraph should be added to the reasoned justification for Policy 35 to ensure that provision for countryside access would not result in detrimental impact on biodiversity.

### **Inspector’s Reasoning and Conclusions**

- 35.1 The County Council suggests that an additional paragraph should be added to the reasoned justification for Policy 35 to ensure that provision for countryside access would not result in detrimental impact on biodiversity.
- 35.2 I do not consider that it is appropriate to refer to the subject of biodiversity within Policy 35, as this issue is considered in other policies of the re-deposit plan. Sites identified as being of natural heritage value have been so designated through re-deposit Policies 4A, 4B and 4C. These policies ensure the protection, re-establishment, enhancement, and where appropriate, mitigation of Pendle’s natural heritage. Policy 4D also makes reference to development affecting undesignated sites which provide habitats for protected species, stating that English Heritage must be consulted in these circumstances.
- 35.3 However, the requirement for the submission of an ecological assessment has been omitted from Policy 4D. Consequently, I support the Council’s suggested Change No. 21 (CD 193) in response to this objection, which would result in a further paragraph being added to the reasoned justification for Policy 4D, to ensure an ecological assessment is submitted with any development proposal that would affect sites referenced within Policy 4D. In this way, I consider that the spirit of the objection is met.

### **RECOMMENDATION (binding)**

- 35.4 **I RECOMMEND that the plan be modified by adding an additional paragraph at the end of the reasoned justification for Policy 4D which would read:**

**An ecological assessment will be required for any development proposal affecting sites defined within Policy 4D. The assessment should also detail the appropriate mitigation and compensation measures to account for any loss to these sites.**

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## **Policy 36 – Leeds-Liverpool Canal Corridor**

### **A. Objections to Policy Wording and Approach**

#### **Summary of Key Issues**

- Whether Policy 36 should acknowledge the importance of the Leeds and Liverpool Canal Corridor as an important ecological asset.
- Whether an additional paragraph should be added to the reasoned justification for Policy 36 to ensure that development proposals concerning the Leeds and Liverpool Canal Corridor have no detrimental impact on biodiversity.

#### **Inspector’s Reasoning and Conclusions**

- 36.1 The Leeds and Liverpool Canal is identified as a Biological Heritage Site (BHS) and as a site of Local Natural Importance (LNI) under Policy 4C of the re-deposit plan. This policy affords protection to the Canal as an ecological asset. Policy 36 of the re-deposit plan indirectly supports the ecological conservation and enhancement of the Canal Corridor by supporting the initiatives contained in the Leeds and Liverpool Canal Corridor Study (CD 101) and Pendle’s Canal Corridor Development Strategy (CD 102). In addition, Policy 4D of the re-deposit plan concerns wildlife corridors and it identifies the Canal as an example of such a wildlife corridor. As with all planning applications, any proposal would be judged against the whole development plan and its consideration would, therefore, take account of Policies 4C and 4D.
- 36.2 In response to an objection, the Council intends to identify the remaining unallocated sections of the Canal as sites of Local Natural Importance, under Policy 4C. Furthermore, in Chapters 4C and 35 of my report I have recommended that an additional paragraph should be added to the reasoned justification for Policies 4C and 4D that would require an ecological assessment to be submitted with any development proposal affecting sites defined within Policies 4C and 4D. I consider that this is the appropriate place for such a requirement, and I see no need to duplicate it in Policy 36. The objections have been conditionally withdrawn on the basis of these changes.

#### **RECOMMENDATION (binding)**

- 36.3 **I RECOMMEND that the plan be modified by adding to Table 2a – Environmental Protection Sites details of any further sections of the Leeds and Liverpool Canal Corridor that are**

**designated as sites of Local Natural Importance under Policy 4 before the plan is adopted.**

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## **B. Objections to Specific Sites**

### **Routes - Land between Yarnspinnners Wharf and Foulridge, omission site Y30**

#### **Summary of Key Issue**

- Whether the whole of the Leeds and Liverpool Canal Corridor from Yarnspinnners Wharf to Foulridge should be developed for tourism and should be environmentally protected.

#### **Inspector's Reasoning and Conclusions**

- 36.4 Omission site Y30 refers to the Leeds and Liverpool Canal Corridor, between Yarnspinnners Wharf in Nelson and Foulridge. This section runs north through the settlement of Nelson before passing into open countryside, which forms part of the Green Belt separating Colne from Nelson and Barrowford. It is 6.0 kilometres in length. In the re-deposit plan it is designated as predominantly Open Countryside and Green Belt outside the Settlement Boundary, but part falls within the Settlement Boundary for Nelson and the Housing Market Renewal Intervention Area. There are numerous Tree Preservation Orders protecting trees along the route of the canal. In addition, a number of listed buildings are located alongside or overlooking it.
- 36.5 An Objector requests that the whole of the area from Yarnspinnners Wharf to Foulridge is developed for tourism and environmentally protected. It is suggested that leisure usage on this section of the Canal should be further encouraged and developed, and that the area could become part of the proposed East Lancashire Regional Park.
- 36.6 The sites referred to in the reasoned justification for Policy 36 relate to a wider vision and strategy; Leeds and Liverpool Canal Corridor Study – Consultation Draft (CD 101) produced by British Waterways, which seeks to improve the entire length of the Canal in terms of social, economic and environmental regeneration. Policy 36 positively supports improvements to the Canal Corridor. Furthermore, Single Regeneration Budget (SRB6) funding has been secured to support improvements along the Canal in the wards of Brierfield, Whitefield and Bradley. In addition, the entire length of the Leeds and Liverpool Canal in Pendle is protected by an environmental designation in the re-deposit plan. Most is classified as a Biological Heritage Site (BHS) with the middle

section between motorway the M65 Junction 12 (Brierfield) and Barrowford Locks designated as a site of Local Natural Importance (LNI). Therefore, I consider that the environmental protection aspect of the objection is met by these designations.

36.7 Regarding encouragement of leisure usage of the Canal, improvements to cycling and walking environments are proposed through the Leeds and Liverpool Canal Corridor Study. Furthermore, an additional paragraph was included within the reasoned justification for Policy 30 at the re-deposit stage, which states that: 'In Pendle the canal towpath can afford opportunity for walking and cycling. Policy 36 supports improvements to the canal corridor in a bid to increase its attractiveness for amenity recreation and tourism.' I do not consider that further reference is needed also in Policy 36.

36.8 The East Lancashire Regional Park is an initiative that is funded through the Government's Single Regeneration Budget. The initiative is administered and promoted by the (East) Lancashire Partnership. By making reference to the East Lancashire Regional Park in Policy 37 of the re-deposit plan, I consider that the Council has acknowledged its support for this initiative.

36.9 However, the East Lancashire Regional Park is not a statutory designation and, as such, it is not shown on the Proposals Map. Nevertheless, the site is located within the East Lancashire Regional Park boundary and any development proposals that seek to develop its potential for tourism and recreation would be considered favourably, where they are in compliance with Policies 30, 35 and 36 of the re-deposit plan. On this basis, I consider that the objection is met.

#### **RECOMMENDATION (binding)**

36.10 **I RECOMMEND no modification to the plan in response to this objection.**

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## **Policy 37 – East Lancashire Regional Park**

### **A. Objections to Policy Wording and Approach**

#### **Summary of Key Issues**

- Whether the text of Policy 37 should be amended to stress that only environmentally sensitive proposals for development in the East Lancashire Regional Park will be permitted.
- Whether an additional paragraph should be added to the reasoned justification to Policy 37 to ensure that development in accordance with the policy would not have a detrimental impact upon biodiversity.

#### **Inspector’s Reasoning and Conclusions**

- 37.1 Policy 37 of the re-deposit plan only supports proposals for a country park/tourist centre, or to enhance the Canal Corridor for amenity, recreation and leisure, and increased countryside access. Furthermore, such development proposals must also comply with all other policies of the re-deposit plan, including the natural heritage Policies (4A, 4B, 4C and 4D) and Policy 3 - Green Belt, and PPG2 since the part of the Regional Park that is within Pendle is designated as Green Belt.
- 37.2 I am satisfied that this suite of policies provides sufficient environmental protection to the area and consequently, I consider that it is unnecessary to alter Policy 37. For these reasons, I do not support the objection, which wishes it to be stressed in Policy 37 that only environmentally sensitive proposals for development in the East Lancashire Regional Park will be permitted.
- 37.3 With regards to the County Council’s request that an additional paragraph should be added to the reasoned justification to Policy 37, to ensure that development in accordance with the policy would not have a detrimental impact upon biodiversity, I have recommended in Chapter 35 of my report that an additional paragraph should be added to the reasoned justification for Policy 4D. This would require an ecological assessment to be submitted with any development proposal affecting sites referenced within Policy 4D. I consider that this is the appropriate place for such a requirement and I see no need to duplicate it in Policy 37. The objection has been conditionally withdrawn on the basis of this change.

## **RECOMMENDATION (binding)**

37.4 **I RECOMMEND no modification to the plan in response to these objections.**

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### **B. Objections to Specific Sites**

#### **COLNE (including COTTONTREE)**

##### **Land between Barrowford Road, Colne and Red Lane, omission site Y31**

###### **Summary of Key Issue**

- Whether the land between Barrowford Road, Colne and Red Lane, omission site Y31, should be included as part of the East Lancashire Regional Park, in order to link with the Leeds and Liverpool Canal Corridor, and to thereby promote tourism.

###### **Inspector's Reasoning and Conclusions**

37.5 The East Lancashire Regional Park is an initiative that is funded through the Government's Single Regeneration Budget. The initiative is administered and promoted by the (East) Lancashire Partnership and reference to the East Lancashire Regional Park in Policy 37 acknowledges the Council's support for this initiative.

37.6 The East Lancashire Regional Park is not a statutory designation. Therefore, it is not shown on the Proposals Map. However, the site mentioned by the Objector, which covers a large tract of open countryside, public parkland and playing fields immediately beyond the settlement boundary and comprises around 127.2 hectares, clearly falls within the East Lancashire Regional Park. Thus, any development proposals that seek to develop its potential for tourism and recreation would be considered favourably, if they are also in compliance with Policies 30, 35 and 36 of the re-deposit plan. Therefore, I do not consider that any amendment to the plan is necessary in response to the objection.

#### **NELSON**

##### **Gib Hill, omission site X22**

###### **Summary of Key Issue**

- Whether land at Gib Hill, omission site X22, should be allocated as a Country Park.

## Inspector's Reasoning and Conclusions

- 37.7 Omission site X22 comprises land at Gib Hill that extends to 12.44 hectares. It is situated to the south-east of Nelson. On the west, the site is bordered by residential properties. To the north it abuts two schools and to the east it opens out to open countryside. Part of the site comprises forestry plantations and part is used for grazing. Several public footpaths cross the site and it is used for informal recreation. In the adopted Pendle Local Plan the site lies outside the Settlement Boundary and it is designated as an Area of Special Landscape. However, at the first stage deposit the Settlement Boundary was amended to include the site and it was safeguarded for housing. These designations were retained at the re-deposit stage.
- 37.8 Over four hundred objections have been received to these designations at the first and re-deposit stages. In addition, further representations objecting to the designations were made in response to advertisement of this omission site. Some of the Objectors specifically request that the site is re-allocated as a Country Park.
- 37.9 In Chapter 17 of my report I consider the merits of the site as safeguarded land for replacement HMR development and I conclude, having regard to all of the considerations before me, including possible alternative use of the land as a Country Park, that its designations in the re-deposit plan are appropriate. I consider that the allocation of the land as a Country Park would conflict with the purpose of safeguarding the land for HMR housing. Therefore, I do not support these objections.

### RECOMMENDATION (binding)

- 37.10 **I RECOMMEND no modification to the plan in response to these objections.**

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## **Policy 38 - Telecommunications**

### **Summary of Key Issues**

- Whether criterion 1 of Policy 38 should be amended to inform that telecommunications development should also minimise impact on the settings of special places and will be inappropriate within the Green Belt, unless it can be clearly demonstrated that openness is maintained.
- Whether Policy 38 should be updated to include criteria, in line with statutory legislation.

### **Inspector's Reasoning and Conclusions**

- 38.1 An Objector requests that criterion 1 of Policy 38 is amended to inform that telecommunications development should, in addition to the considerations listed, also minimise impact on the settings of special places and will be inappropriate within the Green Belt, unless it can be clearly demonstrated that openness is maintained.
- 38.2 However, PPG8 indicates that some minor telecommunications development is permitted by the GPDO. Proposals which are not permitted under the GPDO are, as stated in paragraph 42 of PPG8, subject to development control and, as with all planning applications, will be considered against the policies of the development plan.
- 38.3 Applications are also always judged against national policy. I consider that it is unnecessary for Policy 38 of the re-deposit plan to repeat national guidance. Furthermore, the settings of buildings of special architectural or historic interest are protected by Policy 9 - Buildings of Special Architectural or Historic Interest, of the re-deposit plan. I consider that it is unnecessary to repeat this policy requirement in Policy 38.
- 38.4 With regards to telecommunications development in the Green Belt, Paragraph 65 of PPG8 explicitly states that such development is likely to be inappropriate unless it maintains openness. Policy 3 - Green Belt of the re-deposit plan informs that inappropriate development will not be permitted in the Green Belt. Therefore, I consider that it is unnecessary to repeat this policy requirement in Policy 38.
- 38.5 Turning now to consider other criteria suggested by an Objector, concerning the need for the developer to specify how a proposed development fits into the network or system, paragraph 8 of PPG8 states that authorities should not question the need for the

telecommunications system which the proposed development is to support.

- 38.6 With regards to the need for applicants to assure that International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines are met, paragraph 99 of PPG8 informs that all planning applications should include a statement that self-certifies that the mobile phone base station will meet the ICNIRP guidelines, when operational. The Council, therefore, suggests that an additional paragraph should be added to the end of the text of Policy 38, to specify this requirement, in accordance with suggested Change No. 88 (CD 193). I support this Change, which would in my opinion, bring the policy in line with PPG8 in this regard, and would partly overcome the objection.
- 38.7 Concerning the need for the developer to demonstrate why a new mast is preferred to sharing or enhancing an existing mast or structure, the policy text of Policy 38 of the re-deposit plan states that proposals for new telecommunications development should, in the first instance, seek to share an existing mast or site. This is further emphasised in the reasoned justification of the re-deposit policy, which informs that any proposal must demonstrate that the applicant has explored the possibility of erecting antennas on an existing mast, or sharing an existing site. This is further explained in the Council's Supplementary Planning Guidance: Guidelines for the Control of Telecommunications Equipment (CD 120), which includes a list of existing masts and identifies those suitable for sharing.
- 38.8 I consider that these references overcome part of an objection. However, I note that a first stage deposit footnote on page 109 of the plan has inadvertently been retained. To avoid confusion, it should be deleted in accordance with the Council's suggested Change No. 90 (CD 193).
- 38.9 The Council agrees with the Objector that reference should be made to the Code of Best Practice on Mobile Phone Network Development and it suggests that the reasoned justification for Policy 38 should be reworded from; 'any proposal must be in line with the Council's Supplementary Planning Guidance' to; 'any proposal must be in line with the Council's Supplementary Planning Guidance and should have regard to the guidance contained in the Government's Code of Best Practice on Mobile Phone Network Development', as set out in suggested Change No. 89 (CD 193). In my opinion, this change would improve the clarity of the policy and it would meet part of an objection to it.
- 38.10 Paragraph 64 of PPG8 gives high priority to the need to protect environmental designations. This is also reflected the re-deposit

text of Policy 38. Therefore, I consider that this aspect of the objection is also met.

**RECOMMENDATIONS (binding)**

- 38.11 **I RECOMMEND that the plan be modified by adding a final paragraph to the text of Policy 38, which would read:**

**Applicants will be required to submit a statement with their proposal which self-certifies that ICNIRP guidelines will be met; this must cover the whole installation.**

- 38.12 **I RECOMMEND that the plan be modified by adding a footnote to the acronym ICNIRP where it is used in the text of Policy 38. The footnote should read:**

**ICNIRP – International Commission on Non-Ionizing Radiation Protection. Guidance on this can be found in Planning Policy Guidance Note 8 (PPG8): Telecommunications.**

- 38.13 **I RECOMMEND that the plan be modified by re-wording the first sentence of the first paragraph of the reasoned justification of Policy 38 so that it would read:**

**Any proposal must be in line with the Council's Supplementary Planning Guidance 76 and should have regard to the guidance contained in the Government's Code of Best Practice on Mobile Phone Network Development.**

- 38.14 **I RECOMMEND that the plan be modified by deleting the first footnote 75 on page 109 of the written statement.**

- 38.15 **I RECOMMEND no further modification to the plan in response to these objections.**

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## **Policy 39 – Equestrian Development**

There are no outstanding duly made objections to this policy, consequently I make no recommendation.

## **Policy 40 - Tourism**

### **A. Objections to Policy Wording and Approach**

#### **Summary of Key Issues**

- Whether reference should be made in Policy 40 to the need for new tourist development to be of an appropriate scale to meet an identified regeneration need, and to be located where the infrastructure and the environment can accommodate the visitor impact.
- Whether Policy 40 should promote the provision of a major hotel development.
- Whether Policy 40 should clarify that all large scale visitor attractions must be conveniently accessible by public transport.
- Whether Policy 40 should clarify what will be regarded as 'appropriate locations' for tourism facilities.
- Whether reference to Country Parks in Policy 40 should acknowledge the need for them to be accessible by public transport.

#### **Inspector's Reasoning and Conclusions**

- 40.1 The County Council's objections to Policy 40, made at both the first and re-deposit stages, raise several issues. In response, the policy text was re-written and the reasoned justification was substantially amended at the re-deposit stage.
- 40.2 Policy 40, in the re-deposit plan states that tourism development in villages and rural areas should be of an 'appropriate scale'. It makes reference to and defines major hotel development. Appropriate locations for hotel, B&B and self catering accommodation and touring caravan/tent sites have also been defined within the policy. It defines 'appropriate scale' in terms of cross referencing Policy 40 to other policies in the plan that refer to and define 'appropriate scale'.
- 40.3 However, in order to clarify that tourist facilities provided in rural areas should assist rural regeneration and be located where the infrastructure and the environment can accommodate the visitor impact, the Council suggests that an additional sub-criterion d) should be inserted under criterion 2 of the policy in accordance with suggested Change No. 91 (CD 193). I consider that this suggested Change adds clarity to the criteria that apply to tourism

development outside the urban area. The objection was conditionally withdrawn on its basis.

- 40.4 I do not consider that it is necessary for Policy 40 to make explicit that large scale visitor attractions must be accessible by public transport, because the policy sets out a sequential approach for the location of tourist facilities that is based on considerations of accessibility.
- 40.5 In particular, the site selection of major hotel developments, which are defined in the policy as containing at least 40 bedrooms, is subject to a sequential test, which requires them to be located, in order of priority; within a town centre, where good transport links already exist; on the edge-of-centre, where transport links should be reasonably established and finally elsewhere within the settlement boundary; in this instance making specific reference to the importance of accessibility by public transport.
- 40.6 Where a major hotel development meets the requirements of this sequential test, the Local Transport Plan will also be a consideration in any planning decision and may signify the need for improvements to public transport.
- 40.7 Policy 40 in the re-deposit plan also permits the provision of a major hotel as part of the development of a Country Park, on land at Lake Burwain to the north of Colne, as identified in Policy 37 - East Lancashire Regional Park. I consider that this provides the potential for adequate hotel development throughout the Borough. In addition to fronting the development of the East Lancashire Regional Park in Pendle, it would offer relatively easy access to all the employment sites within the Borough. In addition, this proposed hotel location would complement the existing premier hotel in the area, the Oaks Hotel, which is situated at the southern end of the Borough, south of Brierfield.
- 40.8 Policy 40 generally only supports developments of an 'appropriate scale' in villages and rural areas. The only exception is for proposals within the designated Country Park to the north of Colne. This site is well served by public transport. Furthermore, since Policy 19 of the JLSP informs that large scale visitor attractions must be conveniently accessible by public transport, I consider that it is unnecessary to reiterate this requirement in Policy 40.

#### **RECOMMENDATIONS (binding)**

- 40.9 **I RECOMMEND that the plan be modified by inserting a sub-criterion d) under criterion 2 of Policy 40, which reads:**

**AND**

**d) Assist rural regeneration in a location where the environment and the transport and utility infrastructure can accommodate the visitor impact.**

40.10 **I RECOMMEND no further modification to the plan in response to these objections.**

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## **B. Objections to Specific Sites**

### **COLNE (including COTTONTREE)**

#### **Land at Barrowford Road, omission site X31**

##### **Summary of Key Issue**

- Whether land at Barrowford Road, omission site X31 should be designated for hotel/leisure development.

##### **Inspector's Reasoning and Conclusions**

40.11 Omission site X31 comprises around 23.0 hectares of open farmland situated on the eastern edge of Colne. I saw that it is attractive countryside bisected by Wanless Water. Part of its eastern boundary abuts part of the proposed route of the A56 Village Bypass. The site is allocated in the adopted Pendle Local Plan as Green Belt and as a Special Landscape Area. In the re-deposit plan it is designated as Green Belt beyond the Settlement Boundary and within the Open Countryside.

40.12 An Objector considers that Policy 40 should identify a site, which allows for a substantial hotel or leisure development to boost tourism and suggests that the site at Barrowford Road in Colne, which is identified in the 'Cambridge Study' (CD 78) as being suitable for employment use, could alternatively be designated for hotel/leisure development.

40.13 I conclude in Chapter 23 of my report that the Council can demonstrate that it has an adequate supply of new employment land to meet the 40.0 hectares of land required by the JLSP, up to 2016. Therefore, there is no need to allocate the site for employment purposes. In Chapter 3 of my report, I conclude that its Green Belt designation is apt; thus a hotel/leisure development would amount to inappropriate development. Consequently, I do not support the Objector's suggestion that the omission site should be allocated for hotel development

40.14 Furthermore, large hotels with at least 40 bedrooms are permitted under Policy 40, provided that they comply with the sequential test, which I refer to in part A of this Chapter of my report. Provision for the development of a new hotel is also enabled through Policy 37 - East Lancashire Regional Park, where it forms part of a wider development scheme associated with the creation of a new Country Park in Pendle.

40.15 In my opinion, this approach provides sufficient flexibility to allow for adequate hotel development throughout the Borough. I do not consider that it is necessary to allocate a specific site for this purpose, which would imply a more restrictive approach to hotel development.

**RECOMMENDATION (binding)**

40.16 **I RECOMMEND no modification to the plan in response to this objection.**

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## **Appendix 1 – Section 106 Agreements**

### **Summary of Key Issues**

- Whether Appendix 1 should either include reference to a Biodiversity/Nature Conservation Fund or alternatively, refer to those considerations in the explanation of the Open Space Fund.
- Whether Appendix 1 should include a reference to the draft SPG 'Landscape and Heritage' for planning obligations, to the 'no net loss' approach, and to the delivery of the UK and Lancashire BAP objectives through development control.
- Whether the explanation of the Open Space Fund should also contain a guideline figure for maintenance that can be index-linked and easily kept up-to-date.
- Whether a working mechanism needs to be defined for the Traffic Calming Fund and Public Transport Improvement Fund referred to in Appendix 1.

### **Inspector's Reasoning and Conclusions**

- 41.1 In response to objections made at the first stage deposit, Appendix 1 of the re-deposit plan has been amended to state that the Open Space Fund will be used to make new provision, and to enhance and maintain existing open space. It also states that this could include works to benefit biodiversity such as where an application site is in close proximity to a known biodiversity site, by the creation of new habitats in new or existing open space, by changes in land management to benefit wildlife, procurement of land that would enhance wildlife corridors, and/or by contributing to Local Nature Reserve provision. I consider that this amendment has met these objections; that of the Lancashire Wildlife Trust has been conditionally withdrawn on its basis.
- 41.2 I have no reason to dispute the Council's opinion that any direct relationship between an application and an obligation upon the developer to provide funds for the creation and enhancement of biodiversity will be infrequent. Consequently, I do not consider that it would be appropriate to create a fifth category in Appendix 1 that would refer specifically to Biodiversity/Nature Conservation considerations. I consider that this matter is best highlighted within the Open Space Fund explanation. In this way, any required contributions can be dealt with as part of any planning application, if deemed necessary. Indeed Policies 4B, 4C and 4D of the re-deposit plan, which all deal with nature conservation and biodiversity, refer to the need for a planning obligation where

development would result in a need to provide mitigation and compensation, in order to achieve a 'no net loss' approach.

- 41.3 The SPG – 'landscape and heritage' (CD 122), which is referred to by an Objector, is a County Council publication. I do not consider that reference to it in Appendix 1 would be appropriate. However, it is included in the List of Supplementary Planning Guidance in Appendix 3 of the re-deposit plan.
- 41.4 The Open Space Fund referred to Appendix 1 of the re-deposit plan applies to the provision of open space in new housing development, in connection with Policy 21 - Provision of Open Space in New Housing Development. It states that a figure in the range of £1,000 - £1,200 per house constructed will be required. In addition, Appendix 1 informs that the developer is also required to make a commuted sum payment to guarantee the future maintenance of the open space for ten years after the development is completed. This will be set by the Council's Parks, Cemeteries and Outdoor Recreation Department, which will take on the maintenance of this land.
- 41.5 The Objector wishes details of this maintenance figure, which should preferably be index-linked so that it is kept up-to-date, to be included in the plan, in order that developers are aware, at an early stage, of all the likely costs of a proposed development.
- 41.6 I consider that this request is reasonable in principle, but I acknowledge that the actual maintenance figures for such open space should be set on a site-by-site basis. Also, that discussion should take place with the Parks, Cemeteries and Outdoor Recreation Department, or through the relevant Development Control Officer at the pre-application or application stage. Therefore, on balance, I do not recommend that the plan is modified in response to this objection.
- 41.7 The County Council considers that a working mechanism needs to be defined for the Traffic Calming Fund and the Public Transport Improvement Fund. It also points out that it should be advised when contributions need to be made, or have been made.
- 41.8 Appendix 1 of the re-deposit plan stipulates as and when contributions will be sought for both the Traffic Calming Fund and the Public Transport Improvement Fund. Specifically for the Public Transport Improvement Fund, it states that: 'The required funds will be negotiated with Lancashire County Council and will be administered by them as the Public Transport Co-ordinating Authority'. Similarly, the explanation of the Traffic Calming Fund informs that; 'the level of money to be contributed will be negotiated with the Highway Authority'.

41.9 I consider that these references to the involvement of the County Council are sufficient to establish an appropriate working mechanism between the Borough Council and the County Council. In my opinion, the Local Plan is not the place to deal with the administration of these funds. I consider that this should be achieved through discussions between Pendle Borough Council and Lancashire County Council. I note that this objection has been conditionally withdrawn.

**RECOMMENDATION (binding)**

41.10 **I RECOMMEND no modification to the plan in response to these objections.**

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## **Appendix 2 – Car & Cycle Parking Standards**

### **Summary of Key Issue**

- Whether the standards for non-food retail set out in Appendix 2 at Table A: Parking Standards are overly restrictive and out of line with PPG13.

### **Inspector's Reasoning and Conclusions**

- 42.1 The parking standards detailed in Appendix 2 have been derived through standards set by the JLSP. For example, whilst PPG13 sets out parking standards for non-food retailing at 1 space per 20 m<sup>2</sup>, it goes on to state that local planning authorities may adopt more rigorous standards where appropriate.
- 42.2 The Council's maximum parking standards are in line with those of the JLSP, which includes the application of an accessibility reduction built into the standards. This allows for car parking to be reduced by 5 – 15% in areas of medium, and 15-35% for areas of high accessibility. The standards also apply different parking requirements to different levels of centre, as identified in the JLSP. No specific details have been provided by the Objector to justify a reduction of the parking requirement for non-food retail development. For these reasons, I do not support the objection.

### **RECOMMENDATION (binding)**

- 42.3 **I RECOMMEND no modification to the plan in response to this objection.**

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## **Appendix 3 – Supplementary Planning Guidance/ Supplementary Planning Documents/Development Plan Documents and Other Documents**

### **Summary of Key Issue**

- Whether the Council should produce Supplementary Planning Guidance for biodiversity and nature conservation considerations.

### **Inspector's Reasoning and Conclusions**

43.1 Objection is made on the basis that Appendix 3 does not include Supplementary Planning Guidance (SPG) for Biodiversity and Nature Conservation considerations. It is considered that the production of such SPG, which should include guidelines for the enhancement of existing sites of value, site management, creation of new habitats, delivery of biodiversity action plans for habitats and species, accessible natural greenspace standards, wildlife corridors, ecological networks and an ecological framework, would help to support Policy ER5 of the RSS.

43.2 However, I consider that it is beyond the remit of this Local Plan review to undertake and commit to the preparation of new Supplementary Planning Guidance. The new planning system requires that a Local Development Scheme is produced, which outlines the various planning documents, including Supplementary Planning Documents (SPD), that the local planning authority will undertake. The request for new SPDs to be produced should be pursued through this process. Furthermore, Policy 4D of the re-deposit plan provides a policy for biodiversity, which deals with a number of the issues raised by the Objector. I note that the objection has been conditionally withdrawn.

### **RECOMMENDATION (binding)**

43.3 **I RECOMMEND no modification to the plan in response to this objection.**

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## **Appendix 4 – Glossary and Abbreviations**

### **Summary of Key Issues**

- Whether Appendix 4 - Glossary and Abbreviations should include definition of the following terms: (1) Accessible Natural Greenspace Standards, (2) Biodiversity Action Plan, (3) Geological Heritage Sites/Regionally Important Geological and Geomorphological Sites, (4) Local Nature Reserves, (5) Special Areas for Conservation and (6) Special Protection Areas.
- Whether the definition of Biological Heritage Sites given in Appendix 4 - Glossary and Abbreviations should state that they are sites of at least county importance and that they are identified by the BHS Partnership, which comprises Lancashire County Council, the Lancashire Wildlife Trust and English Nature (Cheshire to Lancashire Team).
- Whether the term 'Accessibility Corridor' should be defined in Appendix 4 - Glossary and Abbreviations.
- Whether a reference to Planning Policy Statements should be made in Appendix 4 - Glossary and Abbreviations.

### **Inspector's Reasoning and Conclusions**

- 44.1 The plan does not make reference to Accessible Natural Greenspace Standards; therefore, I see no need to provide a definition in Appendix 4 in the re-deposit plan. However, it includes definitions of the following terms: (1) Biodiversity Action Plan (UK), (2) Biodiversity Action Plan (Lancashire), (3) Geological Heritage Sites/Regionally Important Geological and Geomorphological Sites, (4) Local Nature Reserves, (5) Special Areas for Conservation and (6) Special Protection Areas. I consider that these re-deposit additions mainly overcome the objection, which has been conditionally withdrawn.
- 44.2 The definition of Biological Heritage Sites given in Appendix 4 of the re-deposit plan reads: 'A schedule of non-statutory sites of acknowledged county or regional nature conservation value, identified by the BHS Partnership, which comprises Lancashire County Council, the Wildlife Trust (in Lancashire) and English Nature (Cheshire to Lancashire Team).' I consider that this re-deposit change overcomes the objection, which has been conditionally withdrawn.

- 44.3 The County Council requests that the term 'Accessibility Corridor' should be defined in Appendix 4 - Glossary and Abbreviations. In response to this re-deposit objection, the Council suggests the inclusion of a reference to 'Accessibility Corridors' within the Glossary, in line with that outlined in the JLSP on page 106, and in accordance with suggested Change No. 92 (CD 193). I endorse this suggested Change, which I consider would add to the clarity of the plan, and which would overcome the objection that has been conditionally withdrawn on its basis.
- 44.4 The County Council requests that reference to the term, 'Planning Policy Statements', should be defined in Appendix 4 - Glossary and Abbreviations. In response to this re-deposit objection, the Council suggests the inclusion of such a reference, in accordance with suggested Change No. 93 (CD 193). I support this suggested Change, which I consider would add to the clarity of the plan and which would overcome the objection that has been conditionally withdrawn on its basis.

#### **RECOMMENDATIONS (binding)**

- 44.5 **I RECOMMEND that the plan be modified by adding a definition of Accessibility Corridors in Appendix 4-Glossary and Abbreviations, which reads:**

**Accessibility Corridors - As a minimum this should consist of a bus corridor with at least a 15 minute frequency during week-days and half-hourly during evenings and weekends. Such corridors should be designated to "Quality Bus" standard and be served by routes to two or more transport hubs. Developments should be located within a maximum of 400 metres and preferably 300 metres walking distance from a bus stop on such a route.**

- 44.6 **I RECOMMEND that the plan be modified by adding a reference to Planning Policy Statements in Appendix 4-Glossary and Abbreviations, which reads:**

**Planning Policy Statements - Previously known as Planning Policy Guidance Notes (PPGs), Planning Policy Statements (PPSs) are prepared by the Government, after public consultation, to explain statutory provisions and to provide guidance to local authorities and others on planning policy and the operation of the planning system. PPSs also explain the relationship between planning policies and other policies which have an important bearing on issues of**

development and land use. PPSs are issued by the Office of the Deputy Prime Minister (ODPM) and local authorities must take their contents into account in preparing their development plans. PPSs are a material consideration in determining planning applications and appeals and they generally supersede development plan policies if they have been published at a later date. Advice is separated into accompanying documents so there is a clear distinction between policy and guidance.

44.7 I RECOMMEND no further modification to the plan in response to these objections.

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## **Appendix 5 - References**

There are no outstanding duly made objections to Appendix 5, consequently I make no recommendation.

## **Omissions**

### **A. Objections to Policy Wording and Approach**

#### **Summary of Key Issues**

- Whether the plan should contain a policy and an allocation for a new prison.
- Whether the plan should contain a policy for advertisements on listed buildings and in conservation areas.
- Whether the plan should contain a policy that seeks to protect, conserve and enhance wider local landscape distinctiveness and quality.
- Whether the Proposals Map should be updated to show all existing development and that with extant planning permission.
- Whether the plan should designate Greenberfield Lane as a Roman road.
- Whether the Proposals Map should be amended to reflect that the former railway track bed is protected for transport use by Policy 29.

#### **Inspector's Reasoning and Conclusions**

- 46.1 An Objector states that a policy and an allocation for a new prison in Pendle should be included within the plan. In support of this objection, reference is made to Circular 03/98: Planning for Future Prison Development, which indicates that there is overcrowding within the prison estate in England and Wales, and it identifies the need to replace outdated and inadequate prison facilities. The Objector also states that more prison places are needed close to the population centres of Manchester and the Mersey area.
- 46.2 Whilst PPG12 advises at paragraph 4.14 that plans should make provision for various community facilities, including prisons, it also states, at paragraph 3.12 that too many site specific policies can lead to an inflexible and outdated plan that is in need of early replacement or alteration.
- 46.3 Site requirements for new prisons are highly specific and Circular 03/98 acknowledges that identification of possible sites for new prisons is neither a quick nor easy process. The Circular also refers to the objectives of sustainable development and the need to reduce unnecessary travel. It states that prisons should not be located too far from the centres of population that they are

intended to serve and that there should be reasonably good accessibility to public transport services.

- 46.4 The complexity of identifying a site clearly requires close working between the Prison Service and the Borough Council. To date, Pendle Borough Council has not been approached by Her Majesty's Prison Services for more detailed discussions about potential sites within the Borough. Having poor public transport links with Manchester and, in particular, Merseyside, it seems to me that the Borough would be badly placed to meet the needs identified by the Objector. Furthermore, the Council has not brought to my attention any sites in the Borough that would meet the site criteria of paragraph 9 of Circular 03/98. Nor has the Objector suggested a possible site.
- 46.5 Neither the RSS nor the JLSP refer to a need for new prison development. Thus, in the absence of a strategic policy framework or policy advice, and no detailed discussions with the Prison Service having taken place, I consider that it would be inappropriate for the re-deposit plan to identify a site for new prison development. For these reasons, I do not support the objection.
- 46.6 Concerning an objection which states that a policy is required to cover advertisements on listed buildings and those in conservation areas, Planning Policy Guidance Note 19: Outdoor Advertisement Control (PPG19) provides guidance on the control of advertisements in conservation areas and on or around listed buildings. I do not consider that there is any reason to repeat this information within the re-deposit plan. Therefore, I do not support the objection.
- 46.7 With regards to a request that the plan should contain a policy to protect, conserve and enhance wider local landscape distinctiveness and quality, I consider that would be an unnecessary duplication of Policy 1 - Development in the Open Countryside, Policies 4A - 4D - Natural Heritage, Policy 9 - Buildings of Special Architectural or Historic Interest, Policy 10 - Areas of Special Architectural or Historic Interest and the Council's Supplementary Planning Guidance: Development in the Open Countryside (CD 107). I consider that this suite of policies provide sufficient protection for landscape character, therefore, I do not support the objection.
- 46.8 Barnoldswick Town Council is concerned that the Proposals Map is considerably out of date and fails to show a number of new existing and planned housing developments. However, with new development taking place all the time, the Proposals Map is inevitably out-of-date as soon as it is printed. But since the main purpose of the Proposals Map is to guide future development, rather than to simply reflect current land-uses, I do not consider this to be a flaw of the plan.

- 46.9 Nevertheless, at the time the re-deposit plan was put on deposit for public consultation, the Proposals Map was based on the latest Ordnance Survey Landline Map data at the Council's disposal. It is intended by the Council that when the plan is finally adopted, the Proposals Map will be updated to reflect the latest published information available to it.
- 46.10 Regarding Barnoldswick Town Council's request that Greenberfield Lane should be designated as a Roman Road, the Roman Road from Ribchester to Elslack in North Yorkshire is generally well marked on Ordnance Survey maps of the area. The nearest annotation to Greenberfield Lane is provided on Brogden Lane, immediately to the west, where the Roman Road deviates slightly from the metalled road surface. As the route of the Roman Road follows the metalled surface of Brogden Lane/Greenberfield Lane to the east of this point, there are no further annotations on the Ordnance Survey base map used for the Proposals Map. For these reasons, I do not consider that these objections warrant amendment to the plan.
- 46.11 Concerning an objection by the County Council that the Proposals Map should be updated to reflect the revisions made to Policy 29 - Creating an Improved Transport Network, the Proposals Map issued with the re-deposit plan was the same as that used for the first stage deposit plan. This was stated in the accompanying documentation. However, one of the accompanying booklets illustrates the proposed changes to the first stage deposit Proposals Map. Map Change No.35 clearly shows that the former rail corridor through Earby is designated as protected route for transport use in the re-deposit plan. Therefore, I consider that the objection is met.
- 46.12 However, I note that in the Key to the proposed Map Changes reference to, the 'Proposed route of A56 Villages Bypass' has not been deleted. To avoid confusion, this reference should be removed from the key of the adopted Proposals Map, in accordance with suggested Change No. 98 (CD 193).

#### **RECOMMENDATIONS (binding)**

- 46.13 I **RECOMMEND** that the plan **be modified** by deleting reference to the 'Proposed route of A56 Villages Bypass' from Policy 29 key text.
- 46.14 I **RECOMMEND** **no further modification** to the plan in response to these objections.

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## **B. Objection to a Specific Site**

### **NELSON**

#### **Reedyford Mill, Chatham Street, omission site X76**

##### **Summary of Key Issue**

- Whether land at Reedyford Mill, omission site X76, should be allocated as a mixed-use area for redevelopment to create a gateway to the town centre and/or to encourage comprehensive development of the site in association with other canal-side opportunities.

##### **Inspector's Reasoning and Conclusions**

46.15 Reedyford Mill is located on Chatham Street in Nelson. It is one of a group of former cotton mills that lined the banks of the Leeds and Liverpool Canal. It is situated 0.5 kilometre south of Nelson town centre and is 2.48 hectares in area. It comprises a large, multi-storey building along Chatham Street with extensive north light sheds between this and the Leeds and Liverpool Canal. The premises are in employment use.

46.16 In the adopted Pendle Local Plan the site is allocated as an Essential Employment Area and within the Settlement Boundary for Nelson. In both the first and re-deposit stage plans it is shown to be within the Market Renewal Intervention Area and the Settlement Boundary for Nelson.

46.17 The lack of allocation of the site is objected to, because it is considered by the Objector that the site has considerable potential for redevelopment and enhancement as part of the overall regeneration of Nelson. It is thought to be an important gateway site that is suitable for mixed-use development that would add to the vitality of and could link with Nelson town centre. It is thought that this would also give rise to a wide range of benefits, in line with PPS6.

46.18 I saw that Reedyford Mill remains in operational use. I recognise that there are some constraints to its access, but I nevertheless consider that it is suitable for providing opportunities for local employment. In my opinion, it occupies an out-of-centre location that is, nonetheless situated in a key gateway position, which together with its canal-side position provides an obvious opportunity for redevelopment for a variety of uses. However, if retail development were proposed, the guidance of PPS6 would require the application of a sequential approach and the demonstration of 'need' for such development.

46.19 I do not consider that the lack of a designation of the land prevents redevelopment of the site for a variety of suitable uses. In my opinion, it allows any proposals to be considered on their individual merits, through the development control process. I think that the criteria based policies of the re-deposit plan, and the absence of a specific allocation provide an appropriate context and suitable flexibility to enable proposals for the redevelopment of the site to be properly assessed. In my opinion, there is no need to provide a specific policy for this site. To do so could either stifle imaginative opportunities or would be unacceptably vague.

46.20 I consider that a policy that sought to allocate land for redevelopment for a wide range of 'appropriate' uses would fail to provide this certainty and would, therefore, be contrary to Government guidance. On this basis, I do not recommend the allocation of land at Reedyford Mill for specific or unspecified mixed-use development.

#### **RECOMMENDATION (binding)**

46.21 **I RECOMMEND no modification to the plan in response to this objection.**

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## **General Representations**

### **Summary of Key Issue**

- Whether the plan should contain guidelines by which the merits of sites included as sites of Local Natural Importance can be judged.

(Other General Representations to the Policy Wording and Approach are considered in the Introduction and Strategy Chapter of my report).

### **Inspector's Reasoning and Conclusions**

47.1 The reasoned justification of Policy 4C of the re-deposit plan makes reference to the Draft Guidelines for Important Wildlife Sites in Pendle (CD 129), which were prepared by the Lancashire Wildlife Trust. These guidelines will be used by the Council to assess any new sites put forward for designation. I consider that this overcomes the objection, which has been conditionally withdrawn.

### **RECOMMENDATION (binding)**

47.2 **I RECOMMEND no modification to the plan in response to this objection.**

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**BOROUGH OF PENDLE**

**REPORT OF PUBLIC LOCAL INQUIRY INTO  
OBJECTIONS TO THE  
PENDLE LOCAL PLAN – REVIEW**

**ANNEXES**

- A Inquiry Programme**
- B List of Appearances**
- C Schedules of Representations and Documents**
- D Inquiry Core Documents**

**ANNEX A**  
**INQUIRY PROGRAMME**

Tuesday 27th September (Week 1)	
Time	
10:00	Inquiry Opens
11:00	Employment Round Table Session

Wednesday 28th September (Week 1)	
No hearing sessions	

Thursday 29th September (Week 1)	
Time	
09:30	Housing Land Supply and Safeguarded Land for Housing Round Table Session

Friday 30th September (Week 1)	
No hearing sessions	

Monday 3rd October (Week 2)	
No hearing sessions	

Tuesday 4th October (Week 2)	
No hearing sessions	

Wednesday 5th October (Week 2)								
Time	Personal Rep. No.	Objection Number	Chapter	Name	Agent	Stage	Site	Hearing Type & Length
09:30	R104	O155	STR	Byrne		1st Stage Deposit		INFORMAL (1 hour)

Thursday 6th October (Week 2)								
Time	Personal Rep. No.	Objection Number	Chapter	Name	Agent	Stage	Site	Hearing Type & Length
11:00	R015	O027	HOU	Penney (Waterside Community Network)		1st Stage Deposit		INFORMAL (2 hours)
	R010	O015	HOU	Penney (Pendle Environmental Network)		1st Stage Deposit		
14:00	R010	O941	ENV	Penney (Pendle Environmental Network)		1st Stage Deposit		INFORMAL (3 hours)
	R010	O012	ENV	Penney (Pendle Environmental Network)		1st Stage Deposit	Y02 Y03 Y04 X22	
	R010	O013	ENV	Penney (Pendle Environmental Network)		1st Stage Deposit	X22	
	R010	O628	ENV	Penney (Pendle Environmental Network)		1st Stage Deposit	X27	

Monday 10th October (Week 3)								
Time	Personal Rep. No.	Objection Number	Chapter	Name	Agent	Stage	Site	Hearing Type & Length
09:30	R080	O944	ENV	Slater		1st Stage Deposit		INFORMAL (2 hours)
	R080	O235	ENV	Slater		1st Stage Deposit	X22 X26 Y04	
	R080	O709	ENV	Slater		1st Stage Deposit	X22 X23 X30	
	R080	O238	ENV	Slater		1st Stage	X27	
14:00	R101	O147	ENV	Lord (Barrowford PC)		1st Stage	X16	INFORMAL (2 hours)
	R101	O703	ENV	Lord (Barrowford PC)		1st Stage		
	R101	O146	ENV	Lord (Barrowford PC)		1st Stage	X15	
	R101	O145	TRA	Lord (Barrowford PC)		1st Stage	X14	

Tuesday 11th October (Week 3)								
Time	Personal Rep. No.	Objection Number	Chapter	Name	Agent	Stage	Site	Hearing Type & Length
09:30	R518	O903	CRL	Bhatti		Re-deposit	X86	INFORMAL (2 hours)
11:45	R480	O713	ENV	Steele		Re-deposit	X80	INFORMAL (1 hour)

Wednesday 12th October (Week 3)								
Time	Personal Rep. No.	Objection Number	Chapter	Name	Agent	Stage	Site	Hearing Type & Length
10:00	R491	O732	STR	Persimmon Homes	MCP Planning	Re-deposit		FORMAL (All day)
	R491	O734	HOU	Persimmon Homes	MCP Planning	Re-deposit		
	R491	O735	HOU	Persimmon Homes	MCP Planning	Re-deposit		
	R491	O733	HOU	Persimmon Homes	MCP Planning	Re-deposit	X26 X27	

Thursday 13th October (Week 3)								
Time	Personal Rep. No.	Objection Number	Chapter	Name	Agent	Stage	Site	Hearing Type & Length
09:30	R510	O772	ENV	Maskell (Kelbrook & Sough PC)		Re-deposit	X82	INFORMAL (3 hours)
	R510	O779	ENV	Maskell (Kelbrook & Sough PC)		Re-deposit		
	R510	O777	EMP	Maskell (Kelbrook & Sough PC)		Re-deposit		
	R510	O775	EMP	Maskell (Kelbrook & Sough PC)		Re-deposit		
14:00	R519	O906	TCRD	Eshton Property Development Ltd.	Sanderson Weatherall	Re-deposit	X75	INFORMAL (3 hours)
	R519	O907	STR	Eshton Property Development Ltd.	Sanderson Weatherall	Re-deposit	X76	

Friday 14th October (Week 3)								
No hearing sessions								

Monday 24th October (Week 4)									
Time	Personal Rep. No.	Objection Number	Chapter	Name	Agent	Stage	Site	Hearing Type & Length	
10:00	R135	O701	HOU	R Metalwork Ltd.	The Planning & Development Network	1st Stage Deposit		FORMAL (4 hours)	
	R135	O702	HOU	R Metalwork Ltd.	The Planning & Development Network	1st Stage Deposit			
	R135	O222	HOU	R Metalwork Ltd.	The Planning & Development Network	1st Stage Deposit			
	R030	O721	HOU	Crown Way Homes	The Planning & Development Network	Re-deposit			
	R030	O046	HOU	Crown Way Homes	The Planning & Development Network	1st Stage Deposit	X28		
	R030	O938	HOU	Crown Way Homes	The Planning & Development Network	Re-deposit	X29		
14:30	R148 - R221, R229	O245 - O319	HOU	75 people	David Sutcliffe	1st Stage Deposit	Y04	INFORMAL (1 Hour) - Joint with Enville Properties  See above	
	R036	O720	ENV	Enville Properties Ltd.	The Planning & Development Network	Re-deposit	X35		
	R036	O054	HOU	Enville Properties Ltd.	The Planning & Development Network	1st Stage Deposit	X35		
15:45	R031	O047	ENV	HOODCO 441 Ltd.	The Planning & Development Network	1st Stage Deposit	X34	INFORMAL (1 Hour)	
	R031	O048	ENV	HOODCO 441 Ltd.	The Planning & Development Network	1st Stage Deposit	X32		
	R031	O049	HOU	HOODCO 441 Ltd.	The Planning & Development Network	1st Stage Deposit	X32 X34		

Tuesday 25th October (Week 4)									
Time	Personal Rep. No.	Objection Number	Chapter	Name	Agent	Stage	Site	Hearing Type & Length	
09:30	R296	O723	EMP	Peel Investments (North Ltd.)	Stoneleigh Planning	Re-deposit		FORMAL (All day)	
	R296	O739	EMP	Peel Investments (North Ltd.)	Stoneleigh Planning	Re-deposit	X11		
	R296	O737	ENV	Peel Investments (North Ltd.)	Stoneleigh Planning	Re-deposit	X11	Continue at 12 Noon 28/10/05 if needed	

**Wednesday 26th October (Week 4)**

Time	Personal Rep. No.	Objection Number	Chapter	Name	Agent	Stage	Site	Hearing Type & Length
09:30	R487	O726	EMP	LBS Group - Horticultural	The Planning & Development Network	Re-deposit	X82	FORMAL (3 hours)
	R052	O069	EMP	LBS Group - Walk Mill Office	The Planning & Development Network	1st Stage Deposit		

Thursday 27th October (Week 4)								
Time	Personal Rep. No.	Objection Number	Chapter	Name	Agent	Stage	Site	Hearing Type & Length
14:00	R484	O719	EMP	Kitchen (Howarths)	The Planning & Development Network	Re-deposit	X77	INFORMAL (1 hour)
15:00	R032	O050	ENV	Edith Butler Trust	The Planning & Development Network	1st Stage Deposit	X33	INFORMAL (1 hour)
	R032	O917	HOU	Edith Butler Trust	The Planning & Development Network	Re-deposit	X33	

Friday 28th October (Week 4)								
Time	Personal Rep. No.	Objection Number	Chapter	Name	Agent	Stage	Site	Hearing Type & Length
09:30	R490	O731	TRA	Ansar		Re-deposit		INFORMAL (1 hour)
12:00	R296	O737	ENV	Peel Investments	Stoneleigh	Re-deposit	X11	FORMAL -25/10/05

Monday 31st October (Week 5)									
Time	Personal Rep. No.	Objection Number	Chapter	Name	Agent	Stage	Site	Hearing Type & Length	
09:30	R512	O798	ENV		RAGE	Re-deposit	X22	INFORMAL (All day)	
	R512	O799	ENV		RAGE	Re-deposit	X22		
	R512	O800	ENV		RAGE	Re-deposit	X22		
	R517	O897	ENV	Plackett		Re-deposit	X22		
	R512	O790	ENV		RAGE	Re-deposit	X22		
	R517	O900	ENV	Plackett		Re-deposit	X22		
	R123	O213	HOU	Lee	RAGE	1st Stage	X22		
	R419	O490	HOU	Plackett	RAGE	1st Stage	X22		
	R420	O494	HOU	Leah	RAGE	1st Stage	X22		
	R512	O791	HOU		RAGE	Re-deposit	X22		
	R512	O796	HOU		RAGE	Re-deposit	X22		
	R512	O922	HOU	109 objections	RAGE	Re-deposit	X22		
	R512	O923	HOU	294 objections	RAGE	Re-deposit	X22		
	R419	O491	CRL	Plackett	RAGE	1st Stage	X22		
	R420	O495	CRL	Leah	RAGE	1st Stage	X22		
R512	O797	CRL		RAGE	Re-deposit	X22			

Tuesday 1st November (Week 5)									
Time	Personal Rep. No.	Objection Number	Chapter	Name	Agent	Stage	Site	Hearing Type & Length	
09:30	R419	O492	ENV	Plackett	RAGE	1st Stage	X23	INFORMAL (All day)	
	R420	O496	ENV	Leah	RAGE	1st Stage	X23		
	R512	O789	ENV		RAGE	Re-deposit	X78		
	R420	O691	HOU	Leah	RAGE	1st Stage			
	R419	O690	HOU	Plackett	RAGE	1st Stage			
	R420	O692	HOU	Leah	RAGE	1st Stage			
	R419	O766	HOU	Plackett	RAGE	Re-deposit			
	R419	O769	HOU	Plackett	RAGE	Re-deposit			
	R512	O793	HOU		RAGE	Re-deposit			
	R512	O792	HOU		RAGE	Re-deposit			
	R419	O768	HOU	Plackett	RAGE	Re-deposit			
	R512	O795	HOU		RAGE	Re-deposit			
	R419	O619	HOU	Plackett	RAGE	1st Stage	X19		
	R420	O618	HOU	Leah	RAGE	1st Stage	X19		
	R512	O794	HOU		RAGE	Re-deposit	X26		

Wednesday 2nd November (Week 5)								
Time	Personal Rep. No.	Objection Number	Chapter	Name	Agent	Stage	Site	Hearing Type & Length
14:00	R307	O891	ENV	Tennant		Re-deposit	X84	INFORMAL (3 hours)
	R307	O892	ENV	Tennant		Re-deposit	X84	
	R307	O888	ENV	Tennant		Re-deposit	X82	
	R307	O890	ENV	Tennant		Re-deposit	X82	
	R307	O886	EMP	Tennant		Re-deposit	X63	

Thursday 3rd November (Week 5)								
Time	Personal Rep. No.	Objection Number	Chapter	Name	Agent	Stage	Site	Hearing Type & Length
09:30	R513	O859	ENV	Gardner (Trawden Community Group)		Re-deposit		INFORMAL (1 hour)
	R513	O872	HOU	Gardner (Trawden Community Group)		Re-deposit		
	R513	O874	HOU	Gardner (Trawden Community Group)		Re-deposit		
14:00	R100	O139	ENV	Simpson		1st Stage	X16	INFORMAL (2 hours)
	R100	O141	ENV	Simpson		1st Stage		
	R100	O144	ENV	Simpson		1st Stage	X15	
	R100	O143	TRA	Simpson		1st Stage	X14	

Friday 4th November (Week 5)								
Time	Personal Rep. No.	Objection Number	Chapter	Name	Agent	Stage	Site	Hearing Type & Length
09:30	R476	O596	STR	Penney (SELRAP)		1st Stage		INFORMAL (3 hours)
	R476	O763	STR	Penney (SELRAP)		Re-deposit		
	R010	O016	STR	Penney (Pendle Environmental Network)		1st Stage Deposit	X69	
	R476	O622	STR	Penney (SELRAP)		1st Stage	Y18	
	R010	O629	ENV	Penney (Pendle Environmental Network)		1st Stage Deposit	X68	
	R476	O664	TRA	Penney (SELRAP)		1st Stage	X69	
	R476	O764	TRA	Penney (SELRAP)		Re-deposit	Y18	
	R476	O598	TRA	Penney (SELRAP)		1st Stage		
	R476	O668	TRA	Penney (SELRAP)		1st Stage		
	R476	O765	TRA	Penney (SELRAP)		Re-deposit		

Tuesday 8th November (Week 6)									
Time	Personal Rep. No.	Objection Number	Chapter	Name	Agent	Stage	Site	Hearing Type & Length	
09:30	R099	O762	ENV	Lamb (Lancashire Wildlife Trust)		Re-deposit		INFORMAL (All day)	
	R099	O712	ENV	Lamb (Lancashire Wildlife Trust)		Re-deposit			
	R099	O940	ENV	Lamb (Lancashire Wildlife Trust)		Re-deposit	X22 X27		
	R099	O135	HOU	Lamb (Lancashire Wildlife Trust)		1st Stage Deposit	X27		
	R099	O130	HOU	Lamb (Lancashire Wildlife Trust)		1st Stage Deposit			
	R099	O132	TRA	Lamb (Lancashire Wildlife Trust)		1st Stage Deposit	X69		
	R099	O131	CRL	Lamb (Lancashire Wildlife Trust)		1st Stage Deposit			

Wednesday 9th November Week 6)									
Time	Personal Rep. No.	Objection Number	Chapter	Name	Agent	Stage	Site	Hearing Type & Length	
09:30	R488	O729	ENV	Whipp		Re-deposit	X81	INFORMAL (1 hour)	
	R488	O728	CRL	Whipp		Re-deposit	X81		
10:45	R065	O084	ENV	Clancy		1st Stage Deposit		INFORMAL (2 hours)	
	R042	O059	ENV	Beck	John Clancy	1st Stage	X41		

Thursday 10th November (Week 6)									
Time	Personal Rep. No.	Objection Number	Chapter	Name	Agent	Stage	Site	Hearing Type & Length	
09:30	R504	O753	HOU	Akram		Re-deposit		INFORMAL (3 hours)	
14:00	R146	O240	HOU	Whittle		1st Stage	Y02		

Friday 11th November (Week 6)									
No hearing sessions									

## Annex B List of Appearances

**Tuesday 27<sup>th</sup> September 2005**

### **Employment RTS**

Name	Position in Organisation	Address	Professional Qualifications	Representing
John Willcock	Director	JWPC Ltd., Stanley House Lowergate Clitheroe, BB7 1AD.	BA, DipTP, MRTPI	Shayne Langstroth
Andrew Walker		Planning and Development Network Stanley House, Lowergate Clitheroe BB7 1AD	BA, FRICS, FRTPI	LBS Group
Ken Riley		Riley Metalwork 1 Crown Way Colne		Riley Metalwork
Chris Tennant		62 Red Lion Street Earby		
Phil Megson		Lancashire County Council Environment Directorate Guild House Preston PR1 8RD		Lancashire County Council
Pete Milward		Burnley Borough Council Planning Services PO Box 29 Parker Lane Offices Burnley BB11 2DT		Burnley Borough Council
Margaret Whewell		Burnley Borough Council		Burnley Borough Council
Alasdair Jones	Director	Stoneleigh Planning Kingsley House Leamington Spa CV32 4JG	BA, MRTPI	Peel Investments Ltd
Michael Cavannagh		Trevor Dawson 32 St James Street Burnley BB11 1NQ	BSc (Hons), MRTPI	Peel Investments Ltd

Michael Nuttall		Peel Investments (North) Ltd. Peel Dome Trafford Centre Manchester M17 8PL		Peel Investments Ltd
Paul Walton	Director	De Pol Associates Ltd 44 Garstang Road Preston PR1 1NA	MRTPI	Colhoun and Gaughran
John Halton	Principal Planning Officer		MIED MRTPI	Pendle Borough Council
Doug Hann	Associate	Indigo Planning Limited 23 King Street Manchester M2 6AN		Pendle BC
Tim Waring	Director	Indigo Planning Limited 23 King Street Manchester M2 6AN		Pendle BC
David Hardy	Advocate	Wibraham & Co. Trafalgar House 29 Prince street Leeds		Pendle BC

**Thursday 29<sup>th</sup> September 2005**

### **Housing RTS**

Name	Position in Organisation	Address	Professional Qualifications	Representing
David Penney	Secretary	Waterside Community Network 8 William Street Colne BB8 0HH	BA Hons. Dip. Theol.	Pendle Environmental Network
Andrew Walker		Planning and Development Network, Stanley House, Lowergate Clitheroe BB7 1AD	BA, FRICS, FRTPI	Crown Way Homes
Ken Riley		1 Crown Way Colne		Crown Way Homes
Chris Tennant		62 Red Lion Street Earby BB18 6RD		

John Plackett	Chairman	RAGE 71 Walton Lane Nelson BB9 8BG	BSc. Hons. PhD PGCE	RAGE
Andrew Ashworth		Bankfield House Briercliffe Avenue Colne	BSc. (Hons) MBA	RAGE
Margaret Whewell		Burnley Borough Council Planning Services PO Box 29 Parker Lane Burnley BB11 2DT		Burnley Borough Council
Alasdair Jones	Director	Stoneleigh Planning Kingsley House Leamington Spa CV32 4JG	BA, MRTPI	Peel Investments Ltd
Richard Purser	Senior Planner	MCP Planning Abbey House 32 Booth Street Manchester M2 4QP	BA (Hons) BPL MRTPI	Persimmon Homes
Alban Cassidy	Director of Planning and Environment	C + A Planning 7 East Cliff Preston PR1 3JE	BA (Hons) Cert Ecol. MSc MIEMA MRTPI	Mike Bhatti
Paul Walton	Director	De Pol Associates Ltd 44 Garstang Road Preston PR1 1NA	MRTPI	Colhoun and Gaughran
Pam Slater		26 Knotts Drive Colne BB8 8DH		
Julie Whittaker	HMR Coordinator			Pendle BC
Neil Watson	Planning Manager		BA (Hons) MA MRTPI	Pendle BC
Christine Douglas	Planning Policy Manager		BSc MTP MRTPI	Pendle BC

John Halton	Principal Planning Officer		MIED MRTPI	Pendle BC
Darren Tweed	Planning Officer			Pendle BC
David Hardy	Advocate	Wilbraham & Co. Trafalgar House 29 Prince Street Leeds		Pendle BC
Andrew Golland		Nottingham Trent University		Pendle BC
James Glynn		Entec UK Ltd		Pendle BC

**Wednesday 5<sup>th</sup> October 2005 (9.30 a.m.)**

**Objection References: R104/O155**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>W Byrne (104)</b>		131 Wheatley Lane Road Barrowford Nelson BB9 6QW		

**Council Represented By:**

Neil Watson	Planning Manager		BA (Hons) MA MRTPI	Pendle BC
Jonathen Dicken	Planning Officer			Pendle BC

Thursday 6<sup>th</sup> October 2005 (11.00 a.m.)

Objection References: R015/O027 (WCN)/R010/O015 (PEN)

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>D Penney (015)</b>	Secretary/ Vice Chair	8 William Street Colne BB8 0HH	BA (Hons) DIP Theol	Waterside Community Network
<b>D Penney (010)</b>	Treasurer	"		Pendle Environmen tal Network

**Council Represented by:**

Christine Douglas	Planning Policy Manager		BSc MTP MRTPI	Pendle BC
Darren Tweed	Planning Officer			Pendle BC

Thursday 6<sup>th</sup> October 2005 (14.00 p.m.)

Objection References: R010/O941/O012/O013/O628

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>D Penney (010)</b>	Treasurer	8 William Street Colne BB8 0HH	BA (Hons) DIP Theol	Pendle Environmen tal Network

**Council Represented By:**

Christine Douglas	Planning Policy Manager		BSc MTP MRTPI	Pendle BC
Darren Tweed	Planning Officer			Pendle BC

**Monday 10<sup>th</sup> October 2005 (9.30 a.m.)**

**Objection References: R080/O944/O235/O709/O238**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>Pam Slater (080)</b>		26 Knotts Drive Colne		

**Council Represented By:**

Neil Watson	Planning Manager		MRTPI	Pendle BC
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**Monday 10<sup>th</sup> October 2005 (14.00 p.m.)**

**Objection References: R101/O147/O703/O146/O145**

**Barrowford Parish Council represented by:**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>I Lord (101)</b>	Clerk to the Council	55 Gisburn Road Barrowford Nelson BB9 8ND		Barrowford Parish Council

**Council Represented By:**

John Halton	Principal Planning Officer		MRTPI	Pendle BC
Rosemary Lyons	Conservation Officer			Pendle BC

**Tuesday 11<sup>th</sup> October 2005 (9.30 a.m.)**

**Objection References: R518/O903  
CA Planning representing Mike Bhatti (518)**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>Mike Bhatti</b>	Owner – James Nelson	2 Layton Road Ashton-on-Ribble Preston PR2 1PB		
Alban Cassidy	Director of Planning and Environment	CA Planning 7 East Cliff Preston PR1 3JE	BA (Hons) Cert Ecol MRTPI MIEMA	M Bhatti

**Council Represented By:**

Christine Douglas	Planning Policy Manager		BSc MTP MRTPI	Pendle BC
Colin Patten	Parks & OR Manager			Pendle BC
Jonathan Dicken	Planning Officer			Pendle BC

**Tuesday 11<sup>th</sup> October 2005 (11.45 a.m.)**

**Objection References: R480/O713**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>J B Steele (480)</b>		Moorlands Manchester Road Barnoldswick		

**Council Represented By:**

Christine Douglas	Planning Policy Manager		BSc MTP MRTPI	Pendle BC
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Wednesday 12<sup>th</sup> October 2005

**Objection References: R491/O732/O734/O735/O733**

**MCP Planning on behalf of Persimmon Homes (491)**

**Represented by:**

Name	Address
<b>Roger Lancaster of Counsel</b>	King Street Chambers 40 King street Manchester M2 6BA

**He called:**

Name	Position in Organisation	Address	Professional Qualifications	Representing
Michael Watts	Director	MCP Planning Abbey House Booth Street Manchester	Dip URP MRTPI	Persimmon Homes

**Council Represented by:**

Name	Address
<b>David Hardy of Counsel</b>	Wilbraham & Co Trafalgar House 29 Prince Street Leeds

**He called:**

Name	Position in Organisation	Address	Professional Qualifications	Representing
Christine Douglas	Planning Policy Manager		BSc MTP MRTPI	Pendle BC

Thursday 13<sup>th</sup> October 2005 (9.30 a.m.)

**Objection References: R510/O772/O779/O777/O775  
Kelbrook & Sough Parish Council represented by:**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>Paul Maskell (510)</b>	Chair	Waterloo Road Kelbrook Barnoldswick BB18 6TY		Kelbrook & Sough PC
John Drury	Councillor	Hague House Kelbrook		Kelbrook & Sough PC

**Council Represented By:**

John Halton	Principal Planning Officer		MIED MRTPI	Pendle BC
Doug Hann	Associate	Indigo Planning Limited 23 King Street Manchester M2 6AN	BA (Hons) MTDL MSc MRTPI	Pendle BC

Thursday 13<sup>th</sup> October 2005 (14.00 p.m.)

**Objection References: R519/O906/O907  
Sanderson Weatherall on behalf of Eshton Property Development Ltd (519) represented by:**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>G Connell</b>	Director	Sanderson Weatherall 25 Wellington Street Leeds LS1 4WG	MRTPI	Eshton Property Development Ltd.
R Pierce	Senior Planner	Sanderson Weatherall 25 Wellington Street Leeds LS1 4WG	MRTPI	Eshton Property Development Ltd.

**Council Represented By:**

John Halton	Principal Planning Officer		MRTPI	Pendle BC
Christine Douglas	Planning Policy Manager		BSc MTP MRTPI	Pendle BC
Darren Tweed	Planning Officer			Pendle BC

**Monday 24<sup>th</sup> October 2005 (10.00 a.m.)**

**Objection References: R135/O701/O702/O222 & R030/O721/O046/O938**

**The Planning and Development Network on behalf of Riley Metalwork Ltd (135) and Crown Way Homes (030) represented by:**

Name	Address
<b>Martin Carter of Counsel</b>	King Street Chambers 40 King street Manchester M2 6BA

**He called:**

Name	Position in Organisation	Address	Professional Qualifications	Representing
Andrew Walker		Planning and Development Network, Stanley House, Lowergate Clitheroe BB7 1AD	BA, FRICS, FRTPI	Riley Metalworks Crown Way Homes
K A Riley	MD	R Metalwork/Crown Way Homes 1 Crown Way Colne		Riley Metalwork Crown Way Homes
A K Little	Director	Maro Developments Ltd Suite 10 Printworks Ribble Valley Enterprise Park Clitheroe BB7 9WA	MB Eng.	Riley Metalwork Crown Way Homes

**Council Represented by:**

Name	Address
<b>David Hardy of Counsel</b>	Wilbraham & Co Trafalgar House 29 Prince Street Leeds

**He called:**

Name	Position in Organisation	Address	Professional Qualifications	Representing
Neil Watson	Planning Manager		BA (Nons) MA MRTPI	Pendle BC

**Monday 24<sup>th</sup> October 2005 (14.30 p.m.)**

**Objection References: R148 -221/O245-0318/R229/O319/R036/O720/O054**

**David Sutcliffe representing 75 Objectors (148 – 221 & 229) and Enville Properties Ltd (036) represented by The Planning and Development Network**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>Andrew Walker</b>		Planning and Development Network, Stanley House, Lowergate Clitheroe BB7 1AD	BA, FRICS, FRTPI	Enville Properties
Ken Riley	MD	Crown Way Homes 1 Crown Way Colne		Enville Properties
Andrew Little	Director	MARO Development LTD Ribble Valley Enterprise Park Clitheroe BB7 9WA	MB Eng	Enville Properties
David Sutcliffe		22 The Meadows Colne	MA FRTPI	75 Residents

**Council Represented By:**

Neil Watson	Planning Manager		BA (Hons) MA MRTPI	Pendle BC
Jonathan Dicken	Planning Officer			Pendle BC

**Monday 24<sup>th</sup> October 2005 (15.45 p.m.)**

**Objection References: R031/O047/O048/O049  
Hoodco 441 Ltd. (031) Represented by The Planning and  
Development Network**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>Andrew Walker</b>		Planning and Development Network, Stanley House, Lowergate Clitheroe BB7 1AD	BA, FRICS, FRTPI	Hoodco 441 Ltd
Ken Riley	MD	Crown Way Homes 1 Crown Way Colne		Hoodco 441 Ltd
Andrew Little	Director	MARO Development LTD Ribble Valley Enterprise Park Clitheroe BB7 9WA	MB Eng	Hoodco 441 Ltd

**Council Represented By:**

Neil Watson	Planning Manager		MRTPI	Pendle BC
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Tuesday 25<sup>th</sup> October 2005

**Objection References: R296/O723/O739**

**Peel Investments (North) Limited (296) represented by:**

Name	Address
<b>Roger Lancaster of Counsel</b>	King Street Chambers 40 King Street Manchester M2 6BA

**He called:**

Name	Position in Organisation	Address	Professional Qualifications	Representing
Michael Cavannagh		Trevor Dawson Surveyors 32 St James Street Burnley	MRICS	Peel
Paul Singleton		Turley Associates 58 Spring Gardens Manchester	BSc MA MRTPI	Peel
Pauline Randall	Partner	Randall Thorp 3 Chepstow Street Manchester	BSc (Hons) FLI	Peel
Alasdair Jones		Stoneleigh Planning Partnership 63 Holly Walk Leamington Spa	BA MRTPI	Peel

**Council Represented by:**

Name	Address
<b>David Hardy of Counsel</b>	Wilbraham & Co Trafalgar House 29 Prince Street Leeds

**He called:**

Name	Position in Organisation	Address	Professional Qualifications	Representing
Tim Waring	Director	Indigo Planning Limited 23 King Street Manchester	BA (Hons) MRTPI	Pendle BC

		M2 6AN		
Doug Hann	Associate	IndigoPlanning Limited 23 King Street Manchester M2 6AN	MRTPI	Pendle BC

**Wednesday 26<sup>th</sup> October 2005**

**Objection References: R487/O726 & R052/O069**

**LBS Group represented by The Planning and Development Network**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>Andrew Walker</b>		Planning and Development Network, Stanley House, Lowergate Clitheroe BB7 1AD	BA, FRICS, FRTPI	LBS Group
John Drury	Councillor	Hague House Kelbrook		Kelbrook & Sough PC
Paul Maskell	Councillor	Waterloo Road Kelbrook		Kelbrook & Sough PC

**Council Represented by:**

Name	Address
<b>David Hardy of Counsel</b>	Wilbraham & Co Trafalgar House 29 Prince Street Leeds

**He called:**

Name	Position in Organisation	Address	Professional Qualifications	Representing
Tim Waring	Director	Indigo Planning Limited 23 King Street Manchester M2 6AN	BA (Hons) MRTPI	Pendle BC

Doug Hann	Associate	IndigoPlanning Limited 23 King Street Manchester M2 6AN	MRTPI	Pendle BC
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**Thursday 27<sup>th</sup> October 2005 (14.00 p.m.)**

**Objection References: R484/O719  
D Kitchen Ltd (Howarths) represented by The Planning and Development Network**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>Andrew Walker</b>		Planning and Development Network, Stanley House, Lowergate Clitheroe BB7 1AD	BA, FRICS, FRTPI	Howarths
C I Blackadder	MD	Howarths Manor Mill Hallam Road Nelson BB9 8DN		Howarths

**Council represented by:**

John Halton	Principal Planning Officer		MIED MRTPI	Pendle BC
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**Thursday 27<sup>th</sup> October 2005**

**Objection References: R032/O050/O917  
Edith Butler Trust (032) Represented by The Planning and Development Network**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>Andrew Walker</b>		Planning and Development Network, Stanley House, Lowergate Clitheroe BB7 1AD	BA, FRICS, FRTPI	Edith Butler Trust

Ken Riley	MD	Crown Way Homes 1 Crown Way Colne		Edith Butler Trust
Andrew Little	Director	MARO Development LTD Ribble Valley Enterprise Park Clitheroe BB7 9WA	MB Eng	Edith Butler Trust

**Council Represented By:**

Neil Watson	Planning Manager		BA (Hons) MA MRTPI	Pendle BC
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**Friday 28<sup>th</sup> October 2005 (9.00 a.m.)**

**Objection R490/O731**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>Mohammed Ansar (490)</b>		c/o 27 St Pauls Road Nelson Lancs.		

**Council Represented By:**

John Halton	Principal Planning Officer		MIED MRTPI	Pendle BC
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**Friday 28<sup>th</sup> October 2005 (12 Noon)**

**Objection References: R296/O737**

**Peel Investments (North) Limited (296) represented by:**

Name	Address
<b>Roger Lancaster of Counsel</b>	King Street Chambers 40 King Street Manchester M2 6BA

**He called:**

Name	Position in Organisation	Address	Professional Qualifications	Representing
Pauline Randall	Partner	Randall Thorp 3 Chepstow Street Manchester	BSc (Hons) FLI	Peel
Alasdair Jones		Stoneleigh Planning Partnership 63 Holly Walk Leamington Spa	BA MRTPI	Peel

**Council Represented by:**

Name	Address
<b>David Hardy of Counsel</b>	Wilbraham & Co Trafalgar House 29 Prince Street Leeds

**He called:**

Name	Position in Organisation	Address	Professional Qualifications	Representing
John Halton	Principal Planning Officer		MRTPI	Pendle BC

**Monday 31st October 2005**

**Objection References:**

**R512/O790/O791/O796/O922/O923/O797/O798/O799  
/O800; R517/O897/O900; R123/O213; R419/O490/O491;  
R420/O494/O495**

**RAGE (512) represented by John Plackett (419), Andrew Ashworth,  
Anne Plackett (517), N Leah (420) & S Lee (123)**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>John Plackett</b>	Chairman	71 Walton Lane Nelson Lancs. BB9	BSc. PhD	RAGE
Anne Plackett	Member	71 Walton Lane Nelson Lancs. BB9	BA Dip. Ed.	RAGE

Andrew Ashworth	Member	Bankfield House Colne	BSc. MBA	RAGE
N R Leah	Member	95 Marsden Hall Road North nelson		RAGE

**Council Represented By:**

Neil Watson	Planning Manager		MRTPI	Pendle BC
Christine Douglas	Planning Policy Manager		BSc MTP MRTPI	Pendle BC
Chris Binney	Planning Officer		MA	Pendle BC
P Gateley	Senior Ecologist TEP	TEP Genesis Centre Birchwood Science Park Warrington		Pendle BC

**Tuesday 1st November 2005**

**Objection References: R512/O789/O792/O793/O794/O795;  
R419/O492/O619/O690/O766/O768/O769;  
R420/O496/O618/O691/O692  
RAGE (512) represented by John Plackett (419), Andrew Ashworth,  
Anne Plackett & N Leah (420)**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>John Plackett</b>	Chairman	71 Walton Lane Nelson Lancs. BB9	BSc. PhD	RAGE
Anne Plackett	Member	71 Walton Lane Nelson Lancs. BB9	BA Dip. Ed.	RAGE
Andrew Ashworth	Member	Bankfield House Colne	BSc. MBA	RAGE

N R Leah	Member	95 Marsden Hall Road North Nelson		RAGE
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**Council Represented By:**

Neil Watson	Planning Manager		MIED MRTPI	Pendle BC
Christine Douglas	Planning Policy Manager		BSc MTP MRTPI	Pendle BC
John Halton	Principal Planning Officer		MIED MRTPI	Pendle BC

**Wednesday 2<sup>nd</sup> November 2005**

**Objection R307/O891/O892/O888/O890/O886**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>Chris Tennant (307)</b>		62 Red Lion Street Earby Barnoldswick		

**Council Represented By:**

Neil Watson	Planning Manager		MRTPI	Pendle BC
Doug Hann	Associate	Indigo planning Limited 23 King Street Manchester	MRTPI	Pendle BC

**Thursday 3<sup>rd</sup> November 2005 (9.30 a.m.)**

**Objection R513/O859/O872/O874**

**Trawden Community Group (513) represented by:**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>M Gardner</b>	Vice Chair	20 Lanehouse Trawden		Trawden Community Group

**Council Represented By:**

Christine Douglas	Planning Policy Manager		BSc. MTP MRTPI	Pendle BC
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**Thursday 3<sup>rd</sup> November 2005 (14.00 p.m.)**

**Objection R100/O139/O141/O144/O143**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>Michael Simpson (100)</b>		5 Carr Hall Road Barrowford		
Ian Lord	Clerk	47 Higher Causeway Road Barrowford BB9 8QL		Barrowford Parish Council

**Council Represented By:**

John Halton	Principal Planning Officer		MIED MRTPI	Pendle BC
Darren Tweed	Planning Officer			Pendle BC
Rosemary Lyons	Conservation Officer			Pendle BC

Friday 4<sup>th</sup> November 2005

**Objections:**

**R476/O596/O763/O622/O664/O764/O598/O668/O765;  
R010/O016/O629**

**Pendle Environment Network (010) & SELRAP (476) represented  
by David Penney**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>David Penney (010)</b>	Treasurer	8 William Street Colne Lancs. BB8 0HH	BA (Hons) Dip. Theo	PEN
<b>David Penney (476)</b>	Vice Chair			SELRAP

**Council Represented By:**

John Halton	Principal Planning Officer		MIED MRTPI	Pendle BC
Peter Atkinson	Highways Engineering & Design Manager		C Eng. MICE	Pendle BC

Tuesday 8<sup>th</sup> November 2005

**Objections R099/O762/O712/O940/O135/O130/O132/O131  
Lancashire Wildlife Trust (099) represented by John Lamb**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>John Lamb</b>	Conservation Officer	The Barn Berkeley Drive Bamber Bridge	BSc (Hons)	RAGE

**Council Represented By:**

Neil Watson	Planning Manager		BA (Hons) MA MRTPI	Pendle BC
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Christine Douglas	Planning Policy Manager		BSc MTP MRTPI	Pendle BC
Chris Binney	Planning Officer		MA	Pendle BC
P Gateley	Senior Ecologist TEP	TEP Genesis Centre Birchwood Science Park Warrington	MSc.	Pendle BC

**Wednesday 9<sup>th</sup> November 2005 (9.30 a.m.)**

**Objections R488/O729/O728**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>H Keith Whipp (488)</b>		Shemiran Lockfield Drive Barnoldswick BB18 6MN		

**Council Represented By:**

John Halton	Principal Planning Officer		MIED MRTPI	Pendle BC
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**Wednesday 9<sup>th</sup> November 2005 (10.45 a.m.)**

**Objections R065/O084 & R042/O059**

**Pendle Civic Trust (065) & J Beck (042) represented by:**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>John Clancey</b>	Secretary	173 Railway Street Nelson Lancs. BB9 9PG	ARIBA MRTPI	Pendle Civic Trust

**Council Represented By:**

Neil Watson	Planning Manager		BA (Hons) MA MRTPI	Pendle BC
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Jonathan Dicken	Planning Officer			
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**Thursday 10<sup>th</sup> November 2005 (9.30 a.m.)**

**Objections R504/O753**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>M Akram(504)</b>		29 Highgate Nelson Lancs BB9 ODY		

**Council Represented By:**

Christine Douglas	Planning Policy Manager		BSc MTP MRTPI	Pendle BC
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**Thursday 10<sup>th</sup> November 2005 (14.00 p.m.)**

**Objections R146/O240**

Name	Position in Organisation	Address	Professional Qualifications	Representing
<b>Brian Whittle (146)</b>		Longcroft 2 Sandy Hill Lane Barrowford Nelson BB9 6QH	MA LIM	

**Council Represented By:**

Christine Douglas	Planning Policy Manager		BSc MTP MRTPI	Pendle BC
John Halton	Principal Planning Officer		MIED MRTPI	Pendle BC

## ANNEX C1

### SCHEDULE OF OUTSTANDING OBJECTIONS AND DOCUMENT INDEX

Policy	Representation Reference	Party			CW	Objector Proof Number	Council Proof Number	Objector WR Number	Council WR Number
0.03	STR41/R439/O870	Keith	Adamson	Pendle CPRE	No				PBCW/041
0.14	STR41/R258/O368	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/041
0.17	STR41/R107/O185	Colin	Unwin		No				PBCW/041
0.23	STR41/R120/O196	Richard	MacSween		No				PBCW/041
0.26	STR41/R355/O801	Phil	Megson	Lancashire County Council	Yes				PBCW/041
0.28	STR41/R511/O776	Barry	Connolly	E.ON UK Renewables	No				PBCW/041
0.3	STR41/R472/O569	Alan	Hubbard	The National Trust - North West Region.	No				PBCW/041
0.31	STR41/R147/O241	Lynne	Walker	The Council for British Archaeology	No				PBCW/041
0.31	STR41/R467/O580	Judith	Nelson	English Heritage - North West	No				PBCW/041
0.31	STR41/R091/O118	Emma	Semwayo		No				PBCW/041
0.31	STR41/R258/O363	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/041
0.31	STR41/R120/O194	Richard	MacSween		No				PBCW/041
0.31	STR41/R107/O186	Colin	Unwin		No				PBCW/041
0.31	STR41/R258/O365	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/041
0.32	STR41/R491/O732	B	Sparnon	Persimmon Homes (Lancashire) Ltd.	No	RTS/491/01, RTS/491/02	PBCP/228, RTS/PBC/02, RTS/PBC/04 -06		
0.32	STR41/R054/O070	Sylvia	Wilson	Whitefield Conservation Action Group	No				PBCW/041
0.32	STR41/R043/O060	Lucy	Harker		No				PBCW/041

0.32	STR41/R044/O061	Steven	Brayne		No				PBCW/041
0.33	STR41/R107/O184	Colin	Unwin		No				PBCW/041
0.34	STR41/R258/O367	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/041
0.38	STR41/R107/O183	Colin	Unwin		No				PBCW/041
0.4	STR41/R478/O601			Tesco Stores Ltd.	No				PBCW/041
0.45	STR41/R439/O513	Keith	Adamson	Pendle CPRE	No				PBCW/041
0.51	STR41/R476/O596	David	Penney	SELRAP	No	P476/01	PBCP/052		
0.51	STR41/R476/O763	David	Penney	SELRAP	No	P476/01	PBCP/050		
0.59	STR41/R104/O155	Wilfred	Byrne		No	No proof will be submitted	PBCP/049, PBCP/049A		
0.59	STR41/R439/O858	Keith	Adamson	Pendle CPRE	No			W439/02	PBCW/041
0.6	STR41/R476/O622	David	Penney	SELRAP	No	P476/01	PBCP/194		
0.6	STR41/R010/O016	David	Penney	Pendle Environmental Network	No	P010/01	PBCP/197		
0.6	STR41/R439/O514	Keith	Adamson	Pendle CPRE	No			W439/03	PBCW/113
0.6	STR41/R258/O479	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/112
1	ENV01/R355/O429	Phil	Megson	Lancashire County Council	Yes				PBCW/001
1.03	ENV01/R312/O415	Alison	Roland	Town Planning Consultant	No				PBCW/001
1.04	ENV01/R312/O623	Alison	Roland	Town Planning Consultant	No				PBCW/001
1.08	ENV01/R312/O625	Alison	Roland	Town Planning Consultant	No				PBCW/001
1.08	ENV01/R414/O483	P	Harper		No			W414/01	PBCW/001
1.08	ENV01/R312/O624	Alison	Roland	Town Planning Consultant	No				PBCW/001
1.09	ENV01/R355/O802	Phil	Megson	Lancashire County Council	No				PBCW/001
1.1	ENV01/R328/O420			National Grid Company plc	No			W328/01	PBCW/001
1.14	ENV01/R300/O945			Ashmale Properties	No			W300/01	PBCW/001
1.14	ENV01/R469/O563	Janet	Dixon		No				PBCW/001
1.15	ENV01/R091/O114	Emma	Semwayo		No				PBCW/001
1.15	ENV01/R010/O941	David	Penney	Pendle Environmental Network	No	P010/01	PBCP/005		
1.15	ENV01/R137/O943	Shiela	Smith		No			W137/03	PBCW/001

1.15	ENV01/R080/O944	P	Slater		No	P080/01	PBCP/002		
1.15	ENV01/R107/O174	Colin	Unwin		No				PBCW/001
1.16	ENV01/R467/O583	Judith	Nelson	English Heritage - North West	No				PBCW/001
1.16	ENV01/R099/O133	John	Lamb	Lancashire Wildlife Trust	Yes				PBCW/001
1.21	ENV01/R513/O859	Mark	Gardner	Trawden Community Group	No	Sent email	PBCP/004		
1.21	ENV01/R439/O863	Keith	Adamson	Pendle CPRE	No			W439/02	PBCW/001
1.23	ENV01/R355/O840	Phil	Megson	Lancashire County Council	No				PBCW/001
1.23	ENV01/R358/O946	Carlo	Lionti		No				PBCW/001
1.23	ENV01/R497/O744	Robert	Kandt	Barnoldswick Town Council	No				PBCW/001
1.23	ENV01/R126/O942	W	Driver		No				PBCW/001
1.23	ENV01/R469/O627	Janet	Dixon		No				PBCW/001
1.23	ENV01/R312/O626	Alison	Roland	Town Planning Consultant	No				PBCW/001
1.24	ENV01/R453/O536	C A	Blackburn	c/o Agent	No				PBCW/095
1.24	ENV01/R514/O883	Vera	Cocker		No				PBCW/128
1.24	ENV01/R514/O884	Vera	Cocker		No				PBCW/128
1.24	ENV01/R234/O885	Andrew	Ashworth		No			W234/01, W234/04	PBCW/066
1.24	ENV01/R307/O891	Chris	Tennant		No	P307/01	PBCP/213		
1.24	ENV01/R515/O893	Rosemary	Carroll	Pendle Borough Council	No				PBCW/126
1.24	ENV01/R307/O892	Chris	Tennant		No	P307/01	PBCP/214		
1.24	ENV01/R515/O895	Rosemary	Carroll	Pendle Borough Council	No				PBCW/128
1.24	ENV01/R516/O896	Morris	Horsfield	Pendle Borough Council	No				PBCW/128
1.24	ENV01/R520/O909	Melvyn	Aston	Classic Architecture	No			W520/01, W520/02	PBCW/117
1.24	ENV01/R520/O910	Melvyn	Aston	Classic Architecture	No			W/520/01	PBCW/116
1.24	ENV01/R070/O091	D.J.	Pickles		No				PBCW/134
1.24	ENV01/R062/O082	S	Barnes		No				PBCW/045
1.24	ENV01/R042/O059	J	Beck		No	No proof will be submitted	PBCP/186		

1.24	ENV01/R026/O040	Kate	Grimshaw	Lancashire County Council	No				PBCW/094
1.24	ENV01/R010/O012	David	Penney	Pendle Environmental Network	No	P010/01	PBCP/053, PBCP/065, PBCP/107, PBCP/216		
1.24	ENV01/R441/O520		Barnett		No				PBCW/100
1.24	ENV01/R443/O522			Green Emmott Trust c/o Robertshaws	No				PBCW/091
1.24	ENV01/R512/O798			RAGE	No	P512/01	PBCP/077		
1.24	ENV01/R415/O484	S	Durkin		No			W415/01, W415/02	PBCW/049
1.24	ENV01/R449/O531	L	Pilkington		No				PBCW/099
1.24	ENV01/R451/O533	R D C	Bone	c/o Agent	No				PBCW/136
1.24	ENV01/R358/O435	Carlo	Lionti		No				PBCW/135
1.24	ENV01/R300/O399			Ashmale Properties	No			W300/01, W300/02	PBCW/097
1.24	ENV01/R267/O380	Dawn	Newsham		No				PBCW/071, PBCW/072, PBCW/066
1.24	ENV01/R269/O377	C L	Buckley		No				PBCW/066, PBCW/070
1.24	ENV01/R516/O894	Morris	Horsfield	Pendle Borough Council	No				PBCW/126
1.24	ENV01/R080/O235	P	Slater		No	P080/01	PBCP/074, PBCP/090, PBCP/108, PBCP/249		
1.24	ENV01/R142/O234	Janet	Style	Grosvenor & Mable Street Residents Association	No			Left answer phone message	PBCW/084
1.24	ENV01/R137/O233	Shiela	Smith		No			W137/01	PBCW/067
1.24	ENV01/R126/O216	W	Driver		No				PBCW/090
1.24	ENV01/R080/O709	P	Slater		No	P080/01	PBCP/064,		

							PBCP/089, PBCP/098		
1.24	ENV01/R480/O713	J B	Steele		No	No proof will be submitted	PBCP/204		
1.24	ENV01/R481/O714	Norman & Jean	Shorrocks		No	No proof will be submitted unless land is sold	PBCP/211		
1.24	ENV01/R482/O715	Frank	Harper		No	No contact made	PBCP/212		
1.24	ENV01/R509/O767	D J	Pickles		No			No contact made	PBCW/129
1.24	ENV01/R510/O772	Paul	Maskell	Kelbrook and Sough Parish Council	No	P510/01, P510/02	PBCP/207		
2.02	ENV02/R122/O202	Phil	Smith	GONW	No				PBCW/002
2.02	ENV02/R472/O787	Alan	Hubbard	The National Trust - North West Region.	Yes			W472/01	PBCW/002
2.02	ENV02/R511/O778	Barry	Connolly	E.ON UK Renewables	No				PBCW/002
2.03	ENV02/R122/O924	Phil	Smith	GONW	No				PBCW/002
2.12	ENV02/R359/O555	Frank	Belshaw		No				PBCW/075
3.02	ENV03/R067/O087	Deborah	Rusbridge	English Nature	No				PBCW/003
3.03	ENV03/R439/O864	Keith	Adamson	Pendle CPRE	No			W439/02	PBCW/003
3.07	ENV03/R051/O159	T	Coyne		No			W051/02	PBCW/003
3.11	ENV03/R367/O459	V B	Craven	Craven Design Partnership	No				PBCW/089
3.11	ENV03/R419/O492	J	Plackett		No	P419/03	PBCP/087, PBCP/096		
3.11	ENV03/R420/O496	N	Leah		No	P419/03	PBCP/088, PBCP/097		
3.11	ENV03/R464/O560	A J	Holm		No				PBCW/067, PBCW/074, PBCW/066
3.11	ENV03/R358/O699	Carlo	Lionti		No				PBCW/056

3.11	ENV03/R036/O720			Enville Properties Ltd.	No	P036/01, P031/02, RTS/135/02	PBCP/184, PBCP/100/1, RTS/PBC/01 -06		
3.11	ENV03/R505/O755	James	Hutchinson		No			W505/01	PBCW/118
3.11	ENV03/R046/O781	P A	Larter		No				PBCW/115
3.11	ENV03/R512/O799			RAGE	No	P512/02	PBCP/085		
3.11	ENV03/R269/O379	C L	Buckley		No				PBCW/067, PBCW/074
3.11	ENV03/R234/O882	Andrew	Ashworth		No			W234/01	PBCW/066
3.11	ENV03/R307/O888	Chris	Tennant		No	P307/01	PBCP/208		
3.11	ENV03/R010/O013	David	Penney	Pendle Environmental Network	No	P010/01	PBCP/066		
3.11	ENV03/R296/O737	Louise	Morrissey	Peel Investments (North) Ltd.	No	P296/01, RTS/296/02, P296/05, P296/06	PBCP/236, RTS/PBC/01 -06		
3.11	ENV03/R011/O022	S	Langstroth		No	P011/02, P011/03	PBCP/247		
3.11	ENV03/R026/O038	Kate	Grimshaw	Lancashire County Council	No				PBCW/094
3.11	ENV03/R267/O373	Dawn	Newsham		No				PBCW/067, PBCW/074, PBCW/066
3.11	ENV03/R031/O047			HOODCO 441 Ltd.	No	P031/01, P031/02, RTS/135/02	PBCP/104, PBCP/100/1, RTS/PBC/01 -06		
3.11	ENV03/R032/O050			The Edith Butler Trust	No	P031/02, P032/01, RTS/135/02	PBCP/102, PBCP/100/1, RTS/PBC/01 -06		
3.11	ENV03/R080/O107	P	Slater		No				PBCW/066

3.11	ENV03/R100/O139	Michael	Simpson		No	No proof will be submitted	PBCP/060		
3.11	ENV03/R107/O178	Colin	Unwin		No				PBCW/067, PBCW/066
3.11	ENV03/R112/O179	Pam	Smith		No				PBCW/067
3.11	ENV03/R256/O347	Kathleen	Helm		No				PBCW/067, PBCW/074
3.11	ENV03/R260/O351		Forrester		No				PBCW/067, PBCW/074
3.11	ENV03/R258/O372	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/067
3.11	ENV03/R101/O147	Ian	Lord	Barrowford Parish Council	No	No proof will be submitted	PBCP/061		
3.11	ENV03/R005/O005		Chauderey		No				PBCW/047
4.03	ENV04/R051/O160	T	Coyne		No				PBCW/004
4.12	ENV04/R137/O630	Shiela	Smith		No			W137/01	PBCW/067, PBCW/068, PBCW/080, PBCW/088
4.13	ENV04/R099/O645	John	Lamb	Lancashire Wildlife Trust	Yes				PBCW/004
4.13	ENV04/R099/O128	John	Lamb	Lancashire Wildlife Trust	Yes				PBCW/004
4.14	ENV04/R258/O371	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/067, PBCW/112
4.14	ENV04/R112/O180	Pam	Smith		No				PBCW/112
4.14	ENV04/R010/O629	David	Penney	Pendle Environmental Network	No	P010/01	PBCP/195		
4.14	ENV04/R010/O628	David	Penney	Pendle Environmental Network	No	P010/01, P010/02, P010/03	PBCP/094, PBCP/094/1		
4.14	ENV04/R479/O609	A	Moore	Salterforth Parish Council	No				PBCW/102, PBCW/103, PBCW/104, PBCW/105,

									PBCW/106, PBCW/108
4.14	ENV04/R464/O561	A J	Holm		No				PBCW/071, PBCW/070
4.14	ENV04/R439/O704	Keith	Adamson	Pendle CPRE	No				PBCW/071
4.14	ENV04/R263/O359	Nicola	Caygill		No				PBCW/071
4.14	ENV04/R261/O352		Forrester		No				PBCW/074, PBCW/066
4.14	ENV04/R259/O350	J	Slinger		No				PBCW/071
4.14	ENV04/R080/O238	P	Slater		No	P080/01, P080/02	PBCP/093		
4.14	ENV04/R107/O177	Colin	Unwin		No				PBCW/067
4.14	ENV04/R107/O168	Colin	Unwin		No				PBCW/112
4.14	ENV04/R079/O101	Andrea	Shackleton		No				PBCW/071
4.14	ENV04/R137/O323	Shiela	Smith		No			W137/01, W137/03	PBCW/067, PBCW/112
4.36	ENV04B/R355/O803	Phil	Megson	Lancashire County Council	No			W355/01	PBCW/028
4.44	ENV04C/R355/O804	Phil	Megson	Lancashire County Council	Yes				PBCW/033
4.45	ENV04C/R355/O806	Phil	Megson	Lancashire County Council	Yes				PBCW/033
4.47	ENV04C/R439/O860	Keith	Adamson	Pendle CPRE	No			W439/02	PBCW/033
4.48	ENV04C/R355/O805	Phil	Megson	Lancashire County Council	No				PBCW/033
4.51	ENV04C/R355/O807	Phil	Megson	Lancashire County Council	Yes				PBCW/033
4.51	ENV04C/R355/O808	Phil	Megson	Lancashire County Council	No			W355/02	PBCW/033
4.53	ENV04C/R355/O809	Phil	Megson	Lancashire County Council	Yes				PBCW/033
4.54	ENV04C/R355/O810	Phil	Megson	Lancashire County Council	Yes				PBCW/033
4.55	ENV04C/R355/O811	Phil	Megson	Lancashire County Council	Yes				PBCW/033
4.56	ENV04C/R099/O762	John	Lamb	Lancashire Wildlife Trust	No	P099/04	PBCP/042		
4.56	ENV04C/R355/O812	Phil	Megson	Lancashire County Council	Yes				PBCW/033
4.57	ENV04C/R099/O712	John	Lamb	Lancashire Wildlife Trust	No	P099/03	PBCP/043		

4.58	ENV04C/R099/O940	John	Lamb	Lancashire Wildlife Trust	No	P099/07, P099/08, P099/10	PBCP/082, PBCP/095		
4.62	ENV04D/R355/O813	Phil	Megson	Lancashire County Council	No			W355/01	PBCW/039
4.72	ENV04D/R355/O814	Phil	Megson	Lancashire County Council	No			W355/01	PBCW/039
4.73	ENV04D/R080/O881	P	Slater		No				PBCW/039
4.74	ENV04C/R234/O876	Andrew	Ashworth		No			W234/01, W234/05	PBCW/123, PBCW/066
4.74	ENV04C/R512/O800			RAGE	No	P512/03, P512/14, P512/15, P512/16, P512/17, P512/18	PBCP/073, PBCP/067/1		
4.74	ENV04C/R517/O897	A M	Plackett		No	P517/01 P517/02, P512/14, P512/15, P512/18	PBCP/078, PBCP/067/1		
4.74	ENV04C/R004/O727	Thomas	Procter		No				PBCW/069
4.74	ENV04C/R512/O789			RAGE	No	P512/09	PBCP/203		
4.74	ENV04C/R234/O898	Andrew	Ashworth		No			W234/01	PBCW/122
5.02	ENV05/R511/O780	Barry	Connolly	E.ON UK Renewables	No				PBCW/005
5.02	ENV05/R511/O935	Barry	Connolly	E.ON UK Renewables	No				PBCW/005
5.03	ENV05/R511/O930	Barry	Connolly	E.ON UK Renewables	No				PBCW/005
5.03	ENV05/R355/O815	Phil	Megson	Lancashire County Council	No				PBCW/005
5.03	ENV05/R258/O370	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/005
5.04	ENV05/R012/O023	Mick	McLoughlin	Energie Kontor UK Ltd.	No				PBCW/005
5.04	ENV05/R511/O933	Barry	Connolly	E.ON UK Renewables	No				PBCW/005
5.04	ENV05/R511/O931	Barry	Connolly	E.ON UK Renewables	No				PBCW/005
5.04	ENV05/R439/O871	Keith	Adamson	Pendle CPRE	No				PBCW/005

5.04	ENV05/R355/O842	Phil	Megson	Lancashire County Council	No			W355/01	PBCW/005
5.04	ENV05/R067/O093	Deborah	Rusbridge	English Nature	No				PBCW/005
5.04	ENV05/R511/O932	Barry	Connolly	E.ON UK Renewables	No				PBCW/005
5.05	ENV05/R511/O934	Barry	Connolly	E.ON UK Renewables	No				PBCW/005
5.07	ENV05/R511/O936	Barry	Connolly	E.ON UK Renewables	No				PBCW/005
5.09	ENV05/R067/O632	Deborah	Rusbridge	English Nature	No				PBCW/005
5.12	ENV05/R107/O169	Colin	Unwin		No				PBCW/005
5.12	ENV05/R355/O635	Phil	Megson	Lancashire County Council	No				PBCW/005
5.12	ENV05/R355/O841	Phil	Megson	Lancashire County Council	Yes				PBCW/005
6.03	ENV06/R510/O779	Paul	Maskell	Kelbrook and Sough Parish Council	No	P510/01, P510/02	PBCP/009		
6.11	ENV06/R132/O782	David	Hardman	United Utilities	No				PBCW/006
6.11	ENV06/R099/O134	John	Lamb	Lancashire Wildlife Trust	Yes				PBCW/006 A
6.14	ENV06/R295/O785	Philip	Carter	Environment Agency	No			W295/01, W295/02	PBCW/006
6.16	ENV06/R295/O392	Philip	Carter	Environment Agency	No			W295/01, W295/02	PBCW/006
6.16	ENV06/R439/O504	Keith	Adamson	Pendle CPRE	No				PBCW/006
6.16	ENV06/R295/O638	Philip	Carter	Environment Agency	No			W295/01, W295/02	PBCW/006
6.16	ENV06/R101/O703	Ian	Lord	Barrowford Parish Council	No	No proof will be submitted	PBCP/008		
6.16	ENV06/R497/O745	Robert	Kandt	Barnoldswick Town Council	No				PBCW/006
6.16	ENV06/R100/O141	Michael	Simpson		No	No proof will be submitted	PBCP/007		
7.03	ENV07/R439/O865	Keith	Adamson	Pendle CPRE	No			W439/02	PBCW/007
7.07	ENV07/R450/O539	Rachel	Hughes	Yorkshire Water Services	No				PBCW/007
8.02	ENV08/R137/O326	Shiela	Smith		No				PBCW/008
8.02	ENV08/R258/O376	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/055
8.11	ENV08/R132/O784	David	Hardman	United Utilities	No				PBCW/008

8.17	ENV08/R132/O854	David	Hardman	United Utilities	No				PBCW/008
8.17	ENV08/R439/O866	Keith	Adamson	Pendle CPRE	No		W439/02		PBCW/008
9.02	ENV09/R147/O242	Lynne	Walker	The Council for British Archaeology	No				PBCW/009
9.13	ENV09/R355/O816	Phil	Megson	Lancashire County Council	Yes				PBCW/009
10.02	ENV10/R472/O576	Alan	Hubbard	The National Trust - North West Region.	Yes		W472/01		PBCW/010
10.1	ENV10/R522/O912	Julie	Whittaker	Pendle Borough Council	No				PBCW/010
10.1	ENV10/R147/O243	Lynne	Walker	The Council for British Archaeology	No				PBCW/010
10.12	ENV10/R355/O843	Phil	Megson	Lancashire County Council	Yes				PBCW/010
10.12	ENV10/R472/O786	Alan	Hubbard	The National Trust - North West Region.	Yes		W472/01		PBCW/010
10.19	ENV10/R102/O149	David	Foster		No				PBCW/064
10.19	ENV10/R101/O146	Ian	Lord	Barrowford Parish Council	No	No proof will be submitted	PBCP/058		
10.19	ENV10/R100/O144	Michael	Simpson		No	No proof will be submitted	PBCP/059		
10.19	ENV10/R026/O039	Kate	Grimshaw	Lancashire County Council	No				PBCW/094
10.19	ENV10/R439/O517	Keith	Adamson	Pendle CPRE	No				PBCW/065
11.02	ENV11/R355/O817	Phil	Megson	Lancashire County Council	Yes				PBCW/011
11.02	ENV11/R147/O244	Lynne	Walker	The Council for British Archaeology	No				PBCW/011
11.09	ENV11/R147/O643	Lynne	Walker	The Council for British Archaeology	No				PBCW/011
12.12	ENV12/R439/O503	Keith	Adamson	Pendle CPRE	No				PBCW/012
12.13	ENV12/R107/O167	Colin	Unwin		No				PBCW/067
12.13	ENV12/R307/O890	Chris	Tennant		No	P307/01	PBCP/209		
12.13	ENV12/R488/O729	Herbert	Whipp		No	P488/01	PBCP/206, PBCP/205/1		
12.13	ENV12/R080/O698	P	Slater		No			W080/02	PBCW/066

12.13	ENV12/R360/O439		Fowler		No				PBCW/051
12.13	ENV12/R258/O375	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/067
12.13	ENV12/R040/O058	J	Harvey		No				PBCW/050
12.13	ENV12/R034/O051	David	West		No				PBCW/051
12.13	ENV12/R031/O048			HOODCO 441 Ltd.	No	P031/01, P031/02, RTS/135/02	PBCP/100, PBCP/100/1, RTS/PBC/01 -06		
12.13	ENV12/R026/O033	Kate	Grimshaw	Lancashire County Council	No			W026/01	PBCW/050
12.13	ENV12/R025/O032	Jill	Windle		No				PBCW/050
12.13	ENV12/R016/O028	James	Riding		No				PBCW/050
12.13	ENV12/R024/O031	Nicholas	Brierley		No				PBCW/050
13.02	ENV13/R450/O538	Rachel	Hughes	Yorkshire Water Services	No				PBCW/013
13.03	ENV13/R054/O071	Sylvia	Wilson	Whitefield Conservation Action Group	No				PBCW/013
13.03	ENV13/R107/O165	Colin	Unwin		No				PBCW/013
13.03	ENV13/R467/O587	Judith	Nelson	English Heritage - North West	No				PBCW/013
13.08	ENV13/R122/O209	Phil	Smith	GONW	No				PBCW/013
13.14	ENV13/R258/O374	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/013
13.17	ENV13/R486/O725	Barbara	Hollingworth	Lancashire Constabulary	No				PBCW/013
13.17	ENV13/R065/O084	John	Clancy	Pendle Civic Trust	No	No proof will be submitted	PBCP/012		
13.17	ENV13/R099/O137	John	Lamb	Lancashire Wildlife Trust	Yes				PBCW/013 A
14.03	ENV14/R439/O869	Keith	Adamson	Pendle CPRE	No				PBCW/014
14.03	ENV14/R107/O166	Colin	Unwin		No				PBCW/014
14.12	ENV14/R355/O818	Phil	Megson	Lancashire County Council	No				PBCW/014
14.14	ENV14/R355/O554	Phil	Megson	Lancashire County Council	No				PBCW/014
14.14	ENV14/R258/O362	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/014
14.22	ENV14/R099/O553	John	Lamb	Lancashire Wildlife Trust	No				PBCW/014

14.22	ENV14/R439/O499	Keith	Adamson	Pendle CPRE	No				PBCW/014
14.22	ENV14/R355/O844	Phil	Megson	Lancashire County Council	No			W355/01	PBCW/014
14.23	ENV14/R512/O790			RAGE	No	P512/04, P512/14, P512/15, P512/18	PBCP/076		
14.23	ENV14/R517/O900	A M	Plackett		No	P517/02, P512/18	PBCP/079		
15.01	ENV15/R099/O612	John	Lamb	Lancashire Wildlife Trust	No				PBCW/015
15.02	ENV15/R107/O164	Colin	Unwin		No				PBCW/015
15.08	ENV15/R439/O505	Keith	Adamson	Pendle CPRE	No				PBCW/015 A
15.08	ENV15/R439/O648	Keith	Adamson	Pendle CPRE	No				PBCW/015 B
15.08	ENV15/R067/O615	Deborah	Rusbridge	English Nature	No				PBCW/015
15.09	ENV15/R078/O614	Valerie	Shackleton		No				PBCW/066
15.09	ENV15/R262/O611	Martin	Caygill		No				PBCW/066
15.09	ENV15/R269/O568	C L	Buckley		No				PBCW/066
15.09	ENV15/R080/O613	P	Slater		No				PBCW/066
16.03	ENV16/R099/O136	John	Lamb	Lancashire Wildlife Trust	Yes				PBCW/016
17.02	HOU17/R122/O212	Phil	Smith	GONW	No				PBCW/017
17.02	HOU17/R235/O951	Andrew	Ashworth		No			W234/01	PBCW/017
17.02	HOU17/R265/O953	B W	Denton		No				PBCW/017
17.03	HOU17/R013/O947	Diane	Jolly		No				PBCW/017
17.05	HOU17/R257/O952	Kath	Parker		No				PBCW/017
17.09	HOU17/R099/O948	John	Lamb	Lancashire Wildlife Trust	No				PBCW/017
17.12	HOU17/R122/O925	Phil	Smith	GONW	No				PBCW/017
17.19	HOU17/R355/O819	Phil	Megson	Lancashire County Council	Yes				PBCW/017
17.23	HOU17/R494/O740			Thermawear Ltd.	No	Left message with Secretary			PBCW/017

						(twice).			
17.24	HOU17/R355/O820	Phil	Megson	Lancashire County Council	No				PBCW/017
17.26	HOU17/R513/O872	Mark	Gardner	Trawden Community Group	No	Sent email	PBCP/020		
17.26	HOU17/R513/O874	Mark	Gardner	Trawden Community Group	No	Sent email	PBCP/021		
17.27	HOU17/R439/O867	Keith	Adamson	Pendle CPRE	No				PBCW/017
17.34	HOU17/R135/O701	K A	Riley	R. Metalwork Ltd.	No	P030/01, P135/02, RTS/135/02	PBCP/233, RTS/PBC/01 -06		
17.34	HOU17/R083/O200	Phil	Boyle		No				PBCW/017
17.34	HOU17/R477/O954	John	Whittaker		No				PBCW/017
17.34	HOU17/R242/O346	N	Smith	Bellway Homes	No				PBCW/017
17.34	HOU17/R242/O342	N	Smith	Bellway Homes	No				PBCW/017
17.35	HOU17/R107/O162	Colin	Unwin		No				PBCW/017
17.36	HOU17/R102/O687	David	Foster		No				PBCW/017
17.37	HOU17/R107/O191	Colin	Unwin		No				PBCW/017
17.37	HOU17/R258/O361	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/017
17.38	HOU17/R112/O176	Pam	Smith		No				PBCW/017
17.38	HOU17/R091/O115	Emma	Semwayo		No				PBCW/017
17.38	HOU17/R107/O163	Colin	Unwin		No				PBCW/017
17.38	HOU17/R083/O201	Phil	Boyle		No				PBCW/017
17.38	HOU17/R103/O949	Sonia	Robinson	Pendle Borough Council	No				PBCW/017
17.38	HOU17/R420/O691	N	Leah		No	P419/04	PBCP/016		
17.38	HOU17/R419/O689	J	Plackett		No			W419/04	PBCW/017
17.39	HOU17/R234/O950	Andrew	Ashworth		No			W234/01	PBCW/017
17.39	HOU17/R420/O692	N	Leah		No	P419/04	PBCP/018		
17.39	HOU17/R302/O409	Marie	Bintley	English Partnerships	No				PBCW/017
17.39	HOU17/R419/O690	J	Plackett		No	P419/04	PBCP/017		
17.39	HOU17/R258/O353	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/017
17.4	HOU17/R035/O052	H	Parkinson		No				PBCW/017

17.4	HOU17/R442/O562	Susan	Graham	Burnley Borough Council	No			RTS/442/02	PBCW/017
17.45	HOU17/R128/O478	G	Wilkinson	Skipton Pine Factory	No				PBCW/017
17.54	HOU17/R491/O734	B	Sparnon	Persimmon Homes (Lancashire) Ltd.	No	RTS/491/01, RTS/491/02, P491/05	PBCP/226, RTS/PBC/02, RTS/PBC/04-06		
17.57	HOU17/R491/O735	B	Sparnon	Persimmon Homes (Lancashire) Ltd.	Yes	P491/04	PBCP/227		
17.62	HOU17/R234/O939	Andrew	Ashworth		No			W234/01	PBCW/017
17.62	HOU17/R512/O793			RAGE	No	P512/10	PBCP/024		
17.62	HOU17/R419/O769	J	Plackett		No	P419/06	PBCP/023		
17.62	HOU17/R419/O766	J	Plackett		No	P419/05	PBCP/022, PBCP/026		
17.63	HOU17/R512/O792			RAGE	No	P512/11, RTS/512/01	PBCP/025, RTS/PBC/02, RTS/PBC/04-06		
17.64	HOU17/R030/O721			Crown Way Homes Ltd.	No	P030/01, RTS/135/02, P030/02	PBCP/230, RTS/PBC/01-06, PBCP/230/1, PBCP/230/2		
17.64	HOU17/R234/O889	Andrew	Ashworth		No			W234/01	PBCW/017
17.64	HOU17/R419/O768	J	Plackett		No	P419/07, RTS/512/01	PBCP/026, RTS/PBC/02, RTS/PBC/04-06		
17.84	HOU17/R507/O758			Colhoun and Gaughran	No			W507/02	PBCW/017
17.84	HOU17/R500/O749	Shabir	Hussain		No				PBCW/017
17.84	HOU17/R501/O750	Mohammad	Ashraf		No				PBCW/017

17.84	HOU17/R502/O751	Ghulam	Rasul		No				PBCW/017
17.84	HOU17/R503/O752	Riasat	Khan		No				PBCW/017
17.84	HOU17/R504/O753	Mohammad	Akram		No	P504/01	PBCP/027		
17.84	HOU17/R522/O914	Julie	Whittaker	Pendle Borough Council	No				PBCW/017
17.84	HOU17/R083/O108	Phil	Boyle		No				PBCW/017
17.84	HOU17/R512/O795			RAGE	No	P512/12	PBCP/015		
17.84	HOU17/R356/O902			McCarthy & Stone Developments Ltd.	No				PBCW/017
17.85	HOU17/R187/O284		Digging		Yes	P148/1	PBCP/148, PBCP/109/1		
17.85	HOU17/R185/O282		Wharton		Yes	P148/1	PBCP/146, PBCP/109/1		
17.85	HOU17/R163/O260	Kenneth	Driver		Yes	P148/1	PBCP/124, PBCP/109/1		
17.85	HOU17/R162/O259	Michael	Hesketh		Yes	P148/1	PBCP/123, PBCP/109/1		
17.85	HOU17/R161/O258	F	Shepherd		Yes	P148/1	PBCP/122, PBCP/109/1		
17.85	HOU17/R160/O257	B	Little		Yes	P148/1	PBCP/121, PBCP/109/1		
17.85	HOU17/R184/O281	H R	Taylor		Yes	P148/1	PBCP/145, PBCP/109/1		
17.85	HOU17/R186/O283	M	Metcalf		Yes	P148/1	PBCP/147, PBCP/109/1		
17.85	HOU17/R181/O278	L	Riley		Yes	P148/1	PBCP/142, PBCP/109/1		
17.85	HOU17/R158/O255	Geoffrey	Hartley		Yes	P148/1	PBCP/119, PBCP/109/1		
17.85	HOU17/R188/O285	K	Parkinson		Yes	P148/1	PBCP/149, PBCP/109/1		
17.85	HOU17/R189/O286	W	Blackham		Yes	P148/1	PBCP/150,		

							PBCP/109/1		
17.85	HOU17/R157/O254	Liam	Mulligan		Yes	P148/1	PBCP/118, PBCP/109/1		
17.85	HOU17/R190/O287		Holdsworth		Yes	P148/1	PBCP/151, PBCP/109/1		
17.85	HOU17/R156/O253	P	Cunningham	Sacred Heart School	Yes	P148/1	PBCP/117, PBCP/109/1		
17.85	HOU17/R155/O252	J	Proctor		Yes	P148/1	PBCP/116, PBCP/109/1		
17.85	HOU17/R154/O251	A	Edmondson		Yes	P148/1	PBCP/115, PBCP/109/1		
17.85	HOU17/R153/O250	Marjorie	Whatley		Yes	P148/1	PBCP/114, PBCP/109/1		
17.85	HOU17/R159/O256	Karolyn	Bannister		Yes	P148/1	PBCP/120, PBCP/109/1		
17.85	HOU17/R176/O273		Eyre		Yes	P148/1	PBCP/137, PBCP/109/1		
17.85	HOU17/R168/O265	George	Slater		Yes	P148/1	PBCP/129, PBCP/109/1		
17.85	HOU17/R169/O266	G	Wright		Yes	P148/1	PBCP/130, PBCP/109/1		
17.85	HOU17/R170/O267	Mark	Complin		Yes	P148/1	PBCP/131, PBCP/109/1		
17.85	HOU17/R171/O268	K	Johnson		Yes	P148/1	PBCP/132, PBCP/109/1		
17.85	HOU17/R172/O269	Dominic	Parsons		Yes	P148/1	PBCP/133, PBCP/109/1		
17.85	HOU17/R166/O263	Jonathan	Hull		Yes	P148/1	PBCP/127, PBCP/109/1		
17.85	HOU17/R173/O270	Nick	Wilkinson		Yes	P148/1	PBCP/134, PBCP/109/1		
17.85	HOU17/R164/O261		Robinson		Yes	P148/1	PBCP/125, PBCP/109/1		

17.85	HOU17/R175O272	G R	Snape		Yes	P148/1	PBCP/136, PBCP/109/1		
17.85	HOU17/R183/O280	Terry	Gibbons		Yes	P148/1	PBCP/144, PBCP/109/1		
17.85	HOU17/R177/O274	L	Phipps - Carter		Yes	P148/1	PBCP/138, PBCP/109/1		
17.85	HOU17/R165/O262	James	Ellis		Yes	P148/1	PBCP/126, PBCP/109/1		
17.85	HOU17/R178/O275	Stephen	Moody		Yes	P148/1	PBCP/139, PBCP/109/1		
17.85	HOU17/R179/O276	D J	Hodgeon		Yes	P148/1	PBCP/140, PBCP/109/1		
17.85	HOU17/R180/O277	Mathew	Crabtree		Yes	P148/1	PBCP/141, PBCP/109/1		
17.85	HOU17/R182/O279		Edmondson		Yes	P148/1	PBCP/143, PBCP/109/1		
17.85	HOU17/R167/O264	Joyce	Allen		Yes	P148/1	PBCP/128, PBCP/109/1		
17.85	HOU17/R174/O271	L	Walker		Yes	P148/1	PBCP/135, PBCP/109/1		
17.85	HOU17/R057/O074	Ian (Home)	Wolfenden		No				PBCW/133
17.85	HOU17/R102/O150	David	Foster		No				PBCW/130
17.85	HOU17/R102/O148	David	Foster		No				PBCW/064
17.85	HOU17/R006/O006	Gillian	Hudson	Oxford Road Residents Association Group	No				PBCW/066
17.85	HOU17/R013/O025	Diane	Jolly		No				PBCW/066
17.85	HOU17/R017/O029	Margaret	Stobbs		No				PBCW/066
17.85	HOU17/R099/O135	John	Lamb	Lancashire Wildlife Trust	No	P099/02	PBCP/092		
17.85	HOU17/R087/O113	Kevin	Singleton		No				PBCW/070
17.85	HOU17/R086/O112		Singleton		No				PBCW/070
17.85	HOU17/R121/O197	J	Nuttall		No				PBCW/055

17.85	HOU17/R048/O077	Jeremy	Ashworth	Venchem Ltd.	No				PBCW/133
17.85	HOU17/R103/O153	Sonia	Robinson	Pendle Borough Council	No				PBCW/130
17.85	HOU17/R050/O066	W & A	Gott		No				PBCW/055
17.85	HOU17/R047/O064	Bill	Ashton		No				PBCW/055
17.85	HOU17/R046/O063	P A	Larter		No				PBCW/055
17.85	HOU17/R045/O062	Stephen	Traynor		No				PBCW/055
17.85	HOU17/R036/O054			Enville Properties Ltd.	No	P036/01, P031/02, RTS/135/02	PBCP/106, PBCP/100/1, RTS/PBC/01 -06		
17.85	HOU17/R030/O046			Crown Way Homes Ltd.	No	P030/01, RTS/135/02, P030/02	PBCP/231, RTS/PBC/01 -06, PBCP/230/1, PBCP/230/2		
17.85	HOU17/R035/O053	H	Parkinson		No				PBCW/066
17.85	HOU17/R031/O049			HOODCO 441 Ltd.	No	P031/01, P031/02, RTS/135/02	PBCP/101, PBCP/105, PBCP/100/1, RTS/PBC/01 -06		
17.85	HOU17/R063/O083	Andrew	Leyssens	United Utilities	No				PBCW/062
17.85	HOU17/R128/O218	G	Wilkinson	Skipton Pine Factory	No				PBCW/111
17.85	HOU17/R151/O248	Roy	Edington		Yes	P148/1	PBCP/112, PBCP/109/1		
17.85	HOU17/R150/O247	Jennie	Westwell		Yes	P148/1	PBCP/111, PBCP/109/1		
17.85	HOU17/R149/O246	T	Simpson		Yes	P148/1	PBCP/110, PBCP/109/1		
17.85	HOU17/R148/O245	Patricia	Norcross		Yes	P148/01	PBCP/109, PBCP/109/1		
17.85	HOU17/R146/O240	Brian	Whittle		Yes	P146/01	PBCP/055		

17.85	HOU17/R145/O239	Paul	Henderson		No			PBCW/055
17.85	HOU17/R144/O237	A	Hartley		No			PBCW/070
17.85	HOU17/R143/O236	Glyn	Hartley		No			PBCW/070
17.85	HOU17/R102/O151	David	Foster		No			PBCW/055
17.85	HOU17/R131/O219	John	Rusius		No	P131/01	PBCP/054	
17.85	HOU17/R103/O152	Sonia	Robinson	Pendle Borough Council	No			PBCW/064
17.85	HOU17/R129/O217	Jeffrey	Metcalfe		No			PBCW/055
17.85	HOU17/R123/O213	Sarah	Lee		No	P123/01, P512/14, P512/15, P512/18	PBCP/067, PBCP/067/1	
17.85	HOU17/R191/O288	Michael	Roach		Yes	P148/1	PBCP/152, PBCP/109/1	
17.85	HOU17/R119/O193	G	Nuttall		No			PBCW/055
17.85	HOU17/R107/O182	Colin	Unwin		No			PBCW/072, PBCW/073
17.85	HOU17/R004/O004	Thomas	Procter		No			PBCW/109
17.85	HOU17/R106/O161	Janet M	Bainbridge		No			PBCW/055
17.85	HOU17/R103/O154	Sonia	Robinson	Pendle Borough Council	No			PBCW/055
17.85	HOU17/R152/O249	Jean	Turner		Yes	P148/1	PBCP/113, PBCP/109/1	
17.85	HOU17/R138/O228	Norman	Smith		No			PBCW/055
17.85	HOU17/R450/O535	Rachel	Hughes	Yorkshire Water Services	No			PBCW/096
17.85	HOU17/R416/O485	G	Wilcock		No			PBCW/066
17.85	HOU17/R489/O730	Yvonne	May		No			PBCW/066
17.85	HOU17/R485/O724	Audrey	Wilson	Walton Lane Children's Centre	No			PBCW/066
17.85	HOU17/R483/O716	F W	Clarke		No			PBCW/128
17.85	HOU17/R439/O693	Keith	Adamson	Pendle CPRE	No			PBCW/087
17.85	HOU17/R419/O619	J	Plackett		No	P419/08	PBCP/063	
17.85	HOU17/R420/O618	N	Leah		No	P419/08	PBCP/062	

17.85	HOU17/R477/O599	John	Whittaker		No			PBCW/092
17.85	HOU17/R505/O756	James	Hutchinson		No		W505/01	PBCW/118
17.85	HOU17/R462/O559	D	Hartley		Yes			PBCW/053
17.85	HOU17/R419/O771	J	Plackett		No		W419/02, W419/05	PBCW/055, PBCW/115
17.85	HOU17/R452/O534	A	Caygill	c/o Agent	No			PBCW/052
17.85	HOU17/R443/O523			Green Emmott Trust c/o Robertshaws	No			PBCW/091
17.85	HOU17/R439/O512	Keith	Adamson	Pendle CPRE	No		W439/01	PBCW/066
17.85	HOU17/R439/O511	Keith	Adamson	Pendle CPRE	No			PBCW/055
17.85	HOU17/R421/O497			Red Group Ltd.	No			PBCW/046, PBCW/057, PBCW/064
17.85	HOU17/R420/O494	N	Leah		No	P419/01	PBCP/070	
17.85	HOU17/R419/O490	J	Plackett		No	P419/01	PBCP/072	
17.85	HOU17/R418/O488	M A	Smith	Bridge Street Stone Ltd.	No			PBCW/054
17.85	HOU17/R473/O590	P	Yeung	Lynnwood Developments Ltd.	No			PBCW/046, PBCW/064, PBCW/063
17.85	HOU17/R234/O887	Andrew	Ashworth		No		W234/01	PBCW/115
17.85	HOU17/R192/O289	Jean	Dean		Yes	P148/1	PBCP/153, PBCP/109/1	
17.85	HOU17/R030/O938			Crown Way Homes Ltd.	No	P030/01, RTS/135/02, P030/02	PBCP/232, RTS/PBC/01 -06, PBCP/230/1, PBCP/230/2	
17.85	HOU17/R264/O364	Bryan	Wildman		No			PBCW/066, PBCW/070
17.85	HOU17/R512/O922			RAGE	No	P512/07	PBCP/080	
17.85	HOU17/R525/O920	Marcia	Allass		No			PBCW/066
17.85	HOU17/R524/O919	Carol	Pike		No			PBCW/066

17.85	HOU17/R523/O918	Keith	Beresford		No				PBCW/066
17.85	HOU17/R032/O917			The Edith Butler Trust	No	P031/02, P032/01, RTS/135/02	PBCP/103, PBCP/100/1, RTS/PBC/01 -06		
17.85	HOU17/R491/O733	B	Sparnon	Persimmon Homes (Lancashire) Ltd.	No	P491/01, P491/02, P491/03, RTS/491/01, RTS/491/02, P491/06, P491/07, P491/08	PBCP/229, PBCP/229/1, PBCP/229/2, RTS/PBC/02, RTS/PBC/04 -06, PBCP/229/3		
17.85	HOU17/R507/O908			Colhoun and Gaughran	No			W507/01	PBCW/063
17.85	HOU17/R526/O921	Maurice	Pim		No				PBCW/066
17.85	HOU17/R234/O879	Andrew	Ashworth		No			W234/01	PBCW/066, PBCW/073
17.85	HOU17/R234/O878	Andrew	Ashworth		No			W234/01	PBCW/070
17.85	HOU17/R439/O868	Keith	Adamson	Pendle CPRE	No			W439/01	PBCW/066
17.85	HOU17/R512/O796			RAGE	No	P512/06, RTS/512/01	PBCP/083, RTS/PBC/02, RTS/PBC/04 -06		
17.85	HOU17/R512/O794			RAGE	No	P512/13	PBCP/091		
17.85	HOU17/R512/O791			RAGE	No	P512/05, RTS/512/01	PBCP/075, RTS/PBC/02, RTS/PBC/04 -06		
17.85	HOU17/R419/O774	J	Plackett		No			W419/01	PBCW/055
17.85	HOU17/R419/O773	J	Plackett		No			W419/03, RTS/512/0 1, W419/06	PBCW/055

17.85	HOU17/R521/O911	T O	Birtwistle		No			PBCW/066
17.85	HOU17/R201/O298	Joyce	Cooper		Yes	P148/1	PBCP/162, PBCP/109/1	
17.85	HOU17/R212/O309	Chris	Jackson		Yes	P148/1	PBCP/173, PBCP/109/1	
17.85	HOU17/R211/O308		Leeds		Yes	P148/1	PBCP/172, PBCP/109/1	
17.85	HOU17/R210/O307	Darrell	Pilkington		Yes	P148/1	PBCP/171, PBCP/109/1	
17.85	HOU17/R209/O306	P K	Cronshaw		Yes	P148/1	PBCP/170, PBCP/109/1	
17.85	HOU17/R208/O305	Peter	Brierley		Yes	P148/1	PBCP/169, PBCP/109/1	
17.85	HOU17/R207/O304		Balding		Yes	P148/1	PBCP/168, PBCP/109/1	
17.85	HOU17/R206/O303	Karen	Howson		Yes	P148/1	PBCP/167, PBCP/109/1	
17.85	HOU17/R205/O302	P M B	Turner		Yes	P148/1	PBCP/166, PBCP/109/1	
17.85	HOU17/R213/O310	Denise	Corbridge		Yes	P148/1	PBCP/174, PBCP/109/1	
17.85	HOU17/R512/O923			RAGE	No	P512/07	PBCP/081	
17.85	HOU17/R204/O301		Morley		Yes	P148/1	PBCP/165, PBCP/109/1	
17.85	HOU17/R200/O297	John	Dickinson		Yes	P148/1	PBCP/161, PBCP/109/1	
17.85	HOU17/R199/O296	Stuart	Shackleton		Yes	P148/1	PBCP/160, PBCP/109/1	
17.85	HOU17/R198/O295	K	Appleby		Yes	P148/1	PBCP/159, PBCP/109/1	
17.85	HOU17/R197/O294	Edna	Rushton		Yes	P148/1	PBCP/158, PBCP/109/1	
17.85	HOU	Frank	Sedgwick		Yes	P148/1	PBCP/157,	

	17 / R196 / O293						PBCP/109/1		
17.85	HOU 17 / R195 / O292	Neville	Roscoe		Yes	P148/1	PBCP/156, PBCP/109/1		
17.85	HOU 17 / R194 / O291	W	Rutter		Yes	P148/1	PBCP/155, PBCP/109/1		
17.85	HOU 17 / R378 / O476	Ian	Bearysworth	Dalesmoor Homes Ltd.	No				PBCW/061
17.85	HOU 17 / R203 / O300	Alan	Swindburn		Yes	P148/1	PBCP/164, PBCP/109/1		
17.85	HOU 17 / R357 / 	Roberta	Riding		No				PBCW/066

	O434								
17.85	HOU 17 / R372 / O469	William	Peel		No				PBCW/098
17.85	HOU 17 / R202 / O299	J	Hartshorn		Yes	P148/1	PBCP/163, PBCP/109/1		
17.85	HOU 17 / R367 / O460	V B	Craven	Craven Design Partnership	No				PBCW/089
17.85	HOU 17 / R214 / O311		Clark		Yes	P148/1	PBCP/175, PBCP/109/1		
17.85	HOU 17 / R280 / O389	Brenda	Root		No				PBCW/066

17.85	HOU 17 / R269 / O378	C L	Buckley		No				PBCW/071
17.85	HOU 17 / R266 / O369	Sally Anne	Denton		No				PBCW/067, PBCW/066, PBCW/070
17.85	HOU 17 / R193 / O290		Thorp		Yes	P148/1	PBCP/154, PBCP/109/1		
17.85	HOU 17 / R265 / O366	B W	Denton		No				PBCW/072, PBCW/070, PBCW/073
17.85	HOU 17 / R257 / O348	Kath	Parker		No				PBCW/066
17.85	HOU 17 / R218	S	Bracewell		Yes	P148/1	PBCP/179, PBCP/109/1		

	/ O315								
17.85	HOU 17 / R235 / O329	Andrew	Ashworth		No			W234/01	PBCW/066
17.85	HOU 17 / R217 / O314		Lucas		Yes	P148/1	PBCP/178, PBCP/109/1		
17.85	HOU 17 / R219 / O316	P J	Sanderson		Yes	P148/1	PBCP/180, PBCP/109/1		
17.85	HOU 17 / R220 / O317	M D	Roberts		Yes	P148/1	PBCP/181, PBCP/109/1		
17.85	HOU17/R221/O318	P	McCarthy		Yes	P148/1	PBCP/182, PBCP/109/1		
17.85	HOU17/R229/O319	David	Sutcliffe		Yes	P148/1	PBCP/183, PBCP/109/1		
17.85	HOU17/R215/O312	Robert	Ainscough		Yes	P148/1	PBCP/176, PBCP/109/1		
17.85	HOU17/R234/O322	Andrew	Ashworth		No			W234/01	PBCW/066

17.85	HOU17/R216/O313	K	Townson		Yes	P148/1	PBCP/177, PBCP/109/1		
18.04	HOU18/R015/O027	David	Penney	Waterside Community Network	No	P015/01	PBCP/028		
18.05	HOU18/R080/O106	P	Slater		No				PBCW/018
18.05	HOU18/R355/O821	Phil	Megson	Lancashire County Council	Yes				PBCW/018
18.05	HOU18/R010/O015	David	Penney	Pendle Environmental Network	No	P010/01	PBCP/029		
18.16	HOU18/R522/O915	Julie	Whittaker	Pendle Borough Council	No				PBCW/018
18.16	HOU18/R439/O509	Keith	Adamson	Pendle CPRE	No				PBCW/018 C
18.16	HOU18/R234/O856	Andrew	Ashworth		No			W234/03	PBCW/018
18.16	HOU18/R135/O702	K A	Riley	R. Metalwork Ltd.	No	P030/01, P135/02, RTS/135/02	PBCP/234, RTS/PBC/01 -06		
18.16	HOU18/R302/O694	Marie	Bintley	English Partnerships	No				PBCW/018
18.16	HOU18/R302/O407	Marie	Bintley	English Partnerships	No				PBCW/018
18.16	HOU18/R258/O357	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/018
18.16	HOU18/R258/O349	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/018
18.16	HOU18/R107/O181	Colin	Unwin		No				PBCW/018
18.16	HOU18/R107/O189	Colin	Unwin		No				PBCW/018
18.17	HOU18/R028/O045	Steven	Lambert		No				PBCW/139
18.17	HOU18/R029/O042	H	Lambert		No				PBCW/139
18.17	HOU18/R234/O899	Andrew	Ashworth		No			W234/01	PBCW/066, PBCW/070
19.02	HOU19/R443/O527			Green Emmott Trust c/o Robertshaws	No				PBCW/019
19.02	HOU19/R441/O519		Barnett		No				PBCW/019
19.04	HOU19/R242/O345	N	Smith	Bellway Homes	No				PBCW/019
19.08	HOU19/R258/O356	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/019
19.08	HOU19/R107/O187	Colin	Unwin		No				PBCW/019

19.1	HOU19/R477/O600	John	Whittaker		No				PBCW/019
19.15	HOU19/R456/O546	Stephen	Hedley	Countryside Agency - North West Region	No				PBCW/019
19.15	HOU19/R456/O695	Stephen	Hedley	Countryside Agency - North West Region	No				PBCW/019
20.03	HOU20/R122/O410	Phil	Smith	GONW	No				PBCW/020
20.08	HOU20/R107/O171	Colin	Unwin		No				PBCW/020
20.08	HOU20/R137/O336	Shiela	Smith		No			W137/01	PBCW/020
20.08	HOU20/R258/O355	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/020
20.13	HOU20/R522/O916	Julie	Whittaker	Pendle Borough Council	No				PBCW/020
20.13	HOU20/R302/O408	Marie	Bintley	English Partnerships	No				PBCW/020
20.13	HOU20/R135/O222	K A	Riley	R. Metalwork Ltd.	No	P030/01, P135/02, RTS/135/02	PBCP/235, RTS/PBC/01 -06		
20.13	HOU20/R107/O170	Colin	Unwin		No				PBCW/020
21.02	HOU21/R242/O343	N	Smith	Bellway Homes	No				PBCW/021
21.02	HOU21/R242/O696	N	Smith	Bellway Homes	No				PBCW/021
21.03	HOU21/R080/O616	P	Slater		No			W080/01	PBCW/021
21.08	HOU21/R083/O617	Phil	Boyle		No				PBCW/021
21.08	HOU21/R099/O130	John	Lamb	Lancashire Wildlife Trust	No	P099/01, P099/09	PBCP/031, PBCP/031/1		
22.06	EMP22/R356/O901			McCarthy & Stone Developments Ltd.	No				PBCW/022
22.14	EMP22/R242/O344	N	Smith	Bellway Homes	No				PBCW/022
22.15	EMP22/R495/O741	William	Hall		No				PBCW/048
22.15	EMP22/R050/O904	W & A	Gott		No				PBCW/115
22.15	EMP22/R419/O770	J	Plackett		No			W419/02, W419/05	PBCW/115
22.15	EMP22/R507/O759			Colhoun and Gaughran	No			W507/01, RTS/507/0 1	PBCW/063

22.15	EMP22/R106/O688	Janet M	Bainbridge		No				PBCW/053
22.15	EMP22/R473/O592	P	Yeung	Lynnwood Developments Ltd.	No				PBCW/063
22.15	EMP22/R296/O400	Louise	Morrissey	Peel Investments (North) Ltd.	Yes				PBCW/053
22.15	EMP22/R296/O395	Louise	Morrissey	Peel Investments (North) Ltd.	Yes				PBCW/053
22.15	EMP22/R099/O129	John	Lamb	Lancashire Wildlife Trust	Yes				PBCW/140
22.15	EMP22/R047/O905	Bill	Ashton		No				PBCW/115
22.15	EMP22/R484/O719	D	Kitchen	Howarths	No	P484/01	PBCP/202		
23.02	EMP23/R122/O412	Phil	Smith	GONW	No				PBCW/023/3
23.09	EMP23/R442/O521	Susan	Graham	Burnley Borough Council	No			RTS/442/01, W442/01	PBCW/023/7
23.1	EMP23/R510/O777	Paul	Maskell	Kelbrook and Sough Parish Council	No	No proof will be submitted	PBCP/244		
23.11	EMP23/R296/O723	Louise	Morrissey	Peel Investments (North) Ltd.	No	P296/02, P296/03, P296/04, RTS/296/01, P296/05, P296/06, P296/07	PBCP/237, RTS/PBC/01-06, PBCP/237/1, PBCP/237/2		
23.14	EMP23/R417/O486	Philip	Leeds	Lanlee Supplies Ltd.	No				PBCW/023/5
23.15	EMP23/R011/O955	S	Langstroth		No	P011/02, P011/03	PBCP/248		
23.15	EMP23/R355/O822	Phil	Megson	Lancashire County Council	No				PBCW/023/4
23.15	EMP23/R418/O718	M A	Smith	Bridge Street Stone Ltd.	No				PBCW/023/6
23.15	EMP23 /R135/O224	K A	Riley	R. Metalwork Ltd.	No	P135/01, RTS/135/01	PBCP/245, RTS/PBC/01		

							-06		
23.15	EMP23/R059/O076	Paul A	Riding	Furnico Ltd.	No				PBCW/023/2
23.15	EMP23/R052/O069	Ian	Wolfenden	LBS Group - Walk Mill Office	No	P052/01, RTS/135/01, P052/02, P487/01	PBCP/240, RTS/PBC/01 -06, PBCP/240/1		
23.15	EMP23/R048/O065	Jeremy	Ashworth	Venchem Ltd.	No				PBCW/023/1
23.15	EMP23/R418/O487	M A	Smith	Bridge Street Stone Ltd.	No				PBCW/023/6
23.16	EMP23/R307/O886	Chris	Tennant		No	P307/01	PBCP/246		
23.16	EMP23/R487/O726			LBS Group - Horticultural	No	P052/01, P487/01	PBCP/239		
23.16	EMP23/R296/O739	Louise	Morrissey	Peel Investments (North) Ltd.	No	P296/02, P296/03, P296/04, RTS/296/01, P296/05, P296/06, P296/07	PBCP/238, RTS/PBC/01 -06, PBCP/237/1, PBCP/237/2		
23.16	EMP23/R011/O021	S	Langstroth		No	P011/02, P011/03	PBCP/248		
23.16	EMP23/R011/O020	S	Langstroth		No	P011/02, P011/03	PBCP/248		
23.16	EMP23/R033/O620	John	Clarke		No				PBCW/075, PBCW/075/ 1
24.03	EMP24/R510/O775	Paul	Maskell	Kelbrook and Sough Parish Council	No	No proof will be submitted	PBCP/032, PBCP/032/1		
24.05	EMP24/R312/O556	Alison	Roland	Town Planning Consultant	No				PBCW/024
24.05	EMP24/R122/O413	Phil	Smith	GONW	No				PBCW/024
24.19	EMP24/R439/O862	Keith	Adamson	Pendle CPRE	No			W439/02	PBCW/024

24.2	EMP24/R472/O788	Alan	Hubbard	The National Trust - North West Region.	No			PBCW/024
24.23	EMP24/R122/O927	Phil	Smith	GONW	No			PBCW/024
24.25	EMP24/R312/O657	Alison	Roland	Town Planning Consultant	No			PBCW/024
24.25	EMP24/R122/O928	Phil	Smith	GONW	No			PBCW/024
24.28	EMP24/R355/O824	Phil	Megson	Lancashire County Council	No		W355/02	PBCW/024
24.29	EMP24/R355/O825	Phil	Megson	Lancashire County Council	Yes			PBCW/024
24.3	EMP24/R122/O926	Phil	Smith	GONW	No			PBCW/024
24.33	EMP24/R439/O861	Keith	Adamson	Pendle CPRE	No		W439/02	PBCW/024
24.33	EMP24/R122/O655	Phil	Smith	GONW	No			PBCW/024
24.37	EMP24/R472/O577	Alan	Hubbard	The National Trust - North West Region.	No			PBCW/024
24.4	EMP24/R355/O845	Phil	Megson	Lancashire County Council	No			PBCW/024
24.4	EMP24/R355/O828	Phil	Megson	Lancashire County Council	Yes			PBCW/024
25.06	TCRD25/R475/O594		B&Q plc		No			PBCW/025
25.08	TCRD25/R456/O549	Stephen	Hedley	Countryside Agency - North West Region	No			PBCW/025
25.08	TCRD25/R475/O660		B&Q plc		No			PBCW/025
25.12	TCRD25/R355/O827	Phil	Megson	Lancashire County Council	Yes			PBCW/025
25.13	TCRD25/R122/O416	Phil	Smith	GONW	No			PBCW/025
25.13	TCRD25/R355/O826	Phil	Megson	Lancashire County Council	Yes			PBCW/025
25.16	TCRD25/R122/O929	Phil	Smith	GONW	No			PBCW/025
25.19	TCRD25/R478/O956			Tesco Stores Ltd.	No			PBCW/025
25.2	TCRD25/R448/O530	M	Medley	Physique Training Equipment plc	No			PBCW/086
25.2	TCRD25/R492/O736			W.M. Morrison Supermarkets plc	No		W492/01, W/492/02	PBCW/119
25.2	TCRD25/R519/O906	James	Chapman	Eshton Property Development Ltd	No	P519/01	PBCP/200, PBCP/200/1	
25.2	TCRD25/R478/O602			Tesco Stores Ltd.	No			PBCW/153
25.2	TCRD25/R494/O738			Thermawear Ltd.	No	Left message		PBCW/127

						with Secretary (twice).			
26.13	TCRD26/R107/O172	Colin	Unwin		No				PBCW/026
26.13	TCRD26/R258/O354	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/026
27.08	TCRD27/R355/O829	Phil	Megson	Lancashire County Council	Yes				PBCW/027
27.11	TCRD27/R478/O603			Tesco Stores Ltd.	No				PBCW/027
29.08	TRA29/R355/O831	Phil	Megson	Lancashire County Council	No				PBCW/029
29.08	TRA29/R355/O830	Phil	Megson	Lancashire County Council	Yes				PBCW/029
29.08	TRA29/R355/O452	Phil	Megson	Lancashire County Council	No				PBCW/029
29.13	TRA29/R355/O832	Phil	Megson	Lancashire County Council	No			W355/01	PBCW/029
29.15	TRA29/R439/O663	Keith	Adamson	Pendle CPRE	No				PBCW/029 A
29.15	TRA29/R084/O957	Stephen	Lax	Colne Cycling Campaign	No				PBCW/029
29.16	TRA29/R479/O606	A	Moore	Salterforth Parish Council	No				PBCW/112
29.16	TRA29/R068/O089	Wilfred	Ingham		No				PBCW/112
29.16	TRA29/R476/O764	David	Penney	SELRAP	No	P476/01	PBCP/196		
29.16	TRA29/R476/O664	David	Penney	SELRAP	No	P476/01	PBCP/199		
29.16	TRA29/R439/O662	Keith	Adamson	Pendle CPRE	No			W439/03	PBCW/112
29.16	TRA29/R066/O085	Winifred Jean	Ingham		No				PBCW/112
29.16	TRA29 /R084/O403	Stephen	Lax	Colne Cycling Campaign	No				PBCW/113
29.16	TRA29/R137/O223	Shiela	Smith		No			W137/03	PBCW/113
29.16	TRA29/R120/O195	Richard	MacSween		No				PBCW/113
29.16	TRA29/R107/O190	Colin	Unwin		No				PBCW/113
29.16	TRA29/R051/O156	T	Coyne		No				PBCW/114
29.16	TRA29/R069/O090	S	Ingham		No				PBCW/112
29.16	TRA29/R355/O453	Phil	Megson	Lancashire County Council	Yes			W355/02	PBCW/112
29.16	TRA29/R099/O132	John	Lamb	Lancashire Wildlife Trust	No	P099/06	PBCP/198		
30.04	TRA30/R355/O846	Phil	Megson	Lancashire County Council	Yes				PBCW/030

30.04	TRA30/R476/O598	David	Penney	SELRAP	No	P476/01	PBCP/036		
30.05	TRA30/R122/O421	Phil	Smith	GONW	No				PBCW/030
30.05	TRA30/R355/O833	Phil	Megson	Lancashire County Council	Yes				PBCW/030
30.09	TRA30/R439/O958	Keith	Adamson	Pendle CPRE	No				PBCW/030 B
30.13	TRA30/R355/O850	Phil	Megson	Lancashire County Council	Yes				PBCW/030
30.17	TRA30/R355/O849	Phil	Megson	Lancashire County Council	Yes				PBCW/030
30.17	TRA30/R355/O848	Phil	Megson	Lancashire County Council	Yes			W355/01	PBCW/030
30.17	TRA30/R355/O847	Phil	Megson	Lancashire County Council	No				PBCW/030
30.17	TRA30/R476/O668	David	Penney	SELRAP	No	P476/01	PBCP/038		
30.17	TRA30/R456/O547	Stephen	Hedley	Countryside Agency - North West Region	No				PBCW/030
30.17	TRA30/R051/O157	T	Coyne		No				PBCW/030
30.17	TRA30/R476/O765	David	Penney	SELRAP	No	P476/01	PBCP/039		
30.18	TRA30/R479/O608	A	Moore	Salterforth Parish Council	No				PBCW/101
30.18	TRA30/R439/O507	Keith	Adamson	Pendle CPRE	No				PBCW/113
30.18	TRA30/R234/O877	Andrew	Ashworth		Yes			W234/02	PBCW/142
31.02	TRA31/R355/O671	Phil	Megson	Lancashire County Council	Yes				PBCW/031
31.03	TRA31/R355/O834	Phil	Megson	Lancashire County Council	Yes				PBCW/031
31.03	TRA31/R107/O173	Colin	Unwin		No			W355/01	PBCW/031
31.03	TRA31/R258/O360	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/031
31.09	TRA31/R508/O760	Brian	Irlam	Steele, Ford & Newton Solicitors	No			W508/1	PBCW/031
31.09	TRA31/R490/O731	Mohammed	Ansar		No	No contact made	PBCP/040		
31.09	TRA31/R478/O605			Tesco Stores Ltd.	No				PBCW/031
31.1	TRA31/R101/O145	Ian	Lord	Barrowford Parish Council	No	No proof will be submitted	PBCP/057		
31.1	TRA31/R100/O143	Michael	Simpson		No	No proof will be submitted	PBCP/056		
31.1	TRA31/R009/O011	J A	Hufferdine	Barrowford Primary School	No				PBCW/058

31.1	TRA31/R496/O742	Colin	Humberstone	Humberstones	No			PBCW/058
32.22	CRL32/R456/O550	Stephen	Hedley	Countryside Agency - North West Region	No			PBCW/032
32.23	CRL32/R447/O529	S	Barnes		No			PBCW/143
32.23	CRL32/R297/O396	J	Thorpe		No			PBCW/143
32.23	CRL32/R276/O387	C A	Storey		No			PBCW/143
32.23	CRL32/R298/O397	N	Taylor		No			PBCW/143
32.23	CRL32/R299/O398	S	Birtwell		No			PBCW/143
32.23	CRL32/R322/O417	M	Beryl		No			PBCW/143
32.23	CRL32/R325/O419	B	Clark		No			PBCW/143
32.23	CRL32/R369/O466	K	Knight		No			PBCW/143
32.23	CRL32/R370/O467	J	Burns		No			PBCW/143
32.23	CRL32/R371/O468	J	Burns		No			PBCW/143
32.23	CRL32/R093/O120	J	Nutter		No	No proof will be submitted		PBCW/143 A
32.23	CRL32/R374/O473	W	Calvert		No			PBCW/143
32.23	CRL32/R375/O474	M	Howells		No			PBCW/143
32.23	CRL32/R382/O480	Ronnie	Stuttard		No			PBCW/143
32.23	CRL32/R388/O481	E J K	Foulds		No			PBCW/143
32.23	CRL32/R393/O482	Christine	Hindle		No	Left message on answer phone.		PBCW/143 B
32.23	CRL32/R443/O528			Green Emmott Trust c/o Robertshaws	No			PBCW/091
32.23	CRL32/R274/O385	S P	Dey		No			PBCW/143
32.23	CRL32/R438/O498	S	Boyd		No			PBCW/143
32.23	CRL32/R072/O094	J	Taylor		No			PBCW/143
32.23	CRL32/R095/O122	Alan	Spencer		No			PBCW/143
32.23	CRL32/R273/O384	S	Bird		No			PBCW/143

32.23	CRL32/R061/O081	Adrian	Sugden		No				PBCW/143
32.23	CRL32/R073/O096	Mary	Hatfield		No				PBCW/143
32.23	CRL32/R074/O097	T	Storey		No				PBCW/143
32.23	CRL32/R076/O099	Rita	Wilcock		No				PBCW/143
32.23	CRL32/R081/O103	Jodie	Sullivan		No				PBCW/143
32.23	CRL32/R082/O104	Kim	Sugden		No				PBCW/143
32.23	CRL32/R094/O121	W	Clavert		No				PBCW/143
32.23	CRL32/R097/O124	Emily	Wilcock		No				PBCW/143
32.23	CRL32/R098/O125	Christine	Hartley		No				PBCW/143
32.23	CRL32/R107/O175	Colin	Unwin		No				PBCW/070
32.23	CRL32/R118/O192	J	Daws		No				PBCW/143
32.23	CRL32/R258/O358	Eric	Crimmins	Tum Hill Residents Group	No				PBCW/067, PBCW/143
32.23	CRL32/R272/O383	Kevin	Coward		No				PBCW/143
32.23	CRL32/R270/O381	R	Hartley		No				PBCW/143
32.23	CRL32/R271/O382	Tom	Bowling		No				PBCW/143
32.23	CRL32/R096/O123	Norman	Cowgill		No				PBCW/143
32.23	CRL32/R060/O080	Maureen	Emmott		No				PBCW/143
33.09	CRL33/R470/O564	Peter	Stanford	Greenfield Residents Association	No	No proof will be submitted	PBCP/185		
33.09	CRL33/R518/O903	Mike	Bhatti		No	P518/01, RTS/518/01	PBCP/215, PBC/215/1-2, RTS/PBC/02, RTS/PBC/04-06		
33.09	CRL33/R137/O754	Shiela	Smith		No			W137/01, W137/02	PBCW/081
33.09	CRL33/R479/O607	A	Moore	Salterforth Parish Council	No				PBCW/144, PBCW/145, PBCW/146,

									PBCW/147, PBCW/148, PBCW/149, PBCW/150
33.09	CRL33/R026/O036	Kate	Grimshaw	Lancashire County Council	No				PBCW/083
33.09	CRL33/R488/O728	Herbert	Whipp		No	P488/01	PBCP/205, PBCP/205/1		
34.07	CRL34/R099/O131	John	Lamb	Lancashire Wildlife Trust	No	P099/05	PBCP/044		
34.07	CRL34/R122/O422	Phil	Smith	GONW	No				PBCW/034
35.09	CRL35/R355/O851	Phil	Megson	Lancashire County Council	No			W355/01	PBCW/035
36.1	CRL36/R051/O067	T	Coyne		No				PBCW/151
36.1	CRL36/R099/O610	John	Lamb	Lancashire Wildlife Trust	Yes				PBCW/036
36.1	CRL36/R355/O852	Phil	Megson	Lancashire County Council	Yes				PBCW/036
37.02	CRL37/R439/O873	Keith	Adamson	Pendle CPRE	No			W439/02	PBCW/037
37.08	CRL37/R355/O853	Phil	Megson	Lancashire County Council	Yes				PBCW/037
37.09	CRL37/R420/O495	N	Leah		No	P419/02	PBCP/069		
37.09	CRL37/R051/O158	T	Coyne		No			W051/01	PBCW/152
37.09	CRL37/R512/O797			RAGE	No	P512/08	PBCP/084		
37.09	CRL37/R419/O491	J	Plackett		No	P419/02	PBCP/071		
38.04	CRL38/R472/O575	Alan	Hubbard	The National Trust - North West Region.	No				PBCW/038
38.1	CRL38/R499/O748	Gary	Bird		No	No proof will be submitted	PBCP/046		
40.12	CRL40/R355/O457	Phil	Megson	Lancashire County Council	No				PBCW/040
40.2	CRL40/R355/O836	Phil	Megson	Lancashire County Council	No				PBCW/040
40.25	CRL40/R355/O835	Phil	Megson	Lancashire County Council	Yes				PBCW/040
40.25	CRL40/R011/O959	S	Langstroth		No	P011/01	PBCP/047		
40.26	CRL40/R011/O465	S	Langstroth		No	P011/01	PBCP/099		
41	STR41/R099/O138	John	Lamb	Lancashire Wildlife Trust	Yes				PBCW/042
41.02	STR41/R242/O621	N	Smith	Bellway Homes	No				PBCW/042

41.04	STR41/R355/O678	Phil	Megson	Lancashire County Council	No				PBCW/042
41.09	STR41/R355/O838	Phil	Megson	Lancashire County Council	Yes				PBCW/042
41.16	STR41/R355/O679	Phil	Megson	Lancashire County Council	No				PBCW/042
42.03	STR41/R475/O595		B&Q plc		No				PBCW/042
43.01	STR41/R099/O140	John	Lamb	Lancashire Wildlife Trust	Yes				PBCW/042
44	STR41/R099/O672	John	Lamb	Lancashire Wildlife Trust	Yes				PBCW/042
44.06	STR41/R099/O142	John	Lamb	Lancashire Wildlife Trust	Yes				PBCW/042
44.47	STR41/R355/O823	Phil	Megson	Lancashire County Council	Yes				PBCW/041
44.47	STR41/R355/O839	Phil	Megson	Lancashire County Council	Yes				PBCW/041
46	STR41/R355/O837	Phil	Megson	Lancashire County Council	No			W355/02	PBCW/043
46	STR41/R440/O518	Les	Manton	HM Prison Service	No			W440/01	PBCW/043
46	STR41/R497/O746	Robert	Kandt	Barnoldswick Town Council	No				PBCW/043
46	STR41/R497/O743	Robert	Kandt	Barnoldswick Town Council	No				PBCW/043
46	STR41/R067/O880	Deborah	Rusbridge	English Nature	No				PBCW/043
46	STR41/R467/O589	Judith	Nelson	English Heritage - North West	No				PBCW/043
46	STR41/R519/O907	James	Chapman	Eshton Property Development Ltd	No	P519/01	PBCP/201, PBCP/200/1		
46	STR41/R467/O591	Judith	Nelson	English Heritage - North West	No				PBCW/043
47	STR41/R358/O722	Carlo	Lionti		No				PBCW/162, PBCW/135
47	STR41/R137/O674	Shiela	Smith		No				PBCW/044
47	STR41/R099/O673	John	Lamb	Lancashire Wildlife Trust	Yes				PBCW/044
47	STR41/R137/O232	Shiela	Smith		No			W137/03	PBCW/044
47	STR41/R091/O117	Emma	Semwayo		No				PBCW/044
47	STR41/R091/O116	Emma	Semwayo		No				PBCW/044

**ANNEX C2**

**SCHEDULE OF WITHDRAWN OBJECTIONS**

<b>Policy</b>	<b>Representation Reference</b>	<b>Party</b>			<b>Stage</b>
0.03	STR41/R439/O870	Keith	Adamson	Pendle CPRE	Re-deposit
0.14	STR41/R258/O368	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
0.17	STR41/R107/O185	Colin	Unwin		1st Stage Deposit
0.23	STR41/R120/O196	Richard	MacSween		1st Stage Deposit
0.26	STR41/R355/O801	Phil	Megson	Lancashire County Council	Re-deposit
0.28	STR41/R511/O776	Barry	Connolly	E.ON UK Renewables	Re-deposit
0.28	STR41/R373/O471	Alan	Carter	British Waterways	1st Stage Deposit
0.28	STR41/R355/O427	Phil	Megson	Lancashire County Council	1st Stage Deposit
0.28	STR41/R467/O579	Judith	Nelson	English Heritage - North West	1st Stage Deposit
0.3	STR41/R472/O569	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit
0.31	STR41/R467/O580	Judith	Nelson	English Heritage - North West	1st Stage Deposit
0.31	STR41/R147/O241	Lynne	Walker	The Council for British Archaeology	1st Stage Deposit
0.31	STR41/R120/O194	Richard	MacSween		1st Stage Deposit
0.31	STR41/R258/O363	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
0.31	STR41/R091/O118	Emma	Semwayo		1st Stage Deposit
0.31	STR41/R107/O186	Colin	Unwin		1st Stage Deposit
0.31	STR41/R258/O365	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
0.32	STR41/R043/O060	Lucy	Harker		1st Stage Deposit
0.32	STR41/R044/O061	Steven	Brayne		1st Stage Deposit
0.32	STR41/R054/O070	Sylvia	Wilson	Whitefield Conservation Action Group	1st Stage Deposit

0.32	STR41/R491/O732	B	Sparnon	Persimmon Homes (Lancashire) Ltd.	Re-deposit
0.33	STR41/R010/O018	David	Penney	Pendle Environmental Network	1st Stage Deposit
0.33	STR41/R107/O184	Collin	Unwin		1st Stage Deposit
0.33	STR41/R137/O333	Shiela	Smith		1st Stage Deposit
0.33	STR41/R467/O581	Judith	Nelson	English Heritage - North West	1st Stage Deposit
0.34	STR41/R258/O367	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
0.36	STR41/R355/O676	Phil	Megson	Lancashire County Council	1st Stage Deposit
0.36	STR41/R122/O198	Phil	Smith	GONW	1st Stage Deposit
0.38	STR41/R107/O183	Collin	Unwin		1st Stage Deposit
0.4	STR41/R478/O601			Tesco Stores Ltd.	1st Stage Deposit
0.45	STR41/R439/O513	Keith	Adamson	Pendle CPRE	1st Stage Deposit
0.51	STR41/R476/O763	David	Penney	SELRAP	Re-deposit
0.51	STR41/R476/O596	David	Penney	SELRAP	1st Stage Deposit
0.52	STR41/R355/O677	Phil	Megson	Lancashire County Council	1st Stage Deposit
0.52	STR41/R137/O324	Shiela	Smith		1st Stage Deposit
0.58	STR41/R137/O231	Shiela	Smith		1st Stage Deposit
0.59	STR41/R439/O858	Keith	Adamson	Pendle CPRE	Re-deposit
0.59	STR41/R104/O155	Wilfred	Byrne		1st Stage Deposit
0.6	STR41/R010/O016	David	Penney	Pendle Environmental Network	1st Stage Deposit
0.6	STR41/R258/O479	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
0.6	STR41/R476/O622	David	Penney	SELRAP	1st Stage Deposit
0.6	STR41/R439/O514	Keith	Adamson	Pendle CPRE	1st Stage Deposit
1	STR41/R467/O582	Judith	Nelson	English Heritage - North West	1st Stage Deposit
1	ENV01/R355/O429	Phil	Megson	Lancashire County Council	1st Stage Deposit
1.03	ENV01/R312/O415	Alison	Roland	Town Planning Consultant	1st Stage Deposit
1.04	ENV01/R312/O623	Alison	Roland	Town Planning Consultant	1st Stage Deposit
1.07	ENV01/R122/O199	Phil	Smith	GONW	1st Stage Deposit
1.08	ENV01/R312/O624	Alison	Roland	Town Planning Consultant	1st Stage Deposit

1.08	ENV01/R312/O625	Alison	Roland	Town Planning Consultant	1st Stage Deposit
1.08	ENV01/R414/O483	P	Harper		1st Stage Deposit
1.09	ENV01/R355/O802	Phil	Megson	Lancashire County Council	Re-deposit
1.1	ENV01/R328/O420			National Grid Company plc	1st Stage Deposit
1.1	ENV01/R450/O540	Rachel	Hughes	Yorkshire Water Services	1st Stage Deposit
1.12	ENV01/R472/O570	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit
1.14	ENV01/R469/O563	Janet	Dixon		1st Stage Deposit
1.14	ENV01/R300/O945			Ashmale Properties	1st Stage Deposit
1.15	ENV01/R107/O174	Colin	Unwin		1st Stage Deposit
1.15	ENV01/R137/O943	Shiela	Smith		1st Stage Deposit
1.15	ENV01/R010/O941	David	Penney	Pendle Environmental Network	1st Stage Deposit
1.15	ENV01/R091/O114	Emma	Semwayo		1st Stage Deposit
1.15	ENV01/R080/O944	P	Slater		1st Stage Deposit
1.16	ENV01/R099/O133	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
1.16	ENV01/R467/O583	Judith	Nelson	English Heritage - North West	1st Stage Deposit
1.21	ENV01/R439/O863	Keith	Adamson	Pendle CPRE	Re-deposit
1.21	ENV01/R513/O859	Mark	Gardner	Trawden Community Group	Re-deposit
1.22	ENV01/R439/O515	Keith	Adamson	Pendle CPRE	1st Stage Deposit
1.23	ENV01/R355/O840	Phil	Megson	Lancashire County Council	Re-deposit
1.23	ENV01/R126/O942	W	Driver		1st Stage Deposit
1.23	ENV01/R497/O744	Robert	Kandt	Barnoldswick Town Council	Re-deposit
1.23	ENV01/R312/O626	Alison	Roland	Town Planning Consultant	1st Stage Deposit
1.23	ENV01/R469/O627	Janet	Dixon		1st Stage Deposit
1.23	ENV01/R358/O946	Carlo	Lionti		1st Stage Deposit
1.24	ENV01/R512/O798			RAGE	Re-deposit
1.24	ENV01/R062/O082	S	Barnes		1st Stage Deposit
1.24	ENV01/R415/O484	S	Durkin		1st Stage Deposit
1.24	ENV01/R515/O893	Rosemary	Carroll	Pendle Borough Council	Re-deposit

1.24	ENV01/R070/O091	D.J.	Pickles		1st Stage Deposit
1.24	ENV01/R080/O709	P	Slater		1st Stage Deposit
1.24	ENV01/R269/O377	C L	Buckley		1st Stage Deposit
1.24	ENV01/R358/O435	Carlo	Lionti		1st Stage Deposit
1.24	ENV01/R026/O040	Kate	Grimshaw	Lancashire County Council	1st Stage Deposit
1.24	ENV01/R300/O399			Ashmale Properties	1st Stage Deposit
1.24	ENV01/R453/O536	C A	Blackburn	c/o Agent	1st Stage Deposit
1.24	ENV01/R449/O531	L	Pilkington		1st Stage Deposit
1.24	ENV01/R515/O895	Rosemary	Carroll	Pendle Borough Council	Re-deposit
1.24	ENV01/R520/O909	Melvyn	Aston	Classic Architecture	Re-deposit
1.24	ENV01/R520/O910	Melvyn	Aston	Classic Architecture	Re-deposit
1.24	ENV01/R010/O012	David	Penney	Pendle Environmental Network	1st Stage Deposit
1.24	ENV01/R510/O772	Paul	Maskell	Kelbrook and Sough Parish Council	Re-deposit
1.24	ENV01/R003/O003	Karen	Galvin	Trawden Forest Parish Council	1st Stage Deposit
1.24	ENV01/R509/O767	D J	Pickles		Re-deposit
1.24	ENV01/R481/O714	Norman & Jean	Shorrocks		Re-deposit
1.24	ENV01/R126/O216	W	Driver		1st Stage Deposit
1.24	ENV01/R080/O235	P	Slater		1st Stage Deposit
1.24	ENV01/R242/O341	N	Smith	Bellway Homes	1st Stage Deposit
1.24	ENV01/R480/O713	J B	Steele		Re-deposit
1.24	ENV01/R234/O885	Andrew	Ashworth		Re-deposit
1.24	ENV01/R482/O715	Frank	Harper		Re-deposit
1.24	ENV01/R137/O233	Shiela	Smith		1st Stage Deposit
1.24	ENV01/R307/O892	Chris	Tennant		Re-deposit
1.24	ENV01/R307/O891	Chris	Tennant		Re-deposit
1.24	ENV01/R514/O884	Vera	Cocker		Re-deposit
1.24	ENV01/R443/O522			Green Emmott Trust c/o Robertshaws	1st Stage Deposit

1.24	ENV01/R042/O059	J	Beck		1st Stage Deposit
1.24	ENV01/R516/O894	Morris	Horsfield	Pendle Borough Council	Re-deposit
1.24	ENV01/R267/O380	Dawn	Newsham		1st Stage Deposit
1.24	ENV01/R142/O234	Janet	Style	Grosvenor & Mable Street Residents Association	1st Stage Deposit
1.24	ENV01/R514/O883	Vera	Cocker		Re-deposit
1.24	ENV01/R516/O896	Morris	Horsfield	Pendle Borough Council	Re-deposit
1.24	ENV01/R451/O533	R D C	Bone	c/o Agent	1st Stage Deposit
1.24	ENV01/R441/O520		Barnett		1st Stage Deposit
2.02	ENV02/R122/O202	Phil	Smith	GONW	1st Stage Deposit
2.02	ENV02/R472/O787	Alan	Hubbard	The National Trust - North West Region.	Re-deposit
2.02	ENV02/R067/O086	Deborah	Rusbridge	English Nature	1st Stage Deposit
2.02	ENV02/R511/O778	Barry	Connolly	E.ON UK Renewables	Re-deposit
2.03	ENV02/R122/O924	Phil	Smith	GONW	Re-deposit
2.11	ENV02/R498/O747			Roughlee Parish Council	Re-deposit
2.12	ENV02/R359/O555	Frank	Belshaw		1st Stage Deposit
3.02	ENV03/R456/O543	Stephen	Hedley	Countryside Agency - North West Region	1st Stage Deposit
3.02	ENV03/R067/O087	Deborah	Rusbridge	English Nature	1st Stage Deposit
3.03	ENV03/R439/O864	Keith	Adamson	Pendle CPRE	Re-deposit
3.06	ENV03/R008/O697	K	Whinney		1st Stage Deposit
3.07	ENV03/R008/O024	K	Whinney		1st Stage Deposit
3.07	ENV03/R051/O159	T	Coyne		1st Stage Deposit
3.08	ENV03/R472/O571	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit
3.11	ENV03/R256/O347	Kathleen	Helm		1st Stage Deposit
3.11	ENV03/R005/O005		Chauderey		1st Stage Deposit
3.11	ENV03/R234/O882	Andrew	Ashworth		Re-deposit
3.11	ENV03/R307/O888	Chris	Tennant		Re-deposit

3.11	ENV03/R032/O050			The Edith Butler Trust	1st Stage Deposit
3.11	ENV03/R464/O560	A J	Holm		1st Stage Deposit
3.11	ENV03/R505/O755	James	Hutchinson		Re-deposit
3.11	ENV03/R026/O038	Kate	Grimshaw	Lancashire County Council	1st Stage Deposit
3.11	ENV03/R031/O047			HOODCO 441 Ltd.	1st Stage Deposit
3.11	ENV03/R107/O178	Colin	Unwin		1st Stage Deposit
3.11	ENV03/R296/O737	Louise	Morrissey	Peel Investments (North) Ltd.	Re-deposit
3.11	ENV03/R039/O056		Not Supplied (2)		1st Stage Deposit
3.11	ENV03/R367/O459	V B	Craven	Craven Design Partnership	1st Stage Deposit
3.11	ENV03/R419/O492	J	Plackett		1st Stage Deposit
3.11	ENV03/R267/O373	Dawn	Newsham		1st Stage Deposit
3.11	ENV03/R512/O799			RAGE	Re-deposit
3.11	ENV03/R080/O107	P	Slater		1st Stage Deposit
3.11	ENV03/R046/O781	P A	Larter		Re-deposit
3.11	ENV03/R010/O013	David	Penney	Pendle Environmental Network	1st Stage Deposit
3.11	ENV03/R011/O022	S	Langstroth		1st Stage Deposit
3.11	ENV03/R260/O351		Forrester		1st Stage Deposit
3.11	ENV03/R258/O372	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
3.11	ENV03/R420/O496	N	Leah		1st Stage Deposit
3.11	ENV03/R100/O139	Michael	Simpson		1st Stage Deposit
3.11	ENV03/R101/O147	Ian	Lord	Barrowford Parish Council	1st Stage Deposit
3.11	ENV03/R137/O321	Shiela	Smith		1st Stage Deposit
3.11	ENV03/R112/O179	Pam	Smith		1st Stage Deposit
3.11	ENV03/R269/O379	C L	Buckley		1st Stage Deposit
3.11	ENV03/R036/O720			Enville Properties Ltd.	Re-deposit
3.11	ENV03/R358/O699	Carlo	Lionti		1st Stage Deposit
4.01	ENV04/R355/O430	Phil	Megson	Lancashire County Council	1st Stage Deposit
4.02	ENV04/R472/O572	Alan	Hubbard	The National Trust - North West	1st Stage Deposit

				Region.	
4.03	ENV04/R051/O160	T	Coyne		1st Stage Deposit
4.12	ENV04/R137/O631	Shiela	Smith		1st Stage Deposit
4.12	ENV04/R137/O630	Shiela	Smith		1st Stage Deposit
4.13	ENV04/R099/O128	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
4.13	ENV04/R099/O645	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
4.14	ENV04/R439/O704	Keith	Adamson	Pendle CPRE	1st Stage Deposit
4.14	ENV04/R261/O352		Forrester		1st Stage Deposit
4.14	ENV04/R137/O323	Shiela	Smith		1st Stage Deposit
4.14	ENV04/R259/O350	J	Slinger		1st Stage Deposit
4.14	ENV04/R464/O561	A J	Holm		1st Stage Deposit
4.14	ENV04/R263/O359	Nicola	Caygill		1st Stage Deposit
4.14	ENV04/R080/O238	P	Slater		1st Stage Deposit
4.14	ENV04/R112/O180	Pam	Smith		1st Stage Deposit
4.14	ENV04/R107/O177	Colin	Unwin		1st Stage Deposit
4.14	ENV04/R258/O371	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
4.14	ENV04/R010/O629	David	Penney	Pendle Environmental Network	1st Stage Deposit
4.14	ENV04/R010/O628	David	Penney	Pendle Environmental Network	1st Stage Deposit
4.14	ENV04/R479/O609	A	Moore	Salterforth Parish Council	1st Stage Deposit
4.14	ENV04/R107/O168	Colin	Unwin		1st Stage Deposit
4.14	ENV04/R079/O101	Andrea	Shackleton		1st Stage Deposit
4.15	ENV04/R067/O088	Deborah	Rusbridge	English Nature	1st Stage Deposit
4.34	ENV04/R122/O203	Phil	Smith	GONW	1st Stage Deposit
4.36	ENV04B/R355/O803	Phil	Megson	Lancashire County Council	Re-deposit
4.44	ENV04C/R355/O804	Phil	Megson	Lancashire County Council	Re-deposit
4.45	ENV04C/R355/O806	Phil	Megson	Lancashire County Council	Re-deposit
4.47	ENV04C/R439/O860	Keith	Adamson	Pendle CPRE	Re-deposit
4.48	ENV04C/R355/O805	Phil	Megson	Lancashire County Council	Re-deposit
4.51	ENV04C/R355/O807	Phil	Megson	Lancashire County Council	Re-deposit

4.51	ENV04C/R355/O808	Phil	Megson	Lancashire County Council	Re-deposit
4.53	ENV04C/R355/O809	Phil	Megson	Lancashire County Council	Re-deposit
4.54	ENV04/R008/O030	K	Whinney		1st Stage Deposit
4.54	ENV04C/R355/O810	Phil	Megson	Lancashire County Council	Re-deposit
4.55	ENV04C/R355/O811	Phil	Megson	Lancashire County Council	Re-deposit
4.56	ENV04C/R355/O812	Phil	Megson	Lancashire County Council	Re-deposit
4.56	ENV04C/R099/O762	John	Lamb	Lancashire Wildlife Trust	Re-deposit
4.56	ENV04/R010/O014	David	Penney	Pendle Environmental Network	1st Stage Deposit
4.57	ENV04C/R099/O712	John	Lamb	Lancashire Wildlife Trust	Re-deposit
4.58	ENV04C/R099/O940	John	Lamb	Lancashire Wildlife Trust	Re-deposit
4.59	ENV04/R439/O500	Keith	Adamson	Pendle CPRE	1st Stage Deposit
4.59	ENV04/R295/O390	Philip	Carter	Environment Agency	1st Stage Deposit
4.59	ENV04/R067/O111	Deborah	Rusbridge	English Nature	1st Stage Deposit
4.62	ENV04D/R355/O813	Phil	Megson	Lancashire County Council	Re-deposit
4.72	ENV04D/R355/814	Phil	Megson	Lancashire County Council	Re-deposit
4.73	ENV04D/R080/O881	P	Slater		Re-deposit
4.74	ENV04C/R517/O897	A M	Plackett		Re-deposit
4.74	ENV04C/R234/O876	Andrew	Ashworth		Re-deposit
4.74	ENV04C/R512/O800			RAGE	Re-deposit
4.74	ENV04C/R512/O789			RAGE	Re-deposit
4.74	ENV04C/R234/O898	Andrew	Ashworth		Re-deposit
4.74	ENV04C/R004/O727	Thomas	Procter		Re-deposit
5.02	ENV05/R439/O501	Keith	Adamson	Pendle CPRE	1st Stage Deposit
5.02	ENV05/R355/O634	Phil	Megson	Lancashire County Council	1st Stage Deposit
5.02	ENV05/R511/O780	Barry	Connolly	E.ON UK Renewables	Re-deposit
5.02	ENV05/R472/O637	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit
5.02	ENV05/R511/O935	Barry	Connolly	E.ON UK Renewables	Re-deposit
5.03	ENV05/R355/O815	Phil	Megson	Lancashire County Council	Re-deposit

5.03	ENV05/R511/O930	Barry	Connolly	E.ON UK Renewables	Re-deposit
5.03	ENV05/R258/O370	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
5.03	ENV05/R439/O636	Keith	Adamson	Pendle CPRE	1st Stage Deposit
5.04	ENV05/R067/ O093	Deborah	Rusbridge	English Nature	1st Stage Deposit
5.04	ENV05/R511/O931	Barry	Connolly	E.ON UK Renewables	Re-deposit
5.04	ENV05/R511/O933	Barry	Connolly	E.ON UK Renewables	Re-deposit
5.04	ENV05/R474/O593			United Utilities Green Energy Ltd.	1st Stage Deposit
5.04	ENV05/R355/O433	Phil	Megson	Lancashire County Council	1st Stage Deposit
5.04	ENV05/R511/O932	Barry	Connolly	E.ON UK Renewables	Re-deposit
5.04	ENV05/R355/O842	Phil	Megson	Lancashire County Council	Re-deposit
5.04	ENV05/R355/O633	Phil	Megson	Lancashire County Council	1st Stage Deposit
5.04	ENV05/R122/O204	Phil	Smith	GONW	1st Stage Deposit
5.04	ENV05/R439/O871	Keith	Adamson	Pendle CPRE	Re-deposit
5.04	ENV05/R012/O023	Mick	McLoughlin	Energie Kontor UK Ltd.	1st Stage Deposit
5.04	ENV05/R472/O573	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit
5.04	ENV05/R456/O544	Stephen	Hedley	Countryside Agency - North West Region	1st Stage Deposit
5.05	ENV05/R511/O934	Barry	Connolly	E.ON UK Renewables	Re-deposit
5.07	ENV05/R511/O936	Barry	Connolly	E.ON UK Renewables	Re-deposit
5.09	ENV05/R067/O632	Deborah	Rusbridge	English Nature	1st Stage Deposit
5.12	ENV05/R355/O841	Phil	Megson	Lancashire County Council	Re-deposit
5.12	ENV05/R355/O635	Phil	Megson	Lancashire County Council	1st Stage Deposit
5.12	ENV05/R107/O169	Colin	Unwin		1st Stage Deposit
5.12	ENV05/R137/O325	Shiela	Smith		1st Stage Deposit
6.03	ENV06/R510/O779	Paul	Maskell	Kelbrook and Sough Parish Council	Re-deposit
6.11	ENV06/R132/O782	David	Hardman	United Utilities	Re-deposit
6.11	ENV06/R122/O205	Phil	Smith	GONW	1st Stage Deposit
6.11	ENV06/R099/O134	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit

6.14	ENV06/R008/O019	K	Whinney		1st Stage Deposit
6.14	ENV06/R295/O785	Philip	Carter	Environment Agency	Re-deposit
6.16	ENV06/R497/O745	Robert	Kandt	Barnoldswick Town Council	Re-deposit
6.16	ENV06/R100/O141	Michael	Simpson		1st Stage Deposit
6.16	ENV06/R295/O392	Philip	Carter	Environment Agency	1st Stage Deposit
6.16	ENV06/R101/O703	Ian	Lord	Barrowford Parish Council	1st Stage Deposit
6.16	ENV06/R439/O504	Keith	Adamson	Pendle CPRE	1st Stage Deposit
6.16	ENV06/R295/O638	Philip	Carter	Environment Agency	1st Stage Deposit
7.03	ENV07/R439/O865	Keith	Adamson	Pendle CPRE	Re-deposit
7.04	ENV07/R295/O393	Philip	Carter	Environment Agency	1st Stage Deposit
7.07	ENV07/R450/O539	Rachel	Hughes	Yorkshire Water Services	1st Stage Deposit
7.11	ENV07/R450/O639	Rachel	Hughes	Yorkshire Water Services	1st Stage Deposit
8.02	ENV08/R137/O326	Shiela	Smith		1st Stage Deposit
8.02	ENV08/R258/O376	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
8.02	ENV08/R439/O641	Keith	Adamson	Pendle CPRE	1st Stage Deposit
8.11	ENV08/R132/O784	David	Hardman	United Utilities	Re-deposit
8.11	ENV08/R295/O394	Philip	Carter	Environment Agency	1st Stage Deposit
8.11	ENV08/R295/O640	Philip	Carter	Environment Agency	1st Stage Deposit
8.15	ENV08/R439/O502	Keith	Adamson	Pendle CPRE	1st Stage Deposit
8.17	ENV08/R132/O854	David	Hardman	United Utilities	Re-deposit
8.17	ENV08/R439/O866	Keith	Adamson	Pendle CPRE	Re-deposit
9.01	ENV09/R467/O584	Judith	Nelson	English Heritage - North West	1st Stage Deposit
9.02	ENV09/R147/O242	Lynne	Walker	The Council for British Archaeology	1st Stage Deposit
9.06	ENV09/R355/O436	Phil	Megson	Lancashire County Council	1st Stage Deposit
9.07	ENV09/R122/O206	Phil	Smith	GONW	1st Stage Deposit
9.13	ENV09/R122/O642	Phil	Smith	GONW	1st Stage Deposit
9.13	ENV09/R355/O816	Phil	Megson	Lancashire County Council	Re-deposit
10.01	ENV10/R467/O585	Judith	Nelson	English Heritage - North West	1st Stage Deposit

10.02	ENV10/R472/O576	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit
10.02	ENV11/R355/O438	Phil	Megson	Lancashire County Council	1st Stage Deposit
10.04	ENV10/R122/O207	Phil	Smith	GONW	1st Stage Deposit
10.1	ENV10/R147/O243	Lynne	Walker	The Council for British Archaeology	1st Stage Deposit
10.1	ENV10/R522/O912	Julie	Whittaker	Pendle Borough Council	Re-deposit
10.12	ENV10/R472/O786	Alan	Hubbard	The National Trust - North West Region.	Re-deposit
10.12	ENV10/R355/O843	Phil	Megson	Lancashire County Council	Re-deposit
10.17	ENV10/R355/O437	Phil	Megson	Lancashire County Council	1st Stage Deposit
10.19	ENV10/R234/O875	Andrew	Ashworth		Re-deposit
10.19	ENV10/R439/O517	Keith	Adamson	Pendle CPRE	1st Stage Deposit
10.19	ENV10/R100/O144	Michael	Simpson		1st Stage Deposit
10.19	ENV10/R026/O039	Kate	Grimshaw	Lancashire County Council	1st Stage Deposit
10.19	ENV10/R101/O146	Ian	Lord	Barrowford Parish Council	1st Stage Deposit
10.19	ENV10/R102/O149	David	Foster		1st Stage Deposit
10.19	ENV10/R307/O567	Chris	Tennant		1st Stage Deposit
11.02	ENV11/R467/O586	Judith	Nelson	English Heritage - North West	1st Stage Deposit
11.02	ENV11/R147/O244	Lynne	Walker	The Council for British Archaeology	1st Stage Deposit
11.02	ENV11/R355/O817	Phil	Megson	Lancashire County Council	Re-deposit
11.09	ENV11/R147/O643	Lynne	Walker	The Council for British Archaeology	1st Stage Deposit
11.12	ENV11/R355/O644	Phil	Megson	Lancashire County Council	1st Stage Deposit
12.02	ENV12/R002/O001			Winchester Furniture Ltd.	1st Stage Deposit
12.02	ENV12/R122/O208	Phil	Smith	GONW	1st Stage Deposit
12.12	ENV12/R439/O503	Keith	Adamson	Pendle CPRE	1st Stage Deposit
12.13	ENV12/R137/O327	Shiela	Smith		1st Stage Deposit
12.13	ENV12/R037/O055			Dean Gardens Ltd.	1st Stage Deposit

12.13	ENV12/R040/O058	J	Harvey		1st Stage Deposit
12.13	ENV12/R034/O051	David	West		1st Stage Deposit
12.13	ENV12/R307/O890	Chris	Tennant		Re-deposit
12.13	ENV12/R016/O028	James	Riding		1st Stage Deposit
12.13	ENV12/R258/O375	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
12.13	ENV12/R439/O700	Keith	Adamson	Pendle CPRE	1st Stage Deposit
12.13	ENV12/R488/O729	Herbert	Whipp		Re-deposit
12.13	ENV12/R360/O439		Fowler		1st Stage Deposit
12.13	ENV12/R026/O033	Kate	Grimshaw	Lancashire County Council	1st Stage Deposit
12.13	ENV12/R107/O167	Colin	Unwin		1st Stage Deposit
12.13	ENV12/R025/O032	Jill	Windle		1st Stage Deposit
12.13	ENV12/R080/O698	P	Slater		1st Stage Deposit
12.13	ENV12/R024/O031	Nicholas	Brierley		1st Stage Deposit
12.13	ENV12/R031/O048			HOODCO 441 Ltd.	1st Stage Deposit
12.13	ENV12/R003/O002	Karen	Galvin	Trawden Forest Parish Council	1st Stage Deposit
13.02	ENV13/R450/O538	Rachel	Hughes	Yorkshire Water Services	1st Stage Deposit
13.02	ENV13/R355/O440	Phil	Megson	Lancashire County Council	1st Stage Deposit
13.03	ENV13/R054/O071	Sylvia	Wilson	Whitefield Conservation Action Group	1st Stage Deposit
13.03	ENV13/R107/O165	Colin	Unwin		1st Stage Deposit
13.03	ENV13/R467/O587	Judith	Nelson	English Heritage - North West	1st Stage Deposit
13.07	ENV13/R295/O391	Philip	Carter	Environment Agency	1st Stage Deposit
13.07	ENV13/R132/O855	David	Hardman	United Utilities	Re-deposit
13.08	ENV13/R122/O209	Phil	Smith	GONW	1st Stage Deposit
13.14	ENV13/R137/O328	Shiela	Smith		1st Stage Deposit
13.14	ENV13/R258/O374	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
13.17	ENV13/R099/O137	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
13.17	ENV13/R522/O913	Julie	Whittaker	Pendle Borough Council	Re-deposit
13.17	ENV13/R486/O725	Barbara	Hollingworth	Lancashire Constabulary	Re-deposit

13.17	ENV13/R450/O646	Rachel	Hughes	Yorkshire Water Services	1st Stage Deposit
13.17	ENV13/R065/O084	John	Clancy	Pendle Civic Trust	1st Stage Deposit
14.01	ENV14/R122/O210	Phil	Smith	GONW	1st Stage Deposit
14.03	ENV14/R107/O166	Colin	Unwin		1st Stage Deposit
14.03	ENV14/R439/O869	Keith	Adamson	Pendle CPRE	Re-deposit
14.12	ENV14/R355/O818	Phil	Megson	Lancashire County Council	Re-deposit
14.14	ENV14/R137/O330	Shiela	Smith		1st Stage Deposit
14.14	ENV14/R258/O362	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
14.14	ENV14/R355/O554	Phil	Megson	Lancashire County Council	1st Stage Deposit
14.16	ENV14/R067/O552	Deborah	Rusbridge	English Nature	1st Stage Deposit
14.22	ENV14/R099/O553	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
14.22	ENV14/R355/O844	Phil	Megson	Lancashire County Council	Re-deposit
14.22	ENV14/R439/O499	Keith	Adamson	Pendle CPRE	1st Stage Deposit
14.23	ENV14/R517/O900	A M	Plackett		Re-deposit
14.23	ENV14/R512/O790			RAGE	Re-deposit
15.01	ENV15/R099/O612	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
15.02	ENV15/R122/O211	Phil	Smith	GONW	1st Stage Deposit
15.02	ENV15/R107/O164	Colin	Unwin		1st Stage Deposit
15.05	ENV15/R137/O331	Shiela	Smith		1st Stage Deposit
15.05	ENV15/R439/O649	Keith	Adamson	Pendle CPRE	1st Stage Deposit
15.08	ENV15/R132/O220	David	Hardman	United Utilities	1st Stage Deposit
15.08	ENV15/R439/O650	Keith	Adamson	Pendle CPRE	1st Stage Deposit
15.08	ENV15/R439/O651	Keith	Adamson	Pendle CPRE	1st Stage Deposit
15.08	ENV15/R067/O615	Deborah	Rusbridge	English Nature	1st Stage Deposit
15.08	ENV15/R439/O505	Keith	Adamson	Pendle CPRE	1st Stage Deposit
15.08	ENV15/R439/O647	Keith	Adamson	Pendle CPRE	1st Stage Deposit
15.08	ENV15/R355/O441	Phil	Megson	Lancashire County Council	1st Stage Deposit
15.08	ENV15/R439/O648	Keith	Adamson	Pendle CPRE	1st Stage Deposit
15.09	ENV15/R269/O568	C L	Buckley		1st Stage Deposit

15.09	ENV15/R078/O614	Valerie	Shackleton		1st Stage Deposit
15.09	ENV15/R262/O611	Martin	Caygill		1st Stage Deposit
15.09	ENV15/R080/O613	P	Slater		1st Stage Deposit
16.03	ENV16/R099/O136	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
16.06	ENV16/R355/O442	Phil	Megson	Lancashire County Council	1st Stage Deposit
16.1	ENV16/R132/O221	David	Hardman	United Utilities	1st Stage Deposit
17.02	HOU17/R355/O443	Phil	Megson	Lancashire County Council	1st Stage Deposit
17.02	HOU17/R442/O526	Susan	Graham	Burnley Borough Council	1st Stage Deposit
17.02	HOU17/R265/O953	B W	Denton		1st Stage Deposit
17.02	HOU17/R377/O475	E N	Whitaker		1st Stage Deposit
17.02	HOU17/R235/O951	Andrew	Ashworth		1st Stage Deposit
17.02	HOU17/R122/O212	Phil	Smith	GONW	1st Stage Deposit
17.03	HOU17/R013/O947	Diane	Jolly		1st Stage Deposit
17.05	HOU17/R257/O952	Kath	Parker		1st Stage Deposit
17.09	HOU17/R099/O948	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
17.12	HOU17/R122/O925	Phil	Smith	GONW	Re-deposit
17.19	HOU17/R355/O819	Phil	Megson	Lancashire County Council	Re-deposit
17.23	HOU17/R494/O740			Thermawear Ltd.	Re-deposit
17.24	HOU17/R355/O820	Phil	Megson	Lancashire County Council	Re-deposit
17.26	HOU17/R513/O872	Mark	Gardner	Trawden Community Group	Re-deposit
17.26	HOU17/R513/O874	Mark	Gardner	Trawden Community Group	Re-deposit
17.27	HOU17/R439/O867	Keith	Adamson	Pendle CPRE	Re-deposit
17.32	HOU17/R053/O068	Earl	French		1st Stage Deposit
17.32	HOU17/R008/O010	K	Whinney		1st Stage Deposit
17.34	HOU17/R008/O683	K	Whinney		1st Stage Deposit
17.34	HOU17/R420/O493	N	Leah		1st Stage Deposit
17.34	HOU17/R419/O489	J	Plackett		1st Stage Deposit
17.34	HOU17/R056/O685	Doug	Hann	Indigo Planning Ltd.	1st Stage Deposit
17.34	HOU17/R242/O346	N	Smith	Bellway Homes	1st Stage Deposit

17.34	HOU17/R442/O525	Susan	Graham	Burnley Borough Council	1st Stage Deposit
17.34	HOU17/R038/O057		Not Supplied (1)		1st Stage Deposit
17.34	HOU17/R135/O701	K A	Riley	R. Metalwork Ltd.	1st Stage Deposit
17.34	HOU17/R242/O342	N	Smith	Bellway Homes	1st Stage Deposit
17.34	HOU17/R083/O200	Phil	Boyle		1st Stage Deposit
17.34	HOU17/R477/O954	John	Whittaker		1st Stage Deposit
17.35	HOU17/R107/O162	Colin	Unwin		1st Stage Deposit
17.36	HOU17/R102/O687	David	Foster		1st Stage Deposit
17.37	HOU17/R107/O191	Collin	Unwin		1st Stage Deposit
17.37	HOU17/R258/O361	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
17.37	HOU17/R137/O332	Shiela	Smith		1st Stage Deposit
17.38	HOU17/R107/O163	Collin	Unwin		1st Stage Deposit
17.38	HOU17/R420/O691	N	Leah		1st Stage Deposit
17.38	HOU17/R083/O201	Phil	Boyle		1st Stage Deposit
17.38	HOU17/R112/O176	Pam	Smith		1st Stage Deposit
17.38	HOU17/R103/O949	Sonia	Robinson	Pendle Borough Council	1st Stage Deposit
17.38	HOU17/R419/O689	J	Plackett		1st Stage Deposit
17.38	HOU17/R091/O115	Emma	Semwayo		1st Stage Deposit
17.39	HOU17/R296/O402	Louise	Morrissey	Peel Investments (North) Ltd.	1st Stage Deposit
17.39	HOU17/R008/O684	K	Whinney		1st Stage Deposit
17.39	HOU17/R419/O690	J	Plackett		1st Stage Deposit
17.39	HOU17/R234/O950	Andrew	Ashworth		1st Stage Deposit
17.39	HOU17/R420/O692	N	Leah		1st Stage Deposit
17.39	HOU17/R258/O353	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
17.39	HOU17/R302/O409	Marie	Bintley	English Partnerships	1st Stage Deposit
17.4	HOU17/R442/O562	Susan	Graham	Burnley Borough Council	1st Stage Deposit
17.4	HOU17/R035/O052	H	Parkinson		1st Stage Deposit
17.45	HOU17/R456/O545	Stephen	Hedley	Countryside Agency - North West	1st Stage Deposit

				Region	
17.45	HOU17/R128/O478	G	Wilkinson	Skipton Pine Factory	1st Stage Deposit
17.54	HOU17/R491/O734	B	Sparnon	Persimmon Homes (Lancashire) Ltd.	Re-deposit
17.57	HOU17/R491/O735	B	Sparnon	Persimmon Homes (Lancashire) Ltd.	Re-deposit
17.62	HOU17/R419/O769	J	Plackett		Re-deposit
17.62	HOU17/R419/O766	J	Plackett		Re-deposit
17.62	HOU17/R234/O939	Andrew	Ashworth		Re-deposit
17.62	HOU17/R512/O793			RAGE	Re-deposit
17.63	HOU17/R512/O792			RAGE	Re-deposit
17.64	HOU17/R030/O721			Crown Way Homes Ltd.	Re-deposit
17.64	HOU17/R234/O889	Andrew	Ashworth		Re-deposit
17.64	HOU17/R419/O768	J	Plackett		Re-deposit
17.84	HOU17/R083/O108	Phil	Boyle		1st Stage Deposit
17.84	HOU17/R522/O914	Julie	Whittaker	Pendle Borough Council	Re-deposit
17.84	HOU17/R356/O902			McCarthy & Stone Developments Ltd.	Re-deposit
17.84	HOU17/R503/O752	Riasat	Khan		Re-deposit
17.84	HOU17/R500/O749	Shabir	Hussain		Re-deposit
17.84	HOU17/R056/O686	Doug	Hann	Indigo Planning Ltd.	1st Stage Deposit
17.84	HOU17/R512/O795			RAGE	Re-deposit
17.84	HOU17/R502/O751	Ghulam	Rasul		Re-deposit
17.84	HOU17/R504/O753	Mohammad	Akram		Re-deposit
17.84	HOU17/R507/O758			Colhoun and Gaughran	Re-deposit
17.84	HOU17/R501/O750	Mohammad	Ashraf		Re-deposit
17.85	HOU17/R234/O878	Andrew	Ashworth		Re-deposit
17.85	HOU17/R235/O329	Andrew	Ashworth		1st Stage Deposit
17.85	HOU17/R234/O322	Andrew	Ashworth		1st Stage Deposit
17.85	HOU17/R221/O318	P	McCarthy		1st Stage Deposit

17.85	HOU17/R265/O366	B W	Denton		1st Stage Deposit
17.85	HOU17/R191/O288	Michael	Roach		1st Stage Deposit
17.85	HOU17/R154/O251	A	Edmondson		1st Stage Deposit
17.85	HOU17/R193/O290		Thorp		1st Stage Deposit
17.85	HOU17/R203/O300	Alan	Swindburn		1st Stage Deposit
17.85	HOU17/R195/O292	Neville	Roscoe		1st Stage Deposit
17.85	HOU17/R197/O294	Edna	Rushton		1st Stage Deposit
17.85	HOU17/R198/O295	K	Appleby		1st Stage Deposit
17.85	HOU17/R199/O296	Stuart	Shackleton		1st Stage Deposit
17.85	HOU17/R200/O297	John	Dickinson		1st Stage Deposit
17.85	HOU17/R216/O313	K	Townson		1st Stage Deposit
17.85	HOU17/R194/O291	W	Rutter		1st Stage Deposit
17.85	HOU17/R202/O299	J	Hartshorn		1st Stage Deposit
17.85	HOU17/R007/O007	Kate	Grimshaw	Lancashire County Council	1st Stage Deposit
17.85	HOU17/R278/O388	M	Eardley		1st Stage Deposit
17.85	HOU17/R264/O364	Bryan	Wildman		1st Stage Deposit
17.85	HOU17/R087/O113	Kevin	Singleton		1st Stage Deposit
17.85	HOU17/R234/O879	Andrew	Ashworth		Re-deposit
17.85	HOU17/R006/O006	Gillian	Hudson	Oxford Road Residents Association Group	1st Stage Deposit
17.85	HOU17/R257/O348	Kath	Parker		1st Stage Deposit
17.85	HOU17/R439/O868	Keith	Adamson	Pendle CPRE	Re-deposit
17.85	HOU17/R229/O319	David	Sutcliffe		1st Stage Deposit
17.85	HOU17/R192/O289	Jean	Dean		1st Stage Deposit
17.85	HOU17/R217/O314		Lucas		1st Stage Deposit
17.85	HOU17/R218/O315	S	Bracewell		1st Stage Deposit
17.85	HOU17/R219/O316	P J	Sanderson		1st Stage Deposit
17.85	HOU17/R280/O389	Brenda	Root		1st Stage Deposit
17.85	HOU17/R266/O369	Sally Anne	Denton		1st Stage Deposit

17.85	HOU17/R183/O280	Terry	Gibbons		1st Stage Deposit
17.85	HOU17/R158/O255	Geoffrey	Hartley		1st Stage Deposit
17.85	HOU17/R418/O488	M A	Smith	Bridge Street Stone Ltd.	1st Stage Deposit
17.85	HOU17/R419/O773	J	Plackett		Re-deposit
17.85	HOU17/R182/O279		Edmondson		1st Stage Deposit
17.85	HOU17/R174/O271	L	Walker		1st Stage Deposit
17.85	HOU17/R175/O272	G R	Snape		1st Stage Deposit
17.85	HOU17/R176/O273		Eyre		1st Stage Deposit
17.85	HOU17/R177/O274	L	Phipps - Carter		1st Stage Deposit
17.85	HOU17/R178/O275	Stephen	Moody		1st Stage Deposit
17.85	HOU17/R179/O276	D J	Hodgeon		1st Stage Deposit
17.85	HOU17/R173/O270	Nick	Wilkinson		1st Stage Deposit
17.85	HOU17/R419/O774	J	Plackett		Re-deposit
17.85	HOU17/R180/O277	Mathew	Crabtree		1st Stage Deposit
17.85	HOU17/R166/O263	Jonathan	Hull		1st Stage Deposit
17.85	HOU17/R184/O281	H R	Taylor		1st Stage Deposit
17.85	HOU17/R185/O282		Wharton		1st Stage Deposit
17.85	HOU17/R181/O278	L	Riley		1st Stage Deposit
17.85	HOU17/R172/O269	Dominic	Parsons		1st Stage Deposit
17.85	HOU17/R367/O460	V B	Craven	Craven Design Partnership	1st Stage Deposit
17.85	HOU17/R171/O268	K	Johnson		1st Stage Deposit
17.85	HOU17/R170/O267	Mark	Complin		1st Stage Deposit
17.85	HOU17/R169/O266	G	Wright		1st Stage Deposit
17.85	HOU17/R512/O796			RAGE	Re-deposit
17.85	HOU17/R168/O265	George	Slater		1st Stage Deposit
17.85	HOU17/R190/O287		Holdsworth		1st Stage Deposit
17.85	HOU17/R165/O262	James	Ellis		1st Stage Deposit
17.85	HOU17/R512/O794			RAGE	Re-deposit
17.85	HOU17/R004/O004	Thomas	Procter		1st Stage Deposit

17.85	HOU17/R269/O378	C L	Buckley		1st Stage Deposit
17.85	HOU17/R215/O312	Robert	Ainscough		1st Stage Deposit
17.85	HOU17/R220/O317	M D	Roberts		1st Stage Deposit
17.85	HOU17/R071/O092	Ronald	Bone		1st Stage Deposit
17.85	HOU17/R161/O258	F	Shepherd		1st Stage Deposit
17.85	HOU17/R162/O259	Michael	Hesketh		1st Stage Deposit
17.85	HOU17/R163/O260	Kenneth	Driver		1st Stage Deposit
17.85	HOU17/R063/O083	Andrew	Leysens	United Utilities	1st Stage Deposit
17.85	HOU17/R512/O791			RAGE	Re-deposit
17.85	HOU17/R160/O257	B	Little		1st Stage Deposit
17.85	HOU17/R419/O490	J	Plackett		1st Stage Deposit
17.85	HOU17/R159/O256	Karolyn	Bannister		1st Stage Deposit
17.85	HOU17/R234/O887	Andrew	Ashworth		Re-deposit
17.85	HOU17/R186/O283	M	Metcalfe		1st Stage Deposit
17.85	HOU17/R372/O469	William	Peel		1st Stage Deposit
17.85	HOU17/R167/O264	Joyce	Allen		1st Stage Deposit
17.85	HOU17/R164/O261		Robinson		1st Stage Deposit
17.85	HOU17/R420/O494	N	Leah		1st Stage Deposit
17.85	HOU17/R155/O252	J	Proctor		1st Stage Deposit
17.85	HOU17/R419/O771	J	Plackett		Re-deposit
17.85	HOU17/R156/O253	P	Cunningham	Sacred Heart School	1st Stage Deposit
17.85	HOU17/R421/O497			Red Group Ltd.	1st Stage Deposit
17.85	HOU17/R416/O485	G	Wilcock		1st Stage Deposit
17.85	HOU17/R157/O254	Liam	Mulligan		1st Stage Deposit
17.85	HOU17/R378/O476	Ian	Bearysworth	Dalesmoor Homes Ltd.	1st Stage Deposit
17.85	HOU17/R055/O072	Ian	Wolfenden	LBS Group - Cottontree Office	1st Stage Deposit
17.85	HOU17/R057/O074	Ian (Home)	Wolfenden		1st Stage Deposit
17.85	HOU17/R056/O073	Doug	Hann	Indigo Planning Ltd.	1st Stage Deposit
17.85	HOU17/R146/O240	Brian	Whittle		1st Stage Deposit

17.85	HOU17/R505/O756	James	Hutchinson		Re-deposit
17.85	HOU17/R145/O239	Paul	Henderson		1st Stage Deposit
17.85	HOU17/R452/O534	A	Caygill	c/o Agent	1st Stage Deposit
17.85	HOU17/R450/O535	Rachel	Hughes	Yorkshire Water Services	1st Stage Deposit
17.85	HOU17/R144/O237	A	Hartley		1st Stage Deposit
17.85	HOU17/R032/O917			The Edith Butler Trust	Re-deposit
17.85	HOU17/R106/O161	Janet M	Bainbridge		1st Stage Deposit
17.85	HOU17/R058/O075	Geoffrey	Wolfenden		1st Stage Deposit
17.85	HOU17/R439/O512	Keith	Adamson	Pendle CPRE	1st Stage Deposit
17.85	HOU17/R013/O025	Diane	Jolly		1st Stage Deposit
17.85	HOU17/R014/O026		G J Hook		1st Stage Deposit
17.85	HOU17/R148/O245	Patricia	Norcross		1st Stage Deposit
17.85	HOU17/R443/O523			Green Emmott Trust c/o Robertshaws	1st Stage Deposit
17.85	HOU17/R150/O247	Jennie	Westwell		1st Stage Deposit
17.85	HOU17/R102/O151	David	Foster		1st Stage Deposit
17.85	HOU17/R102/O150	David	Foster		1st Stage Deposit
17.85	HOU17/R439/O693	Keith	Adamson	Pendle CPRE	1st Stage Deposit
17.85	HOU17/R103/O152	Sonia	Robinson	Pendle Borough Council	1st Stage Deposit
17.85	HOU17/R143/O236	Glyn	Hartley		1st Stage Deposit
17.85	HOU17/R138/O228	Norman	Smith		1st Stage Deposit
17.85	HOU17/R189/O286	W	Blackham		1st Stage Deposit
17.85	HOU17/R035/O053	H	Parkinson		1st Stage Deposit
17.85	HOU17/R048/O077	Jeremy	Ashworth	Venchem Ltd.	1st Stage Deposit
17.85	HOU17/R507/O908			Colhoun and Gaughran	Re-deposit
17.85	HOU17/R521/O911	T O	Birtwistle		Re-deposit
17.85	HOU17/R128/O218	G	Wilkinson	Skipton Pine Factory	1st Stage Deposit
17.85	HOU17/R103/O154	Sonia	Robinson	Pendle Borough Council	1st Stage Deposit
17.85	HOU17/R056/O078	Doug	Hann	Indigo Planning Ltd.	1st Stage Deposit

17.85	HOU17/R229/O557	David	Sutcliffe		1st Stage Deposit
17.85	HOU17/R099/O135	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
17.85	HOU17/R462/O559	D	Hartley		1st Stage Deposit
17.85	HOU17/R489/O730	Yvonne	May		Re-deposit
17.85	HOU17/R152/O249	Jean	Turner		1st Stage Deposit
17.85	HOU17/R491/O733	B	Sparnon	Persimmon Homes (Lancashire) Ltd.	Re-deposit
17.85	HOU17/R149/O246	T	Simpson		1st Stage Deposit
17.85	HOU17/R050/O066	W & A	Gott		1st Stage Deposit
17.85	HOU17/R439/O511	Keith	Adamson	Pendle CPRE	1st Stage Deposit
17.85	HOU17/R131/O219	John	Rusius		1st Stage Deposit
17.85	HOU17/R439/O510	Keith	Adamson	Pendle CPRE	1st Stage Deposit
17.85	HOU17/R151/O248	Roy	Edington		1st Stage Deposit
17.85	HOU17/R047/O064	Bill	Ashton		1st Stage Deposit
17.85	HOU17/R103/O153	Sonia	Robinson	Pendle Borough Council	1st Stage Deposit
17.85	HOU17/R461/O558	E	Byrne		1st Stage Deposit
17.85	HOU17/R301/O405	N	Moore		1st Stage Deposit
17.85	HOU17/R512/O922			RAGE	Re-deposit
17.85	HOU17/R102/O148	David	Foster		1st Stage Deposit
17.85	HOU17/R296/O404	Louise	Morrissey	Peel Investments (North) Ltd.	1st Stage Deposit
17.85	HOU17/R204/O301		Morley		1st Stage Deposit
17.85	HOU17/R205/O302	P M B	Turner		1st Stage Deposit
17.85	HOU17/R206/O303	Karen	Howson		1st Stage Deposit
17.85	HOU17/R207/O304		Balding		1st Stage Deposit
17.85	HOU17/R208/O305	Peter	Brierley		1st Stage Deposit
17.85	HOU17/R209/O306	P K	Cronshaw		1st Stage Deposit
17.85	HOU17/R030/O046			Crown Way Homes Ltd.	1st Stage Deposit
17.85	HOU17/R357/O434	Roberta	Riding		1st Stage Deposit
17.85	HOU17/R512/O923			RAGE	Re-deposit

17.85	HOU17/R201/O298	Joyce	Cooper		1st Stage Deposit
17.85	HOU17/R212/O309	Chris	Jackson		1st Stage Deposit
17.85	HOU17/R296/O401	Louise	Morrissey	Peel Investments (North) Ltd.	1st Stage Deposit
17.85	HOU17/R213/O310	Denise	Corbridge		1st Stage Deposit
17.85	HOU17/R214/O311		Clark		1st Stage Deposit
17.85	HOU17/R086/O112		Singleton		1st Stage Deposit
17.85	HOU17/R211/O308		Leeds		1st Stage Deposit
17.85	HOU17/R196/O293	Frank	Sedgwick		1st Stage Deposit
17.85	HOU17/R187/O284		Digging		1st Stage Deposit
17.85	HOU17/R188/O285	K	Parkinson		1st Stage Deposit
17.85	HOU17/R210/O307	Darrell	Pilkington		1st Stage Deposit
17.85	HOU17/R419/O619	J	Plackett		1st Stage Deposit
17.85	HOU17/R107/O182	Colin	Unwin		1st Stage Deposit
17.85	HOU17/R123/O213	Sarah	Lee		1st Stage Deposit
17.85	HOU17/R524/O919	Carol	Pike		Re-deposit
17.85	HOU17/R036/O054			Enville Properties Ltd.	1st Stage Deposit
17.85	HOU17/R473/O590	P	Yeung	Lynnwood Developments Ltd.	1st Stage Deposit
17.85	HOU17/R523/O918	Keith	Beresford		Re-deposit
17.85	HOU17/R420/O618	N	Leah		1st Stage Deposit
17.85	HOU17/R153/O250	Marjorie	Whatley		1st Stage Deposit
17.85	HOU17/R477/O599	John	Whittaker		1st Stage Deposit
17.85	HOU17/R485/O724	Audrey	Wilson	Walton Lane Children's Centre	Re-deposit
17.85	HOU17/R119/O193	G	Nuttall		1st Stage Deposit
17.85	HOU17/R526/O921	Maurice	Pim		Re-deposit
17.85	HOU17/R467/O588	Judith	Nelson	English Heritage - North West	1st Stage Deposit
17.85	HOU17/R121/O197	J	Nuttall		1st Stage Deposit
17.85	HOU17/R129/O217	Jeffrey	Metcalfe		1st Stage Deposit
17.85	HOU17/R030/O938			Crown Way Homes Ltd.	Re-deposit
17.85	HOU17/R031/O049			HOODCO 441 Ltd.	1st Stage Deposit

17.85	HOU17/R046/O063	P A	Larter		1st Stage Deposit
17.85	HOU17/R483/O716	F W	Clarke		Re-deposit
17.85	HOU17/R045/O062	Stephen	Traynor		1st Stage Deposit
17.85	HOU17/R017/O029	Margaret	Stobbs		1st Stage Deposit
17.85	HOU17/R525/O920	Marcia	Allass		Re-deposit
18.01	HOU18/R122/O215	Phil	Smith	GONW	1st Stage Deposit
18.04	HOU18/R015/O027	David	Penney	Waterside Community Network	1st Stage Deposit
18.05	HOU18/R080/O106	P	Slater		1st Stage Deposit
18.05	HOU18/R355/O821	Phil	Megson	Lancashire County Council	Re-deposit
18.05	HOU18/R010/O015	David	Penney	Pendle Environmental Network	1st Stage Deposit
18.1	HOU18/R355/O445	Phil	Megson	Lancashire County Council	1st Stage Deposit
18.16	HOU18/R137/O334	Shiela	Smith		1st Stage Deposit
18.16	HOU18/R107/O189	Colin	Unwin		1st Stage Deposit
18.16	HOU18/R439/O509	Keith	Adamson	Pendle CPRE	1st Stage Deposit
18.16	HOU18/R258/O357	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
18.16	HOU18/R302/O694	Marie	Bintley	English Partnerships	1st Stage Deposit
18.16	HOU18/R522/O915	Julie	Whittaker	Pendle Borough Council	Re-deposit
18.16	HOU18/R135/O702	K A	Riley	R. Metalwork Ltd.	1st Stage Deposit
18.16	HOU18/R302/O407	Marie	Bintley	English Partnerships	1st Stage Deposit
18.16	HOU18/R258/O349	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
18.16	HOU18/R107/O181	Colin	Unwin		1st Stage Deposit
18.16	HOU18/R234/O856	Andrew	Ashworth		Re-deposit
18.17	HOU18/R028/O045	Steven	Lambert		1st Stage Deposit
18.17	HOU18/R029/O042	H	Lambert		1st Stage Deposit
18.17	HOU18/R234/O899	Andrew	Ashworth		Re-deposit
19.02	HOU19/R443/O527			Green Emmott Trust c/o Robertshaws	1st Stage Deposit
19.02	HOU19/R441/O519		Barnett		1st Stage Deposit
19.04	HOU19/R242/O345	N	Smith	Bellway Homes	1st Stage Deposit

19.08	HOU19/R107/O187	Colin	Unwin		1st Stage Deposit
19.08	HOU19/R137/O335	Shiela	Smith		1st Stage Deposit
19.08	HOU19/R258/O356	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
19.1	HOU19/R477/O600	John	Whittaker		1st Stage Deposit
19.15	HOU19/R456/O546	Stephen	Hedley	Countryside Agency - North West Region	1st Stage Deposit
19.15	HOU19/R456/O695	Stephen	Hedley	Countryside Agency - North West Region	1st Stage Deposit
19.15	HOU19/R355/O446	Phil	Megson	Lancashire County Council	1st Stage Deposit
20.03	HOU20/R296/O406	Louise	Morrissey	Peel Investments (North) Ltd.	1st Stage Deposit
20.03	HOU20/R122/O410	Phil	Smith	GONW	1st Stage Deposit
20.08	HOU20/R107/O171	Colin	Unwin		1st Stage Deposit
20.08	HOU20/R258/O355	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
20.08	HOU20/R137/O336	Shiela	Smith		1st Stage Deposit
20.13	HOU20/R302/O408	Marie	Bintley	English Partnerships	1st Stage Deposit
20.13	HOU20/R107/O170	Colin	Unwin		1st Stage Deposit
20.13	HOU20/R522/O916	Julie	Whittaker	Pendle Borough Council	Re-deposit
20.13	HOU20/R135/O222	K A	Riley	R. Metalwork Ltd.	1st Stage Deposit
20.13	HOU20/R355/O447	Phil	Megson	Lancashire County Council	1st Stage Deposit
20.14	HOU20/R080/O105	P	Slater		1st Stage Deposit
21.02	HOU21/R242/O343	N	Smith	Bellway Homes	1st Stage Deposit
21.02	HOU21/R242/O696	N	Smith	Bellway Homes	1st Stage Deposit
21.02	HOU21/R137/O337	Shiela	Smith		1st Stage Deposit
21.03	HOU21/R080/O616	P	Slater		1st Stage Deposit
21.06	HOU21/R356/O428			McCarthy & Stone Developments Ltd.	1st Stage Deposit
21.08	HOU21/R083/O617	Phil	Boyle		1st Stage Deposit
21.08	HOU21/R099/O130	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
22.04	EMP22/R122/O411	Phil	Smith	GONW	1st Stage Deposit
22.05	EMP22/R056/O079	Doug	Hann	Indigo Planning Ltd.	1st Stage Deposit

22.06	EMP22/R356/O901			McCarthy & Stone Developments Ltd.	Re-deposit
22.07	EMP22/R056/O706	Doug	Hann	Indigo Planning Ltd.	1st Stage Deposit
22.09	EMP22/R056/O707	Doug	Hann	Indigo Planning Ltd.	1st Stage Deposit
22.1	EMP22/R137/O338	Shiela	Smith		1st Stage Deposit
22.14	EMP22/R056/O705	Doug	Hann	Indigo Planning Ltd.	1st Stage Deposit
22.14	EMP22/R242/O344	N	Smith	Bellway Homes	1st Stage Deposit
22.15	EMP22/R507/O759			Colhoun and Gaughran	Re-deposit
22.15	EMP22/R296/O395	Louise	Morrissey	Peel Investments (North) Ltd.	1st Stage Deposit
22.15	EMP22/R047/O905	Bill	Ashton		Re-deposit
22.15	EMP22/R495/O741	William	Hall		Re-deposit
22.15	EMP22/R484/O719	D	Kitchen	Howarths	Re-deposit
22.15	EMP22/R419/O770	J	Plackett		Re-deposit
22.15	EMP22/R296/O400	Louise	Morrissey	Peel Investments (North) Ltd.	1st Stage Deposit
22.15	EMP22/R450/O532	Rachel	Hughes	Yorkshire Water Services	1st Stage Deposit
22.15	EMP22/R106/O688	Janet M	Bainbridge		1st Stage Deposit
22.15	EMP22/R050/O904	W & A	Gott		Re-deposit
22.15	EMP22/R099/O129	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
22.15	EMP22/R473/O592	P	Yeung	Lynnwood Developments Ltd.	1st Stage Deposit
23.01	EMP23/R008/O654	K	Whinney		1st Stage Deposit
23.02	EMP23/R122/O412	Phil	Smith	GONW	1st Stage Deposit
23.06	EMP23/R355/O708	Phil	Megson	Lancashire County Council	1st Stage Deposit
23.09	EMP23/R442/O521	Susan	Graham	Burnley Borough Council	1st Stage Deposit
23.1	EMP23/R008/O008	K	Whinney		1st Stage Deposit
23.1	EMP23/R510/O777	Paul	Maskell	Kelbrook and Sough Parish Council	Re-deposit
23.11	EMP23/R296/O723	Louise	Morrissey	Peel Investments (North) Ltd.	Re-deposit
23.11	EMP23/R355/O448	Phil	Megson	Lancashire County Council	1st Stage Deposit
23.11	EMP23/R008/O653	K	Whinney		1st Stage Deposit

23.14	EMP23/R417/O486	Philip	Leeds	Lanlee Supplies Ltd.	1st Stage Deposit
23.15	EMP23/R052/O069	Ian	Wolfenden	LBS Group - Walk Mill Office	1st Stage Deposit
23.15	EMP23/R011/O955	S	Langstroth		1st Stage Deposit
23.15	EMP23/R418/O487	M A	Smith	Bridge Street Stone Ltd.	1st Stage Deposit
23.15	EMP23/R309/O414	Dorothy	Morris	Pendle Borough Council - Regeneration Unit	1st Stage Deposit
23.15	EMP23/R135/O224	K A	Riley	R. Metalwork Ltd.	1st Stage Deposit
23.15	EMP23/R355/O822	Phil	Megson	Lancashire County Council	Re-deposit
23.15	EMP23/R048/O065	Jeremy	Ashworth	Venchem Ltd.	1st Stage Deposit
23.15	EMP23/R418/O718	M A	Smith	Bridge Street Stone Ltd.	Re-deposit
23.15	EMP23/R059/O076	Paul A	Riding	Furnico Ltd.	1st Stage Deposit
23.15	EMP23/R008/O652	K	Whinney		1st Stage Deposit
23.16	EMP23/R296/O739	Louise	Morrissey	Peel Investments (North) Ltd.	Re-deposit
23.16	EMP23/R011/O021	S	Langstroth		1st Stage Deposit
23.16	EMP23/R011/O020	S	Langstroth		1st Stage Deposit
23.16	EMP23/R487/O726			LBS Group - Horticultural	Re-deposit
23.16	EMP23/R033/O620	John	Clarke		1st Stage Deposit
23.16	EMP23/R307/O886	Chris	Tennant		Re-deposit
24.03	EMP24/R510/O775	Paul	Maskell	Kelbrook and Sough Parish Council	Re-deposit
24.05	EMP24/R122/O413	Phil	Smith	GONW	1st Stage Deposit
24.05	EMP24/R312/O556	Alison	Roland	Town Planning Consultant	1st Stage Deposit
24.07	EMP24/R355/O656	Phil	Megson	Lancashire County Council	1st Stage Deposit
24.1	EMP24/R439/O506	Keith	Adamson	Pendle CPRE	1st Stage Deposit
24.12	EMP24/R456/O548	Stephen	Hedley	Countryside Agency - North West Region	1st Stage Deposit
24.17	EMP24/R472/O658	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit
24.18	EMP24/R472/O578	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit

24.19	EMP24/R439/O862	Keith	Adamson	Pendle CPRE	Re-deposit
24.2	EMP24/R472/O788	Alan	Hubbard	The National Trust - North West Region.	Re-deposit
24.23	EMP24/R122/O927	Phil	Smith	GONW	Re-deposit
24.25	EMP24/R312/O657	Alison	Roland	Town Planning Consultant	1st Stage Deposit
24.25	EMP24/R122/O928	Phil	Smith	GONW	Re-deposit
24.28	EMP24/R355/O824	Phil	Megson	Lancashire County Council	Re-deposit
24.29	EMP24/R355/O825	Phil	Megson	Lancashire County Council	Re-deposit
24.3	EMP24/R122/O926	Phil	Smith	GONW	Re-deposit
24.33	EMP24/R439/O861	Keith	Adamson	Pendle CPRE	Re-deposit
24.33	EMP24/R122/O655	Phil	Smith	GONW	1st Stage Deposit
24.34	EMP24/R355/O450	Phil	Megson	Lancashire County Council	1st Stage Deposit
24.37	EMP24/R472/O577	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit
24.4	EMP24/R355/O828	Phil	Megson	Lancashire County Council	Re-deposit
24.4	EMP24/R355/O845	Phil	Megson	Lancashire County Council	Re-deposit
25.02	TCRD25/R442/O524	Susan	Graham	Burnley Borough Council	1st Stage Deposit
25.06	TCRD25/R475/O594		B&Q plc		1st Stage Deposit
25.08	TCRD25/R456/O549	Stephen	Hedley	Countryside Agency - North West Region	1st Stage Deposit
25.08	TCRD25/R442/O659	Susan	Graham	Burnley Borough Council	1st Stage Deposit
25.08	TCRD25/R475/O660		B&Q plc		1st Stage Deposit
25.08	TCRD25/R355/O451	Phil	Megson	Lancashire County Council	1st Stage Deposit
25.12	TCRD25/R355/O827	Phil	Megson	Lancashire County Council	Re-deposit
25.13	TCRD25/R355/O826	Phil	Megson	Lancashire County Council	Re-deposit
25.13	TCRD25/R122/O416	Phil	Smith	GONW	1st Stage Deposit
25.16	TCRD25/R122/O929	Phil	Smith	GONW	Re-deposit
25.19	TCRD25/R478/O956			Tesco Stores Ltd.	1st Stage Deposit
25.2	TCRD25/R478/O602			Tesco Stores Ltd.	1st Stage Deposit
25.2	TCRD25/R448/O530	M	Medley	Physique Training Equipment plc	1st Stage Deposit

25.2	TCRD25/R519/O906	James	Chapman	Eshton Property Development Ltd	Re-deposit
25.2	TCRD25/R494/O738			Thermawear Ltd.	Re-deposit
25.2	TCRD25/R492/O736			W.M. Morrison Supermarkets plc	Re-deposit
26.11	TCRD26/R137/O661	Shiela	Smith		1st Stage Deposit
26.13	TCRD26/R258/O354	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
26.13	TCRD26/R107/O172	Colin	Unwin		1st Stage Deposit
26.13	TCRD26/R137/O339	Shiela	Smith		1st Stage Deposit
27.08	TCRD27/R355/O829	Phil	Megson	Lancashire County Council	Re-deposit
27.08	TCRD27/R084/O109	Stephen	Lax	Colne Cycling Campaign	1st Stage Deposit
27.11	TCRD27/R478/O603			Tesco Stores Ltd.	1st Stage Deposit
28.11	TCRD28/R137/O340	Shiela	Smith		1st Stage Deposit
29.06	TRA29/R476/O597	David	Penney	SELRAP	1st Stage Deposit
29.08	TRA29/R355/O830	Phil	Megson	Lancashire County Council	Re-deposit
29.08	TRA29/R355/O831	Phil	Megson	Lancashire County Council	Re-deposit
29.08	TRA29/R355/O452	Phil	Megson	Lancashire County Council	1st Stage Deposit
29.09	TRA29/R122/O418	Phil	Smith	GONW	1st Stage Deposit
29.09	TRA29/R439/O508	Keith	Adamson	Pendle CPRE	1st Stage Deposit
29.11	TRA29/R365/O449	Sandra	Fleming	Highways Agency	1st Stage Deposit
29.13	TRA29/R355/O832	Phil	Megson	Lancashire County Council	Re-deposit
29.15	TRA29/R080/O102	P	Slater		1st Stage Deposit
29.15	TRA29/R084/O957	Stephen	Lax	Colne Cycling Campaign	1st Stage Deposit
29.15	TRA29/R010/O017	David	Penney	Pendle Environmental Network	1st Stage Deposit
29.15	TRA29/R307/O566	Chris	Tennant		1st Stage Deposit
29.15	TRA29/R008/O009	K	Whinney		1st Stage Deposit
29.15	TRA29/R439/O663	Keith	Adamson	Pendle CPRE	1st Stage Deposit
29.16	TRA29/R069/O090	S	Ingham		1st Stage Deposit
29.16	TRA29/R068/O089	Wilfred	Ingham		1st Stage Deposit
29.16	TRA29/R066/O085	Winifred Jean	Ingham		1st Stage Deposit
29.16	TRA29/R476/O764	David	Penney	SELRAP	Re-deposit

29.16	TRA29/R137/O223	Shiela	Smith		1st Stage Deposit
29.16	TRA29/R439/O662	Keith	Adamson	Pendle CPRE	1st Stage Deposit
29.16	TRA29/R476/O664	David	Penney	SELRAP	1st Stage Deposit
29.16	TRA29/R051/O156	T	Coyne		1st Stage Deposit
29.16	TRA29/R120/O195	Richard	MacSween		1st Stage Deposit
29.16	TRA29/R099/O132	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
29.16	TRA29/R107/O190	Colin	Unwin		1st Stage Deposit
29.16	TRA29/R479/O606	A	Moore	Salterforth Parish Council	1st Stage Deposit
29.16	TRA29/R355/O453	Phil	Megson	Lancashire County Council	1st Stage Deposit
29.16	TRA29/R084/O403	Stephen	Lax	Colne Cycling Campaign	1st Stage Deposit
30.01	TRA30/R456/O667	Stephen	Hedley	Countryside Agency - North West Region	1st Stage Deposit
30.03	TRA30/R275/O432	Kevin	Hey		1st Stage Deposit
30.03	TRA30/R355/O665	Phil	Megson	Lancashire County Council	1st Stage Deposit
30.04	TRA30/R476/O598	David	Penney	SELRAP	1st Stage Deposit
30.04	TRA30/R355/O846	Phil	Megson	Lancashire County Council	Re-deposit
30.05	TRA30/R122/O421	Phil	Smith	GONW	1st Stage Deposit
30.05	TRA30/R355/O833	Phil	Megson	Lancashire County Council	Re-deposit
30.06	TRA30/R355/O666	Phil	Megson	Lancashire County Council	1st Stage Deposit
30.07	TRA30/R137/O225	Shiela	Smith		1st Stage Deposit
30.09	TRA30/R439/O958	Keith	Adamson	Pendle CPRE	1st Stage Deposit
30.11	TRA30/R476/O669	David	Penney	SELRAP	1st Stage Deposit
30.13	TRA30/R355/O850	Phil	Megson	Lancashire County Council	Re-deposit
30.17	TRA30/R476/O765	David	Penney	SELRAP	Re-deposit
30.17	TRA30/R051/O157	T	Coyne		1st Stage Deposit
30.17	TRA30/R355/O848	Phil	Megson	Lancashire County Council	Re-deposit
30.17	TRA30/R456/O547	Stephen	Hedley	Countryside Agency - North West Region	1st Stage Deposit
30.17	TRA30/R355/O454	Phil	Megson	Lancashire County Council	1st Stage Deposit

30.17	TRA30/R355/O849	Phil	Megson	Lancashire County Council	Re-deposit
30.17	TRA30/R355/O847	Phil	Megson	Lancashire County Council	Re-deposit
30.17	TRA30/R476/O668	David	Penney	SELRAP	1st Stage Deposit
30.18	TRA30/R439/O507	Keith	Adamson	Pendle CPRE	1st Stage Deposit
30.18	TRA30/R479/O608	A	Moore	Salterforth Parish Council	1st Stage Deposit
30.18	TRA30/R373/O472	Alan	Carter	British Waterways	1st Stage Deposit
30.18	TRA30/R234/O877	Andrew	Ashworth		Re-deposit
31.02	TRA31/R355/O671	Phil	Megson	Lancashire County Council	1st Stage Deposit
31.03	TRA31/R258/O360	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
31.03	TRA31/R107/O173	Colin	Unwin		1st Stage Deposit
31.03	TRA31/R355/O834	Phil	Megson	Lancashire County Council	Re-deposit
31.03	TRA31/R137/O226	Shiela	Smith		1st Stage Deposit
31.05	TRA31/R355/O455	Phil	Megson	Lancashire County Council	1st Stage Deposit
31.08	TRA31/R355/O670	Phil	Megson	Lancashire County Council	1st Stage Deposit
31.09	TRA31/R478/O605			Tesco Stores Ltd.	1st Stage Deposit
31.09	TRA31/R508/O760	Brian	Irlam	Steele, Ford & Newton Solicitors	Re-deposit
31.09	TRA31/R490/O731	Mohammed	Ansar		Re-deposit
31.1	TRA31/R026/O035	Kate	Grimshaw	Lancashire County Council	1st Stage Deposit
31.1	TRA31/R496/O742	Colin	Humberstone	Humberstones	Re-deposit
31.1	TRA31/R009/O011	J A	Hufferdine	Barrowford Primary School	1st Stage Deposit
31.1	TRA31/R101/O145	Ian	Lord	Barrowford Parish Council	1st Stage Deposit
31.1	TRA31/R100/O143	Michael	Simpson		1st Stage Deposit
32.15	CRL32/R356/O431			McCarthy & Stone Developments Ltd.	1st Stage Deposit
32.2	CRL32/R355/O456	Phil	Megson	Lancashire County Council	1st Stage Deposit
32.22	CRL32/R456/O550	Stephen	Hedley	Countryside Agency - North West Region	1st Stage Deposit
32.23	CRL32/R298/O397	N	Taylor		1st Stage Deposit
32.23	CRL32/R370/O467	J	Burns		1st Stage Deposit

32.23	CRL32/R270/O381	R	Hartley		1st Stage Deposit
32.23	CRL32/R371/O468	J	Burns		1st Stage Deposit
32.23	CRL32/R299/O398	S	Birtwell		1st Stage Deposit
32.23	CRL32/R438/O498	S	Boyd		1st Stage Deposit
32.23	CRL32/R297/O396	J	Thorpe		1st Stage Deposit
32.23	CRL32/R274/O385	S P	Dey		1st Stage Deposit
32.23	CRL32/R322/O417	M	Beryl		1st Stage Deposit
32.23	CRL32/R374/O473	W	Calvert		1st Stage Deposit
32.23	CRL32/R375/O474	M	Howells		1st Stage Deposit
32.23	CRL32/R379/O477	John	Wood		1st Stage Deposit
32.23	CRL32/R393/O482	Christine	Hindle		1st Stage Deposit
32.23	CRL32/R443/O528			Green Emmott Trust c/o Robertshaws	1st Stage Deposit
32.23	CRL32/R447/O529	S	Barnes		1st Stage Deposit
32.23	CRL32/R325/O419	B	Clark		1st Stage Deposit
32.23	CRL32/R107/O175	Colin	Unwin		1st Stage Deposit
32.23	CRL32/R118/O192	J	Daws		1st Stage Deposit
32.23	CRL32/R137/O227	Shiela	Smith		1st Stage Deposit
32.23	CRL32/R258/O358	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
32.23	CRL32/R382/O480	Ronnie	Stuttard		1st Stage Deposit
32.23	CRL32/R077/O100	David	Spencer		1st Stage Deposit
32.23	CRL32/R276/O387	C A	Storey		1st Stage Deposit
32.23	CRL32/R275/O386	Kevin	Hey		1st Stage Deposit
32.23	CRL32/R095/O122	Alan	Spencer		1st Stage Deposit
32.23	CRL32/R093/O120	J	Nutter		1st Stage Deposit
32.23	CRL32/R388/O481	E J K	Foulds		1st Stage Deposit
32.23	CRL32/R096/O123	Norman	Cowgill		1st Stage Deposit
32.23	CRL32/R098/O125	Christine	Hartley		1st Stage Deposit
32.23	CRL32/R094/O121	W	Clavert		1st Stage Deposit

32.23	CRL32/R097/O124	Emily	Wilcock		1st Stage Deposit
32.23	CRL32/R082/O104	Kim	Sugden		1st Stage Deposit
32.23	CRL32/R092/O119	P	Gabbatt		1st Stage Deposit
32.23	CRL32/R061/O081	Adrian	Sugden		1st Stage Deposit
32.23	CRL32/R273/O384	S	Bird		1st Stage Deposit
32.23	CRL32/R272/O383	Kevin	Coward		1st Stage Deposit
32.23	CRL32/R271/O382	Tom	Bowling		1st Stage Deposit
32.23	CRL32/R369/O466	K	Knight		1st Stage Deposit
32.23	CRL32/R081/O103	Jodie	Sullivan		1st Stage Deposit
32.23	CRL32/R060/O080	Maureen	Emmott		1st Stage Deposit
32.23	CRL32/R076/O099	Rita	Wilcock		1st Stage Deposit
32.23	CRL32/R072/O094	J	Taylor		1st Stage Deposit
32.23	CRL32/R073/O096	Mary	Hatfield		1st Stage Deposit
32.23	CRL32/R074/O097	T	Storey		1st Stage Deposit
32.23	CRL32/R075/O098	W V	Newbould		1st Stage Deposit
32.23	CRL32/R026/O034	Kate	Grimshaw	Lancashire County Council	1st Stage Deposit
33.02	CRL33/R137/O229	Shiela	Smith		1st Stage Deposit
33.09	CRL33/R479/O607	A	Moore	Salterforth Parish Council	1st Stage Deposit
33.09	CRL33/R518/O903	Mike	Bhatti		Re-deposit
33.09	CRL33/R026/O036	Kate	Grimshaw	Lancashire County Council	1st Stage Deposit
33.09	CRL33/R470/O564	Peter	Stanford	Greenfield Residents Association	1st Stage Deposit
33.09	CRL33/R307/O565	Chris	Tennant		1st Stage Deposit
33.09	CRL33/R026/O037	Kate	Grimshaw	Lancashire County Council	1st Stage Deposit
33.09	CRL33/R137/O754	Shiela	Smith		Re-deposit
33.09	CRL33/R488/O728	Herbert	Whipp		Re-deposit
34.04	CRL34/R137/O230	Shiela	Smith		1st Stage Deposit
34.07	CRL34/R099/O131	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
34.07	CRL34/R122/O422	Phil	Smith	GONW	1st Stage Deposit
35.06	CRL35/R084/O110	Stephen	Lax	Colne Cycling Campaign	1st Stage Deposit

35.08	CRL35/R456/O551	Stephen	Hedley	Countryside Agency - North West Region	1st Stage Deposit
35.09	CRL35/R355/O851	Phil	Megson	Lancashire County Council	Re-deposit
36.05	CRL36/R373/O470	Alan	Carter	British Waterways	1st Stage Deposit
36.1	CRL36/R099/O610	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
36.1	CRL36/R355/O852	Phil	Megson	Lancashire County Council	Re-deposit
36.1	CRL36/R051/O067	T	Coyne		1st Stage Deposit
37.01	CRL37/R122/O423	Phil	Smith	GONW	1st Stage Deposit
37.02	CRL37/R439/O873	Keith	Adamson	Pendle CPRE	Re-deposit
37.08	CRL37/R355/O853	Phil	Megson	Lancashire County Council	Re-deposit
37.09	CRL37/R051/O158	T	Coyne		1st Stage Deposit
37.09	CRL37/R419/O491	J	Plackett		1st Stage Deposit
37.09	CRL37/R420/O495	N	Leah		1st Stage Deposit
37.09	CRL37/R512/O797			RAGE	Re-deposit
38.02	CRL38/R122/O424	Phil	Smith	GONW	1st Stage Deposit
38.04	CRL38/R472/O575	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit
38.1	CRL38/R499/O748	Gary	Bird		Re-deposit
39.03	CRL39/R122/O425	Phil	Smith	GONW	1st Stage Deposit
40.01	CRL40/R122/O426	Phil	Smith	GONW	1st Stage Deposit
40.12	CRL40/R355/O457	Phil	Megson	Lancashire County Council	1st Stage Deposit
40.2	CRL40/R355/O836	Phil	Megson	Lancashire County Council	Re-deposit
40.22	CRL40/R472/O574	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit
40.25	CRL40/R132/O857	David	Hardman	United Utilities	Re-deposit
40.25	CRL40/R355/O835	Phil	Megson	Lancashire County Council	Re-deposit
40.25	CRL40/R011/O959	S	Langstroth		1st Stage Deposit
40.26	CRL40/R011/O465	S	Langstroth		1st Stage Deposit
41	STR41/R099/O138	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
41.02	STR41/R242/O621	N	Smith	Bellway Homes	1st Stage Deposit

41.04	STR41/R355/O678	Phil	Megson	Lancashire County Council	1st Stage Deposit
41.09	STR41/R355/O838	Phil	Megson	Lancashire County Council	Re-deposit
41.13	STR41/R355/O458	Phil	Megson	Lancashire County Council	1st Stage Deposit
41.16	STR41/R355/O679	Phil	Megson	Lancashire County Council	1st Stage Deposit
42.02	STR41/R355/O461	Phil	Megson	Lancashire County Council	1st Stage Deposit
42.03	STR41/R475/O595		B&Q plc		1st Stage Deposit
43.01	STR41/R099/O140	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
43.01	STR41/R355/O462	Phil	Megson	Lancashire County Council	1st Stage Deposit
44	STR41/R099/O672	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
44.06	STR41/R099/O142	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
44.06	STR41/R355/O463	Phil	Megson	Lancashire County Council	1st Stage Deposit
44.29	STR41/R355/O464	Phil	Megson	Lancashire County Council	1st Stage Deposit
44.47	STR41/R355/O839	Phil	Megson	Lancashire County Council	Re-deposit
44.47	STR41/R355/O823	Phil	Megson	Lancashire County Council	Re-deposit
46	STR41/R467/O591	Judith	Nelson	English Heritage - North West	1st Stage Deposit
46	STR41/R467/O589	Judith	Nelson	English Heritage - North West	1st Stage Deposit
46	STR41/R450/O541	Rachel	Hughes	Yorkshire Water Services	1st Stage Deposit
46	STR41/R450/O542	Rachel	Hughes	Yorkshire Water Services	1st Stage Deposit
46	STR41/R440/O518	Les	Manton	HM Prison Service	1st Stage Deposit
46	STR41/R519/O907	James	Chapman	Eshton Property Development Ltd	Re-deposit
46	STR41/R497/O743	Robert	Kandt	Barnoldswick Town Council	Re-deposit
46	STR41/R355/O837	Phil	Megson	Lancashire County Council	Re-deposit
46	STR41/R497/O746	Robert	Kandt	Barnoldswick Town Council	Re-deposit
46	STR41/R067/O880	Deborah	Rusbridge	English Nature	Re-deposit
46	STR41/R439/O681	Keith	Adamson	Pendle CPRE	1st Stage Deposit
46	STR41/R439/O680	Keith	Adamson	Pendle CPRE	1st Stage Deposit
46	STR41/R439/O516	Keith	Adamson	Pendle CPRE	1st Stage Deposit
47	STR41/R476/O682	David	Penney	SELRAP	1st Stage Deposit
47	STR41/R137/O232	Shiela	Smith		1st Stage Deposit

47	STR41/R358/O722	Carlo	Lionti		Re-deposit
47	STR41/R091/O117	Emma	Semwayo		1st Stage Deposit
47	STR41/R137/O674	Shiela	Smith		1st Stage Deposit
47	STR41/R137/O675	Shiela	Smith		1st Stage Deposit
47	STR41/R099/O673	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
47	STR41/R091/O116	Emma	Semwayo		1st Stage Deposit

**ANNEX C3**

**SCHEDULE OF SUPPORTING REPRESENTATIONS**

<b>Policy</b>	<b>Representation Reference</b>	<b>Party</b>			<b>Stage</b>
0.18	STR41/R463/S471	E	Webber		1st Stage Deposit
0.18	STR41/R460/S470	J	Dawson		1st Stage Deposit
0.18	STR41/R459/S469	Freda	Stuttard		1st Stage Deposit
0.18	STR41/R457/S464	Jack	Stuttard		1st Stage Deposit
0.18	STR41/R427/S429	R	Beswick		1st Stage Deposit
0.18	STR41/R230/S156	Leslie	Clough		1st Stage Deposit
0.18	STR41/R231/S157	Godfrey	Packham		1st Stage Deposit
0.18	STR41/R313/S272	Austin	Douglas		1st Stage Deposit
0.18	STR41/R467/S481	Judith	Nelson	English Heritage - North West	1st Stage Deposit
0.18	STR41/R242/S193	N	Smith	Bellway Homes	1st Stage Deposit
0.2	STR41/R242/S186	N	Smith	Bellway Homes	1st Stage Deposit
0.3	STR41/R099/S59	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
0.3	STR41/R099/S60	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
0.34	STR41/R302/S260	Marie	Bintley	English Partnerships	1st Stage Deposit
0.37	STR41/R302/S259	Marie	Bintley	English Partnerships	1st Stage Deposit
0.44	STR41/R418/S410	M A	Smith	Bridge Street Stone Ltd.	1st Stage Deposit
0.56	STR41/R350/S343	Wendy	Farmer		1st Stage Deposit
0.56	STR41/R351/S344		Berry		1st Stage Deposit
0.56	STR41/R424/S416	J	Storwell		1st Stage Deposit
0.58	STR41/R107/S93	Colin	Unwin		1st Stage Deposit
0.58	STR41/R258/S212	Eric	Crimmins	Tum Hill Residents Group	1st Stage Deposit
1.02	ENV01/R361/S355	Judith	Malcolm	Clerk to Blacko Parish Council	1st Stage Deposit
1.16	ENV01/R355/S351	Phil	Megson	Lancashire County Council	1st Stage deposit

1.16	ENV01/R472/S479	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit
1.23	ENV01/R439/S505	Keith	Adamson	Pendle CPRE	Re-deposit
3.08	ENV03/R033/S20	John	Clarke		1st Stage Deposit
3.1	ENV03/R439/S508	Keith	Adamson	Pendle CPRE	Re-deposit
3.11	ENV03/R410/S406	S	Nicholson		1st Stage Deposit
3.11	ENV03/R400/S396	E	Robinson		1st Stage Deposit
3.11	ENV03/R401/S397	C	Robinson		1st Stage Deposit
3.11	ENV03/R402/S398	Graham	Lund		1st Stage Deposit
3.11	ENV03/R403/S399	John	Chester		1st Stage Deposit
3.11	ENV03/R404/S400	Helen	Chester		1st Stage Deposit
3.11	ENV03/R405/S401	M	Stead		1st Stage Deposit
3.11	ENV03/R406/S402		Holmes		1st Stage Deposit
3.11	ENV03/R386/S384	Gary	Scholey		1st Stage Deposit
3.11	ENV03/R407/S403	M	Pollard		1st Stage Deposit
3.11	ENV03/R409/S405	F	Moorhouse		1st Stage Deposit
3.11	ENV03/R411/S407	A	Nicholson		1st Stage Deposit
3.11	ENV03/R412/S408	Susan	Halstead		1st Stage Deposit
3.11	ENV03/R413/S409	D	Halstead		1st Stage Deposit
3.11	ENV03/R433/S450	Andrew	Bates		1st Stage Deposit
3.11	ENV03/R434/S451	April	Mirfield		1st Stage Deposit
3.11	ENV03/R435/S452	J W	Robinson		1st Stage Deposit
3.11	ENV03/R436/S453	Edith	Robinson		1st Stage Deposit
3.11	ENV03/R437/S454	D A	Taylor		1st Stage Deposit
3.11	ENV03/R399/S395	Jane	Platt		1st Stage Deposit
3.11	ENV03/R408/S404	A	Ashworth		1st Stage Deposit
3.11	ENV03/R380/S380	K	Taylor		1st Stage Deposit
3.11	ENV03/R023/S18	Terry	Opacic		1st Stage Deposit
3.11	ENV03/R041/S24	R	Hudson		1st Stage Deposit
3.11	ENV03/R225/S146	S A	Mitchell		1st Stage Deposit
3.11	ENV03/R226/S147	M	Mitchell		1st Stage Deposit

3.11	ENV03/R296/S257	Louise	Morrissey	Peel Investments (North) Ltd.	1st Stage Deposit
3.11	ENV03/R354/S350	P A	Hudson		1st Stage Deposit
3.11	ENV03/R389/S386	Renee	Scholey		1st Stage Deposit
3.11	ENV03/R363/S359	M L	Opacic		1st Stage Deposit
3.11	ENV03/R398/S394	Matthew	Platt		1st Stage Deposit
3.11	ENV03/R383/S381	A	Taylor		1st Stage Deposit
3.11	ENV03/R395/S391	Jean	Roberts		1st Stage Deposit
3.11	ENV03/R397/S393	Anne	Lund		1st Stage Deposit
3.11	ENV03/R359/S353	Frank	Belshaw		1st Stage Deposit
3.11	ENV03/R396/S392	Chris	Redmond		1st Stage Deposit
3.11	ENV03/R384/S382	Alexander	Taylor		1st Stage Deposit
3.11	ENV03/R394/S390	Jack	Roberts		1st Stage Deposit
3.11	ENV03/R392/S389	Andrew	Kiryjewicz		1st Stage Deposit
3.11	ENV03/R391/S388	John	Kiryjewicz		1st Stage Deposit
3.11	ENV03/R390/S387	Laura	Kiryjewicz		1st Stage Deposit
3.11	ENV03/R387/S385	Helen	Scholey		1st Stage Deposit
3.11	ENV03/R385/S383	Trevor	Scholey		1st Stage Deposit
4.01	ENV04/R355/S352	Phil	Megson	Lancashire County Council	1st Stage Deposit
4.02	ENV04D/R355/S512	Phil	Megson	Lancashire County Council	Re-deposit
4.02	ENV04A/R355/S498	Phil	Megson	Lancashire County Council	Re-deposit
4.02	ENV04B/R355/S510	Phil	Megson	Lancashire County Council	Re-deposit
4.02	ENV04C/R355/S511	Phil	Megson	Lancashire County Council	Re-deposit
4.57	ENV04C/R439/S504	Keith	Adamson	Pendle CPRE	Re-deposit
4.74	ENV04C/R234/S503	Andrew	Ashworth		Re-deposit
5.06	ENV05/R472/S480	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit
5.11	ENV05/R439/S456	Keith	Adamson	Pendle CPRE	1st Stage Deposit
7.02	ENV07/R132/S109	David	Hardman	United Utilities	1st Stage Deposit
7.02	ENV07/R472/S489	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit
7.02	ENV07/R099/S58	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
7.07	ENV07/R132/S496	David	Hardman	United Utilities	Re-deposit

8.11	ENV08/R132/S110	David	Hardman	United Utilities	1st Stage Deposit
8.13	ENV08/R472/S488	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit
9.05	ENV09/R472/S487	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit
12.02	ENV12/R134/S115	Jeffrey	Needham		1st Stage Deposit
12.02	ENV12/R088/S43		Collinge		1st Stage Deposit
12.02	ENV12/R110/S74	William E	Hurst		1st Stage Deposit
12.02	ENV12/R108/S65	John Vernon	Harrison		1st Stage Deposit
12.02	ENV12/R290/S243	E A	Lord		1st Stage Deposit
12.02	ENV12/R090/S51	Anna	Coates		1st Stage Deposit
12.02	ENV12/R429/S434	P	Christie		1st Stage Deposit
12.02	ENV12/R085/S39	Margaret	Hindle		1st Stage Deposit
12.02	ENV12/R427/S425	R	Beswick		1st Stage Deposit
12.02	ENV12/R364/S360	David Ronald	Smith		1st Stage Deposit
12.02	ENV12/R284/S228	S	Veevers		1st Stage Deposit
12.02	ENV12/R053/S84	Earl	French		1st Stage Deposit
12.02	ENV12/R136/S118	P	Wilson		1st Stage Deposit
12.02	ENV12/R458/S465		Hayhurst		1st Stage Deposit
12.12	ENV12/R431/S442	Peter	Harris		1st Stage Deposit
12.12	ENV12/R430/S438	Alan	Sadler		1st Stage Deposit
12.13	ENV12/R314/S273	J A	Knowles		1st Stage Deposit
12.13	ENV12/R339/S313	Peter	Rigby		1st Stage Deposit
12.13	ENV12/R337/S308	Marian	Taylor		1st Stage Deposit
12.13	ENV12/R336/S307	P	Nicholas		1st Stage Deposit
12.13	ENV12/R335/S303	Terry	Williams		1st Stage Deposit
12.13	ENV12/R333/S302	A P	Fishwick		1st Stage Deposit
12.13	ENV12/R332/S301	C A	Fishwick		1st Stage Deposit
12.13	ENV12/R331/S300	Yvonne	Hope		1st Stage Deposit
12.13	ENV12/R330/S299	Alan	Hope		1st Stage Deposit

12.13	ENV12/R311/S271	Edmund	Lee		1st Stage Deposit
12.13	ENV12/R327/S297	Helen	Hedges		1st Stage Deposit
12.13	ENV12/R319/S286	Elsie	Nutter		1st Stage Deposit
12.13	ENV12/R315/S276	J O	Knowles		1st Stage Deposit
12.13	ENV12/R326/S296	A R	Hedges		1st Stage Deposit
12.13	ENV12/R316/S278	Craig	Holden		1st Stage Deposit
12.13	ENV12/R324/S294	Julie M	Hall		1st Stage Deposit
12.13	ENV12/R323/S293	David	Hall		1st Stage Deposit
12.13	ENV12/R321/S291	Anne	Vickers		1st Stage Deposit
12.13	ENV12/R317/S284	Robert	Nutter		1st Stage Deposit
12.13	ENV12/R320/S290	Simon Richard	Pickles		1st Stage Deposit
12.13	ENV12/R318/S285	A	Waddington		1st Stage Deposit
12.13	ENV12/R340/S317	David	Hartley		1st Stage Deposit
12.13	ENV12/R329/S298	Ivy	Smith		1st Stage Deposit
12.13	ENV12/R376/S373	K	Fisher		1st Stage Deposit
12.13	ENV12/R249/S189	Peter	MacDonald		1st Stage Deposit
12.13	ENV12/R439/S500	Keith	Adamson	Pendle CPRE	Re-deposit
12.13	ENV12/R468/S475	Neil	Thornton		1st Stage Deposit
12.13	ENV12/R465/S472	Jennifer	Cockett		1st Stage Deposit
12.13	ENV12/R334/S463	Jason	Sparks		1st Stage Deposit
12.13	ENV12/R446/S460	R W	Milburn		1st Stage Deposit
12.13	ENV12/R444/S458	J	Danby		1st Stage Deposit
12.13	ENV12/R432/S446	Margaret Theresa	Maka		1st Stage Deposit
12.13	ENV12/R428/S430	D A	Smith		1st Stage Deposit
12.13	ENV12/R426/S421	B	Neill		1st Stage Deposit
12.13	ENV12/R425/S417	Lyn	Proctor		1st Stage Deposit
12.13	ENV12/R366/S364	P C	Milnes		1st Stage Deposit
12.13	ENV12/R377/S377	E N	Whitaker		1st Stage Deposit

12.13	ENV12/R341/S318	John	Haythornthwaite		1st Stage Deposit
12.13	ENV12/R310/S270	Joan	Lee		1st Stage Deposit
12.13	ENV12/R368/S369	Alan	Abbott		1st Stage Deposit
12.13	ENV12/R362/S356	Patrick	Garaghty		1st Stage Deposit
12.13	ENV12/R353/S346	Christine	Pickup		1st Stage Deposit
12.13	ENV12/R348/S339	S	Whitnear		1st Stage Deposit
12.13	ENV12/R348/S335	S	Whitnear		1st Stage Deposit
12.13	ENV12/R347/S331		Vallance		1st Stage Deposit
12.13	ENV12/R346/S327		Whitnear		1st Stage Deposit
12.13	ENV12/R345/S326	Brian	Waddicor		1st Stage Deposit
12.13	ENV12/R343/S320	J	Cunningham		1st Stage Deposit
12.13	ENV12/R342/S319	Kevin	Betts		1st Stage Deposit
12.13	ENV12/R422/S411	D	McLoughlin		1st Stage Deposit
12.13	ENV12/R115/S87	W	Warburton		1st Stage Deposit
12.13	ENV12/R227/S148	H	Fearn		1st Stage Deposit
12.13	ENV12/R224/S142	Alan Francis	Weeds		1st Stage Deposit
12.13	ENV12/R223/S138	William	Adams		1st Stage Deposit
12.13	ENV12/R222/S134	Alan	Smith		1st Stage Deposit
12.13	ENV12/R141/S130	R	Cook		1st Stage Deposit
12.13	ENV12/R140/S126	B	Sutcliffe		1st Stage Deposit
12.13	ENV12/R139/S122	E	Nutter		1st Stage Deposit
12.13	ENV12/R133/S111	Eric	Thornton		1st Stage Deposit
12.13	ENV12/R130/S105	Audrey	Bray		1st Stage Deposit
12.13	ENV12/R127/S103	Jean	Holt		1st Stage Deposit
12.13	ENV12/R125/S101	Jennifer	Cockett		1st Stage Deposit
12.13	ENV12/R124/S96	Alan	Simpson		1st Stage Deposit
12.13	ENV12/R228/S153	Catherine	Hayden		1st Stage Deposit
12.13	ENV12/R117/S89	James	Millar		1st Stage Deposit
12.13	ENV12/R022/S14	Muriel	Proctor		1st Stage Deposit

12.13	ENV12/R114/S83	J C	Blackburn		1st Stage Deposit
12.13	ENV12/R111/S78	Ian	Barry		1st Stage Deposit
12.13	ENV12/R109/S69	Lois	Needham		1st Stage Deposit
12.13	ENV12/R099/S63	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
12.13	ENV12/R089/S47		Ronson		1st Stage Deposit
12.13	ENV12/R064/S29	J W	Hudson		1st Stage Deposit
12.13	ENV12/R049/S25	D	Todd		1st Stage Deposit
12.13	ENV12/R306/S268	Walter	Gough		1st Stage Deposit
12.13	ENV12/R021/S10	Martin	Proctor		1st Stage Deposit
12.13	ENV12/R252/S198				1st Stage Deposit
12.13	ENV12/R019/S5	Carole	Chippendale		1st Stage Deposit
12.13	ENV12/R08/S4	Peter	Cash		1st Stage Deposit
12.13	ENV12/R116/S91	Christian	Smith		1st Stage Deposit
12.13	ENV12/R293/S255	N	Hudson		1st Stage Deposit
12.13	ENV12/R020/S6	A	Gregory		1st Stage Deposit
12.13	ENV12/R236/S161	Margaret	McCallum		1st Stage Deposit
12.13	ENV12/R304/S263	A	Stobbs		1st Stage Deposit
12.13	ENV12/R305/S267	E M	Walton		1st Stage Deposit
12.13	ENV12/R294/S256	W	Throup		1st Stage Deposit
12.13	ENV12/R292/S251	Mike	Edmundson		1st Stage Deposit
12.13	ENV12/R291/S247	Janet	Barrowclough		1st Stage Deposit
12.13	ENV12/R289/S239	David	Peel		1st Stage Deposit
12.13	ENV12/R288/S235	Jonathan	Howe		1st Stage Deposit
12.13	ENV12/R287/S231	Roger	Veevers		1st Stage Deposit
12.13	ENV12/R286/S230	Kevin	Whitaker		1st Stage Deposit
12.13	ENV12/R285/S229		Shuttleworth		1st Stage Deposit
12.13	ENV12/R283/S227	H	Maden		1st Stage Deposit
12.13	ENV12/R281/S222	B	Spink		1st Stage Deposit
12.13	ENV12/R246/S184	Joseph	Wormwell		1st Stage Deposit
12.13	ENV12/R279/S221	D	Chadwick		1st Stage Deposit

12.13	ENV12/R241/S175	Brian	Swift		1st Stage Deposit
12.13	ENV12/R303/S262		Maden		1st Stage Deposit
12.13	ENV12/R239/S170	Jacqueline	Swift		1st Stage Deposit
12.13	ENV12/R248/S188		Dolton		1st Stage Deposit
12.13	ENV12/R238/S169	Sean	O' Brien		1st Stage Deposit
12.13	ENV12/R250/S194	Maureen	MacDonald		1st Stage Deposit
12.13	ENV12/R237/S165	S L	Anderson		1st Stage Deposit
12.13	ENV12/R254/S202	P J	Anderson		1st Stage Deposit
12.13	ENV12/R255/S209	S	Hendleman		1st Stage Deposit
12.13	ENV12/R277/S217	T	Riddiough		1st Stage Deposit
12.13	ENV12/R245/S183	Valerie	Wormwell		1st Stage Deposit
14.01	ENV14/R132/S499	David	Hardman	United Utilities	Re-deposit
14.11	ENV14/R472/S485	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit
15.02	ENV15/R472/S484	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit
16.01	ENV16/R067/S502	Deborah	Rusbridge	English Nature	Re-deposit
16.01	ENV16/R472/S486	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit
16.03	ENV16/R295/S497	Philip	Carter	Environment Agency	Re-deposit
17.01	HOU17/R364/S361	David Ronald	Smith		1st Stage Deposit
17.01	HOU17/R430/S439	Alan	Sadler		1st Stage Deposit
17.01	HOU17/R368/S370	Alan	Abbott		1st Stage Deposit
17.01	HOU17/R090/S52	Anna	Coates		1st Stage Deposit
17.01	HOU17/R458/S466		Hayhurst		1st Stage Deposit
17.01	HOU17/R290/S244	E A	Lord		1st Stage Deposit
17.01	HOU17/R085/S41	Margaret	Hindle		1st Stage Deposit
17.01	HOU17/R224/S143	Alan Francis	Weeds		1st Stage Deposit
17.01	HOU17/R429/S435	P	Christie		1st Stage Deposit
17.01	HOU17/R301/S501	N	Moore		Re-deposit
17.02	HOU17/R234/S160	Andrew	Ashworth		1st Stage Deposit

17.05	HOU17/R277/S216	T	Riddiough		1st Stage Deposit
17.18	HOU17/R522/S513	Julie	Whittaker	Pendle Borough Council	Re-deposit
17.4	HOU17/R116/S92	Christian	Smith		1st Stage Deposit
17.41	HOU17/R249/S190	Peter	MacDonald		1st Stage Deposit
17.41	HOU17/R136/S119	P	Wilson		1st Stage Deposit
17.41	HOU17/R088/S44		Collinge		1st Stage Deposit
17.41	HOU17/R110/S75	William E	Hurst		1st Stage Deposit
17.41	HOU17/R108/S66	John Vernon	Harrison		1st Stage Deposit
17.84	HOU17/R439/S507	Keith	Adamson	Pendle CPRE	Re-deposit
17.85	HOU17/R227/S150	H	Fearn		1st Stage Deposit
17.85	HOU17/R228/S152	Catherine	Hayden		1st Stage Deposit
17.85	HOU17/R021/S11	Martin	Proctor		1st Stage Deposit
17.85	HOU17/R236/S162	Margaret	McCallum		1st Stage Deposit
17.85	HOU17/R237/S166	S L	Anderson		1st Stage Deposit
17.85	HOU17/R020/S7	A	Gregory		1st Stage Deposit
17.85	HOU17/R049/S26	D	Todd		1st Stage Deposit
17.85	HOU17/R279/S220	D	Chadwick		1st Stage Deposit
17.85	HOU17/R252/S199	C A	Pollard		1st Stage Deposit
17.85	HOU17/R254/S203	P J	Anderson		1st Stage Deposit
17.85	HOU17/R255/S206	S	Hendleman		1st Stage Deposit
17.85	HOU17/R342/S321	Kevin	Betts		1st Stage Deposit
17.85	HOU17/R239/S171	Jacqueline	Swift		1st Stage Deposit
17.85	HOU17/R035/S23	H	Parkinson		1st Stage Deposit
17.85	HOU17/R223/S139	William	Adams		1st Stage Deposit
17.85	HOU17/R222/S135	Alan	Smith		1st Stage Deposit
17.85	HOU17/R141/S131	R	Cook		1st Stage Deposit
17.85	HOU17/R140/S127	B	Sutcliffe		1st Stage Deposit
17.85	HOU17/R139/S123	E	Nutter		1st Stage Deposit
17.85	HOU17/R089/S50		Ronson		1st Stage Deposit

17.85	HOU17/R133/S112	Eric	Thornton		1st Stage Deposit
17.85	HOU17/R130/S106	Audrey	Bray		1st Stage Deposit
17.85	HOU17/R124/S97	Alan	Simpson		1st Stage Deposit
17.85	HOU17/R109/S70	Lois	Needham		1st Stage Deposit
17.85	HOU17/R111/S79	Ian	Barry		1st Stage Deposit
17.85	HOU17/R022/S15	Muriel	Proctor		1st Stage Deposit
17.85	HOU17/R425/S418	Lyn	Proctor		1st Stage Deposit
17.85	HOU17/R468/S476	Neil	Thornton		1st Stage Deposit
17.85	HOU17/R439/S457	Keith	Adamson	Pendle CPRE	1st Stage Deposit
17.85	HOU17/R432/S447	Margaret Theresa	Maka		1st Stage Deposit
17.85	HOU17/R431/S443	Peter	Harris		1st Stage Deposit
17.85	HOU17/R428/S431	D A	Smith		1st Stage Deposit
17.85	HOU17/R337/S309	Marian	Taylor		1st Stage Deposit
17.85	HOU17/R426/S422	B	Neill		1st Stage Deposit
17.85	HOU17/R422/S412	D	McLoughlin		1st Stage Deposit
17.85	HOU17/R376/S374	K	Fisher		1st Stage Deposit
17.85	HOU17/R366/S365	P C	Milnes		1st Stage Deposit
17.85	HOU17/R353/S347	Christine	Pickup		1st Stage Deposit
17.85	HOU17/R349/S340	Brenda	Twist		1st Stage Deposit
17.85	HOU17/R348/S336	S	Whitnear		1st Stage Deposit
17.85	HOU17/R347/S332		Vallance		1st Stage Deposit
17.85	HOU17/R427/S426	R	Beswick		1st Stage Deposit
17.85	HOU17/R282/S226	Anne	Howarth		1st Stage Deposit
17.85	HOU17/R287/S232	Roger	Veevers		1st Stage Deposit
17.85	HOU17/R288/S236	Jonathan	Howe		1st Stage Deposit
17.85	HOU17/R289/S240	David	Peel		1st Stage Deposit
17.85	HOU17/R291/S248	Janet	Barrowclough		1st Stage Deposit
17.85	HOU17/R346/S328		Whitnear		1st Stage Deposit
17.85	HOU17/R292/S252	Mike	Edmundson		1st Stage Deposit

17.85	HOU17/R304/S264	A	Stobbs		1st Stage Deposit
17.85	HOU17/R315/S277	J O	Knowles		1st Stage Deposit
17.85	HOU17/R316/S280	Craig	Holden		1st Stage Deposit
17.85	HOU17/R318/S287	A	Waddington		1st Stage Deposit
17.85	HOU17/R335/S304	Terry	Williams		1st Stage Deposit
17.85	HOU17/R339/S314	Peter	Rigby		1st Stage Deposit
17.85	HOU17/R281/S223	B	Spink		1st Stage Deposit
18.01	HOU18/R242/S195	N	Smith	Bellway Homes	1st Stage Deposit
18.01	HOU18/R466/S473	Oliver	Bird	North West Regional Assembly	1st Stage Deposit
18.02	HOU18/R302/S261	Marie	Bintley	English Partnerships	1st Stage Deposit
20.05	HOU20/R456/S461	Stephen	Hedley	Countryside Agency - North West Region	1st Stage Deposit
22.15	EMP22/R296/S493	Louise	Morrissey	Peel Investments (North) Ltd.	Re-deposit
22.15	EMP22/R439/S506	Keith	Adamson	Pendle CPRE	Re-deposit
23.01	EMP23/R466/S474	Oliver	Bird	North West Regional Assembly	1st Stage Deposit
23.07	EMP23/R439/S509	Keith	Adamson	Pendle CPRE	Re-deposit
24.04	EMP24/R472/S482	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit
24.11	EMP24/R027/S19	J	Litt	North West Development Agency	1st Stage Deposit
25.02	TCRD25/R084/S37	Stephen	Lax	Colne Cycling Campaign	1st Stage Deposit
28.05	TCRD28/R456/S462	Stephen	Hedley	Countryside Agency - North West Region	1st Stage Deposit
29.01	TRA29/R506/S494	Lucy	Mitchell	Yorkshire Forward	Re-deposit
29.16	TRA29/R011/S2	S	Langstroth		1st Stage Deposit
29.16	TRA29/R033/S22	John	Clarke		1st Stage Deposit
29.16	TRA29/R080/S34	P	Slater		1st Stage Deposit
30.04	TRA30/R080/S33	P	Slater		1st Stage Deposit
30.07	TRA30/R084/S258	Stephen	Lax	Colne Cycling Campaign	1st Stage Deposit
31.01	TRA31/R355/S368	Phil	Megson	Lancashire County Council	1st Stage Deposit
31.02	TRA31/R242/S176	N	Smith	Bellway Homes	1st Stage Deposit
31.07	TRA31/R084/S38	Stephen	Lax	Colne Cycling Campaign	1st Stage Deposit
32.23	CRL32/R322/S292	M	Beryl		1st Stage Deposit

32.23	CRL32/R325/S295	B	Clark		1st Stage Deposit
32.23	CRL32/R438/S455	S	Boyd		1st Stage Deposit
33.01	CRL33/R288/S238	Jonathan	Howe		1st Stage Deposit
33.01	CRL33/R337/S310	Marian	Taylor		1st Stage Deposit
33.01	CRL33/R304/S265	A	Stobbs		1st Stage Deposit
33.01	CRL33/R468/S477	Neil	Thornton		1st Stage Deposit
33.01	CRL33/R335/S305	Terry	Williams		1st Stage Deposit
33.01	CRL33/R318/S288	A	Waddington		1st Stage Deposit
33.01	CRL33/R316/S281	Craig	Holden		1st Stage Deposit
33.01	CRL33/R314/S274	J A	Knowles		1st Stage Deposit
33.01	CRL33/R339/S315	Peter	Rigby		1st Stage Deposit
33.01	CRL33/R292/S253	Mike	Edmundson		1st Stage Deposit
33.01	CRL33/R342/S322	Kevin	Betts		1st Stage Deposit
33.01	CRL33/R290/S245	E A	Lord		1st Stage Deposit
33.01	CRL33/R362/S357	Patrick	Garaghty		1st Stage Deposit
33.01	CRL33/R287/S233	Roger	Veevers		1st Stage Deposit
33.01	CRL33/R281/S224	B	Spink		1st Stage Deposit
33.01	CRL33/R279/S219	D	Chadwick		1st Stage Deposit
33.01	CRL33/R277/S215	T	Riddiough		1st Stage Deposit
33.01	CRL33/R255/S207	S	Hendleman		1st Stage Deposit
33.01	CRL33/R254/S204	P J	Anderson		1st Stage Deposit
33.01	CRL33/R291/S249	Janet	Barrowclough		1st Stage Deposit
33.01	CRL33/R425/S419	Lyn	Proctor		1st Stage Deposit
33.01	CRL33/R252/S200	C A	Pollard		1st Stage Deposit
33.01	CRL33/R458/S467		Hayhurst		1st Stage Deposit
33.01	CRL33/R432/S448	Margaret Theresa	Maka		1st Stage Deposit
33.01	CRL33/R431/S444	Peter	Harris		1st Stage Deposit
33.01	CRL33/R430/S440	Alan	Sadler		1st Stage Deposit
33.01	CRL33/R429/S436	P	Christie		1st Stage Deposit

33.01	CRL33/R428/S432	D A	Smith		1st Stage Deposit
33.01	CRL33/R347/S333		Vallance		1st Stage Deposit
33.01	CRL33/R426/S423	B	Neill		1st Stage Deposit
33.01	CRL33/R344/S324		Bell		1st Stage Deposit
33.01	CRL33/R422/S413	D	McLoughlin		1st Stage Deposit
33.01	CRL33/R377/S378	E N	Whitaker		1st Stage Deposit
33.01	CRL33/R376/S375	K	Fisher		1st Stage Deposit
33.01	CRL33/R368/S371	Alan	Abbott		1st Stage Deposit
33.01	CRL33/R366/S366	P C	Milnes		1st Stage Deposit
33.01	CRL33/R364/S362	David Ronald	Smith		1st Stage Deposit
33.01	CRL33/R353/S348	Christine	Pickup		1st Stage Deposit
33.01	CRL33/R346/S329		Whitnear		1st Stage Deposit
33.01	CRL33/R427/S427	R	Beswick		1st Stage Deposit
33.01	CRL33/R090/S53	Anna	Coates		1st Stage Deposit
33.01	CRL33/R134/S116	Jeffrey	Needham		1st Stage Deposit
33.01	CRL33/R133/S113	Eric	Thornton		1st Stage Deposit
33.01	CRL33/R125/S100	Jennifer	Cockett		1st Stage Deposit
33.01	CRL33/R124/S99	Alan	Simpson		1st Stage Deposit
33.01	CRL33/R116/S88	Christian	Smith		1st Stage Deposit
33.01	CRL33/R053/S85	Earl	French		1st Stage Deposit
33.01	CRL33/R140/S129	B	Sutcliffe		1st Stage Deposit
33.01	CRL33/R109/S71	Lois	Needham		1st Stage Deposit
33.01	CRL33/R022/S16	Muriel	Proctor		1st Stage Deposit
33.01	CRL33/R089/S48		Ronson		1st Stage Deposit
33.01	CRL33/R088/S45		Collinge		1st Stage Deposit
33.01	CRL33/R085/S40	Margaret	Hindle		1st Stage Deposit
33.01	CRL33/R049/S27	D	Todd		1st Stage Deposit
33.01	CRL33/R021/S12	Martin	Proctor		1st Stage Deposit
33.01	CRL33/R020/S8	A	Gregory		1st Stage Deposit

33.01	CRL33/R247/S187	H	Pickles		1st Stage Deposit
33.01	CRL33/R111/S80	Ian	Barry		1st Stage Deposit
33.01	CRL33/R241/S178	Brian	Swift		1st Stage Deposit
33.01	CRL33/R141/S132	R	Cook		1st Stage Deposit
33.01	CRL33/R243/S181		Birtwistle		1st Stage Deposit
33.01	CRL33/R239/S173	Jacqueline	Swift		1st Stage Deposit
33.01	CRL33/R240/S172	D	Holden		1st Stage Deposit
33.01	CRL33/R237/S167	S L	Anderson		1st Stage Deposit
33.01	CRL33/R236/S163	Margaret	McCallum		1st Stage Deposit
33.01	CRL33/R233/S159	Joan	Shackleton		1st Stage Deposit
33.01	CRL33/R232/S158	Carole	Sodo		1st Stage Deposit
33.01	CRL33/R228/S154	Catherine	Hayden		1st Stage Deposit
33.01	CRL33/R227/S151	H	Fearn		1st Stage Deposit
33.01	CRL33/R222/S136	Alan	Smith		1st Stage Deposit
33.01	CRL33/R224/S144	Alan Francis	Weeds		1st Stage Deposit
33.01	CRL33/R223/S140	William	Adams		1st Stage Deposit
33.05	CRL33/R113/S82	John	O'Connor		1st Stage Deposit
33.05	CRL33/R349/S341	Brenda	Twist		1st Stage Deposit
33.05	CRL33/R110/S76	William E	Hurst		1st Stage Deposit
33.05	CRL33/R244/S182	Walter	Stafford		1st Stage Deposit
33.07	CRL33/R139/S124	E	Nutter		1st Stage Deposit
33.07	CRL33/R249/S191	Peter	MacDonald		1st Stage Deposit
33.07	CRL33/R136/S120	P	Wilson		1st Stage Deposit
33.07	CRL33/R289/S241	David	Peel		1st Stage Deposit
33.07	CRL33/R099/S64	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
33.07	CRL33/R108/S67	John Vernon	Harrison		1st Stage Deposit
33.07	CRL33/R127/S104	Jean	Holt		1st Stage Deposit
33.07	CRL33/R130/S107	Audrey	Bray		1st Stage Deposit

33.07	CRL33/R348/S337	S	Whitnear		1st Stage Deposit
33.08	CRL33/R445/S459	R W	Milburn		1st Stage Deposit
33.08	CRL33/R338/S312	Ruth	Mason		1st Stage Deposit
33.09	CRL33/R315/S279	J O	Knowles		1st Stage Deposit
34.01	CRL34/R335/S306	Terry	Williams		1st Stage Deposit
34.01	CRL34/R337/S311	Marian	Taylor		1st Stage Deposit
34.01	CRL34/R339/S316	Peter	Rigby		1st Stage Deposit
34.01	CRL34/R342/S323	Kevin	Betts		1st Stage Deposit
34.01	CRL34/R347/S334		Vallance		1st Stage Deposit
34.01	CRL34/R346/S330		Whitnear		1st Stage Deposit
34.01	CRL34/R318/S289	A	Waddington		1st Stage Deposit
34.01	CRL34/R288/S237	Jonathan	Howe		1st Stage Deposit
34.01	CRL34/R344/S325		Bell		1st Stage Deposit
34.01	CRL34/R315/S283	J O	Knowles		1st Stage Deposit
34.01	CRL34/R316/S282	Craig	Holden		1st Stage Deposit
34.01	CRL34/R314/S275	J A	Knowles		1st Stage Deposit
34.01	CRL34/R308/S269	A	Myers		1st Stage Deposit
34.01	CRL34/R304/S266	A	Stobbs		1st Stage Deposit
34.01	CRL34/R292/S254	Mike	Edmundson		1st Stage Deposit
34.01	CRL34/R281/S225	B	Spink		1st Stage Deposit
34.01	CRL34/R290/S246	E A	Lord		1st Stage Deposit
34.01	CRL34/R287/S234	Roger	Veevers		1st Stage Deposit
34.01	CRL34/R429/S437	P	Christie		1st Stage Deposit
34.01	CRL34/R291/S250	Janet	Barrowclough		1st Stage Deposit
34.01	CRL34/R423/S415	B	Ward		1st Stage Deposit
34.01	CRL34/R133/S114	Eric	Thornton		1st Stage Deposit
34.01	CRL34/R279/S218	D	Chadwick		1st Stage Deposit
34.01	CRL34/R468/S478	Neil	Thornton		1st Stage Deposit
34.01	CRL34/R458/S468		Hayhurst		1st Stage Deposit
34.01	CRL34/R432/S449	Margaret	Maka		1st Stage Deposit

		Theresa		
34.01	CRL34/R431/S445	Peter	Harris	1st Stage Deposit
34.01	CRL34/R430/S441	Alan	Sadler	1st Stage Deposit
34.01	CRL34/R428/S433	D A	Smith	1st Stage Deposit
34.01	CRL34/R427/S428	R	Beswick	1st Stage Deposit
34.01	CRL34/R425/S420	Lyn	Proctor	1st Stage Deposit
34.01	CRL34/R352/S345	D	Cockerill	1st Stage Deposit
34.01	CRL34/R422/S414	D	McLoughlin	1st Stage Deposit
34.01	CRL34/R377/S379	E N	Whitaker	1st Stage Deposit
34.01	CRL34/R376/S376	K	Fisher	1st Stage Deposit
34.01	CRL34/R368/S372	Alan	Abbott	1st Stage Deposit
34.01	CRL34/R366/S367	P C	Milnes	1st Stage Deposit
34.01	CRL34/R364/S363	David Ronald	Smith	1st Stage Deposit
34.01	CRL34/R362/S358	Patrick	Garaghty	1st Stage Deposit
34.01	CRL34/R353/S349	Christine	Pickup	1st Stage Deposit
34.01	CRL34/R426/S424	B	Neill	1st Stage Deposit
34.01	CRL34/R089/S49		Ronson	1st Stage Deposit
34.01	CRL34/R134/S117	Jeffrey	Needham	1st Stage Deposit
34.01	CRL34/R277/S214	T	Riddiough	1st Stage Deposit
34.01	CRL34/R125/S98	Jennifer	Cockett	1st Stage Deposit
34.01	CRL34/R116/S90	Christian	Smith	1st Stage Deposit
34.01	CRL34/R053/S86	Earl	French	1st Stage Deposit
34.01	CRL34/R111/S81	Ian	Barry	1st Stage Deposit
34.01	CRL34/R140/S128	B	Sutcliffe	1st Stage Deposit
34.01	CRL34/R090/S54	Anna	Coates	1st Stage Deposit
34.01	CRL34/R124/S102	Alan	Simpson	1st Stage Deposit
34.01	CRL34/R085/S42	Margaret	Hindle	1st Stage Deposit
34.01	CRL34/R049/S28	D	Todd	1st Stage Deposit
34.01	CRL34/R022/S17	Muriel	Proctor	1st Stage Deposit

34.01	CRL34/R021/S13	Martin	Proctor		1st Stage Deposit
34.01	CRL34/R020/S9	A	Gregory		1st Stage Deposit
34.01	HOU17/R241/S177	Brian	Swift		1st Stage Deposit
34.01	CRL34/R110/S77	William E	Hurst		1st Stage Deposit
34.01	CRL34/R228/S155	Catherine	Hayden		1st Stage Deposit
34.01	CRL34/R252/S197	C A	Pollard		1st Stage Deposit
34.01	CRL34/R253/S201	Lesley	Walls		1st Stage Deposit
34.01	CRL34/R141/S133	R	Cook		1st Stage Deposit
34.01	CRL34/R254/S205	P J	Anderson		1st Stage Deposit
34.01	CRL34/R237/S168	S L	Anderson		1st Stage Deposit
34.01	CRL34/R251/S196	Anne	Connor		1st Stage Deposit
34.01	CRL34/R236/S164	Margaret	McCallum		1st Stage Deposit
34.01	CRL34/R241/S180	Brian	Swift		1st Stage Deposit
34.01	CRL34/R227/S149	H	Fearn		1st Stage Deposit
34.01	CRL34/R224/S145	Alan Francis	Weeds		1st Stage Deposit
34.01	CRL34/R223/S141	William	Adams		1st Stage Deposit
34.01	CRL34/R255/S208	S	Hendleman		1st Stage Deposit
34.01	CRL34/R222/S137	Alan	Smith		1st Stage Deposit
34.02	CRL34/R015/S3	David	Penney	Waterside Community Network	1st Stage Deposit
34.02	CRL34/R010/S1	David	Penney	Pendle Environmental Network	351
34.04	CRL34/R109/S72	Lois	Needham		1st Stage Deposit
34.04	CRL34/R136/S121	P	Wilson		1st Stage Deposit
34.05	CRL34/R289/S242	David	Peel		1st Stage Deposit
34.05	CRL34/R088/S46		Collinge		1st Stage Deposit
34.05	CRL34/R130/S108	Audrey	Bray		1st Stage Deposit
34.05	CRL34/R108/S68	John Vernon	Harrison		1st Stage Deposit
34.05	CRL34/R349/S342	Brenda	Twist		1st Stage Deposit
34.05	CRL34/R348/S338	S	Whitnear		1st Stage Deposit

34.05	CRL34/R139/S125	E	Nutter		1st Stage Deposit
34.05	CRL34/R249/S192	Peter	MacDonald		1st Stage Deposit
34.08	CRL34/R239/S174	Jacqueline	Swift		1st Stage Deposit
37.02	CRL37/R472/S483	Alan	Hubbard	The National Trust - North West Region.	1st Stage Deposit
37.04	CRL37/R099/S61	John	Lamb	Lancashire Wildlife Trust	1st Stage Deposit
41.06	STR41/R242/S185	N	Smith	Bellway Homes	1st Stage Deposit
44.01	STR41/R083/S95	Phil	Boyle		1st Stage Deposit

## ANNEX C4

### SCHEDULE OF OMISSION SITE REPRESENTATIONS

<b>Representation Reference</b>	<b>Forename</b>	<b>Surname</b>	<b>Organisation</b>
R527/Z001	A	Pool	
R528/Z002	Barbara	Savage	
R527/Z003	A	Pool	
R452/Z004	A	Caygill	c/o Agent
R530/Z005	D	Croft	
R308/Z006	A	Myers	
R308/Z007	A	Myers	
R530/Z008	D	Croft	
R530/Z009	D	Croft	
R479/Z010	A	Moore	Salterforth Parish Council
R532/Z011		Barrowford Parish Council	
R532/Z012		Barrowford Parish Council	
R532/Z013		Barrowford Parish Council	
R532/Z014		Barrowford Parish Council	
R532/Z015		Barrowford Parish Council	
R532/Z016		Barrowford Parish Council	
R532/Z017		Barrowford Parish Council	
R532/Z018		Barrowford Parish Council	
R532/Z019		Barrowford Parish Council	
R532/Z020		Barrowford Parish Council	
R532/Z021		Barrowford Parish Council	
R532/Z022		Barrowford Parish Council	
R532/Z023		Barrowford Parish Council	
R532/Z024		Barrowford Parish Council	
R532/Z025		Barrowford Parish Council	
R533/Z026	M	Green	
R533/Z027	M	Green	
R533/Z028	M	Green	
R533/Z029	M	Green	
R535/Z030	W	Collier	
R535/Z031	W	Collier	
R535/Z032	W	Collier	
R535/Z033	W	Collier	
R535/Z034	W	Collier	
R536/Z035	Martin	Leaver	
R536/Z036	Martin	Leaver	

R536/Z037	Martin	Leaver	
R536/Z038	Martin	Leaver	
R538/Z039	J	West	
R538/Z040	J	West	
R538/Z041	J	West	
R538/Z042	J	West	
R539/Z043	C	McGuinness	
R539/Z044	C	McGuinness	
R539/Z046	C	McGuinness	
R539/Z047	C	McGuinness	
R540/Z048		Linskill	
R540/Z049		Linskill	
R540/Z050		Linskill	
R540/Z051		Linskill	
R541/Z052	R	Brown	
R541/Z053	R	Brown	
R541/Z054	R	Brown	
R541/Z055	R	Brown	
R542/Z056	R	Brown	
R542/Z057	R	Brown	
R542/Z058	R	Brown	
R542/Z059	R	Brown	
R543/Z060	E	Sagar	
R543/Z061	E	Sagar	
R543/Z062	E	Sagar	
R543/Z063	E	Sagar	
R544/Z064	Brownsett	P	
R544/Z065	Brownsett	P	
R544/Z066	Brownsett	P	
R544/Z067	Brownsett	P	
R545/Z068	B	Tetlow	
R545/Z069	B	Tetlow	
R545/Z070	B	Tetlow	
R545/Z071	B	Tetlow	
R547/Z072	Tracey	Leigh	
R547/Z073	Tracey	Leigh	
R547/Z074	Tracey	Leigh	
R547/Z075	Tracey	Leigh	
R548/Z076	W	Harrison	
R548/Z077	W	Harrison	
R548/Z078	W	Harrison	
R548/Z079	W	Harrison	
R549/Z080	K	Betts	

R549/Z081	K	Betts	
R549/Z082	K	Betts	
R549/Z083	K	Betts	
R550/Z084		Taylforth	
R550/Z085		Taylforth	
R550/Z086		Taylforth	
R550/Z087		Taylforth	
R551/Z088	B	Hoyland	
R551/Z089	B	Hoyland	
R551/Z090	B	Hoyland	
R551/Z091	B	Hoyland	
R552/Z092	D	Morris	
R552/Z093	D	Morris	
R552/Z094	D	Morris	
R552/Z095	D	Morris	
R553/Z096	C	Holden	
R553/Z097	C	Holden	
R553/Z098	C	Holden	
R553/Z099	C	Holden	
R554/Z100	J	Brammam	
R554/Z101	J	Brammam	
R554/Z102	J	Brammam	
R554/Z103	J	Brammam	
R555/Z104	E	Hoyland	
R555/Z105	E	Hoyland	
R555/Z106	E	Hoyland	
R555/Z107	E	Hoyland	
R556/Z108	N	Allen	
R556/Z109	N	Allen	
R556/Z110	N	Allen	
R556/Z111	N	Allen	
R557/Z112	Robert	Preslan	
R557/Z113	Robert	Preslan	
R557/Z114	Robert	Preslan	
R557/Z115	Robert	Preslan	
R558/Z116	D	Foster	
R558/Z117	D	Foster	
R558/Z118	D	Foster	
R558/Z119	D	Foster	
R559/Z120	Jade	Field	
R559/Z121	Jade	Field	
R559/Z122	Jade	Field	
R559/Z123	Jade	Field	

R560/Z124	P J	Chadwick	
R560/Z125	P J	Chadwick	
R561/Z126	B	Villiers	
R561/Z127	B	Villiers	
R561/Z128	B	Villiers	
R561/Z129	B	Villiers	
R562/Z130	K	Rycroft	
R562/Z131	K	Rycroft	
R562/Z132	K	Rycroft	
R562/Z133	K	Rycroft	
R563/Z134		Hartley	
R563/Z135		Hartley	
R563/Z136		Hartley	
R563/Z137		Hartley	
R564/Z138	E	Bowker	
R564/Z139	E	Bowker	
R564/Z140	E	Bowker	
R564/Z141	E	Bowker	
R565/Z142	T	Annison	
R565/Z143	T	Annison	
R565/Z144	T	Annison	
R565/Z145	T	Annison	
R566/Z146	K	Wilson	
R566/Z147	K	Wilson	
R566/Z148	K	Wilson	
R566/Z149	K	Wilson	
R567/Z150	D	Hoyle	
R567/Z151	D	Hoyle	
R567/Z152	D	Hoyle	
R567/Z153	D	Hoyle	
R568/Z154	J	Agg	
R568/Z155	J	Agg	
R568/Z156	J	Agg	
R568/Z157	J	Agg	
R569/Z158		Walton	
R569/Z159		Walton	
R569/Z160		Walton	
R569/Z161		Walton	
R570/Z162		Cowgill	
R570/Z163		Cowgill	
R570/Z164		Cowgill	
R570/Z165		Cowgill	
R571/Z166	J	Parkins	

R571/Z167	J	Parkins	
R571/Z168	J	Parkins	
R571/Z169	J	Parkins	
R572/Z170	N	Leigh	
R572/Z171	N	Leigh	
R572/Z172	N	Leigh	
R572/Z173	N	Leigh	
R573/Z174	W	Byrne	
R104/Z175	Wilfred	Byrne	
R104/Z176	Wilfred	Byrne	
R574/Z177	J R	Butler	
R575/Z178	M & J	Watson	
R576/Z179	Christine	Harrison	
R576/Z180	Christine	Harrison	
R577/Z181	D	Holden	
R577/Z182	D	Holden	
R577/Z183	D	Holden	
R577/Z184	D	Holden	
R578/Z185	H A	Mitchell	
R578/Z186	H A	Mitchell	
R578/Z187	H A	Mitchell	
R578/Z188	H A	Mitchell	
R579/Z189	Norma	Cowgill	
R579/Z190	Norma	Cowgill	
R579/Z191	Norma	Cowgill	
R579/Z192	Norma	Cowgill	
R580/Z193	James	Fay	
R580/Z194	James	Fay	
R580/Z195	James	Fay	
R580/Z196	James	Fay	
R581/Z197	M	Parkinson	
R581/Z198	M	Parkinson	
R581/Z199	M	Parkinson	
R581/Z200	M	Parkinson	
R582/Z201	Derrick	Boocock	
R582/Z202	Derrick	Boocock	
R582/Z203	Derrick	Boocock	
R582/Z204	Derrick	Boocock	
R583/Z205	R M	Lord	
R583/Z206	R M	Lord	
R583/Z207	R M	Lord	
R583/Z208	R M	Lord	
R584/Z209	Roy	St Pierre	

R584/Z210	Roy	St Pierre	
R584/Z211	Roy	St Pierre	
R584/Z212	Roy	St Pierre	
R584/Z213	Roy	St Pierre	
R584/Z214	Roy	St Pierre	
R584/Z215	Roy	St Pierre	
R584/Z216	Roy	St Pierre	
R584/Z217	Roy	St Pierre	
R584/Z218	Roy	St Pierre	
R584/Z219	Roy	St Pierre	
R584/Z220	Roy	St Pierre	
R585/Z221	Jennifer	Greenwood	
R586/Z222	M & L	Jackson	
R587/Z223	C	Hodgson	
R588/Z224	D	Pickles	
R588/Z225	D	Pickles	
R588/Z226	D	Pickles	
R588/Z227	D	Pickles	
R588/Z228	D	Pickles	
R307/Z229	Chris	Tennant	
R307/Z230	Chris	Tennant	
R307/Z231	Chris	Tennant	
R307/Z232	Chris	Tennant	
R589/Z233	Richard	Pighill	
R589/Z234	Richard	Pighill	
R589/Z235	Richard	Pighill	
R589/Z236	Richard	Pighill	
R590/Z237	K	Barker	
R590/Z238	K	Barker	
R590/Z239	K	Barker	
R590/Z240	K	Barker	
R592/Z241	J	Taylor	
R591/Z242	Simon and Sandra	Martin & Taylor	
R592/Z243	J	Taylor	
R592/Z244	J	Taylor	
R592/Z245	J	Taylor	
R593/Z246	Margaret	Greenwood	
R593/Z247	Margaret	Greenwood	
R593/Z248	Margaret	Greenwood	
R593/Z249	Margaret	Greenwood	
R594/Z250	John	Tattersall	
R594/Z251	John	Tattersall	

R594/Z252	John	Tattersall	
R594/Z253	John	Tattersall	
R595/Z254	D	Wright	
R595/Z255	D	Wright	
R595/Z256	D	Wright	
R595/Z257	D	Wright	
R596/Z258	J	Crabtree-Wormwell	
R597/Z259	Bryan	Slater	
R597/Z260	Bryan	Slater	
R597/Z261	Bryan	Slater	
R597/Z262	Bryan	Slater	
R598/Z263	D	Elwiss	
R598/Z264	D	Elwiss	
R598/Z265	D	Elwiss	
R598/Z266	D	Elwiss	
R599/Z267	M	Newman	
R599/Z268	M	Newman	
R600/Z269	Daniel & Jonathan	O'Connor	
R599/Z270	M	Newman	
R599/Z271	M	Newman	
R601/Z272	M & T	O'Connor	
R602/Z273	Margaret	Berry	
R603/Z274	Ursula	Janion	
R603/Z275	Ursula	Janion	
R603/Z276	Ursula	Janion	
R603/Z277	Ursula	Janion	
R604/Z278	Tina	Parkinson	
R604/Z279	Tina	Parkinson	
R604/Z280	Tina	Parkinson	
R604/Z281	Tina	Parkinson	
R605/Z282	Valerie	Dixon	
R605/Z283	Valerie	Dixon	
R605/Z284	Valerie	Dixon	
R605/Z285	Valerie	Dixon	
R606/Z286	Ray	Spragg	
R606/Z287	Ray	Spragg	
R606/Z288	Ray	Spragg	
R606/Z289	Ray	Spragg	
R607/Z290	M	Winder	
R607/Z291	M	Winder	
R607/Z292	M	Winder	
R607/Z293	M	Winder	

R608/Z294	Brian	Bird	
R608/Z295	Brian	Bird	
R608/Z296	Brian	Bird	
R608/Z297	Brian	Bird	
R609/Z298	Lea	Bank	
R609/Z299	Lea	Bank	
R609/Z300	Lea	Bank	
R609/Z301	Lea	Bank	
R610/Z302	Barbara	Males	
R610/Z303	Barbara	Males	
R610/Z304	Barbara	Males	
R610/Z305	Barbara	Males	
R611/Z306	S	Irodenko	
R611/Z307	S	Irodenko	
R611/Z308	S	Irodenko	
R611/Z309	S	Irodenko	
R612/Z310	H	Morris	
R612/Z311	H	Morris	
R612/Z312	H	Morris	
R612/Z313	H	Morris	
R613/Z314	Angela	Scarisbrick	
R614/Z315	V	Cocker	
R614/Z316	V	Cocker	
R614/Z317	V	Cocker	
R614/Z318	V	Cocker	
R614/Z319	V	Cocker	
R615/Z320	M	H	
R615/Z321	M	H	
R615/Z322	M	H	
R615/Z323	M	H	
R616/Z324	P	Spenceley	
R616/Z325	P	Spenceley	
R616/Z326	P	Spenceley	
R616/Z327	P	Spenceley	
R617/Z328	S & G	Connah	
R618/Z329	Anthony	Halstead	
R620/Z330	C	Blacoe	
R620/Z331	C	Blacoe	
R619/Z332	H & G	Gee	
R621/Z333	Janette	Mullany	
R621/Z334	Janette	Mullany	
R622/Z335	K	Hargreaves	
R622/Z336	K	Hargreaves	

R623/Z337	K	Blacoe	
R623/Z338	K	Blacoe	
R624/Z339	Carl	Ross	
R624/Z340	Carl	Ross	
R625/Z341	R T	Metclafe	
R625/Z342	R T	Metclafe	
R626/Z343	A	Earnshaw	
R626/Z344	A	Earnshaw	
R627/Z345	Trevor	Mousley	
R627/Z346	Trevor	Mousley	
R628/Z347	John	Whiteside	
R628/Z348	John	Whiteside	
R629/Z349	kelly	Pedder	
R629/Z350	kelly	Pedder	
R622/Z351	K	Hargreaves	
R622/Z352	K	Hargreaves	
R630/Z353	Ian	White	
R630/Z354	Ian	White	
R631/Z355	B	Tonge	
R631/Z356	B	Tonge	
R632/Z357		Killian	
R632/Z358		Killian	
R633/Z359	J	Hudson	
R633/Z360	J	Hudson	
R634/Z361	Margaret	Thornley	
R634/Z362	Margaret	Thornley	
R635/Z363	D	Harmmerton	
R635/Z364	D	Harmmerton	
R636/Z365	E	Edge	
R636/Z366	E	Edge	
R637/Z367	D	Eastham	
R637/Z368	D	Eastham	
R638/Z369	V	Hudson	
R638/Z370	V	Hudson	
R639/Z371	S	Standing	
R639/Z372	S	Standing	
R640/Z373	S	Riley	
R640/Z374	S	Riley	
R641/Z375	Paul	Halstead	
R641/Z376	Paul	Halstead	
R642/Z377	Philip	Mousdale	
R642/Z378	Philip	Mousdale	
R643/Z379	Douglas	Lord	

R643/Z380	Douglas	Lord	
R644/Z381	J	Emmott	
R644/Z382	J	Emmott	
R645/Z383	Peter	Slyle	
R645/Z384	Peter	Slyle	
R646/Z385	P	Holt	
R646/Z386	P	Holt	
R647/Z387	K	Wildman	
R647/Z388	K	Wildman	
R648/Z389	P	Bowen	
R648/Z390	P	Bowen	
R649/Z391	M	Stafford	
R649/Z392	M	Stafford	
R650/Z393	Dena	Watson	
R650/Z394	Dena	Watson	
R651/Z395	S	Foulds	
R651/Z396	S	Foulds	
R652/Z397	J	Roberts	
R652/Z398	J	Roberts	
R653/Z399	Alan	Dixon	
R653/Z400	Alan	Dixon	
R654/Z401	D	Yates	
R654/Z402	D	Yates	
R655/Z403	Michael	Smith	
R656/Z404	M	Fielding	
R656/Z405	M	Fielding	
R656/Z406	M	Fielding	
R657/Z407	John	Kelly	
R657/Z408	John	Kelly	
R657/Z409	John	Kelly	
R658/Z410	Alison	Birkinshaw	
R658/Z411	Alison	Birkinshaw	
R658/Z412	Alison	Birkinshaw	
R659/Z413	Bryan	Atkinson	
R659/Z414	Bryan	Atkinson	
R659/Z415	Bryan	Atkinson	
R660/Z416	Marie	Allan	
R660/Z417	Marie	Allan	
R660/Z418	Marie	Allan	
R661/Z419	V	Vaughan	
R661/Z420	V	Vaughan	
R661/Z421	V	Vaughan	
R662/Z422	John	Ingram	

	Anthony		
R662/Z423	John Anthony	Ingram	
R662/Z424	John Anthony	Ingram	
R663/Z425	Clare	Shutt	
R663/Z426	Clare	Shutt	
R663/Z427	Clare	Shutt	
R664/Z428	Bob	Elliott	
R664/Z429	Bob	Elliott	
R664/Z430	Bob	Elliott	
R665/Z431	N	Sharp	
R665/Z432	N	Sharp	
R665/Z433	N	Sharp	
R667/Z434	Jean	Mayor	
R666/Z435	Andrew & Katie	Bolland & Duxbury	
R667/Z436	Jean	Mayor	
R667/Z437	Jean	Mayor	
R668/Z438	Michael	Stott	
R668/Z439	Michael	Stott	
R668/Z440	Michael	Stott	
R669/Z441	Jean	Ingram	
R669/Z442	Jean	Ingram	
R669/Z443	Jean	Ingram	
R670/Z444	S T	Butterworth	
R670/Z445	S T	Butterworth	
R670/Z446	S T	Butterworth	
R671/Z447	I	Patstan	
R671/Z448	I	Patstan	
R671/Z449	I	Patstan	
R671/Z450	I	Patstan	
R672/Z451	William	Newbould	
R672/Z452	William	Newbould	
R672/Z453	William	Newbould	
R673/Z454	Susan	Downham	
R673/Z455	Susan	Downham	
R673/Z456	Susan	Downham	
R674/Z457	Graham	Harrison	
R674/Z458	Graham	Harrison	
R674/Z459	Graham	Harrison	
R675/Z460	Hey	Anthony	
R675/Z461	Hey	Anthony	
R675/Z462	Hey	Anthony	

R676/Z463	M	Bentley	
R676/Z464	M	Bentley	
R676/Z465	M	Bentley	
R677/Z466	E	Bainbridge	
R677/Z467	E	Bainbridge	
R677/Z468	E	Bainbridge	
R678/Z469	F	Lloyd	
R678/Z470	F	Lloyd	
R678/Z471	F	Lloyd	
R679/Z472	Brian	Mitchener	
R679/Z473	Brian	Mitchener	
R679/Z474	Brian	Mitchener	
R680/Z475	H	Bailey	
R680/Z476	H	Bailey	
R680/Z477	H	Bailey	
R681/Z478	A	Hathersall	
R681/Z479	A	Hathersall	
R681/Z480	A	Hathersall	
R682/Z481	P	Cruise	
R682/Z482	P	Cruise	
R682/Z483	P	Cruise	
R683/Z484	Tom	Dickinson	
R683/Z485	Tom	Dickinson	
R683/Z486	Tom	Dickinson	
R684/Z487	E	Heyworth	
R684/Z488	E	Heyworth	
R684/Z489	E	Heyworth	
R685/Z490	G	Halstead	
R685/Z491	G	Halstead	
R685/Z492	G	Halstead	
R686/Z493	S	Dey	
R686/Z494	S	Dey	
R686/Z495	S	Dey	
R687/Z496	Pauline	Hirons	
R687/Z497	Pauline	Hirons	
R687/Z498	Pauline	Hirons	
R688/Z499	Trevor	Mayes	
R688/Z500	Trevor	Mayes	
R688/Z501	Trevor	Mayes	
R689/Z502	J	Lowe	
R689/Z503	J	Lowe	
R689/Z504	J	Lowe	
R690/Z505	Margaret	Watson	

R691/Z506	L. A.	Watson	
R691/Z507	L. A.	Watson	
R691/Z508	L. A.	Watson	
R692/Z509	John	Howson	
R692/Z510	John	Howson	
R692/Z511	John	Howson	
R693/Z512	G. P.	Lawlor	
R693/Z513	G. P.	Lawlor	
R693/Z514	G. P.	Lawlor	
R694/Z515	D	Mitchell	
R694/Z516	D	Mitchell	
R694/Z517	D	Mitchell	
R695/Z518	Mary	Neylon	
R695/Z519	Mary	Neylon	
R695/Z520	Mary	Neylon	
R696/Z521	Mark	Rogers	
R696/Z522	Mark	Rogers	
R696/Z523	Mark	Rogers	
R697/Z524	M	Pickles	
R697/Z525	M	Pickles	
R697/Z526	M	Pickles	
R698/Z527	Michael	Walsh	
R698/Z528	Michael	Walsh	
R698/Z529	Michael	Walsh	
R699/Z530	G	Turner	
R700/Z531	R	Eidden	
R700/Z532	R	Eidden	
R700/Z533	R	Eidden	
R701/Z534	John	Willis	
R703/Z536	B	Riley	
R236/Z537	Margaret	McCallum	
R236/Z538	Margaret	McCallum	
R704/Z539	D	Hendleman	Halifax Road Area Action Committee
R704/Z540	D	Hendleman	Halifax Road Area Action Committee
R255/Z541	S	Hendleman	
R255/Z542	S	Hendleman	
R706/Z544	J A	Bradley	
R707/Z545	T JMr	Coyne	
R708/Z546	P C	Oxlade	
R708/Z547	P C	Oxlade	
R708/Z548	P C	Oxlade	
R295/Z549	Philip	Carter	Environment Agency
R295/Z550	Philip	Carter	Environment Agency

R295/Z551	Philip	Carter	Environment Agency
R295/Z552	Philip	Carter	Environment Agency
R295/Z553	Philip	Carter	Environment Agency
R295/Z554	Philip	Carter	Environment Agency
R295/Z555	Philip	Carter	Environment Agency
R295/Z556	Philip	Carter	Environment Agency
R295/Z557	Philip	Carter	Environment Agency
R295/Z558	Philip	Carter	Environment Agency
R295/Z559	Philip	Carter	Environment Agency
R295/Z560	Philip	Carter	Environment Agency
R295/Z561	Philip	Carter	Environment Agency
R295/Z562	Philip	Carter	Environment Agency
R295/Z563	Philip	Carter	Environment Agency
R295/Z564	Philip	Carter	Environment Agency
R295/Z565	Philip	Carter	Environment Agency
R295/Z566	Philip	Carter	Environment Agency
R295/Z567	Philip	Carter	Environment Agency
R295/Z568	Philip	Carter	Environment Agency
R295/Z569	Philip	Carter	Environment Agency
R295/Z570	Philip	Carter	Environment Agency
R295/Z571	Philip	Carter	Environment Agency
R295/Z572	Philip	Carter	Environment Agency
R439/Z574	Keith	Adamson	Pendle CPRE
R439/Z575	Keith	Adamson	Pendle CPRE
R439/Z576	Keith	Adamson	Pendle CPRE
R439/Z577	Keith	Adamson	Pendle CPRE
R439/Z578	Keith	Adamson	Pendle CPRE
R439/Z579	Keith	Adamson	Pendle CPRE
R439/Z580	Keith	Adamson	Pendle CPRE
R439/Z581	Keith	Adamson	Pendle CPRE
R439/Z582	Keith	Adamson	Pendle CPRE
R439/Z583	Keith	Adamson	Pendle CPRE
R439/Z584	Keith	Adamson	Pendle CPRE
R439/Z585	Keith	Adamson	Pendle CPRE
R439/Z586	Keith	Adamson	Pendle CPRE
R439/Z587	Keith	Adamson	Pendle CPRE
R439/Z588	Keith	Adamson	Pendle CPRE
R439/Z589	Keith	Adamson	Pendle CPRE
R439/Z590	Keith	Adamson	Pendle CPRE
R439/Z591	Keith	Adamson	Pendle CPRE
R439/Z592	Keith	Adamson	Pendle CPRE
R439/Z593	Keith	Adamson	Pendle CPRE
R439/Z594	Keith	Adamson	Pendle CPRE

R439/Z595	Keith	Adamson	Pendle CPRE
R439/Z596	Keith	Adamson	Pendle CPRE
R439/Z597	Keith	Adamson	Pendle CPRE
R439/Z598	Keith	Adamson	Pendle CPRE
R439/Z599	Keith	Adamson	Pendle CPRE
R439/Z600	Keith	Adamson	Pendle CPRE
R439/Z601	Keith	Adamson	Pendle CPRE
R439/Z602	Keith	Adamson	Pendle CPRE
R439/Z603	Keith	Adamson	Pendle CPRE
R439/Z604	Keith	Adamson	Pendle CPRE
R439/Z605	Keith	Adamson	Pendle CPRE
R439/Z606	Keith	Adamson	Pendle CPRE
R439/Z607	Keith	Adamson	Pendle CPRE
R439/Z608	Keith	Adamson	Pendle CPRE
R439/Z609	Keith	Adamson	Pendle CPRE
R439/Z610	Keith	Adamson	Pendle CPRE
R439/Z611	Keith	Adamson	Pendle CPRE
R439/Z612	Keith	Adamson	Pendle CPRE
R439/Z613	Keith	Adamson	Pendle CPRE
R439/Z614	Keith	Adamson	Pendle CPRE
R439/Z615	Keith	Adamson	Pendle CPRE
R439/Z616	Keith	Adamson	Pendle CPRE
R439/Z617	Keith	Adamson	Pendle CPRE
R439/Z618	Keith	Adamson	Pendle CPRE
R439/Z619	Keith	Adamson	Pendle CPRE
R439/Z620	Keith	Adamson	Pendle CPRE
R439/Z621	Keith	Adamson	Pendle CPRE
R439/Z622	Keith	Adamson	Pendle CPRE
R711/Z623	Helen	Walker	
R712/Z624	Mary	Hardacre	
R713/Z625	Tracey	Rishton	The Parish Church of St. Mary Kelbrook
R712/Z626	Mary	Hardacre	
R714/Z627	B	Hacking	
R716/Z628	Anne	Dodd	
R717/Z629	Clive	Grimshaw	Lancashire County Council
R717/Z630	Clive	Grimshaw	Lancashire County Council
R717/Z631	Clive	Grimshaw	Lancashire County Council
R717/Z632	Clive	Grimshaw	Lancashire County Council
R717/Z633	Clive	Grimshaw	Lancashire County Council
R717/Z634	Clive	Grimshaw	Lancashire County Council
R717/Z635	Clive	Grimshaw	Lancashire County Council
R718/Z636	Angela	Tillotson	

R718/Z637	Angela	Tillotson	
R718/Z638	Angela	Tillotson	
R708/Z639	P C	Oxlade	
R708/Z640	P C	Oxlade	
R719/Z641	P.A	Preston	
R719/Z642	P.A	Preston	
R109/Z643	Lois	Needham	
R109/Z644	Lois	Needham	
R720/Z645	B	Rich	
R720/Z646	B	Rich	
R720/Z647	B	Rich	
R721/Z648	D	Stringer	
R721/Z649	D	Stringer	
R491/Z650	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z651	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z652	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z653	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z654	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z655	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z656	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z657	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z658	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z659	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z660	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z661	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z662	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z663	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z664	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z665	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z666	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z667	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z668	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z669	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z670	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z671	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z672	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z673	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z674	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z675	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z676	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z677	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z678	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z679	B	Sparnon	Persimmon Homes (Lancashire) Ltd.

R491/Z680	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z681	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z682	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z683	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z684	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R491/Z685	B	Sparnon	Persimmon Homes (Lancashire) Ltd.
R717/Z686	Clive	Grimshaw	Lancashire County Council
R717/Z687	Clive	Grimshaw	Lancashire County Council
R717/Z688	Clive	Grimshaw	Lancashire County Council
R717/Z689	Clive	Grimshaw	Lancashire County Council
R717/Z690	Clive	Grimshaw	Lancashire County Council
R717/Z691	Clive	Grimshaw	Lancashire County Council
R717/Z692	Clive	Grimshaw	Lancashire County Council
R717/Z693	Clive	Grimshaw	Lancashire County Council
R717/Z694	Clive	Grimshaw	Lancashire County Council
R717/Z695	Clive	Grimshaw	Lancashire County Council
R717/Z696	Clive	Grimshaw	Lancashire County Council
R717/Z697	Clive	Grimshaw	Lancashire County Council
R717/Z698	Clive	Grimshaw	Lancashire County Council
R717/Z699	Clive	Grimshaw	Lancashire County Council
R717/Z700	Clive	Grimshaw	Lancashire County Council
R717/Z701	Clive	Grimshaw	Lancashire County Council
R717/Z702	Clive	Grimshaw	Lancashire County Council
R717/Z703	Clive	Grimshaw	Lancashire County Council
R717/Z704	Clive	Grimshaw	Lancashire County Council
R717/Z705	Clive	Grimshaw	Lancashire County Council
R717/Z706	Clive	Grimshaw	Lancashire County Council
R717/Z707	Clive	Grimshaw	Lancashire County Council
R717/Z708	Clive	Grimshaw	Lancashire County Council
R717/Z709	Clive	Grimshaw	Lancashire County Council
R717/Z710	Clive	Grimshaw	Lancashire County Council
R717/Z711	Clive	Grimshaw	Lancashire County Council
R717/Z712	Clive	Grimshaw	Lancashire County Council
R717/Z713	Clive	Grimshaw	Lancashire County Council
R717/Z714	Clive	Grimshaw	Lancashire County Council
R717/Z715	Clive	Grimshaw	Lancashire County Council
R717/Z716	Clive	Grimshaw	Lancashire County Council
R717/Z717	Clive	Grimshaw	Lancashire County Council
R717/Z718	Clive	Grimshaw	Lancashire County Council
R717/Z719	Clive	Grimshaw	Lancashire County Council
R717/Z720	Clive	Grimshaw	Lancashire County Council
R717/Z721	Clive	Grimshaw	Lancashire County Council
R717/Z722	Clive	Grimshaw	Lancashire County Council

R717/Z723	Clive	Grimshaw	Lancashire County Council
R717/Z724	Clive	Grimshaw	Lancashire County Council
R717/Z725	Clive	Grimshaw	Lancashire County Council
R717/Z726	Clive	Grimshaw	Lancashire County Council
R717/Z727	Clive	Grimshaw	Lancashire County Council
R717/Z728	Clive	Grimshaw	Lancashire County Council
R717/Z729	Clive	Grimshaw	Lancashire County Council
R717/Z730	Clive	Grimshaw	Lancashire County Council
R717/Z731	Clive	Grimshaw	Lancashire County Council
R717/Z732	Clive	Grimshaw	Lancashire County Council
R717/Z733	Clive	Grimshaw	Lancashire County Council
R722/Z734	Ken	Parsons	
R723/Z735	Gill	Hall	
R717/Z736	Clive	Grimshaw	Lancashire County Council
R717/Z737	Clive	Grimshaw	Lancashire County Council
R717/Z738	Clive	Grimshaw	Lancashire County Council
R717/Z739	Clive	Grimshaw	Lancashire County Council
R717/Z740	Clive	Grimshaw	Lancashire County Council
R717/Z741	Clive	Grimshaw	Lancashire County Council
R717/Z742	Clive	Grimshaw	Lancashire County Council
R717/Z743	Clive	Grimshaw	Lancashire County Council
R724/Z744	Jan	Hartley-Watson	
R725/Z745	S	O'Shea	
R725/Z746	S	O'Shea	
R725/Z747	S	O'Shea	
R725/Z748	S	O'Shea	
R725/Z749	S	O'Shea	
R726/Z750	M	Whiteoak	
R726/Z751	M	Whiteoak	
R727/Z752	Joyce	Myers	
R728/Z753	Ivy	Dene	
R728/Z754	Ivy	Dene	
R728/Z755	Ivy	Dene	
R729/Z756	J	Lord	
R730/Z757	J & M	Bell	
R731/Z758		Ellis	
R731/Z759		Ellis	
R732/Z760	Douglas	Cottam	
R732/Z761	Douglas	Cottam	
R513/Z762	Mark	Gardner	Trawden Community Group
R513/Z763	Mark	Gardner	Trawden Community Group
R513/Z764	Mark	Gardner	Trawden Community Group
R513/Z765	Mark	Gardner	Trawden Community Group

R513/Z766	Mark	Gardner	Trawden Community Group
R513/Z767	Mark	Gardner	Trawden Community Group
R513/Z768	Mark	Gardner	Trawden Community Group
R513/Z769	Mark	Gardner	Trawden Community Group
R513/Z770	Mark	Gardner	Trawden Community Group
R513/Z771	Mark	Gardner	Trawden Community Group
R513/Z772	Mark	Gardner	Trawden Community Group
R513/Z773	Mark	Gardner	Trawden Community Group
R513/Z774	Mark	Gardner	Trawden Community Group
R513/Z775	Mark	Gardner	Trawden Community Group
R513/Z776	Mark	Gardner	Trawden Community Group
R513/Z777	Mark	Gardner	Trawden Community Group
R513/Z778	Mark	Gardner	Trawden Community Group
R513/Z779	Mark	Gardner	Trawden Community Group
R513/Z780	Mark	Gardner	Trawden Community Group
R513/Z781	Mark	Gardner	Trawden Community Group
R513/Z782	Mark	Gardner	Trawden Community Group
R513/Z783	Mark	Gardner	Trawden Community Group
R349/Z784	Brenda	Twist	
R349/Z785	Brenda	Twist	
R733/Z786	E	Leather	
R733/Z787	E	Leather	
R288/Z788	Jonathan	Howe	
R288/Z789	Jonathan	Howe	
R734/Z790	A	Sherrifs	
R734/Z791	A	Sherrifs	
R734/Z792	A	Sherrifs	
R735/Z793	J	Wilton	
R735/Z794	J	Wilton	
R735/Z795	J	Wilton	
R736/Z796	E	Rowland	
R736/Z797	E	Rowland	
R737/Z798	M	Rowland	
R737/Z799	M	Rowland	
R738/Z800	Enid	Ellis	
R738/Z801	Enid	Ellis	
R738/Z802	Enid	Ellis	
R739/Z803	B	Hird	
R739/Z804	B	Hird	
R740/Z805	M	Rushton	
R740/Z806	M	Rushton	
R740/Z807	M	Rushton	
R741/Z808	Stephanie	Matthews	

R741/Z809	Stephanie	Matthews	
R290/Z810	E A	Lord	
R290/Z811	E A	Lord	
R742/Z812	Dirk	Kriete	
R743/Z813	C R	Hill	
R743/Z814	C R	Hill	
R743/Z815	C R	Hill	
R139/Z816	E	Nutter	
R139/Z817	E	Nutter	
R744/Z818	Dorothy	Braithwaite	
R744/Z819	Dorothy	Braithwaite	
R744/Z820	Dorothy	Braithwaite	
R136/Z821	P	Wilson	
R136/Z822	P	Wilson	
R745/Z823	Christopher	Crabtree	
R746/Z824	M	Martin	
R747/Z825	Janet	Williams	
R747/Z826	Janet	Williams	
R747/Z827	Janet	Williams	
R748/Z828	B	Nutter	
R748/Z829	B	Nutter	
R748/Z830	B	Nutter	
R749/Z831	Brian	Whitfield	
R750/Z832	K	Bancroft	
R750/Z833	K	Bancroft	
R751/Z834	J	Newsome	
R751/Z835	J	Newsome	
R752/Z836	Scott	Earing	
R752/Z837	Scott	Earing	
R752/Z838	Scott	Earing	
R753/Z839	Susan	Horsefield	
R754/Z840	A J	Nizinkiewicz	
R754/Z841	A J	Nizinkiewicz	
R755/Z842	L	Roberts	
R755/Z843	L	Roberts	
R556/Z844	N	Allen	
R756/Z845	Gillian	Goode	
R757/Z846	M	Coates	
R757/Z847	M	Coates	
R758/Z848	I	Matthews	
R758/Z849	I	Matthews	
R759/Z850	P A	Hodgson	
R760/Z851	E	Heap	

R760/Z852	E	Heap	
R760/Z853	E	Heap	
R761/Z854	J	Howard	
R761/Z855	J	Howard	
R761/Z856	J	Howard	
R762/Z857	Chris	Leach	
R762/Z858	Chris	Leach	
R763/Z859	O	Hopkins	
R763/Z860	O	Hopkins	
R763/Z861	O	Hopkins	
R764/Z862	M	Almond	
R764/Z863	M	Almond	
R765/Z864	R	Pooley	
R765/Z865	R	Pooley	
R766/Z866	R	Hobson	
R375/Z867	M	Howells	
R375/Z868	M	Howells	
R375/Z869	M	Howells	
R767/Z870	J K	Kewin	
R767/Z871	J K	Kewin	
R768/Z872	M	Keller	
R769/Z873	J	Gillibrand	
R769/Z874	J	Gillibrand	
R768/Z875	M	Keller	
R768/Z876	M	Keller	
R717/Z877	Clive	Grimshaw	Lancashire County Council
R717/Z878	Clive	Grimshaw	Lancashire County Council
R770/Z879	P	Whalley	
R770/Z880	P	Whalley	
R771/Z881	Paul	Harper	
R325/Z882	B	Clark	
R325/Z883	B	Clark	
R325/Z884	B	Clark	
R772/Z885	A	Tillotson	
R772/Z886	A	Tillotson	
R772/Z887	A	Tillotson	
R438/Z888	S	Boyd	
R438/Z889	S	Boyd	
R438/Z890	S	Boyd	
R773/Z891	Brian	Parkins	
R774/Z892	James	Mounsey	
R774/Z893	James	Mounsey	
R775/Z894	Nadine	Gifford	

R776/Z895	John	Carman	
R777/Z896	Laura	Newbould	
R778/Z897	B	Carlile	
R779/Z898	Mary	Mattochs	
R780/Z899	H M	Reid	
R781/Z900	J A	Walsh	
R782/Z901	D	Bannistor	
R783/Z902	Andrew	Gill	
R784/Z903	Patricia	Dickins	
R784/Z904	Patricia	Dickins	
R785/Z905	K	Hargreaves	
R786/Z906	M	Duerden	
R787/Z907	D L	Cockshott	
R788/Z908	Derek	Greenwood	
R789/Z909	Ann	Efemey	
R790/Z910	Trudy	Nichols	
R791/Z911	J	Coates	
R792/Z912	Paul	Sudds	
R793/Z913	Barbara	udds	
R513/Z914	Mark	Gardner	Trawden Community Group
R513/Z915	Mark	Gardner	Trawden Community Group
R513/Z916	Mark	Gardner	Trawden Community Group
R513/Z917	Mark	Gardner	Trawden Community Group
R513/Z918	Mark	Gardner	Trawden Community Group
R513/Z919	Mark	Gardner	Trawden Community Group
R513/Z920	Mark	Gardner	Trawden Community Group
R513/Z921	Mark	Gardner	Trawden Community Group
R513/Z922	Mark	Gardner	Trawden Community Group
R513/Z923	Mark	Gardner	Trawden Community Group
R513/Z924	Mark	Gardner	Trawden Community Group
R513/Z925	Mark	Gardner	Trawden Community Group
R513/Z926	Mark	Gardner	Trawden Community Group
R513/Z927	Mark	Gardner	Trawden Community Group
R513/Z928	Mark	Gardner	Trawden Community Group
R513/Z929	Mark	Gardner	Trawden Community Group
R513/Z930	Mark	Gardner	Trawden Community Group
R513/Z931	Mark	Gardner	Trawden Community Group
R513/Z932	Mark	Gardner	Trawden Community Group
R513/Z933	Mark	Gardner	Trawden Community Group
R513/Z934	Mark	Gardner	Trawden Community Group
R513/Z935	Mark	Gardner	Trawden Community Group
R513/Z936	Mark	Gardner	Trawden Community Group
R513/Z937	Mark	Gardner	Trawden Community Group

R513/Z938	Mark	Gardner	Trawden Community Group
R513/Z939	Mark	Gardner	Trawden Community Group
R513/Z940	Mark	Gardner	Trawden Community Group
R513/Z941	Mark	Gardner	Trawden Community Group
R513/Z942	Mark	Gardner	Trawden Community Group
R794/Z943	Engenie	Bate	
R099/Z944	John	Lamb	Lancashire Wildlife Trust
R795/Z945	Peter	Odor	
R099/Z946	John	Lamb	Lancashire Wildlife Trust
R796/Z947	Nick	Federico	
R797/Z948	Phil S	Wood	
R798/Z949	C J	Hindle	
R799/Z950	N	Berry	
R800/Z951	Chris	Howarth	
R800/Z952	Chris	Howarth	
R800/Z953	Chris	Howarth	
R800/Z954	Chris	Howarth	
R312/Z955	Alison	Roland	Town Planning Consultant
R312/Z956	Alison	Roland	Town Planning Consultant
R801/Z957	Sandie	Butler	
R802/Z958	Nancy	Walbank	
R803/Z959	Sara Attwood	Jones	
R804/Z960	M A	Rabuden	
R805/Z961	Ivan	Firman	
R806/Z962	Catherine	Firman	
R807/Z963	Adrian	Harper	
R808/Z964	Lindsay	Harper	
R809/Z965	Brian	Rattigan	
R809/Z966	Brian	Rattigan	
R810/Z967	Joan	Rattigan	
R811/Z968	N	Crook	
R811/Z969	N	Crook	
R812/Z970	N	Bilundish	
R812/Z971	N	Bilundish	
R813/Z972		Kelly	
R813/Z973		Kelly	
R814/Z974	Sharon	Cook	
R815/Z975	P	Halstead	
R816/Z976	E	Frost	
R817/Z977	John	Humpherys	
R291/Z978	Janet	Barrowclough	
R291/Z979	Janet	Barrowclough	

R818/Z980	A	Bates	
R819/Z981	Colin	Dalby	
R820/Z982	M	Drummond - Burnett	
R821/Z983	Andrew	Drummond - Burnett	
R822/Z984	David	O'Neill	
R823/Z985	Donald	O'Neill	
R825/Z986	K	Heyworth	
R825/Z987	K	Heyworth	
R825/Z988	K	Heyworth	
R826/Z989	Owen G	Oliver	Lidgett Preservation Group
R826/Z990	Owen G	Oliver	Lidgett Preservation Group
R826/Z991	Owen G	Oliver	Lidgett Preservation Group
R826/Z992	Owen G	Oliver	Lidgett Preservation Group
R827/Z993	Ronald	Parker	
R827/Z994	Ronald	Parker	
R827/Z995	Ronald	Parker	
R828/Z996	P G	Barrett	
R828/Z997	P G	Barrett	
R828/Z998	P G	Barrett	
R829/Z999	Barry	Bitwistle	Secretary, Lidgett Preservation Group
R829/Z1000	Barry	Bitwistle	Secretary, Lidgett Preservation Group
R829/Z1001	Barry	Bitwistle	Secretary, Lidgett Preservation Group
R830/Z1002	David	Haslam	
R830/Z1003	David	Haslam	
R429/Z1004	P	Christie	
R429/Z1005	P	Christie	
R831/Z1006	Alan	Markham	Poppy Cottage
R831/Z1007	Alan	Markham	Poppy Cottage
R831/Z1008	Alan	Markham	Poppy Cottage
R831/Z1009	Alan	Markham	Poppy Cottage
R831/Z1010	Alan	Markham	Poppy Cottage
R831/Z1011	Alan	Markham	Poppy Cottage
R831/Z1012	Alan	Markham	Poppy Cottage
R831/Z1013	Alan	Markham	Poppy Cottage
R831/Z1014	Alan	Markham	Poppy Cottage
R831/Z1015	Alan	Markham	Poppy Cottage
R831/Z1016	Alan	Markham	Poppy Cottage
R831/Z1017	Alan	Markham	Poppy Cottage
R832/Z1018	A	Haigh	
R833/Z1019	MP	Bradley	
R834/Z1020	Bryan	Tyrrell	
R834/Z1021	Bryan	Tyrrell	
R834/Z1022	Bryan	Tyrrell	

R834/Z1023	Bryan	Tyrrell	
R835/Z1024	G N	Bolton	
R835/Z1025	G N	Bolton	
R835/Z1026	G N	Bolton	
R836/Z1027	Alan	Hague	
R836/Z1028	Alan	Hague	
R836/Z1029	Alan	Hague	
R836/Z1030	Alan	Hague	
R837/Z1031	Brian	Jackson	Friends of the Earth Pendle
R837/Z1032	Brian	Jackson	Friends of the Earth Pendle
R837/Z1033	Brian	Jackson	Friends of the Earth Pendle
R837/Z1034	Brian	Jackson	Friends of the Earth Pendle
R838/Z1035	Martin	Dickinson	
R838/Z1036	Martin	Dickinson	
R839/Z1037	Jeffrey C	Rhodes	
R839/Z1038	Jeffrey C	Rhodes	
R840/Z1039	Martin	Proctor	
R840/Z1040	Martin	Proctor	
R841/Z1041	Keith	Pickup	
R842/Z1042	Sara	Pollitt	
R842/Z1043	Sara	Pollitt	
R843/Z1044	Anna	Biley	
R843/Z1045	Anna	Biley	
R844/Z1046	M	Burton	
R844/Z1047	M	Burton	
R845/Z1048	P H	Laycock	
R845/Z1049	P H	Laycock	
R425/Z1050	Lyn	Proctor	
R425/Z1051	Lyn	Proctor	
R846/Z1052	Elizabeth	Whittaker	
R847/Z1053	David	Pollitt	
R847/Z1054	David	Pollitt	
R314/Z1055	J A	Knowles	
R315/Z1056	J O	Knowles	
R315/Z1057	J O	Knowles	
R848/Z1058	Gwen	Lucas	
R849/Z1059	Janis	Tatterall	
R850/Z1060	Phillip	Lund	
R851/Z1061	Shirley	Oldfield	
R852/Z1062	E	Green	
R853/Z1063	N J	Dart	
R854/Z1064	C A	Simmonds	
R854/Z1065	C A	Simmonds	

R855/Z1066	Alison J	Clay	Tarwden Forest Parish Council
R855/Z1067	Alison J	Clay	Tarwden Forest Parish Council
R249/Z1068	Peter	MacDonald	
R249/Z1069	Peter	MacDonald	
R856/Z1070	D H	Shuttleworth	
R856/Z1071	D H	Shuttleworth	
R857/Z1072	C A	Owens	
R858/Z1073	Colin	Munro	
R859/Z1074	David	Mudie	
R859/Z1075	David	Mudie	
R859/Z1076	David	Mudie	
R860/Z1077	Stuart	Broughton	
R861/Z1078	David F	Hodgson	
R861/Z1079	David F	Hodgson	
R861/Z1080	David F	Hodgson	
R862/Z1081	T	Hardman	
R862/Z1082	T	Hardman	
R458/Z1083		Hayhurst	
R458/Z1084		Hayhurst	
R863/Z1085	Jennifer	O'Shea	
R863/Z1086	Jennifer	O'Shea	
R863/Z1087	Jennifer	O'Shea	
R864/Z1088	D	Fitzpatrick	
R864/Z1089	D	Fitzpatrick	
R865/Z1090	Katrina	Cutler	
R866/Z1091	D	Diggins	
R867/Z1092	Peter	Jarratt	
R867/Z1093	Peter	Jarratt	
R867/Z1094	Peter	Jarratt	
R868/Z1095	Anna	Jarratt	
R868/Z1096	Anna	Jarratt	
R868/Z1097	Anna	Jarratt	
R869/Z1098	Elizabeth A	Kennedy	
R869/Z1099	Elizabeth A	Kennedy	
R870/Z1100	Roy	Shuttleworth	
R870/Z1101	Roy	Shuttleworth	
R870/Z1102	Roy	Shuttleworth	
R871/Z1103	E	Grimshaw	
R871/Z1104	E	Grimshaw	
R871/Z1105	E	Grimshaw	
R872/Z1106	D	Beckett	
R872/Z1107	D	Beckett	
R873/Z1108	Mark	Wilkinson	

R873/Z1109	Mark	Wilkinson	
R873/Z1110	Mark	Wilkinson	
R457/Z1111	Jack	Stuttard	
R457/Z1112	Jack	Stuttard	
R874/Z1114	Chrsitine	Farnhill	
R874/Z1115	Chrsitine	Farnhill	
R874/Z1116	Chrsitine	Farnhill	
R875/Z1117	S M	Wrigglesworth	
R875/Z1118	S M	Wrigglesworth	
R875/Z1119	S M	Wrigglesworth	
R876/Z1120	Rodney	Spencer	
R876/Z1121	Rodney	Spencer	
R876/Z1122	Rodney	Spencer	
R877/Z1123	M	Mitchell	
R866/Z1124	D	Diggins	
R878/Z1125	Edward H	Nelson	
R878/Z1126	Edward H	Nelson	
R878/Z1127	Edward H	Nelson	
R878/Z1128	Edward H	Nelson	
R583/Z1129	R M	Lord	
R583/Z1130	R M	Lord	
R879/Z1131	P	Duxbury	
R108/Z1132	John Vernon	Harrison	
R108/Z1133	John Vernon	Harrison	
R275/Z1134	Kevin	Hey	
R275/Z1135	Kevin	Hey	
R275/Z1136	Kevin	Hey	
R880/Z1137	Kevin	Holden	
R880/Z1138	Kevin	Holden	
R881/Z1139	Mark	Cutler	
R882/Z1140	Julian	Pickles	
R882/Z1141	Julian	Pickles	
R883/Z1142	P	Harrison	
R884/Z1143	Susan J	Boardwell	
R884/Z1144	Susan J	Boardwell	
R884/Z1145	Susan J	Boardwell	
R885/Z1146	Trevor	Boardwell	
R885/Z1147	Trevor	Boardwell	
R885/Z1148	Trevor	Boardwell	
R886/Z1149	S	Duncan	
R887/Z1150	J	Short	
R888/Z1151	Eric	Cock	
R889/Z1152	John	Ilott	

R889/Z1153	John	Ilott	
R890/Z1154	S	Hounslow	
R891/Z1155	Kathleen B	Bannister	
R892/Z1156	Felicity	Cooper	
R893/Z1157	M	Cronin	
R894/Z1158	E	Holmes	
R895/Z1159	P	Standage	
R896/Z1160	Margaret	Cooke	
R897/Z1161	J	Spencer	
R898/Z1162	Danielle	Spencer	
R899/Z1163	D	Foster	
R900/Z1164	Lynne Sarah	Walmsley	
R901/Z1165	D A	Thomas	
R902/Z1166	Ann	Pelter	
R336/Z1167	P	Nicholas	
R336/Z1168	P	Nicholas	
R903/Z1169	Chris	Cummings	
R904/Z1170	T	Greenwood	
R904/Z1171	T	Greenwood	
R361/Z1172	Judith	Malcolm	Clerk to Blacko Parish Council
R905/Z1173	J	Coates	
R905/Z1174	J	Coates	
R905/Z1175	J	Coates	
R906/Z1176	A	Booth	
R906/Z1177	A	Booth	
R907/Z1178	Jean	Richardson	
R908/Z1179	Susan A	Greenwood	
R909/Z1180	Dave	Sudds	
R910/Z1181	Jaqueline	Donaldson	
R911/Z1182	John	Harrison	
R912/Z1183	Carole	Conboy	
R913/Z1184	R	Horrocks	
R914/Z1185	M	Pilling	
R915/Z1186	Elaine	Eccles	
R916/Z1187	Gwyneth	Carter	
R917/Z1188	K	Smith	
R918/Z1189	James	Haggerty	
R919/Z1190	D	Smith	
R920/Z1191	J	Stanford	
R921/Z1192	Ron	Crosby	
R922/Z1193	R	Dennis	
R922/Z1194	R	Dennis	
R922/Z1195	R	Dennis	

R423/Z1196	B	Ward	
R423/Z1197	B	Ward	
R923/Z1198	B	Brown	
R924/Z1199	Stephen	Arnold	
R925/Z1200	D	Evans	
R926/Z1201	E	Maxwell	
R927/Z1202	S	Spencer	
R928/Z1203	Howard	Proctor	
R479/Z1204	A	Moore	Salterforth Parish Council
R479/Z1205	A	Moore	Salterforth Parish Council
R929/Z1206	Sylvia	Whitlock	
R930/Z1207	Sally	Wilkinson	
R931/Z1208	D M	Wilkinson	
R932/Z1209	D	Radford	
R933/Z1210	John	Pickles	
R934/Z1211	Trevor	Walmsley	
R935/Z1212	J	Wilkinson	
R936/Z1213	H	Birtwistle	
R937/Z1214	David	Buckell	
R938/Z1215	D	Carradice	
R939/Z1216	P I	Parris	
R940/Z1217	Kevin	Hird	
R940/Z1218	Kevin	Hird	
R941/Z1219	W	Demaline	
R942/Z1220	G	Wilson	
R944/Z1221	Katherine	Fitzpatrick	
R944/Z1222	Katherine	Fitzpatrick	
R945/Z1223	Joan	Sill	
R244/Z1224	Walter	Stafford	
R244/Z1225	Walter	Stafford	
R946/Z1226	Ray	Kitchen	
R943/Z1227	C	Muff	
R947/Z1228	M	gGillam	
R920/Z1229	J	Stanford	
R920/Z1230	J	Stanford	
R920/Z1231	J	Stanford	
R948/Z1232	T A	Pickles	
R948/Z1233	T A	Pickles	
R949/Z1234	D	Crowther	
R950/Z1235	S	Kitchen	
R950/Z1236	S	Kitchen	
R951/Z1237	D E	Heyworth	
R951/Z1238	D E	Heyworth	

R952/Z1239	J	Hartley	
R952/Z1240	J	Hartley	
R222/Z1241	Alan	Smith	
R222/Z1242	Alan	Smith	
R953/Z1243	Ann	Walker	
R954/Z1244	Kit	Hartley	
R954/Z1245	Kit	Hartley	
R954/Z1246	Kit	Hartley	
R955/Z1247	Michael J	Hartley	
R955/Z1248	Michael J	Hartley	
R955/Z1249	Michael J	Hartley	
R956/Z1250	S	Mousley	
R957/Z1251	Helen	Clegg	
R957/Z1252	Helen	Clegg	
R307/Z1253	Chris	Tennant	
R958/Z1254	Denis R	Threadgill	
R958/Z1255	Denis R	Threadgill	
R958/Z1256	Denis R	Threadgill	
R958/Z1257	Denis R	Threadgill	
R959/Z1258	Christine	Ashworth	
R960/Z1259	M W	Turner	
R960/Z1260	M W	Turner	
R955/Z1261	Michael J	Hartley	
R961/Z1262	Marcus	Sunderland	
R961/Z1263	Marcus	Sunderland	
R962/Z1264	Denise	Davis	
R962/Z1265	Denise	Davis	
R962/Z1266	Denise	Davis	
R962/Z1267	Denise	Davis	
R963/Z1268	Christine	Carty	Reedley Hallows Parish Council
R964/Z1269	M W	Riley	
R965/Z1270	Patricia	Mclroy	
R965/Z1271	Patricia	Mclroy	
R966/Z1272	Betty	Bannister	
R661/Z1273	V	Vaughan	
R967/Z1274	C M	Metcalfe	
R528/Z1275	Barbara	Savage	
R968/Z1276	Andrew	Walker	The Planning and Development Network
R099/Z1277	John	Lamb	Lancashire Wildlife Trust
R099/Z1278	John	Lamb	Lancashire Wildlife Trust
R099/Z1279	John	Lamb	Lancashire Wildlife Trust
R099/Z1280	John	Lamb	Lancashire Wildlife Trust

R099/Z1281	John	Lamb	Lancashire Wildlife Trust
R099/Z1282	John	Lamb	Lancashire Wildlife Trust
R099/Z1283	John	Lamb	Lancashire Wildlife Trust
R099/Z1284	John	Lamb	Lancashire Wildlife Trust
R099/Z1285	John	Lamb	Lancashire Wildlife Trust
R099/Z1286	John	Lamb	Lancashire Wildlife Trust
R099/Z1287	John	Lamb	Lancashire Wildlife Trust
R099/Z1288	John	Lamb	Lancashire Wildlife Trust
R099/Z1289	John	Lamb	Lancashire Wildlife Trust
R099/Z1290	John	Lamb	Lancashire Wildlife Trust
R099/Z1291	John	Lamb	Lancashire Wildlife Trust
R099/Z1292	John	Lamb	Lancashire Wildlife Trust
R099/Z1293	John	Lamb	Lancashire Wildlife Trust
R099/Z1294	John	Lamb	Lancashire Wildlife Trust
R099/Z1295	John	Lamb	Lancashire Wildlife Trust
R099/Z1296	John	Lamb	Lancashire Wildlife Trust
R099/Z1297	John	Lamb	Lancashire Wildlife Trust
R099/Z1298	John	Lamb	Lancashire Wildlife Trust
R099/Z1299	John	Lamb	Lancashire Wildlife Trust
R099/Z1300	John	Lamb	Lancashire Wildlife Trust
R099/Z1301	John	Lamb	Lancashire Wildlife Trust
R099/Z1302	John	Lamb	Lancashire Wildlife Trust
R099/Z1303	John	Lamb	Lancashire Wildlife Trust
R099/Z1304	John	Lamb	Lancashire Wildlife Trust
R099/Z1305	John	Lamb	Lancashire Wildlife Trust
R099/Z1306	John	Lamb	Lancashire Wildlife Trust
R099/Z1307	John	Lamb	Lancashire Wildlife Trust
R099/Z1308	John	Lamb	Lancashire Wildlife Trust
R099/Z1309	John	Lamb	Lancashire Wildlife Trust
R099/Z1310	John	Lamb	Lancashire Wildlife Trust
R099/Z1311	John	Lamb	Lancashire Wildlife Trust
R099/Z1312	John	Lamb	Lancashire Wildlife Trust
R099/Z1313	John	Lamb	Lancashire Wildlife Trust
R099/Z1314	John	Lamb	Lancashire Wildlife Trust
R099/Z1315	John	Lamb	Lancashire Wildlife Trust
R099/Z1316	John	Lamb	Lancashire Wildlife Trust
R099/Z1317	John	Lamb	Lancashire Wildlife Trust
R099/Z1318	John	Lamb	Lancashire Wildlife Trust
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R099/Z1320	John	Lamb	Lancashire Wildlife Trust
R099/Z1321	John	Lamb	Lancashire Wildlife Trust
R099/Z1322	John	Lamb	Lancashire Wildlife Trust
R099/Z1323	John	Lamb	Lancashire Wildlife Trust

R099/Z1324	John	Lamb	Lancashire Wildlife Trust
R099/Z1325	John	Lamb	Lancashire Wildlife Trust
R099/Z1326	John	Lamb	Lancashire Wildlife Trust
R099/Z1327	John	Lamb	Lancashire Wildlife Trust
R099/Z1328	John	Lamb	Lancashire Wildlife Trust
R099/Z1329	John	Lamb	Lancashire Wildlife Trust
R099/Z1330	John	Lamb	Lancashire Wildlife Trust
R099/Z1331	John	Lamb	Lancashire Wildlife Trust
R099/Z1332	John	Lamb	Lancashire Wildlife Trust
R099/Z1333	John	Lamb	Lancashire Wildlife Trust
R099/Z1334	John	Lamb	Lancashire Wildlife Trust
R099/Z1335	John	Lamb	Lancashire Wildlife Trust
R099/Z1336	John	Lamb	Lancashire Wildlife Trust
R099/Z1337	John	Lamb	Lancashire Wildlife Trust
R099/Z1338	John	Lamb	Lancashire Wildlife Trust
R969/Z1339	Stuart	Wrigley	Lancashire County Council
R969/Z1340	Stuart	Wrigley	Lancashire County Council
R970/Z341	S	Cramphorn	
R971/Z1343	M	Warrington	
R972/Z1344	Phyliss	Bird	
R972/Z1345	Phyliss	Bird	
R972/Z1346	Phyliss	Bird	
R973/Z1347	J	Crowther	
R973/Z1348	J	Crowther	
R974/Z1349	P	Wilson	
R974/Z1350	P	Wilson	
R974/Z1351	P	Wilson	
R975/Z1352	Mavis	Gradwell	
R584/Z1353	Roy	St Pierre	
R497/Z1354	Robert	Kandt	Barnoldswick Town Council
R976/Z1355	S	Gibbons	
R977/Z1356	Richard J	Parkinson	SHM Smith Hodgkinson
R978/Z1357	Alban	Cassidy	C A Planning
R979/Z1358	S	Brooksbank	
R980/Z1359	Julie A	Smith	
R981/Z1360	B	Carlos	
R982/Z1361	Adrian K	Slinger	
R983/Z1362	K	Dewhurst	
R984/Z1363		Brown	
R985/Z1364	A	Woodcock	
R986/Z1365	Steven	Beresford	
R101/Z1366	Ian	Lord	Barrowford Parish Council
R479/Z1367	A	Moore	Salterforth Parish Council

R491/Z1368	B	Sparron	Persimmon Homes (Lancashire) Ltd.
R707/Z1369	T JMr	Coyne	
R584/Z1370	Roy	St Pierre	
R532/Z1371		Barrowford Parish Council	
R967/Z1372	C M	Metcalfe	
R987/Z1373	Garry	Ellam	
R988/Z1374	R S & K	Evans	
R989/Z1375	RE & H	Adamson	
R990/Z1376	Michael	Townson	
R991/Z1377	G J	Murray	
R132/Z1378	David	Hardman	United Utilities
R132/Z1379	David	Hardman	United Utilities
R992/Z1380	PF & CM	Owen	
R93/Z1381	Philip	Hoyle	

## Annex D

### Pendle Local Plan Core Document Library : By CD Number

Cat.	CD Ref.	Title of Core Document	Produced by	Date	Weblink
Nat.	CD001	Planning Policy Guidance Note 2 (PPG2): Green Belts	Department of the Environment (DoE now ODPM)	1995	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606905.hcsp">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606905.hcsp</a>
Nat.	CD002	Planning Policy Guidance Note 3 (PPG3): Housing	Department of the Environment, Transport and the Regions (DETR now ODPM)	2000	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606933.hcsp">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606933.hcsp</a>
Nat.	CD003	Planning Policy Guidance Note 4 (PPG4): Industrial, Commercial Development and Small Firms	Department of the Environment (DoE now ODPM)	1992	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606913.hcsp">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606913.hcsp</a>
Nat.	CD004	Planning Policy Guidance Note 5 (PPG5): Simplified Planning Zones	Department of the Environment (DoE now ODPM)	1992	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606914.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606914.pdf</a>
Nat.	CD005	Planning Policy Guidance Note 8 (PPG8): Telecommunications	Office of the Deputy Prime Minister (ODPM)	2001	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606918.hcsp">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606918.hcsp</a>
Nat.	CD006	Planning Policy Guidance Note 9 (PPG9): Nature Conservation	Department of the Environment (DoE now ODPM)	1994	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606919.hcsp">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606919.hcsp</a>
Nat.	CD007	Planning Policy Guidance Note 10 (PPG10): Planning and Waste Management	Department of the Environment, Transport and the Regions (DETR now ODPM)	1999	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606925.hcsp">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606925.hcsp</a>
Nat.	CD008	Planning Policy Guidance Note 12 (PPG12): Development Plans	Department of the Environment, Transport and the Regions (DETR now ODPM)	1999	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606929.hcsp">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606929.hcsp</a>
Nat.	CD009	Planning Policy Guidance Note 13 (PPG13): Transport	Department of the Environment, Transport and the Regions (DETR now ODPM)	2001	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606896.hcsp">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606896.hcsp</a>
Nat.	CD010	Planning Policy Guidance Note 14 (PPG14): Development on Unstable Land	Department of the Environment (DoE now ODPM)	1990	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606899.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606899.pdf</a>
Nat.	CD011	Planning Policy Guidance Note 15 (PPG15): Planning and the	Department of the Environment (DoE now ODPM)	1994	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606900.hcsp">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606900.hcsp</a>

		Historic Environment			
<b>Nat.</b>	<b>CD012</b>	Planning Policy Guidance Note 16 (PPG16): Archaeology and Planning	Department of the Environment (DoE now ODPM)	1990	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606901.hcsp">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606901.hcsp</a>
<b>Nat.</b>	<b>CD013</b>	Planning Policy Guidance Note 17 (PPG17): Planning for Open Space, Sport and Recreation	Office of the Deputy Prime Minister (ODPM)	2002	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606902.hcsp">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606902.hcsp</a>
<b>Nat.</b>	<b>CD014</b>	Planning Policy Guidance Note 18 (PPG18): Enforcing Planning Control	Department of the Environment (DoE now ODPM)	1991	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606903.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606903.pdf</a>
<b>Nat.</b>	<b>CD015</b>	Planning Policy Guidance Note 19 (PPG19): Outdoor Advertisement Control	Department of the Environment (DoE now ODPM)	1992	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606904.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606904.pdf</a>
<b>Nat.</b>	<b>CD016</b>	Planning Policy Guidance Note 20 (PPG20): Coastal Planning	Department of the Environment (DoE now ODPM)	1992	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606907.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606907.pdf</a>
<b>Nat.</b>	<b>CD017</b>	Planning Policy Guidance Note 21 (PPG21): Tourism	Department of the Environment (DoE now ODPM)	1992	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606908.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606908.pdf</a>
<b>Nat.</b>	<b>CD018</b>	Planning Policy Guidance Note 24 (PPG24): Planning and Noise	Department of the Environment (DoE now ODPM)	1994	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606912.hcsp">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606912.hcsp</a>
<b>Nat.</b>	<b>CD019</b>	Planning Policy Guidance Note 25 (PPG25): Development and Flood Risk	Department of Transport, Local Government and the Regions (DTLR now ODPM)	2001	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606931.hcsp">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606931.hcsp</a>
<b>Nat.</b>	<b>CD020</b>	Planning Policy Statement 1 (PPS1): Delivering Sustainable Development	Office of the Deputy Prime Minister (ODPM)	2005	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/downloadable/odpm_plan_034815.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/downloadable/odpm_plan_034815.pdf</a>
<b>Nat.</b>	<b>CD021</b>	Planning Policy Statement 6 (PPS6): Planning for Town Centres	Office of the Deputy Prime Minister (ODPM)	2005	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_036805.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_036805.pdf</a>
<b>Nat.</b>	<b>CD022</b>	Planning Policy Statement 7 (PPS7): Sustainable Development in Rural Areas	Office of the Deputy Prime Minister (ODPM)	2004	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/downloadable/odpm_plan_030185.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/downloadable/odpm_plan_030185.pdf</a>
<b>Nat.</b>	<b>CD023</b>	Planning Policy Statement 11 (PPS11): Regional Spatial Strategies	Office of the Deputy Prime Minister (ODPM)	2004	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_030921.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_030921.pdf</a>

<b>Nat.</b>	<b>CD024</b>	Planning Policy Statement 12 (PPS12): Local Development Frameworks	Office of the Deputy Prime Minister (ODPM)	2004	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/downloadable/odpm_plan_030922.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/downloadable/odpm_plan_030922.pdf</a>
<b>Nat.</b>	<b>CD025</b>	Planning Policy Statement 22 (PPS22): Renewable Energy	Office of the Deputy Prime Minister (ODPM)	2004	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/downloadable/odpm_plan_030335.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/downloadable/odpm_plan_030335.pdf</a>
<b>Nat.</b>	<b>CD026</b>	Planning Policy Statement 23 (PPS23): Planning and Pollution Control	Office of the Deputy Prime Minister (ODPM)	2004	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/downloadable/odpm_plan_032633.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/downloadable/odpm_plan_032633.pdf</a>
<b>Reg</b>	<b>CD027</b>	Regional Spatial Strategy for the North West (RSS) (RPG 13)	North West Regional Assembly (NWRA)	2003	<a href="http://www.gos.gov.uk/gonw/docs/273480/RPG13">http://www.gos.gov.uk/gonw/docs/273480/RPG13</a>
<b>Reg</b>	<b>CD028</b>	Joint Lancashire Structure Plan - Deposit Edition	Joint Lancashire Authorities (JLA)	2002	<a href="http://www.lancashire2016.com/depositedcontents.asp">http://www.lancashire2016.com/depositedcontents.asp</a>
<b>Reg</b>	<b>CD029</b>	Joint Lancashire Structure Plan (JLSP)	Joint Lancashire Authorities (JLA)	2005	<a href="http://www.lancashire2016.com/sp_list.asp">http://www.lancashire2016.com/sp_list.asp</a>
<b>Reg</b>	<b>CD029 /1</b>	Parking Standards	Joint Lancashire Authorities (JLA)	2005	<a href="http://www.lancashire2016.com/pdf/parking_adopted.pdf">http://www.lancashire2016.com/pdf/parking_adopted.pdf</a>
<b>Reg</b>	<b>CD029 /2</b>	SPG Access and Parking	Joint Lancashire Authorities (JLA)	2005	<a href="http://www.lancashire2016.com/pdf/spg.pdf">http://www.lancashire2016.com/pdf/spg.pdf</a>
<b>Loc.</b>	<b>CD030</b>	Pendle Local Plan - Adopted	Pendle Borough Council (PBC)	1999	Not available online
<b>Loc.</b>	<b>CD030 /1</b>	Pendle Local Plan - Inspector's Report	The Planning Inspectorate (PINS)	1996	Not available online
<b>Loc.</b>	<b>CD031</b>	Pendle Local Plan - Key Issues Report: Planning Our Future, A New Local Plan for Pendle	Pendle Borough Council (PBC)	2002	Not available online
<b>Loc.</b>	<b>CD032</b>	Pendle Local Plan - 1st Stage Deposit	Pendle Borough Council (PBC)	2003	<a href="http://ww2.pendle.gov.uk/environment/planning/local-plan/first-stage-deposit/pendle-plan-2003.pdf">http://ww2.pendle.gov.uk/environment/planning/local-plan/first-stage-deposit/pendle-plan-2003.pdf</a>
<b>Loc.</b>	<b>CD033</b>	Pendle Local Plan - Re-deposit	Pendle Borough Council (PBC)	2005	<a href="http://www.pendle.gov.uk/downloads/written-statement-redeposit.pdf">http://www.pendle.gov.uk/downloads/written-statement-redeposit.pdf</a>
<b>Loc.</b>	<b>CD033 /1</b>	Pendle Local Plan - Re-deposit Omission Sites	Pendle Borough Council (PBC)	2005	<a href="http://www.pendle.gov.uk/downloads/Omission_Sites.pdf">http://www.pendle.gov.uk/downloads/Omission_Sites.pdf</a>
<b>Loc.</b>	<b>CD033 /2</b>	Pendle Local Plan - Re-deposit Omission Sites X82 & X86	Pendle Borough Council (PBC)	2005	<a href="http://www.pendle.gov.uk/downloads/Omission_Sites.pdf">http://www.pendle.gov.uk/downloads/Omission_Sites.pdf</a>
<b>Loc.</b>	<b>CD034</b>	Housing Land Availability Report (October 2002)	Pendle Borough Council (PBC)	2002	Not available online
<b>Loc.</b>	<b>CD035</b>	Housing Land Availability Report (March 2004)	Pendle Borough Council (PBC)	2004	Not available online

<b>Loc.</b>	<b>CD036</b>	Housing Land Availability Report (March 2005)	Pendle Borough Council (PBC)	2005	Not available online
<b>Loc.</b>	<b>CD037</b>	Urban Capacity Study (2003)	Pendle Borough Council (PBC)	2003	Not available online
<b>Loc.</b>	<b>CD038</b>	Urban Potential Study (2005)	ENTEC (for Pendle Borough Council)	2005	Not available online
<b>Loc.</b>	<b>CD038 /1</b>	Urban Potential Study Consultation Results (2005)	ENTEC (for Pendle Borough Council)	2005	Not available online
<b>Loc.</b>	<b>CD039</b>	Industrial and Business Land Availability Report (June 2002)	Pendle Borough Council (PBC)	2002	Not available online
<b>Loc.</b>	<b>CD040</b>	Industrial and Business Land Availability Report (March 2004)	Pendle Borough Council (PBC)	2004	Not available online
<b>Loc.</b>	<b>CD041</b>	Industrial and Business Land Availability Report (March 2005)	Pendle Borough Council (PBC)	2005	Not available online
<b>Loc.</b>	<b>CD042</b>	Housing Needs Survey (2003)	Pendle Borough Council (PBC)	2004	Not available online
<b>Loc.</b>	<b>CD043</b>	Supporting People Strategy (2002)	Lancashire County Council (LCC)	2002	<a href="http://www.spkweb.org.uk/NR/rdonlyres/0848EF5D-3868-4189-803D-700B4BC706F9/3338/Latest5yrStrat31Mar051.doc">http://www.spkweb.org.uk/NR/rdonlyres/0848EF5D-3868-4189-803D-700B4BC706F9/3338/Latest5yrStrat31Mar051.doc</a>
<b>Reg</b>	<b>CD044</b>	England's North West - A Strategy Towards 2020	North West Development Agency (NWDA)	2003	<a href="http://nwda-cms.amaze.co.uk/DocumentUploads/RegionalStrategy.pdf">http://nwda-cms.amaze.co.uk/DocumentUploads/RegionalStrategy.pdf</a>
<b>Nat.</b>	<b>CD045</b>	North West Regional Housing - Need and Demand Research	Department of Environment Transport and the Regions (DETR now ODPM)	2000	Not available online
<b>Loc.</b>	<b>CD046</b>	Draft Planning Brief for Brierfield Canal Corridor (SPD)	Pendle Borough Council (PBC)	2005	<a href="http://www.pendle.gov.uk/downloads/Final_Draft_Brierfield_Canal_Corridor_Planning_Brief_June.pdf">http://www.pendle.gov.uk/downloads/Final_Draft_Brierfield_Canal_Corridor_Planning_Brief_June.pdf</a>
<b>Loc.</b>	<b>CD047</b>	The Pendle Open Space Audit	Pendle Borough Council (PBC)	2003	Not available online
<b>Loc.</b>	<b>CD048</b>	Minute 1291 of the Executive (23rd January 2003)	Pendle Borough Council (PBC)	2003	<a href="http://ww2.pendle.gov.uk/netitcommittees/">http://ww2.pendle.gov.uk/netitcommittees/</a>
<b>Loc.</b>	<b>CD049</b>	Topic Paper 1: Housing Land Requirements	Pendle Borough Council (PBC)	2005	Not available online
<b>Loc.</b>	<b>CD050</b>	Topic Paper 2: The Need for Safeguarded Land	Pendle Borough Council (PBC)	2005	Not available online
<b>Loc.</b>	<b>CD051</b>	Topic Paper 3: The Green Belt	Pendle Borough Council (PBC)	2005	Not available online
<b>Loc.</b>	<b>CD052</b>	Topic Paper 4: HMR and ADF	Pendle Borough Council (PBC)	2005	Not available online

		Boundaries			
<b>Loc.</b>	<b>CD053</b>	Topic Paper 5: Protected Employment Areas	Pendle Borough Council (PBC)	2005	Not available online
<b>Loc.</b>	<b>CD054</b>	Topic Paper 6: Maintaining Settlement Character.	Pendle Borough Council (PBC)	2005	Not available online
<b>Nat.</b>	<b>CD055</b>	Census 2001: Housing Statistics	Office for National Statistics (ONS)	2003	<a href="http://www.statistics.gov.uk/census2001/default.asp">http://www.statistics.gov.uk/census2001/default.asp</a>
<b>Nat.</b>	<b>CD056</b>	Sustainable Communities: Building for the Future	Office of the Deputy Prime Minister (ODPM)	2003	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_communities/documents/downloadable/odpm_comm_037677.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_communities/documents/downloadable/odpm_comm_037677.pdf</a>
<b>Loc.</b>	<b>CD057</b>	Minutes of the Full Council (2nd September 2004)	Pendle Borough Council (PBC)	2004	<a href="http://ww2.pendle.gov.uk/netitcommittees/">http://ww2.pendle.gov.uk/netitcommittees/</a>
<b>Loc.</b>	<b>CD058</b>	Minutes of the Full Council (2nd February 2005)	Pendle Borough Council (PBC)	2005	<a href="http://ww2.pendle.gov.uk/netitcommittees/">http://ww2.pendle.gov.uk/netitcommittees/</a>
<b>Loc.</b>	<b>CD059</b>	Minutes of the Executive (22nd April 2004)	Pendle Borough Council (PBC)	2004	<a href="http://ww2.pendle.gov.uk/netitcommittees/">http://ww2.pendle.gov.uk/netitcommittees/</a>
<b>Loc.</b>	<b>CD060</b>	Minutes of the Executive (26th August 2004)	Pendle Borough Council (PBC)	2004	<a href="http://ww2.pendle.gov.uk/netitcommittees/">http://ww2.pendle.gov.uk/netitcommittees/</a>
<b>Loc.</b>	<b>CD061</b>	Minutes of the Executive (30th September 2004)	Pendle Borough Council (PBC)	2004	<a href="http://ww2.pendle.gov.uk/netitcommittees/">http://ww2.pendle.gov.uk/netitcommittees/</a>
<b>Loc.</b>	<b>CD062</b>	Minutes of the Executive (21st October 2004)	Pendle Borough Council (PBC)	2004	<a href="http://ww2.pendle.gov.uk/netitcommittees/">http://ww2.pendle.gov.uk/netitcommittees/</a>
<b>Loc.</b>	<b>CD063</b>	Minutes of the Executive (25th January 2005)	Pendle Borough Council (PBC)	2005	<a href="http://ww2.pendle.gov.uk/netitcommittees/">http://ww2.pendle.gov.uk/netitcommittees/</a>
<b>Loc.</b>	<b>CD064</b>	Brierfield Area Development Framework	GVA Grimley (for Pendle Borough Council)	2004	<a href="http://www.pendle.gov.uk/downloads/brierfield-adf-exec-summary.pdf">http://www.pendle.gov.uk/downloads/brierfield-adf-exec-summary.pdf</a>
<b>Loc.</b>	<b>CD065</b>	Colne Area Development Framework	GVA Grimley (for Pendle Borough Council)	2004	Not available online
<b>Loc.</b>	<b>CD066</b>	Nelson Area Development Framework Executive Summary	Nathaniel Lichfield & Partners (for Pendle Borough Council)	2005	Not available online
<b>Loc.</b>	<b>CD067</b>	Nelson Area Development Framework Strategy	Nathaniel Lichfield & Partners (for Pendle Borough Council)	2005	Not available online
<b>Loc.</b>	<b>CD068</b>	Pendle Community Strategy 2003-2018: A Place with a Future for Everyone	Pendle Partnership (PP)	2004	<a href="http://www.pendle.gov.uk/downloads/community-strategy.pdf">http://www.pendle.gov.uk/downloads/community-strategy.pdf</a>
<b>Misc</b>	<b>CD069</b>	Enquiry By Design	Princes Trust Foundation (PTF)	2005	<a href="http://www.pendle.gov.uk/downloads/Whitefield_EBD_Final_Report_28.02.05.pdf">http://www.pendle.gov.uk/downloads/Whitefield_EBD_Final_Report_28.02.05.pdf</a>

<b>Loc.</b>	<b>CD070</b>	Local Development Scheme	Pendle Borough Council (PBC)	2005	Not available online
<b>Loc.</b>	<b>CD071</b>	ELP - Letter to ODPM (23rd July 2002)	East Lancashire Partnership (ELP)	2002	Not available online
<b>Loc.</b>	<b>CD072</b>	East Lancashire ADF Brief	DTZ Piedad Consulting (for the East Lancashire Partnership)	2003	Not available online
<b>Nat.</b>	<b>CD073</b>	Urban White Paper: Our Towns and Cities: The Future	Office of the Deputy Prime Minister (ODPM)	2000	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_urbanpolicy/documents/page/odpm_urbpol_608358.hcsp">http://www.odpm.gov.uk/stellent/groups/odpm_urbanpolicy/documents/page/odpm_urbpol_608358.hcsp</a>
<b>Nat.</b>	<b>CD074</b>	Employment Land Review (2004)	Office of the Deputy Prime Minister (ODPM)	2004	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/downloadable/odpm_plan_033486.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/downloadable/odpm_plan_033486.pdf</a>
<b>Nat.</b>	<b>CD075</b>	Planning System: General Principles	Office of the Deputy Prime Minister (ODPM)	2005	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/downloadable/odpm_plan_034816.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/downloadable/odpm_plan_034816.pdf</a>
<b>Nat.</b>	<b>CD076</b>	Towards an Urban Renaissance: Final Report of the Urban Task Force	Department of Environment, Transport and the Regions (DETR now ODPM)	1999	<a href="http://www.renewal.net/Documents/RNET/Policy%20Guidance/Towardsurbanrenaissance.pdf">http://www.renewal.net/Documents/RNET/Policy%20Guidance/Towardsurbanrenaissance.pdf</a>
<b>Nat.</b>	<b>CD077</b>	Annual Business Inquiry (2003)	Office of National Statistics (ONS)	2004	<a href="http://www.lancashire.gov.uk/environment/lancashireprofile/areas/peemploy.asp">http://www.lancashire.gov.uk/environment/lancashireprofile/areas/peemploy.asp</a>
<b>Loc.</b>	<b>CD078</b>	The Pendle Economy and Future Outlook	University of Cambridge (for Pendle Borough Council)	2002	Not available online
<b>Nat.</b>	<b>CD079</b>	Tapping the Potential: Assessing the Urban Housing Capacity	Department of Environment, Transport and the Regions (DETR now ODPM)	2000	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606416.hcsp">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606416.hcsp</a>
<b>Loc.</b>	<b>CD080</b>	Pendle Retail Study (2001)	Development Land and Planning Consultants (for Pendle Borough Council)	2001	Not available online
<b>Nat.</b>	<b>CD081</b>	Town and Country Planning (General Permitted Development) Order 1995	Department of the Environment (DoE now ODPM)	1995	<a href="http://www.opsi.gov.uk/si/si1995/Uksi_19950418_en_1.htm">http://www.opsi.gov.uk/si/si1995/Uksi_19950418_en_1.htm</a>
<b>Nat.</b>	<b>CD082</b>	Draft Revised Circular on Planning Obligations	Office of the Deputy Prime Minister (ODPM)	1994	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_032594.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_032594.pdf</a>
<b>Nat.</b>	<b>CD083</b>	Tree Preservation Orders - A Guide to the Law and Good Practice	Department of Environment, Transport and the Regions (DETR now ODPM)	2000	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_urbanpolicy/documents/page/odpm_urbpol_607978.hcsp">http://www.odpm.gov.uk/stellent/groups/odpm_urbanpolicy/documents/page/odpm_urbpol_607978.hcsp</a>
<b>Str.</b>	<b>CD084</b>	Lancashire Rural Recovery Action Plan	Lancashire County Council (LCC)	2002	<a href="http://www.lancashireruralpartnership.gov.uk/docs/LancashireRuralRecoveryActionPlan.pdf">http://www.lancashireruralpartnership.gov.uk/docs/LancashireRuralRecoveryActionPlan.pdf</a>

<b>Nat.</b>	<b>CD085</b>	Transport White Paper - A New Deal for Transport: Better for Everyone	Department for Transport (DoT)	1998	<a href="http://www.dft.gov.uk/stellent/groups/dft_about/documents/page/dft_about_021588.hcsp">http://www.dft.gov.uk/stellent/groups/dft_about/documents/page/dft_about_021588.hcsp</a>
<b>Loc.</b>	<b>CD086</b>	Future of the Colne-Skipton Railway Formation	Steer Davies Gleave (SDG)	2003	Not available online
<b>Str.</b>	<b>CD087</b>	Provisional Lancashire Local Transport Plan 2006/07-2010/11	Lancashire County Council (LCC)	2005	<a href="http://www.lancashire.gov.uk/environment/ltp/pdf/LTP2.pdf">http://www.lancashire.gov.uk/environment/ltp/pdf/LTP2.pdf</a>
<b>Nat.</b>	<b>CD088</b>	Community Rail Development Strategy	Strategic Rail Authority (SRA)	2004	<a href="http://www.sra.gov.uk/pubs2/stratpolplan/publication.2004-11-22.5301054796/crds.pdf">http://www.sra.gov.uk/pubs2/stratpolplan/publication.2004-11-22.5301054796/crds.pdf</a>
<b>Nat.</b>	<b>CD089</b>	Circular 1/97	Department of the Environment (DoE now ODPM)	1997	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606798.hcsp">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606798.hcsp</a>
<b>Nat.</b>	<b>CD090</b>	The Environment Act 1995	Her Majesty's Stationery Office (HMSO)	1995	<a href="http://www.opsi.gov.uk/acts/acts1995/Ukpga_19950025_en_1.htm">http://www.opsi.gov.uk/acts/acts1995/Ukpga_19950025_en_1.htm</a>
<b>Nat.</b>	<b>CD091</b>	The Hedgerow Regulations 1997	Her Majesty's Stationery Office (HMSO)	1997	<a href="http://www.opsi.gov.uk/si/si1997/97116001.htm">http://www.opsi.gov.uk/si/si1997/97116001.htm</a>
<b>Nat.</b>	<b>CD092</b>	Part VIII Special Controls, The Town and Country Planning Act 1990	Her Majesty's Stationery Office (HMSO)	1990	<a href="http://www.uk-legislation.hmso.gov.uk/acts/acts1990/Ukpga_19900008_en_11.htm">http://www.uk-legislation.hmso.gov.uk/acts/acts1990/Ukpga_19900008_en_11.htm</a>
<b>Nat.</b>	<b>CD093</b>	The Town and Country Planning (Trees) Regulations 1999	Her Majesty's Stationery Office (HMSO)	1999	<a href="http://www.opsi.gov.uk/si/si1999/19991892.htm">http://www.opsi.gov.uk/si/si1999/19991892.htm</a>
<b>Nat.</b>	<b>CD094</b>	Planning Policy Guidance Note 3 (PPG3): Housing Update. Supporting the Delivery of New Housing	Office of the Deputy Prime Minister (ODPM)	2005	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/downloadable/odpm_plan_034130.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/downloadable/odpm_plan_034130.pdf</a>
<b>Loc.</b>	<b>CD095</b>	Decision Notice (13/95/0637P)	Pendle Borough Council (PBC)	1995	Not available online
<b>Nat.</b>	<b>CD096</b>	Assessing Needs and Opportunities (A Companion Guide to PPG17)	Office of the Deputy Prime Minister (ODPM)	2002	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606788.hcsp">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606788.hcsp</a>
<b>Nat.</b>	<b>CD097</b>	Community Woodland Design Guidelines	Forestry Commission (FC)	1991	<a href="http://www.forestry.gov.uk/website/treetrunk.nsf/ByUnique/HCOU-4XEHBE">http://www.forestry.gov.uk/website/treetrunk.nsf/ByUnique/HCOU-4XEHBE</a>
<b>Loc.</b>	<b>CD098</b>	The Pendle Green Belt Subject Plan - Draft	Pendle Borough Council (PBC)	1987	Not available online
<b>Str.</b>	<b>CD099</b>	Lancashire Structure Plan - Greening the Red Rose County	Lancashire County Council (LCC)	1989	Not available online
<b>Str.</b>	<b>CD100</b>	Draft Rights of Way Improvement Plan	Lancashire County Council (LCC)	2005	Not available online

<b>Nat.</b>	<b>CD101</b>	Leeds and Liverpool Canal Corridor Study - Consultation Draft	British Waterways (BW)	2003	Not available online
<b>Loc.</b>	<b>CD102</b>	Pendle's Canal Corridor Development Strategy	Pendle Borough Council (PBC)	2003	Not available online
<b>Loc.</b>	<b>CD103</b>	Built Heritage Strategy - Laying Foundations	Pendle Borough Council (PBC)	1997	Not available online
<b>Str.</b>	<b>CD104</b>	Lancashire Biodiversity Action Plan (Broadleaved & Mixed Woodland)	Lancashire County Council (LCC)	2001	<a href="http://www.lbap.org.uk/bap/habitat/woodland.htm">http://www.lbap.org.uk/bap/habitat/woodland.htm</a>
<b>Str.</b>	<b>CD105</b>	Lancashire Inventory of Ancient Woodlands (Provisional)	English Nature (EN)	1994	<a href="http://www.ndad.nationalarchives.gov.uk/CRDA/43/DD/2/23/image/display.html">http://www.ndad.nationalarchives.gov.uk/CRDA/43/DD/2/23/image/display.html</a>
<b>Str.</b>	<b>CD106</b>	Lancashire Environment 2002 (Landscape - Woodlands)	Lancashire County Council (LCC)	2002	<a href="http://www.lancashire.gov.uk/environment/env_planning/environment2002/landscapewood.asp">http://www.lancashire.gov.uk/environment/env_planning/environment2002/landscapewood.asp</a>
<b>Loc.</b>	<b>CD107</b>	SPG Development in the Open Countryside	Pendle Borough Council (PBC)	2002	Not available online
<b>Loc.</b>	<b>CD108</b>	Pendle Green Belt Local Plan - Draft	Pendle Borough Council (PBC)	1990	Not available online
<b>Loc.</b>	<b>CD109</b>	Changing East Lancashire: The Housing Market	DTZ Pidea Consulting (for the East Lancashire Partnership)	2000	<a href="http://www.elp.org.uk/default.asp?body&amp;http%3A//www.elp.org.uk/housingdownloads.asp">http://www.elp.org.uk/default.asp?body&amp;http%3A//www.elp.org.uk/housingdownloads.asp</a>
<b>Nat.</b>	<b>CD110</b>	Letter from ODPM 05/11/02	Office of the Deputy Prime Minister (ODPM)	2002	Not available online
<b>Loc.</b>	<b>CD111</b>	Letter from East Lancashire Market Restructuring Pathfinder 07/11/02	East Lancashire Market Restructuring Pathfinder	2002	Not available online
<b>Nat.</b>	<b>CD112</b>	Letter from ODPM 04/12/02	Office of the Deputy Prime Minister (ODPM)	2002	Not available online
<b>Nat.</b>	<b>CD113</b>	Circular 03/98: Planning for Future Prison Development	Department of the Environment, Transport and the Regions (DETR now ODPM)	1998	Not available online
<b>Str.</b>	<b>CD114</b>	Statement of Conformity	Lancashire County Council (LCC)	2005	Not available online
<b>Nat.</b>	<b>CD115</b>	Land Registry - Comparison of House Prices Jan-Mar 1999 to Jan-Mar 2004	Land Registry	2005	<a href="http://www.landregistry.gov.uk/propertyprice/interactive/ppr_compare.asp">http://www.landregistry.gov.uk/propertyprice/interactive/ppr_compare.asp</a>
<b>Nat.</b>	<b>CD116</b>	Land Registry - Comparison of House Prices Jan-Mar 1999 to Jan-Mar 2005	Land Registry	2005	<a href="http://www.landregistry.gov.uk/propertyprice/interactive/ppr_compare.asp">http://www.landregistry.gov.uk/propertyprice/interactive/ppr_compare.asp</a>

<b>Str.</b>	<b>CD117</b>	Lancashire Sites and Monuments Record	Lancashire County Council (LCC)	Ongoing	<a href="http://www.lancashire.gov.uk/environment/archaeology/mruse.asp">http://www.lancashire.gov.uk/environment/archaeology/mruse.asp</a>
<b>Loc.</b>	<b>CD118</b>	SPG Development and Flood Risk	Pendle Borough Council (PBC)	2003	Not available online
<b>Nat.</b>	<b>CD119</b>	Mobile phone network development: code of best practice	Office of the Deputy Prime Minister (ODPM)	2002	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_control/documents/contentservertemplate/odpm_index.hcst?n=2348&amp;l=2">http://www.odpm.gov.uk/stellent/groups/odpm_control/documents/contentservertemplate/odpm_index.hcst?n=2348&amp;l=2</a>
<b>Loc.</b>	<b>CD120</b>	SPG Guidelines for the Control of Telecommunications Equipment	Pendle Borough Council (PBC)	2002	Not available online
<b>Nat.</b>	<b>CD121</b>	Part II Development Plans, The Town and Country Planning Act 1990	Her Majesty's Stationery Office (HMSO)	1990	<a href="http://www.uk-legislation.hmso.gov.uk/acts/acts1990/Ukpga_19900008_en_4.htm#mdiv48">http://www.uk-legislation.hmso.gov.uk/acts/acts1990/Ukpga_19900008_en_4.htm#mdiv48</a>
<b>Loc.</b>	<b>CD122</b>	Draft SPG 'Landscape and Heritage'	Lancashire County Council (LCC)	2002	<a href="http://www.lancashire2016.com/landscapeheritage.asp">http://www.lancashire2016.com/landscapeheritage.asp</a>
<b>Loc.</b>	<b>CD123</b>	East Lancashire Rail Infrastructure Feasibility Study	Posford Haskoning (for the East Lancashire Partnership)	2003	Not available online
<b>Loc.</b>	<b>CD124</b>	Trent Road Development Brief	Pendle Borough Council (PBC)	1999	Not available online
<b>Str.</b>	<b>CD125</b>	Local Transport Plan For Lancashire (2001-2006) - Section 6 East Lancashire	Lancashire County Council (LCC)	2000	<a href="http://www.lancashire.gov.uk/environment/ltp/pdf/Sec6.pdf">http://www.lancashire.gov.uk/environment/ltp/pdf/Sec6.pdf</a>
<b>Str.</b>	<b>CD126</b>	Statement of non-conformity between the Adopted Pendle Local Plan (1999) and the Lancashire Structure Plan (1991-2006)	Lancashire County Council (LCC)	1999	Not available online
<b>Str.</b>	<b>CD127</b>	Extract from Nelson and District Town Map 1963	Lancashire County Council (LCC)	1963	Not available online
<b>Str.</b>	<b>CD128</b>	Extract from Colne and District Town Map 1965	Lancashire County Council (LCC)	1965	Not available online
<b>Loc.</b>	<b>CD129</b>	Draft Guidelines for Important Wildlife Sites in Pendle	Lancashire Wildlife Trust (LWT)	2005	Not available online
<b>Loc.</b>	<b>CD130</b>	Appeal decision for Lucas Playing Fields	The Planning Inspectorate (PINS)	2005	Not available online
<b>Str.</b>	<b>CD131</b>	Statement of non-conformity between the Adopted Pendle Local Plan (1999) and the Joint	Lancashire County Council (LCC)	2005	Not available online

		Lancashire Structure Plan (2001-2016)			
<b>Loc.</b>	<b>CD132</b>	Statement of Case: Issue 6 - Stratgeic Road Improvements	Pendle Borough Council (PBC)	2003	Not available online
<b>Loc.</b>	<b>CD133</b>	Appeal decision for land to the south-west of South Valley Drive, off Knotts Lane, Colne – 13/03/0226P	The Planning Inspectorate (PINS)	2004	Not available online
<b>Loc.</b>	<b>CD134</b>	Baseline Studies Nelson ADF	Nathaniel Lichfield & Partners (for Pendle Borough Council)	2004	Not available online
<b>Nat.</b>	<b>CD135</b>	Planning Policy Guidance Note 3 (PPG3): Housing Update. Planning for Sustainable Communities in Rural Areas.	Office of the Deputy Prime Minister (ODPM)	2005	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_035729.hcsp">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_035729.hcsp</a>
<b>Loc.</b>	<b>CD136</b>	Decision Notice (13/00/0049P )	The Planning Inspectorate (PINS)	2001	Not available online
<b>Nat.</b>	<b>CD137</b>	Local Nature Reserves in England	English Nature (EN)	1999	<a href="http://www.english-nature.org.uk/pubs/publication/PDF/ENLNR.pdf">http://www.english-nature.org.uk/pubs/publication/PDF/ENLNR.pdf</a>
<b>Loc.</b>	<b>CD138</b>	Appeal decision at Knotts Lane, Colne – 13/00/0073P	The Planning Inspectorate (PINS)	2005	Not available online
<b>Loc.</b>	<b>CD139</b>	Pendle Local Plan - Deposit Edition	Pendle Borough Council (PBC)	1994	Not available online
<b>Loc.</b>	<b>CD140</b>	The Playing Pitch Assesment and Strategy	Burnley Borough Council Strategic Leisure (for Burnley and Pendle Borough Council's)	2001	Not available online
<b>Loc.</b>	<b>CD141</b>	Committee Report - Proposed Winewall and Cotton Tree Conservation Area - Report to the Executive 6th March 2002	Pendle Borough Council (PBC)	2002	<a href="http://ww2.pendle.gov.uk/committeefornetit/">http://ww2.pendle.gov.uk/committeefornetit/</a>
<b>Nat.</b>	<b>CD142</b>	UK Biodiversity Action Plan	Her Majesty's Stationery Office (HMSO)	1994	<a href="http://www.ukbap.org.uk/library/Plan_LO.pdf">http://www.ukbap.org.uk/library/Plan_LO.pdf</a>
<b>Str.</b>	<b>CD143</b>	Lancashire Biodiversity Action Plan	Lancashire County Council (LCC)	2001	<a href="http://www.lbap.org.uk/introduction/introduction.htm">http://www.lbap.org.uk/introduction/introduction.htm</a>
<b>Str.</b>	<b>CD144</b>	Panel Report from the Examination in Public of the Joint Lancashire Structure Plan	Lancashire County Council (LCC)	2004	Not available online

<b>Loc.</b>	<b>CD145</b>	Inspector's Report form the Burnley Local Plan Inquiry	The Planning Inspectorate (PINS)	2005	<a href="http://www.burnley.gov.uk/site/scripts/download_info.php?fileID=140">http://www.burnley.gov.uk/site/scripts/download_info.php?fileID=140</a>
<b>Str.</b>	<b>CD146</b>	Housing Supply: E-mail from Lancashire County Council	Lancashire County Council (LCC)	2005	Not available online
<b>Loc.</b>	<b>CD147</b>	Pendle's Cycling Strategy	Pendle Borough Council (PBC)	2000	<a href="http://www.pendle.gov.uk/site/scripts/documents_info.php?documentID=334&amp;pageNumber=4">http://www.pendle.gov.uk/site/scripts/documents_info.php?documentID=334&amp;pageNumber=4</a>
<b>Loc.</b>	<b>CD148</b>	Full Council Minutes 28/10/04 Applying a moratorium to the release of housing land.	Pendle Borough Council (PBC)	2004	<a href="http://ww2.pendle.gov.uk/committeefornetit/">http://ww2.pendle.gov.uk/committeefornetit/</a>
<b>Nat.</b>	<b>CD149</b>	Written Ministerial Statement, Thursday 17th July 2003, Deputy Prime Minister, Housing (Planning) (Minister for Housing and Planning - Keith Hill)	The United Kingdom Parliament	2003	<a href="http://www.parliament.the-stationery-office.co.uk/pa/cm200203/cmhansrd/vo030717/wmstext/30717m01.htm">http://www.parliament.the-stationery-office.co.uk/pa/cm200203/cmhansrd/vo030717/wmstext/30717m01.htm</a>
<b>Nat.</b>	<b>CD150</b>	Consultation Paper Planning for Housing Provision, July 2005	Office of the Deputy Prime Minister (ODPM)	2005	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_039132.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_039132.pdf</a>
<b>Reg</b>	<b>CD151</b>	Exploring Urban Potential for Housing	ENTEC (for the North West Regional Assembly)	2003	<a href="http://www.entecuk.com/downloads/pp_721_long.pdf">http://www.entecuk.com/downloads/pp_721_long.pdf</a>
<b>Nat.</b>	<b>CD152</b>	Planning (Listed Buildings and Conservation Areas) Act	Her Majesty's Stationery Office (HMSO)	1990	<a href="http://www.opsi.gov.uk/acts/acts1990/Ukpga_19900009_en_1.htm">http://www.opsi.gov.uk/acts/acts1990/Ukpga_19900009_en_1.htm</a>
<b>Loc.</b>	<b>CD153</b>	Pendle Woodland Survey	P.L. Winchester (for Pendle Borough Council)	1992	Not available online
<b>Str.</b>	<b>CD154</b>	Letter from Lancashire County Council. Re: Birch Hall Lane Pasture (BHS)	Lancashire County Council (LCC)	2005	Not available online
<b>Reg</b>	<b>CD155</b>	Prioritisation of Major Transport Schemes (May 2003) - Overview & Scrutiny Committee	Lancashire County Council (LCC)	2003	<a href="http://www.lancashire.gov.uk/corporate/overview_scrutiny/completed_reports/prioritisation_major_transport_schemes.pdf">http://www.lancashire.gov.uk/corporate/overview_scrutiny/completed_reports/prioritisation_major_transport_schemes.pdf</a>
<b>Reg</b>	<b>CD156</b>	M65 Extension East of Colne: Protection of Route	Lancashire County Council (LCC)	1996	Not available online
<b>Reg</b>	<b>CD157</b>	Correspondence from North West Regional Asembly on the publication of revised Urban potential study methodology for the North West. June 2003	North West Regional Assembly (NWRA)	2003	Not available online

<b>Reg</b>	<b>CD158</b>	Correspondence from the North West Regional Assembly regarding the request for Urban Potential Study results (March 2004)	North West Regional Assembly (NWRA)	2004	Not available online
<b>Nat.</b>	<b>CD159</b>	Transcript of a letter from Alun Michael MP to Pam Warhurst (Countryside Agency) - 6th May 2004	Countryside Agency (CA)	2004	<a href="http://www.countryside.gov.uk/Images/AP04_25_tcm2-19515.doc">http://www.countryside.gov.uk/Images/AP04_25_tcm2-19515.doc</a>
<b>Loc.</b>	<b>CD160</b>	Report to Executive - Housing Market Renewal Initiative 26th August 2004	Pendle Borough Council (PBC)	2004	<a href="http://www.pendle.gov.uk">http://www.pendle.gov.uk</a>
<b>Str.</b>	<b>CD161</b>	Correspondence from Lancashire County Council in respect of the methodology used to demonstrate the delivery of the annual dwelling requirement. 17th August 2005	Lancashire County Council (LCC)	2005	Not available online
<b>Nat.</b>	<b>CD162</b>	The Government's Response to the ODPM: Housing, Planning, Local Government and the Regions Select Committee's Eighth Report on Empty Homes and Low Demand Pathfinders	Office of the Deputy Prime Minister (ODPM)	2005	<a href="http://www.renewal.net/Documents/RNET/Policy%20Guidance/Governmentresponseeighthempty.pdf">http://www.renewal.net/Documents/RNET/Policy%20Guidance/Governmentresponseeighthempty.pdf</a>
<b>Loc.</b>	<b>CD163</b>	Future of the Colne-Skipton Railway Formation: Assessment of an Alternative Alignment for the A56	Steer Davies Gleave (SDG)	2003	Not available online
<b>Nat.</b>	<b>CD164</b>	Strategic Plan 2002: Priorities	Strategic Rail Authority (SRA)	2003	<a href="http://www.sra.gov.uk/pubs2/indy_general/general_The_Strategic_Plan_Summary/strategic_plan_summary04_summary_priorities_qxd.pdf">http://www.sra.gov.uk/pubs2/indy_general/general_The_Strategic_Plan_Summary/strategic_plan_summary04_summary_priorities_qxd.pdf</a>
<b>Nat.</b>	<b>CD165</b>	Strategic Plan 2003 (1)	Strategic Rail Authority (SRA)	2004	<a href="http://www.sra.gov.uk/pubs2/stratpolplan/index_page_SRAs_Strategic_Plan_2003/strategic_plan_2003SRA_Plan1.pdf">http://www.sra.gov.uk/pubs2/stratpolplan/index_page_SRAs_Strategic_Plan_2003/strategic_plan_2003SRA_Plan1.pdf</a>
<b>Nat.</b>	<b>CD165</b>	Strategic Plan 2003 (2)	Strategic Rail Authority (SRA)	2004	<a href="http://www.sra.gov.uk/pubs2/stratpolplan/index_page_SRAs_Strategic_Plan_2003/strategic_plan_2003SRA_Plan2.pdf">http://www.sra.gov.uk/pubs2/stratpolplan/index_page_SRAs_Strategic_Plan_2003/strategic_plan_2003SRA_Plan2.pdf</a>
<b>Loc.</b>	<b>CD166</b>	Minutes of the Executive (6 <sup>th</sup> )	Pendle Borough Council (PBC)	2004	<a href="http://ww2.pendle.gov.uk/netitcommittees/">http://ww2.pendle.gov.uk/netitcommittees/</a>

		October 2004)			
<b>Str.</b>	<b>CD167</b>	Extract from Lancashire: A Green Audit: Summary	Lancashire County Council (LCC)	1990	<a href="http://www.lancashire.gov.uk/environment/beyondla21/greenaudit2.asp">http://www.lancashire.gov.uk/environment/beyondla21/greenaudit2.asp</a>
<b>Str.</b>	<b>CD168</b>	Extract from Lancashire: A Green Audit	Lancashire County Council (LCC)	1990	<a href="http://www.lancashire.gov.uk/environment/beyondla21/greenaudit2.asp">http://www.lancashire.gov.uk/environment/beyondla21/greenaudit2.asp</a>
<b>Nat.</b>	<b>CD169</b>	Draft of the Town and Country Planning (Green Belt) Direction 2005 (Consultation Paper)	Office of the Deputy Prime Minister (ODPM)	2005	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_039084.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_039084.pdf</a>
<b>Loc.</b>	<b>CD170</b>	Re-deposit Pendle Local Plan Conservation Areas	Pendle Borough Council (PBC)	2005	<a href="http://www.pendle.gov.uk/downloads/written-statement-redeposit.pdf">http://www.pendle.gov.uk/downloads/written-statement-redeposit.pdf</a>
<b>Reg</b>	<b>CD171</b>	Northern Way - Central Lancashire City Region Development Programme	Lancashire Economic Partnership	2005	<a href="http://www.thenorthernway.co.uk/docs/2005/cityregions/CLancs.pdf">http://www.thenorthernway.co.uk/docs/2005/cityregions/CLancs.pdf</a>
<b>Nat.</b>	<b>CD172</b>	Next Stop the 21st Century	New Start Publishing Ltd.	2005	Not available online
<b>Str.</b>	<b>CD173</b>	E-mail from Lancashire County Council Re: Replacement Dwellings	Lancashire County Council (LCC)	2005	Not available online
<b>Loc.</b>	<b>CD174</b>	Extract from Appendices to Nelson ADF Re: Vacancy Rates	Nathaniel Lichfield & Partners (for Pendle Borough Council)	2004	Not available online
<b>Loc.</b>	<b>CD175</b>	Extract from North Valley Environmental Re-design Scheme	Barnes Walker Consultatants (for Pendle Borough Council)	2005	<a href="http://www.pendle.gov.uk/downloads/Churchfields_preferred_scheme_leaflet_FINAL">http://www.pendle.gov.uk/downloads/Churchfields_preferred_scheme_leaflet_FINAL</a>
<b>Loc.</b>	<b>CD176</b>	Brierfield Housing Survey Report	Consultants Report (for Pendle Borough Council)	2004	Not available online
<b>Nat.</b>	<b>CD177</b>	Planning Policy Statement 9 (PPS9): Biodiversity and Geological Conservation	Office of the Deputy Prime Minister (ODPM)	2005	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_039821.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_039821.pdf</a>
<b>Nat.</b>	<b>CD178</b>	Circular 06/05 Biodiversity and Geological Conservation	Office of the Deputy Prime Minister (ODPM)	2005	<a href="http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/downloadable/odpm_plan_039962.pdf">http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/downloadable/odpm_plan_039962.pdf</a>
<b>Loc.</b>	<b>CD179</b>	Millennium Woodland Planting at Gib Hill - Nelson Area Committee (4th June 2001)	Pendle Borough Council (PBC)	2001	Not available online
<b>Loc.</b>	<b>CD180</b>	Committee Report - Proposed Southfield Conservation Area, Nelson	Pendle Borough Council (PBC)	2003	<a href="http://ww2.pendle.gov.uk/committeefornetit/">http://ww2.pendle.gov.uk/committeefornetit/</a>
<b>Loc.</b>	<b>CD181</b>	Colne Housing Survey Report	Consultants Report (for Pendle	2004	Not available online

			Borough Council)		
Loc.	CD182	Minutes of Nelson Committee Meeting 1st August 2005	Pendle Borough Council (PBC)	2005	<a href="http://www.pendle.gov.uk">http://www.pendle.gov.uk</a>
Loc.	CD183	Outdoor Recreation Strategy 2003-2008	Pendle Borough Council (PBC)	2003	<a href="http://www.pendle.gov.uk/downloads/Outdoor_Recreation_Strategy.doc">http://www.pendle.gov.uk/downloads/Outdoor_Recreation_Strategy.doc</a>
Loc.	CD184	Pendle Borough Council - Barrister's Opening Statement	Pendle Borough Council (PBC)	2005	Not available online
Loc.	CD185	Land and premises enquiries: Pendle 2002-2005	East Lancashire Partnership (ELP)	2005	Not available online
Str.	CD186	E-mail from Lancashire County Council Re: Brownfield Targets	Lancashire County Council (LCC)	2005	Not available online
Loc.	CD187	Financial Assistance in Pendle, 2005	Pendle Borough Council (PBC)	2005	Not available online
Loc.	CD188	Pendle Housing Site Analysis	Pendle Borough Council (PBC)	2005	Not available online
Str.	CD189	Developing a Vision for Education in Pendle	Lancashire County Council (LCC)	2005	Not available online
Loc.	CD190	Area Development Framework Boundaries	Pendle Borough Council (PBC)	2005	Not available online
Loc.	CD191	<b>Deleted CD - Now a Core Proof PBCP/067/1</b>	<b>Deleted CD - Now a Core Proof PBCP/067/1</b>		<b>Deleted CD - Now a Core Proof PBCP/067/1</b>
Loc.	CD192	Economic Development Strategy 2002-2007	Pendle Borough Council (PBC)	2003	Not available online
Loc.	CD193	Suggested Changes to Re-deposit Pendle Local Plan	Pendle Borough Council (PBC)	2005	Not available online
Str.	CD194	Biological Heritage Sites: Guidelines for Site Selection	Lancashire County Heritage Sites Scheme	1998	Not available online
Loc.	CD195	Notes of Pendle Local Plan Inquiry Housing Round Table Session held on 29 September 2005	Planning Inspectorate	2005	<a href="http://www.pendle.gov.uk">http://www.pendle.gov.uk</a>
Loc.	CD196	Notes of Pendle Local Plan Inquiry Employment Round Table Session held on 27 September 2005	Planning Inspectorate	2005	<a href="http://www.pendle.gov.uk">http://www.pendle.gov.uk</a>