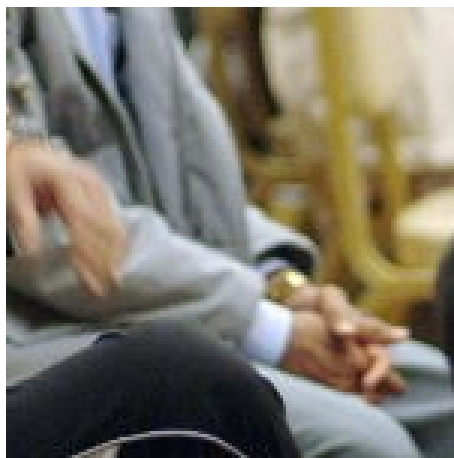
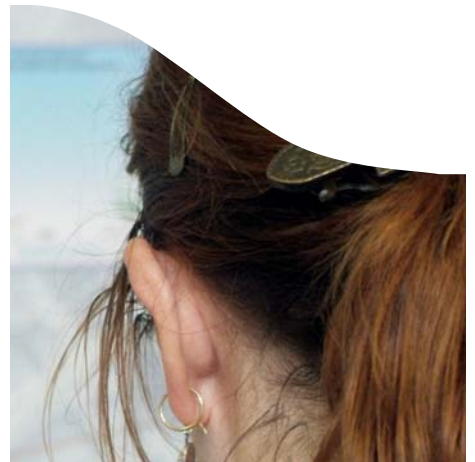
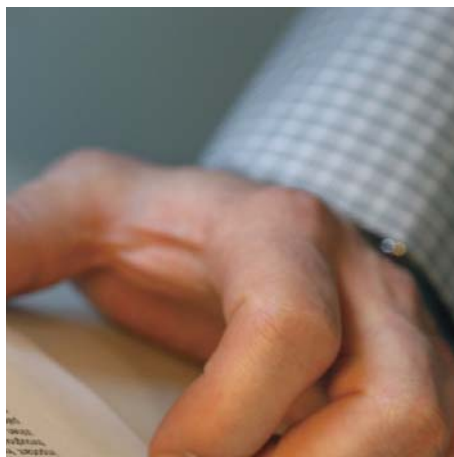
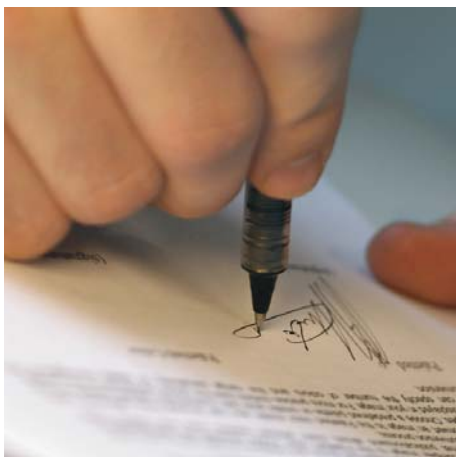


# Preparing a Local Plan for Pendle



## Core Strategy Regulation 22(c) Consultation Statement

December 2014



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## 1. Background

### Introduction

- 1.1 The Pendle Core Strategy is a strategic planning document that has been created with the cooperation of the local community and key stakeholders.<sup>1</sup> A combination of informal engagement and formal public consultation has been employed to help Pendle Council establish its preferred strategy.
- 1.2 This statement has been published to comply with the requirements of Regulation 22 (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended and sets out:
- (i) Which bodies and persons the local planning authority (Pendle Borough Council) invited to make representations under Regulation 18.<sup>2</sup>
  - (ii) How those bodies and persons were invited to make representations under Regulation 18.
  - (iii) A summary of the main issues raised by the representations pursuant to Regulation 18.
  - (iv) How any representations made pursuant to Regulation 18 have been taken into account.
  - (v) If representations were made pursuant to Regulation 20<sup>3</sup> the number of representations made and a summary of the main issues raised in those representations; and
  - (vi) How those bodies and persons were invited to make representations under Regulation 18.
- 1.3 The key stages in the preparation of the Pendle Core Strategy are summarised in Table 1.1. Over this period, the regulations, introduced in 2004 to establish the process for plan preparation, have been revised on two occasions (i.e. 2008 and 2012). To help avoid confusion, this statement refers to the relevant regulations in the Town and Country Planning (Local Planning) (England) Regulations 2012, which came into force on 6<sup>th</sup> April 2012, with any references to earlier versions of the regulations only highlighted where this is considered necessary.

**Table 1.1 – Preparation of the Pendle Core Strategy**

Stage	Reg.	Consultation Period	Summary
You Choose	18	08 June to 03 August 2007	A period of informal engagement (under old Regulation 25) carried out in conjunction with those responsible for preparing the Pendle Sustainable Community Strategy (SCS). Following targeted discussions with key stakeholders, an eight week public consultation helped to confirm the key issues for Pendle and identify possible ways of dealing with them.
Issues and Options	18	04 July to 18 August 2008	A formal public consultation (under old Regulation 25) to consider a wide-range of options for dealing with the issues to be addressed through the Core Strategy.
Preferred Options	18	28 October to 12 December 2011	A formal public consultation (under old Regulation 25) to consider the findings from the Issues and Options stage and present those options most likely to be taken forward in the Council's preferred strategy. This consultation also provided an opportunity for

<sup>1</sup> Stakeholder is the collective term used to describe any organisation, company or individual that has an interest in the future planning of the area.

<sup>2</sup> Formerly Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004 and the Town and Country Planning (Local Development) (England) Regulations 2009

<sup>3</sup> Formerly Regulation 27 of the Town and Country Planning (Local Development) (England) Regulations 2004 and the Town and Country Planning (Local Development) (England) Regulations 2009

Stage	Reg.	Consultation Period	Summary
			interested parties to suggest alternative options, where these were considered appropriate.
Publication	19	19 October to 03 December 2012	A formal public consultation to consider the whether the Council's preferred Strategy was considered to be sound and legally compliant. A challenge to the currency of the Strategic housing Market Assessment (SHMA), which had been adopted in 2008, resulted in the Council taking the decision to update this key document and several other components of the evidence base before progressing the Core Strategy.
Further Options	18	10 January to 21 February 2014	On the basis of changes to planning policy and the updated evidence, the decision was taken to allocate strategic development sites for housing and employment in the Core Strategy, to help demonstrate its deliverability. This change required the Council to return to the preceding stage in the plan preparation process, now governed by Regulation 18 of the 2012 Regulations (formerly old Regulation 25).
Pre-Submission	19	10 October to 24 November 2014	A formal public consultation to consider the whether the Council's preferred Strategy is considered to be sound and legally compliant.

- 1.4 All planning documents prepared by Pendle Borough Council (including those forming part of the evidence base) are reported to the Council's Executive with any policy documents also ratified by Full Council. The documents are then made available on the Council's website as a downloadable pdf.
- 1.5 Three 'process documents', integral to the organisation of effective and ongoing participation in the plan making process are considered below.

### Local Development Scheme (LDS)

- 1.6 A three-year project plan, which sets-out the timetable for the production of new planning policy documents. The LDS provides brief details of the documents to be produced, and shows people when they can reasonably expect to be involved in the plan making process. It also demonstrates how the Council's planning policies address a particular place or issue, and the current status of these policies.
- 1.7 Pendle Council prepared its first LDS in 2005 and has issued subsequent updates effective from the dates shown below:
- Pendle Local Development Scheme (2004-2009) .....27<sup>th</sup> January 2005
  - First Revision (2005-2011) .....22<sup>nd</sup> September 2005
  - Second Revision (2005-2011)..... 10<sup>th</sup> April 2007
  - Third Revision (2008-2014) .....31<sup>st</sup> December 2008
  - Fourth Revision (2012-2015).....22<sup>nd</sup> November 2012
  - Fifth Revision (2014-2017) .....19<sup>th</sup> June 2014

- 1.8 The fifth revision supersedes all previous versions of the LDS. It sets out a work programme for planning policy over the three-year period 2014-2017, and will be reviewed on a regular basis to ensure that it is up to date.

#### **Authority's Monitoring Report (AMR)<sup>4</sup>**

- 1.9 The current requirement for a local planning authority to produce an AMR, at least every 12 months is set out in Section 113 of the Localism Act 2011. The AMR is the main mechanism for assessing performance of the statutory development plan and it plays an important role in the provision of evidence for emerging planning policies.
- 1.10 Monitoring has a crucial role to play in providing feedback on the delivery of planning policy. The AMR provides information on the implementation of the LDS, and the extent to which the planning policies set out in existing Local Plan documents are achieving their objectives. The findings allow Pendle Council to understand the wider social, economic and environmental issues that affect the Pendle area, and to make appropriate policy adjustments and revisions as necessary. In the context of the planning system, with its focus on the delivery of sustainable development and sustainable communities, monitoring takes on an added importance in providing a check on whether those aims are being achieved.
- 1.11 Pendle's first AMR considered the twelve months from 1<sup>st</sup> April 2004 to 31<sup>st</sup> March 2005, whilst the most recent will cover the period 1<sup>st</sup> April 2013 to 31<sup>st</sup> March 2014.

#### **Statement of Community Involvement (SCI)**

- 1.12 The SCI essentially establishes who should be consulted, how they should be consulted and when they should be consulted in the preparation of new planning policy documents and planning applications.
- 1.13 The SCI sets-out the detail of how the Council intends to consult with stakeholders in the preparation of new policy documents and planning applications. It explains when and how individuals and organisations can become involved in the process and how the Council will engage with them at each stage. Table 1.2 provides a summary of the key measures employed in the preparation of the Core Strategy (Regulation 18) and at publication (Regulation 19).
- 1.14 The process of informal engagement and formal public consultation carried out for all Local Plan documents prepared by Pendle Council, irrespective of whether they affect all or part of the borough, has been informed by the provisions set-out in the Statement of Community Involvement (SCI), which was adopted by Pendle Council on 29<sup>th</sup> March 2007. Although the SCI is in need of updating, to reflect changes in the regulations, the bodies consulted at each stage in the preparation of new Local Plan documents have reflected any requirements established by any regulations that have come into effect since its adoption.

**Table 1.2: Summary of Consultation Measures**

Measure		Regulation 18	Regulation 19
1	Making the consultation documents available at public libraries and Council offices	✓	✓
2	Writing to all stakeholders on the Planning Policy Database	✓	✓
3	Writing to all businesses on the economic development, town centres and tourism databases <sup>1</sup>	✓	
4	Writing to members of the Citizens Panel <sup>1</sup>	✓	

<sup>4</sup> Previously known as the Annual Monitoring Report.

Measure		Regulation 18	Regulation 19
5	Contacting people registered with the Council's website	✓	✓
6	Messaging people on social media (e.g. Facebook and Twitter)		
7	Issuing a 'message of the day' to staff at Pendle Council, Liberata and Pendle Leisure Trust	✓	✓
8	Holding a series of stakeholder events, or one-to-one meetings	✓	✓
9	Holding a briefing session for Elected Members <sup>2</sup>	✓	
10	Attend and/or report to Area Committee meetings, Council meetings and Parish/ Town Council Meetings.	✓	
11	Placing an advertisement in the local press	✓	✓
12	Issuing a press release to the local media	✓	✓
13	Placing a banner on the homepage of the Pendle Council website	✓	✓
14	Placing a 'status update' on the Pendle Council LinkedIn page	✓	✓
15	Publicising via the Feedb@ck Online website	✓	
16	Circulation of the Framework newsletter and/or leaflets	✓	✓

<sup>1</sup> Businesses and members of the Citizens Panel who commented at Reg. 18 were added to the Planning Policy Database.

<sup>2</sup> In September 2014, the debate on the Core Strategy (Reg. 19) was held at Executive and Full Council.

### How Bodies and Persons Are Invited to Comment

- 1.15 All formal public consultations for Local Plan documents prepared by Pendle Council are conducted over a minimum period of six weeks. Whenever possible consultations start on a Friday and finish on a Monday, to give members of the public an additional weekend in which to prepare their responses.
- 1.16 The approaches which have been employed at each stage in the preparation of the Core Strategy are described briefly under the headings below and are not repeated at length in the chapters that follow.

### Document Availability

- 1.17 Consultation documents have been made available at Council Offices and Public Libraries throughout Pendle. In the early stages 15 'deposit locations' were used, but the closure of two facilities reduced this to 13 (Appendix 2).
- 1.18 The main documents are made available at all deposit locations. Where the cost of reproducing particular consultation documents is considered to be prohibitive, these are accompanied by a detailed list showing the additional supporting documents available at the four venues where all consultation documents are made available for public inspection, namely:
- Council Contact Centre, Number One Market Street, Nelson
  - Nelson Public Library
  - Colne Public Library
  - Barnoldswick Public Library

**Targeted Correspondence**

- 1.19 The Planning Policy Database is the heart of the Council's programme of informal engagement with key stakeholders and any formal public consultations. The database includes details for those bodies that the Council is required to consult by the government together with a wide-range of general consultation bodies<sup>5</sup> (Appendix 1). It also holds the details of members of the public who have submitted a valid representation, or asked to be kept up-to-date on the preparation of the Local Plan.
- 1.20 As of December 2014, the database holds contact details for 1,162 active consultees; 47% of whom have a valid email address. A further 522 entries relate to contacts who have left an organisation, or individuals who have submitted a request not to be contacted in the future, or sadly passed away.
- 1.21 Ahead of each formal public consultation all active contacts on the Council's database (Appendix 1) are sent a letter in the post, to let them know:
- **WHERE** they can view the relevant documents;
  - **HOW** they can submit a representation; and
  - **WHEN** they must submit their comments by.
- 1.22 Contacts with a valid email address are also sent an electronic notification.

**Media Coverage**

- 1.23 Paid for advertisements and/or public notices are placed in the Friday edition of the Leader Times Series of newspapers (Nelson Leader, Colne Times and Barnoldswick & Earby Times) published immediately prior to the start of the public consultation .
- 1.24 In the days leading up to a public consultation, a press release is issued to the local media (press and radio) to help raise awareness of the consultation and explain its purpose. During the consultation period one or more press releases are issued to maintain public awareness and help to generate interest in engaging with the consultation process.

**Publications**

- 1.25 Before commencing work on the Core Strategy a number of single-issue leaflets were produced to help explain the new planning system, introduced by the Planning and Compulsory Purchase Act 2004. The five leaflets that were produced focussed on the Local Development Framework (LDF) and the suite of documents within it – the Core Strategy DPD, the Land-Use Allocations DPD, The Local Development Scheme (LDS) and the Statement of Community Involvement (SCI).
- 1.26 A bespoke leaflet was produced for the joint public consultation on the Core Strategy and Sustainable Community Strategy, held under the 'You Choose' banner. Information on subsequent public consultations was made available through the Council's planning policy newsletter Framework, which first appeared in August 2006. This A4 double-sided leaflet uses short articles, written in plain English, to keep people up to date on progress with the Core Strategy and emerging planning policy. The success of the approach taken in Framework was recognised by the Royal Town Planning Institute in 2009 when it received a commendation at the North West Planning Achievement Awards.

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<sup>5</sup> A term used to describe those bodies which will have an interest in the future plans for the area including voluntary organisations; ethnic and religious groups; community and other interest groups; and local businesses.

- 1.27 A3 and A4 Posters, together with a small supply of leaflets/newsletters have been sent to each of the deposit locations and a wide-range of other venues across the borough, which are frequently used by members of the public, who might not normally consider engaging with the Council on planning matters (e.g. doctors surgeries and leisure centres), to help raise awareness of each formal public consultation. Full details of the venues where these materials have been placed on display can be found in Appendix 2.

### **Internet and Social Media**

- 1.28 A prominent interactive banner has been placed on the homepage of the Pendle Council website for the duration of each formal public consultation. Clicking on this banner takes people directly to the consultation pages, avoiding the need to search for further information and relevant documents. Similar links from the websites of partner organisations have also been used at specific stages, but these are detailed in the relevant chapter.
- 1.29 A friendly URL<sup>6</sup> is widely publicised so that interested parties should have no difficulty finding what they are looking for (e.g. [www.pendle.gov.uk/corestrategy](http://www.pendle.gov.uk/corestrategy)). Where possible a URL is embedded in the articles that feature in the Framework newsletter, so that people reading an electronic version can obtain further information.
- 1.30 The use of social media has taken off significantly since 2005. In later public consultations for the Core Strategy it has been widely used by the Council, particularly to help raise awareness amongst younger people. The social media channels used by Pendle Council are Facebook, Twitter and LinkedIn.

### **Events and Presentations**

- 1.31 The number and format of the events organised reflects the particular stage in the consultation process. All public events are hosted in DDA compliant venues<sup>7</sup> to ensure access for all. And geographical coverage is evenly spread, with at least one event held in each of the three spatial areas.
- 1.32 When a large number of events is planned these are programmed to take place at different times of the day (e.g. morning, afternoon and evening) to ensure that everyone who wishes to attend a meeting can do so at a venue and/or time that is convenient for them. Experience revealed that meetings held in the late afternoon/early evening were consistently the best attended, so where a limited number of events were programmed to take place they were held between 4:30pm and 8:30pm.
- 1.33 The five Area Committee meetings and those of the 19 town and parish councils offered a further opportunity to provide detailed advice to interested parties.

### **Feedback**

- 1.34 For each formal public consultation, the Council has published a *Consultation Statement* similar to this document, to show who has been invited to participate in the preparation of the Core Strategy and how they have been engaged in the process.

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<sup>6</sup> A uniform resource locator, also known as a web address.

<sup>7</sup> Venues offering access to all, by meeting the requirements of the Disability Discrimination Act, 1995.

- 1.35 This statement also sets-out all of the issues raised in the representations submitted in response to the preceding consultation; offers a detailed officer response to each of these comments and, where appropriate, shows how these comments have influenced the latest draft of the Core Strategy. Each of these statements provides further detail on the consultation process and is included in the document library for the examination.
- 1.36 In the periods between formal public consultations all persons and organisations on the Council's consultation database with a valid email address are regularly sent copies of our newsletter Framework. A small number of paper copies of Framework are also distributed to local libraries and Council shops.
- 1.37 Whilst Pendle Council has encouraged respondents to use Objective<sup>8</sup> – the Council's online consultation portal – or the official representation form, the overwhelming majority of written representations have been submitted in the form of a letter or email.
- 1.38 As a result officers have had to spend longer than anticipated typing representations into the Council's database and categorising these responses. This has been particularly problematic at the Publication and Pre-Submission stages, where the arguments being put forward are not always clearly defined and easy to attribute to a particular test of soundness.

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<sup>8</sup> Formerly known as Limehouse and U-Engage.

## 2. Early Engagement (2007)

### Introduction

- 2.1 Pendle Borough Council adopted the Replacement Pendle Local Plan (2001-2016) in May 2006. To address the requirements of the Planning and Compulsory Purchase Act 2004, it then commenced work on its replacement with a suite of documents to be known as the Local Development Framework (LDF).
- 2.2 The Council began to raise awareness of the new planning system in early 2005, publishing a series of leaflets about the new Local Development Framework (LDF). It subsequently published copies of the Local Development Scheme (LDS) on the 27<sup>th</sup> January 2005 and the Statement of Community Involvement (SCI) and the 29<sup>th</sup> March 2007.

### Public Consultation

- 2.3 The first stage in the preparation of the Pendle Core Strategy was carried out in conjunction with officers from Pendle Partnership, the Local Strategic Partnership (LSP) for the area, who were responsible for preparing the Sustainable Community Strategy (SCS).
- 2.4 In seeking to maximise public engagement early in the process, a widespread programme of promotion and publicity was carried out across the borough between June and August 2007, under the auspices of "You Choose ... the future of Pendle".

#### (a) Targeted Correspondence

- 2.5 In advance of the public consultation, approximately 3,300 bodies and persons received a letter, email, social media announcement etc., notifying them about the times and dates for the public consultation, where to access the consultation documents and how to submit comments.
- 2.6 A total of 507 letters or emails were addressed to bodies and persons on various Pendle Council and Pendle Partnership databases.<sup>9</sup>
- 2.7 All staff at Pendle Council, its outsourcing partner Liberata and the Pendle Leisure Trust were emailed a Message of the Day encouraging them to take part in the consultation, as were members of the Citizens Panel.

#### (b) Internet and Social Media

- 2.8 For the duration of the consultation period, the front page of the Council's website included an interactive banner promoting the public consultation. A similar banner, linking directly to the relevant pages on the Pendle Council website, was placed on the homepage of the Pendle Community Network website.

#### (c) Media Coverage

- 2.9 To raise awareness amongst members of the public, a quarter page paid advertisement was placed in the Leader Times Series of newspapers (Nelson Leader, Colne Times and Barnoldswick & Earby Times) on six separate occasions between Friday 8<sup>th</sup> June and Tuesday 31<sup>st</sup> July 2007. Further advertising slots were secured on local radio station 2BR from Sunday 1<sup>st</sup> July to Monday 30<sup>th</sup> July 2007. In addition, four press releases were issued and these generated eight feature articles between June 2007 and March 2008.

<sup>9</sup> Of this total 307 were on the planning database and 220 on the LSP Database.



**(d) Literature**

- 2.10 A total of 20,000 leaflets, incorporating a pre-paid response card, were distributed to venues across the borough and handed-out at public events and meetings. The leaflet was also attached to a survey issued to 1,350 members of the Citizens Panel and the wage slips of people employed by Pendle Council and several other public and private sector organisations.

**(e) Meetings and Events**

- 2.11 Taking their lead from the priority goals in the Sustainable Community Strategy (SCS), six joint working groups were held in July and August 2007, to discuss particular topic areas in greater detail.
- Confident Communities
  - Accessible Local Services
  - Supporting People
  - A Decent home for Everyone
  - Caring for the Environment
  - A Vibrant Economy
- 2.12 The working groups were hosted in the Wilson Room at Nelson Town Hall and attended by a total of 112 representatives from various organisations, with a further 77 attending three follow-up meetings in September 2007 to feedback and help finalise the SCS.
- 2.13 Senior planning officers delivered a short PowerPoint presentation to each of the five Area Committees, which are attended by local councillors, members of the borough's 19 parish/town councils and are open to members of the public. Together with representatives of Pendle Partnership, planning officers also attended ten further meetings hosted by key stakeholders (e.g. Barnoldswick Youth Council, Pendle Disability Forum).
- 2.14 To help spread the message to residents who would not normally engage in a planning consultation, manned displays were taken to 16 existing community events (e.g. parkland festivals) and venues regularly used by local residents (e.g. the foyers of local supermarkets). To ensure that everyone had an equal opportunity to discuss any issues they may have with an officer of the Council, the timing of these events gave residents of the three spatial areas the opportunity to attend an event in their area in the morning, afternoon, evening or at the weekend.

**Summary of Feedback**

- 2.15 In total 266 valid representations were received by the Council, which in turn contained 903 individual comments. A further 420 comments were recorded at the nine working groups, giving a total of 1,323 individual comments for consideration.
- 2.16 A wide range of issues were raised at this early stage in the consultation process and these are detailed in Appendices 3 and 4 of the associated Consultation Statement (June 2006). The key spatial planning issues, which were most appropriate to deal with through the Core Strategy, rather than the SCS, are summarised in Table 2.1.
- 2.17 Further public feedback on the You Choose consultation was provided in Issues 6 and 7 of the Framework newsletter.

**Table 2.1:** Summary of the Key Spatial Issues Emerging from the ‘You Choose’ Consultation

Strategic Issue	Comments
Location of Development	Development and service provision should accord with an agreed hierarchy of settlements. Major development should be located in the key service centres of Nelson and Colne (including Brierfield) and Barnoldswick.
Regeneration	Major developments should be directed to those areas in need of physical, economic or social regeneration. All development should be located on previously developed (brownfield) land in preference to greenfield sites.
Environmental Protection	Offer continued protection to the historic environment, Green Belt and other areas of the countryside valued for their landscape, or biodiversity. Require new development to respect heritage and landscape character and be compatible with the sustainable management of land, soil, air and water.
Design	Promote high quality design in new developments, to create fully accessible, attractive and safe places to live, learn, work and visit. New developments should plan to reduce energy requirements and make use of renewable energy sources.
Climate Change	Development should seek to reduce the impact of society on the environment. It should respond to the causes and potential impacts of climate change through a process of mitigation and adaptation.
Recycling	Help to make Pendle a place where people and businesses produce less waste and recycle more.
Accessibility	All developments should be easy to access by all members of the local community and be located close to effective and efficient transport links.
Transport	Deliver a safe, sustainable transport network that improves internal and external connectivity, reduces the need to travel by car, supports long-term growth, contributes to an improved environment and increases the quality of life for residents.
Housing	In meeting the regional housing requirement, seek to create a balanced housing market that delivers quality housing that is both appropriate and affordable.
Economy	In accordance with wider environmental objectives, seek to increase prosperity by supporting economic growth and rural regeneration in ways that are compatible with the objectives of both regional and local economic strategies.
Retailing	Promote new retail developments that make a positive contribution to sustainable high quality growth, in accordance with an established hierarchy of centres.
Town Centres	Encourage development that increases the choice, variety and quality of the retail offer and promote uses that contribute to the creation of a safe, well-balanced and socially inclusive night-time economy in Pendle's town centres.
Public Realm	Provide (public buildings), streets and public spaces that are attractive, uncluttered, safe, secure and accessible to all.
Recreation & Leisure	Protect and enhance accessible green open spaces within urban areas, improve access to the countryside and provide varied opportunities for leisure and recreational activities, in order to promote healthy and active lifestyles.
Tourism	New tourism development should complement existing provision, be at an appropriate scale, sustainable, accessible and used to support rural regeneration and/or economic diversification.
Education	Support well-designed, sustainable and inclusive improvements in education, which will enable everyone to share in Pendle's growing prosperity.
Health & Well-being	Seek to reduce any inequalities in the delivery of health services in order to help improve the overall health of local people.

Strategic Issue	Comments
Community Safety	Establish safer living environments by requiring new developments to incorporate design features that reduce both the opportunity for crime and the fear of crime in the community.
Community	Ensure that the provision of community facilities and services reflect the geographical distribution of the population and its (projected) profile, which shows that young people represent a significant and growing element of the local population.

### 3. Issues and Options (2008)

#### Introduction

- 3.1 This is a key stage in the plan making process, as it is at this point that stakeholders have the greatest opportunity to influence the strategic direction of the plan.
- 3.2 The Issues and Options stage focussed on how the Core Strategy could help to deliver the nine priority goals in the SCS, and sought to achieve this under five spatial planning themes:
- Sustainable Communities
  - Caring for the Environment
  - A Decent Home for Everyone
  - A Vibrant Economy
  - Confident Communities
- 3.3 These themes aligned closely with the workshops held as part of the earlier 'You Choose' campaign and, with some minor changes, they continue to form the basis for the chapters in the submission version of the Core Strategy.<sup>10</sup>
- 3.4 The consultation materials made it clear that the options put forward for consideration had emerged from earlier public engagement, but that alternative approaches could still be put forward for consideration.

#### Public Consultation

- 3.5 Formal consultation on the Core Strategy (Issues and Options Report) was carried out for a period of six weeks between 4<sup>th</sup> July and 18<sup>th</sup> August 2008.

#### (a) Targeted Correspondence

- 3.6 In advance of the public consultation, just over 5,000 bodies and persons received a letter, email, social media announcement etc., notifying them about the times and dates for the public consultation, where to access the consultation documents and how to submit comments.
- 3.7 A total of 1,917 letters or emails were addressed to bodies and persons on various Pendle Council and Pendle Partnership databases.<sup>11</sup>
- 3.8 All staff at Pendle Council, its outsourcing partner Liberata and the Pendle Leisure Trust were emailed a Message of the Day encouraging them to take part in the consultation, as were members of the Citizens Panel and people registered with the Council's website.

#### (b) Internet and Social Media

- 3.9 For the duration of the consultation period, the front page of the Council's website included an interactive banner promoting the public consultation. Lancashire County Council also hosted a page dedicated to the consultation on their website.

<sup>10</sup> Themes addressed in the Accessible Local Services and Supporting People workshops were incorporated into Confident Communities.

<sup>11</sup> Of this total 452 were on the planning database, 220 on the LSP Database and 1,168 on the company, town centres and tourism databases.

**(c) Media Coverage**

- 3.10 A public notice was placed in the Leader Times Series of newspapers (Nelson Leader, Colne Times and Barnoldswick & Earby Times) on Friday 4<sup>th</sup> July 2008. The following week a full colour banner at the foot of the front page of the Leader Times Series referred readers to a second half-page advertisement on page 15, which (like the public notice) gave details of the five exhibitions/workshops to be held across the borough.
- 3.11 Press releases were issued at the start of the consultation period and part way through to help maintain momentum. These resulted in articles appearing in the Leader Times Series (Page 11 on 11<sup>th</sup> July 2008) and Page 8 on 22<sup>nd</sup> August 2008).
- 3.12 A feature article also appeared in Issue 35 of the Council's staff newsletter Grapevine (Summer 2008).

**(d) Literature**

- 3.13 In the build up to the public consultation, issues six and seven of the Council's planning policy newsletter Framework, published in December 2007 and June 2008 respectively, provided feedback on the informal engagement held under the 'You Choose' banner. These articles explained how the findings would be taken forward in the Sustainable Community Strategy (SCS) and the Core Strategy.
- 3.14 A special edition of Framework was also published in June 2008 to outline the purpose of the Issues and Options consultation and set out why it was important for the public to be involved at this early stage in the preparation of the Core Strategy.
- 3.15 The newsletter and posters were distributed to 90 venues throughout the borough, including local schools and colleges. Representation forms were also sent to each of the venues identified in Appendix 2.

**(e) Meetings and Events**

- 3.16 Five public exhibitions were held across the borough between 17:00 and 20:30. These events were featured in the letters sent out to key stakeholders and interested parties and publicised in the press advertisements. Each of the 19 parish/town councils was sent an invitation to attend one of the workshops.
- 3.17 Planning officers also gave a detailed presentation to Pendle Partnership, the Local Strategic Partnership for Pendle, on 24<sup>th</sup> June 2008 and its business sub-group (Pendle Vision) on 28<sup>th</sup> July 2008. Presentations were also made to each of the Council's five Area Committees, which are attended by local councillors and representatives from the borough's 19 town and parish councils.

**Summary of Feedback**

- 3.18 The consultation generated 58 separate written representations, which in turn contained 1,171 individual comments. Five stakeholder workshops were attended by 71 representatives of various organisations and these generated a further 1,630 comments, giving a total of 2,801 individual comments for consideration.
- 3.19 A detailed consideration of the issues raised at this stage in the consultation process is set-out in the document Issues and Options Consultation: Summary of Responses (December 2008) and Appendix 5 of the associated Consultation Statement (September 2011). The key issues are summarised on the following pages under each of the five spatial planning themes:

**Sustainable Communities**

- Establish a hierarchy of settlements to assist regeneration by directing growth to the most sustainable locations (SO1).
- Ensure that the physical and social infrastructure is capable of supporting both new and existing development, thereby helping to create sustainable communities (SO2).
- Deliver a safe sustainable transport network that improves both internal and external connectivity, reduces the need to travel by car, supports long-term growth and contributes to an improved environment (SO11).

There was significant support (77%) for the proposed strategic approach to creating Sustainable Communities. The preference was for a 4-tier settlement hierarchy which focussed development in identified regeneration areas (57%) and Key Service Centres (34%) (Option 1a). There was overwhelming support for energy and heat generation from renewable and low carbon sources (Options 4a and 4b) although subsequent consultations would reveal significant opposition to wind turbines and wind farms. A criterion based policy rather than identifying specific areas of search was preferred (Option 4c). In terms of transport, the favoured options were for the protection of the former Colne-Skipton railway line and its eventual reinstatement ahead of any proposals for a bypass (Option 11a) and improvements to public transport (Option 11b). However, there was recognition that travel by car was inevitable in the immediate future (Options 11b and 11c). Key concerns were the need for the Core Strategy and its strategic objectives to:

- Judge the sustainability of sites on their individual merits and not determined by their location or previous use.
- Better reflect the need to reduce the borough's carbon footprint and limit the use of natural resources.
- Make reference to green infrastructure and networks of open spaces (Strategic Objective 2).
- Resist the physical modification and culverting of watercourses wherever possible.

**Caring for the Environment**

- Ensure new development respects our built heritage and areas of the countryside which are valued for their contribution to landscape character or biodiversity (SO10).
- Respond to the causes and potential impacts of climate change through mitigation and adaptation (SO4).

The strategic objectives addressing the environment received a mixed response with only half of the respondents in agreement with the proposals and a similar number in disagreement. The need for new development to be in keeping with the traditional character received significant levels of support (Option 3a), with the increased use of traditional materials, natural surfaces and planting favoured in the public realm (Option 3b). Key concerns were the need for the Core Strategy and its strategic objectives to:

- Make better reference to the need to conserve and enhance the character of landscapes, townscapes, habitats and biodiversity.
- Make explicit that any references to built heritage includes the wider setting of a designated asset.
- Provide absolute protection to irreplaceable habitats such as ancient woodland.

- Offer better support for the establishment of a coherent ecological network by linking core biodiversity sites with wildlife corridors, particularly in densely populated urban areas.
- Recognise the importance of biodiversity within urban, as well as rural, areas.
- Be more ambitious and pro-active in the protection afforded to environmental assets, recognising the positive contribution that they make to help reduce the pace of climate change.

### **A Decent Home for Everyone**

- Deliver quality housing that is both appropriate and affordable, contributing to the creation of a balanced housing market (SO5).

There was significant support (87%) for the proposed strategic approach to housing delivery. But, whilst the development of new housing in regeneration areas was favoured by the sustainability appraisal and most respondents (24%), there was no overall consensus (on how housing should be distributed throughout the borough (Option 1b). Indeed several representations suggested that a hybrid approach offered a more appropriate solution, whereby new housing provision was in-line with the settlement hierarchy, but gave consideration to local regeneration needs. This was reflected in the high level of support for focussing new housing provision within existing settlement boundaries (64%), preferably on Brownfield sites (Option 1c). The amount of housing to be delivered gave contrasting results, but members of the public attending local exhibitions clearly favoured providing no more than the minimum requirement (Option 5a) to meet identified local needs (Option 5b). For affordable housing different rates in different areas were favoured, based on an assessment of local need (Option 5c) with one quarter of respondents accepting that rural exception sites may be required (Option 5d). Key concerns were the need for the Core Strategy and its strategic objectives to:

- Make a clearer commitment to bringing the existing supply of housing back into use through the renovation of terraced housing, as opposed to its demolition.
- Ensure that open space and recreational areas are available close to all types of housing development and not just close to areas of family housing.
- Consider the inclusion of criteria based policy to deal with a firm prison proposal should it arise during the plan period.

### **A Vibrant Economy**

- Strengthen the local economy by facilitating growth that supports economic diversification and rural regeneration (SO6).
- Increase the choice, variety and quality of the retail offer and promote uses that contribute to the creation of a well-balanced, safe and socially inclusive night-time economy in our town centres (SO7).

The strategic objectives addressing employment received a mixed response with only 64% of the respondents in agreement with the proposals. Whilst agents and developers favoured bringing forward sites based on market attractiveness (Option 1d), overall responses favoured new employment provision in Key Service Centres (36%) and areas of proven need (36%). The use of a sequential approach for site selection was preferred by 67% of respondents (Option 1e), but the second most popular option was to allow for an urban extension where need could be proven. That said a large strategic site was the least favoured option (Option 1f). For retailing an approach supporting appropriate development in town, district, local and rural centres was favoured by half of

respondents rather than more focussed provision in larger centres (Option 1g). A balanced approach to employment provision was favoured (Option 6a) as was the possibility of redeveloping existing employment sites for alternative uses that met wider regeneration objectives receiving significant support (Option 6b). Canalside developments were the favoured location for new tourism provision (Option 6c). There was considerable support for additional retail provision (Option 7a), but this was less pronounced for national multiples (Option 7b). The protection of designated frontages within existing shopping centres received overwhelming support (Option 7c), but the need to attract additional retail growth and leisure and cultural uses was acknowledged (Options 7c and 7d). Key concerns were the need for the Core Strategy and its strategic objectives to:

- Make a clearer commitment to the creation of a self-sufficient local economy, to help reduce the need to travel and transport goods.
- Focus more on the revitalisation of town centres.
- Address the deficit in suitable employment sites by allocating sufficient employment land to meet market demand.
- Good environmental quality is a pre-requisite for healthy economic growth.

### **Confident Communities**

- Promote high quality design in new developments, our streets and public spaces, to create fully accessible, attractive and safe places to live, work, play or visit (SO3).
- Reduce inequalities by ensuring that the provision of community education and healthcare facilities and their services are fully accessible (SO8).
- Protect, enhance and improve access to our green spaces, sports and recreation facilities to promote active and healthier lifestyles (SO9).

There was significant support (78%) for the proposed strategic approach to creating Confident Communities. A more even distribution of highly accessible community facilities across the borough was supported (Option 8a), whilst more green space within densely populated urban areas (Option 8b) and the protection of existing areas of open space (Option 9a) were regarded as a priority. Key concerns were the need for the Core Strategy and its strategic objectives to:

- Protect and enhance good design in existing developments.
- Consider the importance of the historic environment.
- Offer better protection for green spaces, acknowledging the multi-use aspects of green infrastructure and its potential role in nature conservation.
- Recognise the relationship between enjoyment of the outdoors and improved health and well-being.
- Appreciate the role biodiversity plays in terms of quality of life.
- The spatial portrait should make it clear whether issues are borough-wide or localised.



## 4. Preferred Options (2011)

### Introduction

- 4.1 Following consultation on the Core Strategy (Issues and Options Report), the responses to the consultation were given detailed consideration to help develop the Council's strategic approach to future growth and development in the Borough.
- 4.2 Although the Core Strategy (Preferred Options Report) set out the Council's preferred strategic approach for promoting growth and development over the plan period, it was made clear in the consultation materials that respondents could express a preference for one of the rejected options, or suggest an alternative approach.

### Public Consultation

- 4.3 Formal consultation on the Core Strategy (Preferred Options Report) was carried out for a period of six weeks between 28<sup>th</sup> October and 12<sup>th</sup> December 2011.

#### (a) Targeted Correspondence

- 4.4 In advance of the public consultation, almost 8,000 bodies and persons received a personal letter, email, social media announcement etc., notifying them about the times and dates for the public consultation, where to access the consultation documents and how to submit comments.
- 4.5 A total of 2,314 letters or emails were addressed to bodies and persons on various Pendle Council and Pendle Partnership databases.<sup>12</sup>
- 4.6 All staff at Pendle Council, its outsourcing partner Liberata and the Pendle Leisure Trust were emailed a Message of the Day encouraging them to take part in the consultation, as were members of the Citizens Panel and people registered with the Council's website.

#### (b) Internet and Social Media

- 4.7 For the duration of the consultation period, the front page of the Council's website included an interactive banner promoting the public consultation. A dedicated webpage also featured on the Feedback Online website, a joint consultation portal used by a number of local authorities in Pennine Lancashire.
- 4.8 For the first time messages were issued via social media to a further 2,146 people who were 'friends' of the Council on Facebook or follow it on Twitter.

#### (c) Media Coverage

- 4.9 A half page full-colour advertisement featured on page 25 of the Leader Times Series of newspapers (Nelson Leader, Colne Times and Barnoldswick & Earby Times) on Friday 28<sup>th</sup> October 2011.
- 4.10 A press release was issued at the start of the consultation period. This did not generate an article in the newspaper until Friday 11<sup>th</sup> November 2011, as a result of follow-up work by the Council's communications team. A second article then appeared in the Barnoldswick & Earby Times (only) on Friday 18<sup>th</sup> November 2011, publicising the Core Strategy and the forthcoming drop-in sessions in that part of the borough. A third article appeared in all three editions of the Leader Times Series published on Friday 2<sup>nd</sup> December 2011, although this was in response to issues raised by local

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<sup>12</sup> Of this total 1,682 were on the planning database, 175 on the LSP Database and 457 on the company, town centres and tourism databases.

interest group Lidgett & Beyond, who oppose development on a particular area of land to the east of Colne. The Core Strategy also featured on the letters pages on the Friday 2<sup>nd</sup> and 9<sup>th</sup> December 2011.

#### **(d) Literature**

- 4.11 A bespoke leaflet and posters were distributed to 90 venues throughout the borough, including local schools and colleges. Representation forms were also sent to each of the venues identified in Appendix 2.
- 4.12 Technical Papers addressing the complex information relating to housing and employment were prepared and published alongside the Core Strategy for information.

#### **(e) Meetings and Events**

- 4.13 Prior to the consultation detailed briefings for councillors representing the Liberal Democrat, Conservative and Labour parties were held on 22<sup>nd</sup> June 2011, 4<sup>th</sup> July and 16<sup>th</sup> July 2011 respectively. At the meeting elected members were asked to encourage their constituents to engage in the forthcoming public consultation.
- 4.14 A presentation on the Core Strategy was also made to the Annual General Meeting of the LSP (Pendle Partnership) at Colne Municipal Hall on Tuesday 5<sup>th</sup> July 2011.
- 4.15 The offer of a detailed presentation from planning officers was taken up by 13 of the 19 parish/town councils in the borough.
- 4.16 Faced with the need to provide detailed information to explain the difficult choices that had been taken before arriving at a preferred strategic approach, public drop-in sessions were arranged in 14 of the borough's 21 settlements between 4<sup>th</sup> November and 9<sup>th</sup> December 2011. Once again these events were held at different times of the day; giving everyone an opportunity to attend an event at a time and place that was convenient for them. A new mobile facility, STAN the Van<sup>13</sup>, was used to reach locations where 'bricks and mortar' facilities were not available. Unfortunately only 13 of the 15 drop-in sessions planned actually took place. Unfortunately, towards the end of the consultation period STAN the Van broke down and the events in Laneshaw Bridge and Foulridge had to be cancelled.
- 4.17 When not in use, the display panels were put on display at Number One Market Street in Nelson.

#### **Summary of Feedback**

- 4.18 The consultation generated 246 separate written representations, which in turn contained 1,118 individual comments.
- 4.19 A detailed consideration of the issues raised at this stage in the consultation process are set-out in Appendices 6 and 8 of the associated Consultation Statement (August 2012). The key issues are highlighted below and the level of response is summarised in Table 4.1:<sup>14</sup>

#### **Sustainable Communities**

- Need to make clear that the proposed housing (Policy SDP2) and employment (Policy SDP3) distributions are for guidance only and not targets.

<sup>13</sup> STAN = Services to a Neighbourhood

<sup>14</sup> Note that the inclusion of additional policies has changed the policy numbers in subsequent versions of the Core Strategy.

**Caring for the Environment**

- Offer greater policy support for the protection and creation of key components in an emerging ecological network (Policy ENV1).
- Reflect that the requirement to generate 10% of heat and energy from on-site renewables may not always be viable (Policy ENV2).
- Address the overemphasis on wind energy (Policy ENV2).
- Remove the table highlighting technology specific targets (Policy ENV2).
- Acknowledge additional transport infrastructure may be required to support growth in the M65 Corridor (ENV4).
- Make reference to the need to reduce the amount of waste going to landfill (Policy ENV5).
- Better address the potential consequences of the areas mining legacy for land stability (Policy ENV5).
- Better address the potential impact of noise, light and water pollution arising from new development (Policy ENV5).
- Acknowledge the need to manage surface water at source and to promote the use of Sustainable Urban Drainage Systems (SuDS) to mimic Greenfield runoff rates in order to limit peak surface water discharge and reduce flood risk (Policy ENV6).
- Include an arrow to indicate the 'broad direction' of the A56 bypass and/or reinstated route of the former Colne to Skipton railway line (Key Diagram).
- Add AONB and SSSI designations (Key Diagram).

**A Decent Home for Everyone**

- Increase the housing requirement figure to take account of under-delivery (LIV1).
- Make clear that there is no restriction on housing delivery arising from the proposed phasing (LIV1).
- Include criteria for the selection of sites for the Gypsy and Traveller community (LIV2).
- Explain why rural exception sites for market housing may be needed to help deliver affordable housing requirements (LIV3).
- Clarify the proportions of affordable housing required in the different tenures (LIV3).
- Make a clearer distinction between affordable housing needs in urban and rural areas (LIV3).
- Clarify how density requirements are addressed in the different spatial areas (LIV4).


**A Vibrant Economy**

- Offer support to projects in rural areas which make a positive contribution to the protection, enhancement, conservation and interpretation of the landscape, natural assets, biodiversity and built heritage (WRK2).
- Make clear how the calculation of the employment land requirement has been carried out in the reasoned justification for the policy (WRK2).
- Support socially inclusive tourism, leisure and cultural uses that help to improve the vitality and viability of town centres (WRK4).

**Table 4.1:** Summary of Responses to the Public Consultation for the Preferred Options Report

Section of Preferred Options Report	Comments			
	None	Total	Agree	Disagree
<b>All Written Representations</b>	<b>1,118</b>		-	-
<b>Document</b>	962	156	-	-
<b>Chapter 1: Introduction</b>	1,117	1	-	-
<b>Chapter 2: About the Core Strategy</b>	1,115	3	-	-
<b>Chapter 3: Our Spatial Issues</b>	1,102	16	-	-
<b>Chapter 4: Our Spatial Vision</b>	1,087	31	81%	19%
<b>Chapter 5: Our Strategic Objectives<sup>1</sup></b>	1,107	11	-	-
<b>Chapter 6: Our Spatial Strategy</b>	1,089	29	83%	17%
<b>Chapter 7: Our Foundations for a Sustainable Future</b>	1,116	2	-	-
SDP1: Spatial Development Principles	1,090	28	82%	18%
SDP2: Housing Distribution	1,087	31	42%	58%
SDP3: Employment Distribution	1,089	29	79%	21%
SDP4: Retail Distribution	1,093	25	80%	20%
SDP5: Future Infrastructure Requirements	1,092	26	88%	12%
SDP6: Sequential Approach to Development	1,088	30	83%	17%
<b>Chapter 8: The Key Diagram</b>	1,115	3	-	-
ENV1: Protecting & Enhancing Our Natural and Historic Environments	1,079	39	59%	41%
ENV2: Achieving Quality in Design and Conservation	1,092	26	88%	12%
ENV3: Renewable and Low Carbon Energy Generation	1,063	55	33%	67%
ENV4: Promoting Sustainable Travel	1,089	29	69%	31%
ENV5: Pollution and Unstable Land	1,094	24	96%	4%
ENV6: Waste Management	1,092	26	100%	0%
ENV7: Water Management	1,095	23	100%	0%
<b>Chapter 9: Place Shaping</b>	1,118	0	-	-
<b>Chapter 10: Living</b>	1,116	2	-	-
LIV1: Housing Provision, Phasing and Delivery	1,089	29	69%	31%
LIV2: Housing Needs	1,091	27	70%	30%
LIV3: Affordable Housing	1,090	28	68%	32%
LIV4: Designing Better Places to Live	1,094	24	83%	17%
<b>Chapter 11: Working</b>	1,118	0	-	-
WRK1: Strengthening the Local Economy	1,094	24	92%	8%
WRK2: Employment Land Supply	1,091	27	78%	22%
WRK3: Retailing and Town Centres	1,093	25	80%	20%
WRK4: Tourism, Leisure and Culture	1,093	25	96%	4%
WRK5: Designing Better Places to Work	1,094	24	96%	4%
<b>Chapter 12: Supporting</b>	1,118	0	-	-
SUP1: Community Facility Provision	1,094	24	96%	4%
SUP2: Health and Well-Being	1,095	23	96%	4%
SUP3: Education and Training	1,095	23	100%	0%
SUP4: Designing Better Public Places	1,094	24	92%	8%
<b>Appendix 1: Affordable Housing &amp; Dynamic Viability</b>	1,118	0	-	-
<b>Appendix 2: Replacement of Local Plan Policies</b>	1,116	2	-	-
<b>Appendix 3: Glossary</b>	1,118	0	-	-
<b>Any Other Comments</b>	1,093	25	96%	4%

<sup>1</sup> Spatial Issues and Strategic Objectives finalised, based on feedback to the Issues and Options consultation.

 Support for policy less than two-thirds of those persons expressing an opinion.

**Confident communities**

- Reference the benefits to health and well-being afforded by the natural environment (SUP2).
- Amend policy to reflect new working practices at Lancashire County Council (SUP3).

4.20 Following the close of the public consultation there was a need to make major revisions to the Core Strategy to reflect the requirements of the Localism Act and the National Planning Policy Framework, which came into effect in November 2011 and March 2012 respectively.<sup>15</sup>

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<sup>15</sup> The Draft National Planning Policy Framework was made available for public consultation on 3<sup>rd</sup> July 2012.

## 5. Publication (2012)

- 5.1 Following consultation on the Core Strategy (Preferred Options Report), the responses were used to help refine the Council's strategic approach. The Council then set-out what it considered to be the final version of its strategy to promote future growth and development in the Core Strategy (Publication Report).

### Public Consultation

- 5.2 Formal consultation on the Core Strategy (Publication Report) was carried out for a period of six weeks between 19<sup>th</sup> October and 3<sup>rd</sup> December 2012.

#### (a) Targeted Correspondence

- 5.3 In advance of the public consultation, over 7,000 bodies and persons received a personal letter, email, social media announcement etc., notifying them about the times and dates for the public consultation, where to access the consultation documents and how to submit comments.
- 5.4 A total of 2,258 letters or emails were addressed to bodies and persons on various Pendle Council and Pendle Partnership databases.<sup>16</sup>
- 5.5 All staff at Pendle Council, its outsourcing partner Liberata and the Pendle Leisure Trust were emailed a Message of the Day encouraging them to take part in the consultation, as were members of the Citizens Panel and people registered with the Feedb@ck Online and Pendle Council websites.

#### (b) Internet and Social Media

- 5.6 For the duration of the consultation period, the front page of the Council's website included an interactive banner promoting the public consultation. A dedicated webpage also featured on the Feedb@ck Online website, a joint consultation portal used by a number of local authorities in Pennine Lancashire.
- 5.7 Messages were once again issued via social media to a further 3,898 people who were 'friends' of the Council on Facebook or follow it on Twitter.

#### (c) Media Coverage

- 5.8 A quarter page full-colour advertisement featured on page 13 of the Leader Times Series of newspapers (Nelson Leader, Colne Times and Barnoldswick & Earby Times) on Friday 19<sup>th</sup> October 2012.
- 5.9 A press release was issued at the start of the consultation period, which generated a short article in the Lancashire Telegraph on Friday 19<sup>th</sup> October 2012. The corresponding article in the Leader Times appeared on Friday 2<sup>nd</sup> November 2012 (Page 7).
- 5.10 A short debate about the Core Strategy featured on the blogging site 'One Guy From Barlick' on 19<sup>th</sup> October 2012.

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<sup>16</sup> Of this total 1,608 were on the planning database (number slightly reduced due to a refresh in 2012), 175 on the LSP Database and 475 on the company, town centres and tourism databases.

**(f) Literature**

- 5.11 Framework (Issue 22 – August 2012) announced the intention to publish the Core Strategy at Full Council on 27<sup>th</sup> September 2012 and introduced the upcoming public consultation and the concept of soundness. As usual this edition was emailed to each consultee on the Council's Planning Policy Database with a valid email address, with a small number of printed copies being distributed through libraries and Council shops (13 venues in total).
- 5.12 Framework (Issue 23 – October 2012) highlighted the revised focus of the public consultation carried out under Regulation 19, emphasising that it is primarily concerned with the overall soundness of the Council's chosen strategy and whether or not preparation of the document has complied with all legal requirements.
- 5.13 Ahead of the public consultation a poster and copies of Framework (Issue 23) were distributed to 63 venues throughout the borough. Representation forms and guidance notes were also sent to each of the venues identified in Appendix 2.

**(g) Meetings and Events**

- 5.14 Due to the nature of the public consultation no stakeholder or public events were organised by Pendle Council.

**Summary of Feedback**

- 5.15 The consultation generated 33 separate written representations, commenting on the legal compliance and soundness of the document.
- 5.16 A list of all the valid representations that had been received was published in Framework (Issue 24 – January 2013). The key issues arising from these representations are summarised below:
- The Strategic Housing Market Assessment (SHMA) adopted in 2008, and a key part of the evidence base for housing, was not considered to be up-to-date.
  - Concerns about perceived inconsistencies in the evidence base for housing, employment and renewable energy.
  - The housing requirement figure was too low to provide the step-change sought by the NPPF.
  - The proposed distribution of housing would not create effective competition and choice in the market.
  - The viability of a number of sites included in the five-year supply was considered to be questionable.
  - There was insufficient detail on nature conservation issues and landscape scale proposals.
  - The document failed to make adequate reference to the setting of heritage assets.
  - The document failed to make clear that settlement boundaries will only be established on adoption of Pendle Local Plan (Part 2): Site Allocations & Development Policies.
  - Greater emphasis on the wider economic role of Pendle in a Lancashire context was required.
- 5.17 Pendle Council subsequently took the decision not to submit the Core Strategy to the Secretary of State. The reasons for this decision were set-out in Framework (Issue 24) as was a link to a note prepared by the Inspector for the East Hampshire Core Strategy, which made it clear that an SHMA that is almost five years old would not allow him to properly consider whether the plan met the objectively assessed need for housing.

## 6. Further Options (2013)

### Introduction

- 6.1 Following the decision not to submit its Core Strategy for independent examination, Pendle Council spent a considerable amount of time and money in 2013 updating key parts of its evidence base. Foremost amongst the documents produced were
- Pendle Employment Land Review (Pendle Council, September 2013).
  - Pendle Strategic Housing Land Availability Assessment (Pendle Council, September 2013)
  - Joint Burnley and Pendle Strategic Housing Market Assessment (Nathaniel Lichfield, December 2013)
- 6.2 The new evidence and representations received in response to the previous public consultation on the Core Strategy (Publication Report) indicated that a significant increase in both the housing and employment land requirements would be required.
- 6.3 Pendle Council took the decision that the inclusion of strategic sites for housing and employment would be required in the latest version of the Core Strategy, in order to provide additional certainty with regard to delivery of the plan objectives. As these strategic sites had not been included in previous versions of the Core Strategy, it was necessary to take a step-back in the process and conduct a further options appraisal under Regulation 18.
- 6.4 Two additional evidence base reports were published to demonstrate that the two sites identified in the plan were the only ones that could realistically be considered to fulfil a strategic role early in the plan period
- Strategic Housing Land Site Allocation Report
  - Strategic Employment Land Site Allocation Report (Parts 1 and 2)

### Public Consultation

- 6.5 Formal consultation on the Core Strategy (Further Options Report) was carried out for a period of six weeks between 10<sup>th</sup> January and 21<sup>st</sup> February 2014.

#### (a) Targeted Correspondence

- 6.6 In advance of the public consultation, almost 20,000 organisations and individuals were sent a letter, email or social media message informing them about the public consultation, how to access the consultation documents and how to submit comments.
- 6.7 A total of 1,956 letters or emails were addressed to bodies and persons on various Pendle Council and Pendle Partnership databases.<sup>17</sup>
- 6.8 All staff at Pendle Council, its outsourcing partner Liberata and the Pendle Leisure Trust (498) were emailed a Message of the Day encouraging them to take part in the consultation, as were members of the Citizens Panel (1,101) and people registered with the Feedback Online (122) and Pendle Council (9,264) websites.

#### (b) Internet and Social Media

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<sup>17</sup> Of this total 1,443 were on the planning database and 513 on the company, town centres and tourism databases.



- 6.9 For the duration of the consultation period, the front page of the Council's website included an interactive banner promoting the public consultation. A similar banner was featured on the Feedb@ck Online website, a joint consultation portal used by a number of local authorities in Pennine Lancashire.
- 6.10 The new Pendle Council LinkedIn webpage, which had just under 200 followers at the time, also carried a 'recent update' announcing the public consultation.
- 6.11 Messages were once again issued via social media to a further 7,447 people who were 'friends' of the Council on Facebook or follow it on Twitter.

#### **(c) Media Coverage**

- 6.12 A half page full-colour advertisement featured on page 30 of the Leader Times Series of newspapers (Nelson Leader, Colne Times and Barnoldswick & Earby Times) on Friday 10<sup>th</sup> January 2014.
- 6.13 A press release was issued at the start of the consultation period, but the Council has no evidence that it was picked up by the local press or radio.
- 6.14 An extended debate about the Core Strategy featured on the blogging site 'One Guy From Barlick' between 10<sup>th</sup> January and 5<sup>th</sup> February 2014.

#### **(h) Literature**

- 6.15 Framework (Issue 27 – January 2014) introduced the upcoming public and explained that it represented a step-backwards in the process. As such people were once again encouraged to comment in detail on the strategic direction and policy emphasis of the document.
- 6.16 As usual this edition of the newsletter was emailed to each consultee on the Council's Planning Policy Database with a valid email address, with a small number of printed copies being distributed through libraries and Council shops (13 venues in total).
- 6.17 Ahead of the public consultation a poster, copies of Framework (Issue 27), representation forms and guidance notes were distributed to each of the venues identified in Appendix 2.

#### **(i) Meetings and Events**

- 6.18 During the second week of the consultation, four exhibitions were held at venues in Nelson, Colne, Barnoldswick and Barrowford in the late afternoon/early evening (4:00pm-8:00pm). The events were advertised in the local press and reminders sent out via Twitter. In the penultimate week of the consultation a fifth event was held at Nelson Town Hall between 10:00am and 4:30pm. This drop-in session was arranged to allow anyone who wished to discuss a particular matter in more detail with a planning officer, before submitting their representation, the opportunity to do so.
- 6.19 When not in use at these events, the exhibition panels were left on permanent display at Number One Market Street in Nelson.

#### **Summary of Feedback**

- 6.20 The consultation generated 128 separate written representations, which in turn contained 326 individual comments.

6.21 Two petitions were also submitted in respect of the following:

- Land at Castle Road / Skipton Old Road / Lidgett, Colne – 489 individual letters of support for the submission from the Lidgett and Beyond Group.
- Land off Barrowford Road, Colne – The representation submitted by Mr. John Metcalfe was supported by a petition signed by 201 individuals.

6.22 The key issues raised at this stage in the consultation process are summarised below:

- SDP2 – Question the allocation of a strategic housing site adjacent to a lower order centre (Barrowford) rather than one of the three Key Service Centres.
- SDP3 – The percentage distribution should be expressed by settlement rather than spatial area.
- ENV1 – Insufficient detail on the protection to be afforded to biodiversity – species and habitats of principal importance etc.
- ENV4 – Opposition to the support offered within the policy for construction of a bypass in the A56 Corridor between Colne and the boundary with North Yorkshire.
- ENV4 – Request that car parking standards are reviewed in Local Plan (Part 2).
- ENV7 – Make reference to the SuDS hierarchy within the policy justification.
- LIV1 & WRK2 – Concern that the housing and employment requirement figures are either too high (primarily representations from local residents and environmental organisations) or too low (primarily representations from agents and developers).
- LIV1 – Scepticism about the accuracy of the 2012-based Sub-National Population Projections and their suitability as the basis for housing projections.
- LIV2 – Opposition to the location and justification for a strategic housing site at Trough Laithe Farm.
- LIV2 – Opposition to the allocation of a single strategic housing site, rather than a range of housing sites throughout the borough.
- LIV5 – Cross reference to Policy ENV2 for consistency
- WRK1 – Strengthen importance of aerospace and its future contribution to growth in the Arc of Prosperity.
- WRK3 – Opposition to the location and justification for a strategic employment site at Lomeshaye.
- WRK4 – Remove references to the proposed restrictions to be placed on A5 uses (i.e. hot-food takeaways).
- WRK6 – Cross reference to Policy ENV2 for consistency
- SUP 1 – Include a reference to Assets of Community Value.

## **7. Pre-Submission (2014)**

### **Introduction**

- 7.1 Following consultation on the Core Strategy (Further Options Report), the responses were used to help refine the Council's strategic approach. The Council then set-out what it considered to be the final version of its strategy to promote future growth and development in the Core Strategy (Pre-Submission Report).

### **Public Consultation**

- 7.2 Formal consultation on the Core Strategy (Pre-Submission Report) was carried out for a period of six weeks between 10<sup>th</sup> October and 24<sup>th</sup> November 2014.

#### **(a) Targeted Correspondence**

- 7.3 In advance of the public consultation, approximately 19,800 organisations and individuals were sent a letter, email or social media message informing them about the public consultation, how to access the consultation documents and how to submit comments. Although there would be some duplication, this represented a significant increase on previous consultations, again primarily due to interaction via the Council website and social media.
- 7.4 A total of 1,533 letters were sent to all bodies and persons included on the Planning Policy database prior to the start of the consultation. In addition the 105 statutory bodies and 776 individuals with a valid email address were also sent an email, which included a copy of Framework (Issue 30) as an attachment.
- 7.5 All staff at Pendle Council, its outsourcing partner Liberata and the Pendle Leisure Trust (475) were emailed a Message of the Day encouraging them to take part in the consultation, as were people registered with the Pendle Council (9,264) website.

#### **(b) Internet and Social Media**

- 7.6 For the duration of the consultation period, the front page of the Council's website included an interactive banner promoting the public consultation. Due to the nature of the consultation, a link from the Feedback Online website was not considered necessary on this occasion.
- 7.7 The new Pendle Council LinkedIn webpage, which has 260 followers, also carried a 'recent update' announcing the public consultation. This achieved 190 impressions and one interaction during the period of the consultation.
- 7.8 Messages were once again issued via social media to a further 8,587 people who were 'friends' of the Council on Facebook or follow it on Twitter.

#### **(c) Media Coverage**

- 7.9 A quarter page full-colour advertisement featured on page 17 of the Leader Times Series of newspapers (Nelson Leader, Colne Times and Barnoldswick & Earby Times) on Friday 10<sup>th</sup> October 2014.
- 7.10 Preceding the public consultation articles appeared in the Nelson Leader and Colne Times on Friday 3<sup>rd</sup> October 2014. These commented on the decision taken at the meeting of Full Council on Thursday 25<sup>th</sup> September 2014, to make the Core Strategy, including policies allocating strategic sites for housing and employment, available for public consultation.

- 7.11 The Core Strategy would go on to receive unprecedented coverage in the local press during the consultation period. The heightened awareness of the local media to planning policy can be attributed to two events. Firstly articles concerned with the loss of open countryside and Green Belt for new housing had been in the national headlines throughout the summer. More significantly, immediately prior to the public consultation on the Core Strategy (Pre-Submission Report) neighbouring Burnley had held a public consultation to consider potential sites for new housing and the gypsy and traveller community. A public campaign, orchestrated through the pages of the Burnley Express (a sister paper to the Leader Times Series), generated a considerable amount of coverage opposing the potential allocations.
- 7.12 The result was extensive press coverage for the Pendle Core Strategy in the Leader Times Series. Over a two week period three full pages were devoted to the Core Strategy, with articles on housing and employment appearing on Friday 31<sup>st</sup> October 2014 and 7<sup>th</sup> November 2014 respectively. Pendle Council was not asked to help with the preparation of these feature articles and although they were factually correct, the articles did not adequately reflect the advanced stage that the consultation process had now reached or the limited opportunity for further changes to the chosen strategy. Nor did they properly reflect the status of sites in the Strategic Housing Land Availability Assessment (SHLAA), and the result was a series of negative articles and letters directed towards Pendle Council for 'allocating' housing and employment sites without adequate public engagement. This would also be reflected in the representations received.

#### **(j) Literature**

- 7.13 Framework (Issues 28 – May 2014) announced the intention to take the Core Strategy to the Council's Executive and Full Council in July 2014 and advised people how they could speak at these meetings, should they wish to do so. A delay to the publication of the Housing Needs Update (Nathaniel Lichfield, 2014) meant that there would be a delay until the corresponding meetings in September. As such Framework (Issue 29 – September 2014) covered some of the same issues as Issue 28 (i.e. how to speak at a Council meeting), but also introduced the upcoming public consultation and included an article on soundness.
- 7.14 Framework (Issue 30 – October 2014) focussed on the public consultation; highlighting where the consultation documents were available to view and how people could comment. A further article explained what would happen after the consultation period closed and introduced the examination process. As usual this edition of Framework was emailed to each consultee on the Council's Planning Policy Database (with a valid email address. Copies were also distributed to each of the venues identified in Appendix 2, together with a poster, representation forms and guidance notes.

#### **(k) Meetings and Events**

- 7.15 Due to the nature of the public consultation no stakeholder or public events were organised by Pendle Council.

#### **Summary of Feedback**

- 7.16 As noted above, the public consultation on the Core Strategy (Pre-Submission Report) took place at a time when the local media had gained a new appreciation of the importance that planning policy could have for the local community.
- 7.17 The result was extensive press coverage that did not adequately reflect the purpose of the public consultation. This was reflected in both the number and the nature of the representations submitted in response to the public consultation, few of which used the official representation form, or addressed the issues of legal compliance and soundness directly.

7.18 The key issues raised at this stage in the consultation process are summarised below:

- SDP2 – Policy is not prescriptive enough / too prescriptive with regard to favouring development on Brownfield rather than Greenfield sites.
- SDP2 / SDP3 – Questions the consistency between the settlement hierarchy, the housing distribution by spatial area and the relationship with the strategic housing site.
- LIV1 – Opposition to the phased approach on the grounds that it will not deliver sufficient housing the early years of the plan period.
- LIV1 – The housing requirement figure should be higher and expressed as a minimum
- LIV2 – Opposition to the location and justification for a strategic housing site at Trough Laithe Farm
- LIV2 – Opposition to the allocation of a single strategic housing site, rather than a range of housing sites throughout the borough.
- WRK3 – Opposition to the location and justification for a strategic employment site at Lomeshaye.

## 8. Overall Summary of Public Engagement and Consultation

### Introduction

- 8.1 The Pendle Core Strategy has been subjected to six periods of formal public consultation between 2007 and 2014 and these are summarised in Appendix 3.

### Public Consultation

- 8.2 Whilst engagement was front loaded, the number of people invited to participate in the preparation of the Pendle Core Strategy has increased steadily throughout the process. Using a combination of measures 2-7 in Table 2.1, advance notification of public consultation, via personally addressed (email and/or letter) or direct correspondence (e.g. tweet) increased from circa 3,300 at the outset to approximately 20,000 at the Pre-Submission stage (Regulation 19). Much of this growth in numbers can be attributed to the dramatic rise in the number of people registered with the Council's website and social media channels (i.e. Facebook and Twitter). However, the number of contacts on the Council's Planning Policy Database has shown a corresponding increase from 307 entries to 1,666 over the same period.<sup>18</sup>
- 8.3 At each stage the Council has made key consultation documents available at a minimum of 13 deposit locations throughout the Borough ( i.e. local libraries and council offices), with all consultation documents on display at the Council's Contact Centre (Number One Market Street, Nelson) and at the public libraries in Nelson, Colne and Barnoldswick.
- 8.4 Leaflets and posters have been distributed to 20 other well-used venues (e.g. doctor's surgeries and business centres) for display in their waiting areas and foyers. And, each of the 19 Town and Parish Council's has also been issued with a poster to display on the parish noticeboard and a small quantity of leaflets for circulation.
- 8.5 Up to, and including, the Preferred Options stage the 44 primary and secondary schools in Pendle were also supplied with leaflets and posters. The poor level of response from these establishments led to a review of procedures, with correspondence primarily directed to the local education authority (Lancashire County Council).
- 8.6 A paid advertisement and/or public notice was always placed in the local press to ensure that local residents were aware of each formal public consultation and any local events associated with it.
- 8.7 Press releases were used to obtain editorial coverage which expanded further on the purpose of each consultation and helped to promote engagement in the plan making process. The Council's communications team also briefed the editorial staff at the local paper about the importance of the consultation process and the implications for future development in the borough. However, despite this pro-active approach the prominence given to such releases in the local press was often disappointing in terms of timing, positioning and coverage. On a number of occasions it was necessary to place follow-up calls to ensure that the release was used within the opening weeks of the consultation period. This contrasts sharply with the prominent coverage often given to any objectors to the plan, with ill-informed and misleading articles often getting front page coverage. This was particularly problematic at the Pre-Submission stage when three page feature, spread over two consecutive weeks, focussed on large housing sites featured in the Strategic Housing Land Availability Assessment (SHLAA) rather than the overall strategy.

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<sup>18</sup> This figure includes 121 statutory bodies, 571 other organisations and 629 individuals; with many organisations having more than one recipient.

8.8 Events conducted as part of the early informal engagement were relatively light-touch affairs, often forming part of other public events, in order to help maximise public participation. At the Issues and Options, Preferred Options and Further Options stages a mix of detailed presentations to a specialist audience, one-to-one meetings with key stakeholders and public exhibitions was considered to be more appropriate, as the matters under discussion were relatively complex. In contrast at the Publication and Pre-Submission stages, where the focus moves away from the content of the plan to issues of soundness and legal compliance, no public or stakeholder events were held.

8.9 In addition 30 issues of the Framework newsletter have been published between August 2006 and October 2014 to keep interested parties up to date with the Core Strategy and emerging planning policy in Pendle (Appendix 4).

### **Summary of Feedback**

8.10 From the outset the majority of objections received in response to each of the formal public consultations have questioned the environmental credentials of the policies in the plan. These comments often fail to appreciate the Council's need to balance such requirements against the social and economic benefits of sustainable development and growth.

8.11 Following the public consultation on the Core Strategy (Issues and Options Report), as the Council moved towards its preferred strategy, objections to the plan have focussed on the following issues:

- Opposition to the housing requirement figure, for either being too high (local residents), or too low (landowners, housing developers and their agents).
- General questioning of the methodology used to derive the employment land requirement.
- Comments on the public's general lack of awareness that the Core Strategy was being prepared by Pendle Borough Council.

8.12 At the Pre-Submission Stage the first comments questioning the Council's approach to the provision of accommodation for the gypsy and traveller community were raised.

8.13 A summary of the issues raised (pursuant to Regulation 18) and details of how they have been taken into account can be found in the consultation statement made available for inspection at the next formal public consultation. These documents are identified in Appendix 3 of this document, but are summarised in Table 8.1 for clarity.

8.14 Further information concerning the detailed engagement with key stakeholders to address cross boundary issues can be found in the Statement of Compliance with the Duty to Cooperate (Pendle Council, September 2014).

**Table 8.1:** Where can I see a summary of the comments made on Core Strategy and how they have helped to shape the final version of the plan?

Consultation	Reg.	Representations	
		Summary of Issues Raised	How They Were Taken Into Account
You Choose	18	<ul style="list-style-type: none"> <li>Consultation Statement (Issues &amp; Options Report)</li> </ul>	<ul style="list-style-type: none"> <li>Consultation Statement (Issues &amp; Options Report)</li> </ul>
Issues and Options	18	<ul style="list-style-type: none"> <li>Summary of Responses (Issues &amp; Options Consultation)</li> <li>Consultation Statement (Preferred Options Report) – Appendix 5</li> </ul>	<ul style="list-style-type: none"> <li>Consultation Statement (Preferred Options Report) – Appendix 5</li> </ul>
Preferred Options	18	<ul style="list-style-type: none"> <li>Consultation Statement (Publication Report) – Appendix 6</li> </ul>	<ul style="list-style-type: none"> <li>Consultation Statement (Publication Report) – Appendix 7</li> </ul>
Publication <sup>19</sup>	19	<ul style="list-style-type: none"> <li>Framework (Issue 24)</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>
Further Options	18	<ul style="list-style-type: none"> <li>Consultation Statement (Further Options Report) – Appendices 1-3</li> </ul>	<ul style="list-style-type: none"> <li>Consultation Statement (Further Options Report) – Appendix 4</li> </ul>
Pre-Submission	19	<ul style="list-style-type: none"> <li>N/A</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>

<sup>19</sup> Comments raised in representations to the public consultation for Publication Report were largely addressed through the updating of the evidence base.



## 9. Next Steps: Examination and Adoption

9.1 The Core Strategy (Pre-Submission Report) is to be submitted to the Secretary of State on **17<sup>th</sup> December 2014**. In accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, accompanying it will be:

- (a) Sustainability Appraisal Report
- (b) Submission policies map<sup>20</sup>
- (c) A (consultation) statement setting out:
  - Which bodies and persons the local planning authority (Pendle Council) invited to make representations under Regulation 18.
  - How those bodies and persons were invited to make representations under Regulation 18.
  - How many representations made pursuant to Regulation 18 have been taken into account
  - If representations were made pursuant to Regulation 20, the number of representations made and a summary of the main issues raised in those representations; or
  - a statement that no representations were made pursuant to Regulation 20.
- (d) Copies of any representations made in accordance with Regulation 20
- (e) Such supporting documents, as in the opinion of Pendle Council are relevant to the preparation of the Core Strategy.

9.2 As soon as reasonably practicable after the submission, in accordance with Regulation 35 copies of the Core Strategy (Pre-Submission Report) and documents covered by Regulations 22 (a), (b) and (c) must be made available for inspection at the Council's principal office and "such other places within their area as the local planning authority consider appropriate" during normal office hours and published on the Councils website. The venues at which these documents will be available are:

• Number One Market Street, Nelson	Monday / Friday	08:45-16:00
• Nelson Public Library	Monday to Thursday	09:00-18:00
	Friday	09:00-17:00
	Saturday	09:00-16:00
• Colne Public Library <sup>21</sup>	Monday / Wednesday	09:00-19:00
	Thursday / Friday	09:00-17:00
	Tuesday	09:00-13:00
	Saturday	09:00-16:00
• Barnoldswick Public Library <sup>20</sup>	Monday / Thursday / Friday	09:30-17:00
	Tuesday	09:30-13:30
	Wednesday	09:30-19:00
	Saturday	09:30-16:00

<sup>20</sup> Maps reflecting changes to the Proposals Map arising from the proposed allocation of strategic sites for housing and employment are included in the Core Strategy (Pre-Submission Report) – Appendix F.

<sup>21</sup> The opening hours for Colne and Barnoldswick libraries may be revised from the start of 2015. Please check with the library concerned to confirm their opening times.

- 9.3 Written notification about the submission of the Core Strategy and the availability of documents (see above) will be sent to all bodies and persons invited to, or who have, made representations during the preparation of the Core Strategy.
- 9.4 A Schedule of Proposed Modifications will be opened at the start of the examination. This will initially include minor changes recommended by Pendle Council to address typographical errors in the submission document, or any amendments they feel may be necessary arising from comments received in response to the public consultation carried out in accordance with Regulation 19 (i.e. comments on the Core Strategy (Pre-Submission Report)). Any changes (known as Main Modifications) requested by the Inspector will be added to this schedule during the period of the examination and consulted upon as necessary when complete.
- 9.5 The provisional timetable for the examination and subsequent adoption of the Core Strategy is highlighted below, using the timescales from the guidance note issued by the Planning Inspectorate.

**Table 9.1:** Provisional timeline for adoption of the Pendle Core Strategy

Stage	Regulation(s) <sup>1</sup>	Timing
1. Full Council meeting		25 <sup>th</sup> September 2014
2. Publication	19	10 <sup>th</sup> October 2014
3. End of public consultation	20	24 <sup>th</sup> November 2014
4. Submission to the Secretary of State	22	17 <sup>th</sup> December 2014
5. Appointment of Programme Officer	23 / 24	17 <sup>th</sup> December 2014
6. Appointment of Inspector	23 / 24	Week 2
7. Pre-hearing Meeting		Week 8
8. Hearing Sessions		Week 14
9. Draft Inspectors Report issued	25	Week 23
10. Final Inspectors Report issued		Week 29
11. Adoption (Full Council)	26	24 <sup>th</sup> September 2015 (est.)
12. Opportunity to request judicial review		Six weeks from date of adoption

<sup>1</sup> Town and Country Planning (Local Planning) (England) Regulations 2012

- 9.6 In 2015 Pendle Council will commence preparation of Pendle Local Plan (Part 2): Site Allocations and Development Policies, which will identify specific sites for development in line with Core Strategy.

## **Appendix 1**

### List of Consultees

<b>Duty to Cooperate</b>
<b>Localism Act 2011 Section 33(A)(i)(a)</b>
Lancashire County Council <sup>1</sup>
Blackburn-with Darwen Borough Council <sup>2,3</sup>
Blackpool Borough Council <sup>3</sup>
Burnley Borough Council <sup>1,2,3</sup>
Hyndburn Borough Council <sup>2,3</sup>
Rossendale Borough Council <sup>2,3</sup>
Chorley Borough Council <sup>3</sup>
Fylde Borough Council <sup>3</sup>
Lancaster City Council <sup>3</sup>
Preston City Council <sup>3</sup>
Ribble Valley Borough Council <sup>1,2,3</sup>
South Ribble Borough Council <sup>3</sup>
West Lancashire Borough Council <sup>3</sup>
Wyre Borough Council <sup>3</sup>
North Yorkshire County Council <sup>1</sup>
Craven District Council <sup>1</sup>
Calderdale Metropolitan Borough Council <sup>1</sup>
Bradford Metropolitan Borough Council <sup>1</sup>
<b>Localism Act 2011 Section 33(A)(i)(b)</b>
N/A
<b>Localism Act 2011 Section 33(A)(i)(c)</b>
The Environment Agency
Historic Building & Monuments Commission for England <sup>4</sup>
Natural England
Civil Aviation Authority <sup>5</sup>
Homes and Communities Agency
Primary Care Trust <sup>6</sup>
Office of Rail Regulation
Highways Authority <sup>7</sup>
<b>Localism Act 2011 Section 33(A)(9)</b>
Lancashire Local Enterprise Partnership
Lancashire Local Nature Partnership <sup>8</sup>
South Pennines Local Nature Partnership <sup>8</sup>

**Notes:**<sup>1</sup> Neighbouring local authority<sup>2</sup> Pennine Lancashire local authority<sup>3</sup> Lancashire NUTS-14 district<sup>4</sup> English Heritage<sup>5</sup> NATS En-Route PLC6<sup>6</sup> Also NHS England (Lancashire Area Team) and NHS Property Services<sup>7</sup> Lancashire County Council is the Highways Authority for all classified roads (including the M65 motorway) in Pendle<sup>8</sup> Added from 12<sup>th</sup> November 2012 by SI2613

<b>Specific Consultation Bodies</b>
Coal Authority
Environment Agency
Historic Building & Monuments Commission for England <sup>1</sup>
Natural England
Network Rail Infrastructure Ltd.
Highways Agency
Lancashire County Council
North Yorkshire County Council
Pendle Borough Council
Barley-with-Wheatley Booth Parish Council <sup>1</sup>
Barnoldswick Town Council <sup>1</sup>
Barrowford Parish Council <sup>1</sup>
Blacko Parish Council <sup>1</sup>
Bracewell & Brogden Parish Meeting <sup>1</sup>
Brierfield Town Council <sup>1</sup>
Colne Town Council <sup>1</sup>
Earby Town Council <sup>1</sup>
Foulridge Parish Council <sup>1</sup>
Goldshaw Booth Parish Council <sup>1</sup>
Higham-with-West Close Booth Parish Council <sup>1</sup>
Kelbrook & Sough Parish Council <sup>1</sup>
Laneshaw Bridge Parish Council <sup>1</sup>
Nelson Town Council <sup>1</sup>
Old Laund Booth Parish Council <sup>1</sup>
Reedley Hallows Parish Council <sup>1</sup>
Roughlee Parish Council <sup>1</sup>
Trawden Forest Parish Council <sup>1</sup>
Burnley Borough Council
Briercliffe-with-Extwistle Parish Council <sup>2</sup>
Ightenhill Parish Council <sup>2</sup>
Padiham Town Council <sup>2</sup>
Ribble Valley Borough Council
Sabden Parish Council <sup>3</sup>
Downham Parish Meeting <sup>3</sup>
Gisburn Parish Council <sup>3</sup>
Horton Parish Meeting <sup>3</sup>
Rimington & Middop Parish Council <sup>3</sup>
Simonstone Parish Council <sup>3</sup>
Twiston Parish Council <sup>3</sup>
Craven District Council
Cowling Parish Council <sup>4</sup>
Lothersdale Parish Council
Martons Both Parish Meeting <sup>4</sup>
Thornton-in-Craven Parish Council <sup>4</sup>

<i>Worston &amp; Mearley Parish Meeting</i> <sup>4</sup>
<i>Calderdale Metropolitan Borough Council</i>
<i>Wadsworth Parish Council</i> <sup>5</sup>
<i>Bradford Metropolitan Borough Council</i>
<i>Haworth, Cross Roads &amp; Stanbury Parish Council</i> <sup>6</sup>
<i>Oxenhope Parish Council</i> <sup>6</sup>
<i>Lancashire Constabulary</i>
National Grid
British Gas
Electricity North West
Northern Powergrid
Mobile Operators Association (MOA) <sup>7</sup>
British Telecom
Virgin Media Group Ltd.
British Broadcasting Corporation
United Utilities
Yorkshire Water
Canal and River Trust <sup>8</sup>
Homes and Community Agency

**Notes:**

*Organisations shown in italics are classified as ‘relevant authorities’ in the Town & Country Planning (Local Planning) (England) Regulations 2012*

<sup>1</sup> Parish Council in Pendle

<sup>2</sup> Neighbouring Parish Council in Burnley

<sup>3</sup> Neighbouring Parish Council in Ribbles Valley

<sup>4</sup> Neighbouring Parish Council in Craven

<sup>5</sup> Neighbouring Parish Council in Calderdale

<sup>6</sup> Neighbouring Parish Council in Bradford

<sup>7</sup> Mono Consultants (on behalf of the MOA)

<sup>8</sup> Formerly British Waterways

## General Consultation Bodies

4NW*
Accent North West*
Ace Beds
Adlington – Independent Living
ADM Design
Advisory Council for the Education of Romany & Other Travellers (ACERT)*
Age UK Lancashire
Alison Rowland Town Planners Ltd
Alkincoates Woodland Nature Reserve Group
Anchor Trust
Ancient Monuments Society
Andrew Durham RIBA
Argos Retail Group
Arrowsmith Associates
Arts Council England North West
Asda Stores
Ashiana Housing Association*
Asian Business Federation (ABF)*
Asian Christian Fellowship
Asian People's Disability Alliance
Asian Youth Council
Association of Inland Navigation Authorities (AINA)*
Atkins Global
B&Q plc
Barley Methodist Church
Barnfield Construction Ltd
Barnfield Construction Ltd
Barnoldswick & West Craven Chamber of Trade
Barnoldswick Baptist Church Centre
Barnoldswick C of E Primary School
Barnoldswick Independent Methodist Church
Barnoldswick Road Safety Advisory Committee*
Barnoldswick Town Council
Barratt Developments Plc
Barratt Homes
Barrowford County Primary School
Barrowford Parish Plan
Barton Willmore LLP
BE Group
Beck Developments Ltd
Bellway Homes Ltd (Manchester)*
Bennett & Brown Ltd
Bethel Independent Methodist Church
Better Government for Older People*
Blackburn Diocesan Board of Social Responsibility

Blacko County Primary School
Blacko Independent Methodist Church
BME Community (Women)
BNP Paribas Real Estate UK
Booths
Boots Group plc
Bovis Homes Limited
Bradley Community Forum
Bradley County Primary School
Bradley Residents Association
BRE Global
Bridgewater Meeting Room Trust
Brierfield Action in the Community*
Brierfield Baptist Church
Brierfield Environmental Campaign*
Brierfield Jania Sultania Masjid Mosque
Brierfield Methodist Church*
British Geological Survey*
British Sign and Graphics Association*
British Waterways*
British Waterways North West*
Broden Lloyd Estate Agents
BSN Medical Ltd*
BSR Grassroots*
Building Bridges Pendle
Building Research Establishment
Buoyant Upholstery Ltd
Burnley & District Driving Instructors Association
Burnley & Pendle Dial A Bus Service
Burnley, Pendle & Rossendale CVS
Business in the Community North West
Business Link Lancashire*
CA Planning
CABE*
Cable & Wireless Communications*
Campaign for Real Ale
Canal and River Trust
Castercliffe County Primary School
CBRE Ltd
Central Jamia Ghausia Masjid
Central Methodist Church
Chamber of Commerce East Lancashire
Chattan Developments Ltd*
Chris Thomas Ltd
Christ Church CE Primary School
Christ Church Ecumenical Church
Church Commissioners

Citizens Advice Bureau (Nelson)
Civic Voice
Clifford, Smith & Buchanan
Clitheroe Road Residents Association
Coates Lane County Primary School
Cockburn-Price and Carter
Colliers CRE
Colliers International
Colne & Nelson RUFC Ltd
Colne Cycling Campaign
Colne Golf Club
Colne Neighbourhood Action Group*
Colne Team Ministry
Colne Town Centre Forum
Colne Trinity Baptist Church
Combined Heat and Power Association
Comfortable Living Ltd
Commission for Racial Equality*
Community and Advice Centre
Community Futures
Connect Physical Health Centres*
Cott Beverages Ltd (Nelson)
Cottontree Methodist Church, Colne*
Council for British Archaeology
Council for British Archaeology - North West Regional Group*
Country Land & Business Association North
Crownway Homes Ltd*
Cyclists Touring Club
D&H Precast Products
Dalesmoor Homes Ltd*
Dalesview Developments Ltd
David Hill Property Consultants
David Lock Associates
David McLean Homes Ltd*
David Wilson Homes*
De Pol Associates Ltd
Department for the Environment, Food & Rural Affairs (DEFRA)
Department for Transport
Derbyshire Gypsy Liaison Group
Derek Hicks & Thew Architects*
Design Council
Development Planning Partnership (DPP)
Dialogue
Dickens Property Group Ltd
Dickman Associates Ltd

DPDS Consulting Group
Drivers Jonas*
DTZ
Dunlop Heywood*
Dyspraxia Foundation
E.ON UK Renewables
Earby & Salterforth Mount Zion Baptist Church*
Earby Springfield County Primary School
East Lancashire Deaf Society
East Lancashire Building Partnership Ltd
East Lancashire Deafblind Club*
East Lancashire Hospitals NHS Trust*
East Lancashire into Employment
East Lancashire Landlords Association
East Lancashire Training PCT*
East Lancashire Voluntary Sector Resource Centre
Eaves Brook and Pennine Lancashire Housing
EcoDesign
Edith Butler Trust
ELE Advanced Technologies Ltd
ELEVATE East Lancashire*
Ellis Healey Architecture
Emery Planning Partnership Ltd
Enterprise4all
Enville Properties Ltd
Equalities and Human Rights Commission*
Eric Wright Construction
Ericsson Services Ltd (Vodafone)*
Ethnic Minorities Development Association (EMDA)
Ethnic Minority Benevolent Association (EMBA)
Farmhouse Biscuits Ltd
Farming & Wildlife Advisory Group*
Federation of Small Businesses
Fields in Trust
Forest of Bowland AONB
Forestry Commission England
Fort Consultants Ltd
FR Asian Christian Fellowship CGM
FR Central Gospel Mission
FR Church of Nazarene*
FR Crossroads Christian Fellowship*
FR Hebron Hall*
FR Majestic Centre*
FR Nelson Elim*
FR Pendle Community
Frank Marshall & Co
Freight Transport Association

Friends of Bent Head*
Friends of Greenfield LNR
Friends of the Earth
Friends, Families and Travellers
Furnico Ltd
Fusion Online Limited
Garden History Society
Gay FLAG Burnley*
GCG Construction
Georgian Group
Gisburn Road County Primary School
GL Hearn
Gladedale (Central) Ltd
Gospel Mission, Barnoldswick
Government Office for the North West (GONW)*
Grassroots Centre at St Philips
Great Places Housing Association
Green Emmott Trust
Greenfield Residents Association*
GRIP (Architecture) Ltd
Grosvenor & Mable Street Residents Association*
Groundwork Pennine Lancashire
GVA
Gypsy Council for Health Education & Welfare*
Haggate Baptist Church
Halifax Road Area Action Committee
Hard Platt Friends*
Hargreaves Brown & Benson
Harris & Moss Estate Agents*
Harron Homes Ltd
Hate Crime & Diversity Unit
Haydock Developments Ltd
Head Office
Health & Safety Executive
Heap Land Partnership
Help the Aged
Heritage Trust for the North West (HTNW)
Higherford Residents Action Group
HM Prison Service
Hodge House Allotments Association
Holiday Cottages Group Ltd
Holme Park Developments Ltd*
Holy Saviour RC Parish Church
Holy Saviour RC Primary School
Holy Trinity RC Primary School
Home Builders Federation Ltd
Hourigan Connolly

Housing 21 Housing Association
Housing Pendle
HOW Planning LLP
Howorths (Nelson) Ltd
HPDA Ltd
HW Petty & Co Estate Agents
Idara Minhaj-UI-Quran Mosque
Imran Motors
Indigo Planning Limited
Ingham & Keers
Ingham and Yorke
Inland Waterways Association (Manchester Branch)
Integrated Aluminium Components Ltd
Irish Travellers Movement in Britain*
Irwell Valley Housing Association
ITHAAD
IWA Architects
J N Bentley Ltd
J Steel Consulting
Janet Dixon Town Planners Ltd
Jehovah's Witnesses*
Jinnah Community Development Trust*
JMP Consulting
JMU Access Partnership
Job Centre Plus
John Pallister Limited
Jones Day
Jones Lang Lasalle
Junction Properties Ltd
JWPC Ltd
K & R Ingham
Kate Smyth
Kelbrook County Primary School
Keyland Developments Limited
Knight Frank LLP
L & P Springs UK Ltd
Lambert Smith Hampton*
Lancashire & Blackpool Tourist Board*
Lancashire Black & Minority Ethnic PACT
Lancashire Branch of CPRE
Lancashire Care
Lancashire Care Foundation Trust
Lancashire Community Recycling Network
Lancashire Council of Mosques
Lancashire County Developments Ltd
Lancashire Economic Partnership*
Lancashire Fire & Rescue Service

Lancashire Fire and Rescue Service
Lancashire Friend*
Lancashire Partnership*
Lancashire Rural Steering Group*
Lancashire Telegraph
Lancashire Wide Network for Minority Ethnic Women
Lancashire Youth & Community Services
Laneshaw Bridge County Primary School
LBS Group
Lea, Hough and Co
Leader Times Newspapers
Lee Evans Planning
Leeds & Yorkshire Housing Association
Let's Walk & Talk
Liberata Property Services
Lidgett & Beyond Group
Lidl UK GmbH
Little & Co Development Services Ltd
Little Marsden
Living Hope
Lomeshaye County Primary School
Lord Street County Primary School
Lovell Partnership Ltd
Madina Masjid Mosque
Manor Kingdom*
Manthorpe Developments (UK) Ltd
Marketing Lancashire
Maro Developments Limited*
Marsden Community Primary School
Marsden Heights Community College
Marsden Resource Centre
Matthews & Goodman
McCarthy & Stone Developments Ltd*
Member of Parliament
MENCAP
Michael Jackson Associates Ltd Chartered Architects
Mid Pennine Arts
Millennium Volunteers
Miller Homes Limited
Miller Homes Limited - Yorkshire
Ministry of Defence Safeguarding
Morbaine Ltd
Morris Homes (North) Ltd
Mosaic Town Planning
Motorcycle Action Group
Mount Pleasant Methodist Church, Brierfield
Muir Group Housing Association Ltd



Nathaniel Lichfield & Partners
National Farmers Union
National Federation of Builders
National Federation of Gypsy Liaison Groups
National Federation of the Blind of the United Kingdom
National House Building Council (NHBC)
National Offender Management Service (NOMS)*
National Travellers Action Group*
National Trust
Natural Economy Northwest*
Neerock Ltd
Neil Sharpe Property Services*
NEL Construction Limited*
Nelson & Colne College
Nelson Baptist Church
Nelson Independent Methodist Church
Nelson Job Centre Plus
Nelson Neighbourhood Action Group*
Nelson Probation Service
Nelson Town Centre Partnership
Nelson Youth Centre – The Zone
New Era Enterprises Ltd
NJL Consulting
Nolan Redshaw
North West Aerospace Alliance
North West Development Agency (NWDA)*
North West Environment Link*
North West Planning Aid*
North West Regional Assembly (NWRA)*
North West Regional Leaders Board*
North Yorkshire Business & Education Partnership (NYBEP)
Northern Blue Buses*
Northern Powergrid
Northern Rail Ltd
Northern Technologies / Pendle Training*
Northern Trust
Noyna Holdings
npower Renewables
NR Automatics
Orange*
P & H Castings
Park County Primary School
Park High School
Part Grains Barn Farm
PAUL and Company (Chartered Surveyors)*
Paul Butler Associates

Peacock & Smith
Peel Holdings (Land & Property) Ltd
Peel Investments (North) Ltd
Pendle Angling Agency
Pendle Civic Trust
Pendle Community Mental Health Team
Pendle Community Network (PCN)*
Pendle Constituency Labour Party
Pendle CPRE
Pendle Disability Forum
Pendle Enterprise Trust
Pendle Environmental Network (PEN)*
Pendle Friends of the Earth
Pendle Learning Network*
Pendle Leisure Trust
Pendle Leisure Trust
Pendle Multi-Agency Problem Solving Team
Pendle Pakistani Welfare Association (PPWA)*
Pendle Partnership
Pendle Residents Against Insensitive Siting of Masts (PRISM)
Pendle Vale College
Pendle Vision Board
Pendle Voice - Talking Newspaper
Pendle Womens Centre
Pendle Womens Forum
Pendle Youth Council
Pennine Motor Services*
Pennine Paths Preservation Society
Persimmon Homes Lancashire
Persimmon plc
Peter Birtwistle Trust
Phoenix Lettings*
Pinsent Masons*
PLACE Joint Committee
Planning Potential
Planware Ltd
Play England*
Plot of Gold*
Polis Real Estate
Preston & Western Lancashire Racial Equality Council
Primet County Primary School
Primet High School
Prince's Trust*
Profile Design LLP
Protec Fire Detection plc
Providence Independent Methodist Church Secretary

PWA Planning
R Soper Ltd
Rainbows, Brownies and Guides
Ramblers Association
Rapleys LLP
Real Estate Residential Lettings Ltd
Reedley County Primary School
Regenerate Pennine Lancashire
Regional Offender Manager's Office - North West*
REMADE
RenewableUK
Richard Stirrup Associates Ltd*
Riverside ECHG
Riverside Mills Developments Ltd
Rizwan Motors
Road Haulage Association
Rollinson Planning Consultancy Ltd
Rolls-Royce plc
Roughlee C of E Primary School
Royal Mail Group plc
Royal Mail Property Holdings
Royal National Institute for Deaf People (RNID)*
Royal National Institute of the Blind (RNIB)
RPS Group*
RSPB
RSPB Northern England Region
Rural Futures (North West)
Rural Solutions Consulting Ltd
Russell Homes UK Ltd
Sacred Heart RC Church
Sacred Heart RC Primary School
Sainsbury's
Sally Harrison Estate Agents
Salterforth County Primary School
Salvation Army*
Sanderson Weatherall LLP
Scouts and Venture Scouts (Pendle)
SDS Land Ltd
SGH Martineau LLP
Shelter
Silentnight Group Ltd
Simpsons Furniture
Skills Funding Agency
Skipton East Lancashire Rail Action Partnership (SELRAP)
Smith Planning Consultancy
Society for the Protection of Ancient Buildings
Somerfield Stores*

South Yorkshire Housing Association
Southfield Methodist Chapel, Nelson
Space New Living
Sport England North West
St Andrews Methodist Church, Higherford*
St Andrews Methodist Church, Nelson*
St Anne's CE Church, Fence
St John Fisher & Thomas More RC High School
St John Southworth RC Primary School
St John's CE Primary School
St John's CE Church, Higham
St John's CE Church, Nelson*
St Johns CE Primary School
St John's Methodist Church, Colne
St John's Southworth RC Church
St Joseph's RC Primary School
St Luke's CE Church, Brierfield
St Mary CE Church, Newchurch
St Mary-le-Ghyll CE Church, Barnoldswick*
St Mary's CE Church, Kelbrook*
St Mary's CE Church, Trawden
St Mary's CE Primary School
St Michael & All Angels CE Primary School
St Michael's CE Church, Bracewell*
St Pauls CE Primary School
St Peter's Methodist Church, Nelson
St Philip's CE Church, Nelson*
St Phillips CE Primary School
St Thomas CE Church, Barrowford
St Thomas's CE Primary School
St Vincent's Housing Association Ltd
Steven Abbott Associates
Stewart Ross Associates
Storeys: SSP*
Strutt & Parker*
Sue Organ Planning
Support the East Lancashire Line Association (STELLA)*
Sustainability Northwest*
Taxi Operators Association
Tay Homes (NW) Ltd*
Taylforth Estate Agents
Taylor Wimpey Manchester
Taylor Wimpey Strategic Land
Taylor Wimpey UK Limited
Taylor Young
Tesco Stores Ltd
The Beacon Childrens Centre

The Co-operative Group Ltd
The Drawing Board (UK) Ltd
The Good Shepard RC Parish Church
The Inghamite Church, Wheatley Lane
The Lawn Tennis Association
The National Federation of Gypsy Liaison Groups
The Planning and Development Network
The Planning Bureau Limited*
The Regenda Group
The Showmens Guild
The Theatres Trust
The Woodland Trust
Tiger Taxi
Traffic Commissioners
Transdev Burnley & Pendle Ltd
Traveller Law Reform Project
Trawden Community Group
Trawden Forest County Primary School
Tribal Planning*
Trojan Plant Services Ltd
Trustees Green Emmott Trust
Tum Hill Residents Group
Turley Associates
Twentieth Century Society
Twin Valley Homes
Tyrer Tours Ltd
UK Islamic Mission*
United Utilities Property Services
URC Nelson
URS Infrastructure & Environment
Vernon & Co
Victorian Society
Vivien Green Ltd
W & F Developments Ltd
Walsingham Planning
Walter Street Primary School
Walton & Co
Walton High School
Walton Lane Children's Centre
Walverden Primary School
Wardle Storeys (Earby) Ltd
Waterside Action Group
Waterside Community Network*
Welcome To Yorkshire
West Craven High Technology College
West Craven Together (WCT)*
West Street Community Primary School

Weston EU Ltd
Wheatley Lane Methodist School
Whitakers Lettings
Whitefield Conservation Area Action Group
Whitefield Infant School and Nursery Unit
Wildlife Trust for Lancashire, Manchester and North Merseyside
Wilkinson Hardware Stores Ltd
Windle Beech Winthrop
Wm Morrison Supermarkets plc
Yorkshire Forward*
Youth and Community Service

**Notes:**

\* Organisations not contacted at Pre-Submission stage (Regulation 19) because they either no longer exist, or a request was received to remove them from the Council's database.

**Other Interested Parties**

A large number of local residents and other individuals have participated in the preparation of the Pendle Core Strategy. These are summarised below:

**Active – 1,019**

- 629 are contacted by post
- 390 are contacted by email and/or post

**Inactive – 211**

- These records have been de-activated following a refresh of the Council's database, or a specific request from the individual concerned.



## **Appendix 2**

### Summary of Publicity

Deposit Locations	Stage	
BARNOLDSWICK	18	19
• Council Shop	✓	✓
• <b>Public Library</b>	✓	✓
BARROWFORD	18	19
• Public Library	✓	✓
BRIERFIELD	18	19
• Town Hall / Council Shop <sup>1,2</sup>	✓	
• Public Library	✓	✓
COLNE	18	19
• Town Hall	✓	✓
• <b>Public Library</b>	✓	✓
EARBY	18	19
• Council Shop	✓	✓
• Public Library	✓	✓
NELSON	18	19
• <b>Town Hall</b> <sup>1</sup>	✓	
• <b>Number One Market Street</b>	✓	✓
• <b>Public Library</b>	✓	✓
OTHER	18	19
• Mobile Library	✓	✓
• Trawden Public Library	✓	✓
• Wheatley Lane Public Library	✓	✓

**Notes:**

Locations where ALL documents are normally available, shown in **bold**

<sup>1</sup> Facility no longer available

<sup>2</sup> Facility used for public consultation at the Publication stage, but not for the Pre-Submission public consultation (Reg. 19)

Display Locations <sup>3</sup>	Stage	
BARNOLDSWICK	18	19
Barnoldswick Town Council	✓	✓
The New Surgery, Barnoldswick	✓	✓
West Craven Sports Centre, Barnoldswick	✓	✓
BARROWFORD	18	19
Barrowford Parish Council	✓	✓
Barrowford Surgery	✓	✓
Barrowford Youth & Community Centre	✓	
BRIERFIELD	18	19
Brierfield Town Council	✓	✓
Brierfield Youth & Community Centre	✓	
Reedley Hallows Parish Council	✓	✓
The Health Centre, Brierfield	✓	✓

COLNE	18	19
Colne Corner Surgery	✓	✓
Colne Health Centre	✓	✓
Colne Town Council	✓	✓
Pendle Leisure Centre, Colne	✓	✓
The Muni Theatre, Colne	✓	✓
EARBY	18	19
Earby Parish Council	✓	✓
Earby Youth & Community Centre	✓	
The Surgery, Earby	✓	✓
NELSON	18	19
Bizspace	✓	
Marsden Park Golf Course	✓	✓
Nelson Town Council	✓	✓
Nelson Youth & Community Centre <sup>2</sup>	✓	
Pendle Innovation Centre	✓	
Pendle Wavelengths	✓	✓
Seedhill Athletics & Fitness Centre	✓	✓
Silverman Hall <sup>1</sup>	✓	
The Innovation Centre	✓	
Training 2000	✓	
Yarnspinners Health Centre	✓	✓
Whitefield Project	✓	
OTHER	18	19
Barley-with-Wheatley Booth Parish Council	✓	✓
Blacko Parish Council	✓	✓
Bracewell & Brogden Parish Meeting	✓	✓
Foulridge Parish Council	✓	✓
Goldshaw Booth Parish Council	✓	✓
Harambee Surgery, Trawden	✓	✓
Higham-with-West Close Booth Parish Cn	✓	✓
Kelbrook & Sough Parish Council	✓	✓
Laneshaw Bridge Parish council	✓	✓
Old Laund Booth Parish Council	✓	✓
Roughlee Parish Council	✓	✓
Salterforth Parish Council	✓	✓
Trawden Forest Parish Council	✓	✓

**Notes:**

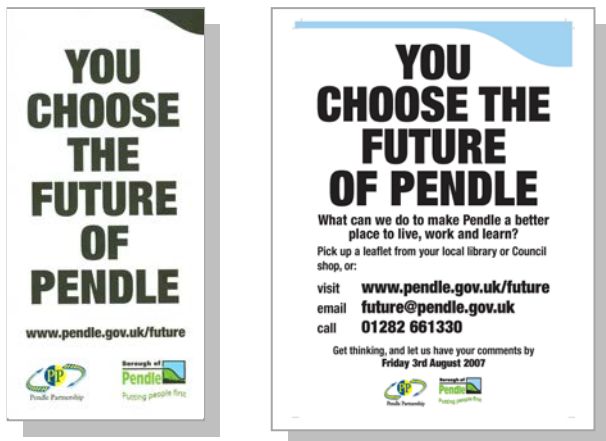
All locations are sent a small selection of leaflets/newsletters and an A4/A3 poster for display in their reception area, waiting room, foyer or parish notice board.

<sup>1</sup> Facility no longer available

<sup>2</sup> Relocated and re-branded as The Zone in 2011

<sup>3</sup> Local schools and colleges (44 in total) were also used at the You Choose, Issues & Options and Preferred Options stages.

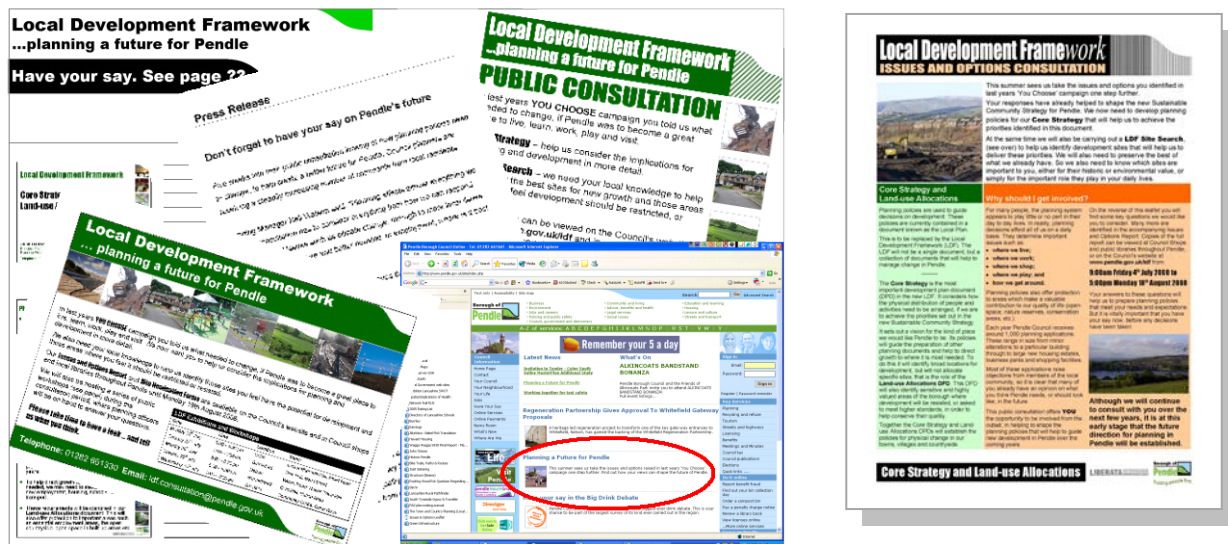
## You Choose



A selection of the leaflets, posters and web-coverage used to generate publicity for the Core Strategy and any associated events.

Full details of any media coverage known to have been generated, is contained in the main body of the report.

## Issues and Options



## Preferred Options

**Have your say on the future of Pendle**  
Pendle Core Strategy  
Preferred Options Report

**Public Consultation**  
28<sup>th</sup> October – 12<sup>th</sup> December 2011

Further Information:  
www.pendle.gov.uk/corestrategy  
info@pendle.gov.uk  
01282 661330  
Planning & Building Control, Town Hall, Market Street, Nelson BB9 7LG

### Pendle Core Strategy

Have your say on the future of Pendle

**Public Consultation: Friday 28<sup>th</sup> October – Monday 12<sup>th</sup> December 2011**

The Core Strategy is one of the most important documents produced by Pendle Council. It will influence how the borough changes in the years to come.

Planning officers will use the Core Strategy on a daily basis to help them decide if proposals for new development make a positive contribution to our vision for the future of Pendle.

This is your chance to consider the approach we propose to take and tell us what you think. Have we got things just about right? Are there fundamental issues still to be resolved?

Copies of our draft Core Strategy and all supporting documents can be viewed or downloaded from the Council's website at:  
[www.pendle.gov.uk/corestrategy](http://www.pendle.gov.uk/corestrategy)

Reference copies of these documents are available at Number One Market Street in Nelson and the main libraries in Nelson, Colne and Barnoldswick.

Summary information and representation forms are also available from your local library or Council Shop.

A permanent exhibition will be on display at Number One Market Street in Nelson, during the six-week public consultation. Planning officers will also be visiting various locations throughout Pendle (see below).

Date	Time	Location	Venue
Friday 4 November	10:00-16:00	Nelson	Number One Market Street
Tuesday 8 November	10:00-12:30	Colne	Colne Market Car Park *
Tuesday 8 November	14:00-18:00	Colne	Lower Muni
Thursday 10 November	16:00-18:00	Barnoldswick	Rainhall Hall
Tuesday 15 November	12:00-14:00	Fence	Village Hall
Tuesday 15 November	16:30-18:30	Burford	Community Centre
Wednesday 16 November	17:00-19:00	Barley	Village Hall
Thursday 17 November	14:00-16:00	Trawden	Community Centre
Friday 18 November	14:00-16:00	Kelbrook	Kelbrook Village Hall
Monday 28 November	10:00-12:30	Salterforth	Silentsight Car Park *
Tuesday 29 November	10:00-12:30	Higham	Four Ales Inn *
Wednesday 7 December	14:00-16:00	Foulridge	Hare & Hounds *
Thursday 8 December	10:00-12:30	Barrowford	Homesfield House *
Thursday 8 December	14:00-16:00	Earby	New Road Community Centre *
Friday 9 December	10:00-12:30	Laneshaw Br.	Emmott Arms Car Park *

\* These events will be hosted in STAN the Van

Tel: 01282 661330 Email: [info@pendle.gov.uk](mailto:info@pendle.gov.uk)

## Publication

**Have we got it right?**  
**Public Consultation**  
**on the 'soundness' of the**  
**CORE STRATEGY**  
**PUBLICATION REPORT**



**Start: 9:00am Friday 19<sup>th</sup> October 2012**  
**Close: 5:00pm Monday 3<sup>rd</sup> December 2012**

**Documents are available on the Council's website and at local libraries and council shops throughout Pendle**

Planning & Building Control, Town Hall, Market Street, Nelson, BB9 7LG  
01282 661330  
ldf@pendle.gov.uk  
www.pendle.gov.uk/corestrategy

**Framework**

**Welcome to the 22<sup>nd</sup> edition of Framework, the newsletter that keeps you up to date on emerging planning policy here in Pendle.**

We are pleased to announce that we will publish what is considered to be the final version of our Core Strategy for a six-week public consultation on Friday 19<sup>th</sup> October 2012.

This consultation will allow you to indicate to the Secretary of State, and the Inspector appointed to carry out the independent examination of the Core Strategy, your views on the proposed Core Strategy. The consultation period will last for 10 weeks, ending on Monday 3<sup>rd</sup> December 2012.

Details of how you can view the consultation documents and submit your comments are included in this newsletter and on the Council's website.

**Core Strategy**  
**Public Consultation**

The Council will then go ahead with the proposed changes to the Core Strategy, subject to the approval of the Secretary of State. The Council will then go ahead with the proposed changes to the Core Strategy, subject to the approval of the Secretary of State.

**Public Consultation**

The purpose of this consultation is to allow you to indicate to the Secretary of State, and the Inspector appointed to carry out the independent examination of the Core Strategy, your views on the proposed Core Strategy. The consultation period will last for 10 weeks, ending on Monday 3<sup>rd</sup> December 2012.

**Issue 22: October 2012**

**Framework**

**Welcome to the 24<sup>th</sup> edition of Framework, the newsletter that keeps you up to date on emerging planning policy here in Pendle.**

This edition is shorter than usual as it deals with one important issue. Following the recent six-week public consultation on the Core Strategy (Publication Report) it was clear that the summary of a key document affecting our residents had to be changed or amended before the Core Strategy could be submitted to the Secretary of State.

After a period of consultation of the relevant documents, Pendle Council has concluded that it must update the Core Strategy Housing Strategy (HS) and the Core Strategy Land Use (LS), which were also updated in 2008. The Core Strategy will then be resubmitted in light of this new information and re-published in summer 2013.

**Core Strategy Consultation**

The Council will then go ahead with the proposed changes to the Core Strategy, subject to the approval of the Secretary of State. The Council will then go ahead with the proposed changes to the Core Strategy, subject to the approval of the Secretary of State.

**Public Consultation**

The purpose of this consultation is to allow you to indicate to the Secretary of State, and the Inspector appointed to carry out the independent examination of the Core Strategy, your views on the proposed Core Strategy. The consultation period will last for 10 weeks, ending on Monday 3<sup>rd</sup> December 2012.

**Issue 24: January 2013**

## Further Options

**Have your say** on the future of Pendle

**Pendle Core Strategy**

**Public Consultation: Friday 10<sup>th</sup> January to Friday 21<sup>st</sup> February 2014**

**What is the Core Strategy?**

The Core Strategy is one of the most important documents produced by Pendle Council and will influence how the borough changes in the years to come.

This consultation is your chance to tell us what you think about a new housing delivery target, a revised employment land requirement and the proposed allocation of two strategic development sites for housing and employment.

Have we got things just about right? Are there issues we still need to resolve? Do you favour a different approach?

**How can I take part in the consultation?**

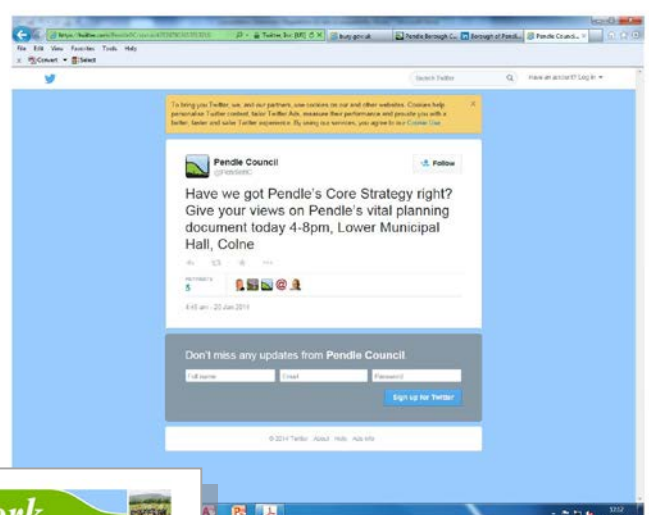
Copies of the Core Strategy (Further Options Report) and all supporting documents can be viewed or downloaded from the Council's website at: [www.pendle.gov.uk/corestrategy](http://www.pendle.gov.uk/corestrategy)

Reference copies of these documents are available at Number One Market Street in Nelson and the main libraries in Nelson, Colne and Barnoldswick. Summary information and representation forms for your comments are also available from your local library or Council Shop.

Display boards will be on show at Number One Market Street in Nelson, throughout the six-week public consultation. Planning officers will also be available to answer your questions at the following venues during the consultation period:

Date	Time	Location	Venue
Monday 20 <sup>th</sup> January	10:00-20:00	Colne	Lower Municipal Hall
Tuesday 21 <sup>st</sup> January	10:00-20:00	Barnoldswick	Railhall Centre
Wednesday 22 <sup>nd</sup> January	10:00-20:00	Barnoldswick	Holmfild House
Thursday 23 <sup>rd</sup> January	10:00-20:00	Nelson	Town Hall Reception
Tuesday 17 <sup>th</sup> February	10:00-18:00	Nelson	Town Hall Reception

Tel: 01282 661330 Email: [ldf@pendle.gov.uk](mailto:ldf@pendle.gov.uk)



Twitter post from Pendle Council (@PendleCouncil) dated 22 Jan 2014. The tweet says: "Have we got Pendle's Core Strategy right? Give your views on Pendle's vital planning document today 4-8pm, Lower Municipal Hall, Colne".

**Framework**

**Welcome to the 27<sup>th</sup> edition of Framework, the newsletter that keeps you up to date on emerging planning policy here in Pendle.**

The purpose of this issue of Framework is to tell you about the six-week public consultation on the Core Strategy (Further Options Report).

While a large proportion of this document remains the same as the previous version of the Core Strategy, a new public consultation is necessary as there are some significant changes, notably a new housing delivery target, a new employment land requirement and the allocation of two strategic sites.

This consultation gives you a chance to tell us what you think about these changes. It also provides you with an opportunity to comment on the overall approach we propose to use to guide development and growth in Pendle over the next 15 years.

**Core Strategy**  
**Public Consultation**

The Council will then go ahead with the proposed changes to the Core Strategy, subject to the approval of the Secretary of State. The Council will then go ahead with the proposed changes to the Core Strategy, subject to the approval of the Secretary of State.

**Public Consultation**

The purpose of this consultation is to allow you to indicate to the Secretary of State, and the Inspector appointed to carry out the independent examination of the Core Strategy, your views on the proposed Core Strategy. The consultation period will last for 10 weeks, ending on Monday 3<sup>rd</sup> December 2012.

**Issue 27: January 2014**



## Pre-Submission

**Pendle Core Strategy**

**Public Consultation**

**Friday 10th October to Monday 24th November 2014**

**What is the Core Strategy?**

The Core Strategy is the most important planning document produced by Pendle Council. It will influence how the borough changes in the years to come, setting out how much development is needed and broadly where this should be located.

This consultation is your first chance to tell us if you think we got things just about right.

**How can I take part in the consultation?**

Copies of the Core Strategy and all supporting documents can be viewed or downloaded from the Council's website at: [www.pendle.gov.uk/corestrategy](http://www.pendle.gov.uk/corestrategy)

Reference copies are available at Number One Market Street in Nelson and the main libraries in Nelson, Colne and Barnoldswick. Summary information and representation forms for your comments are available from all Public Libraries and Council Shops.

**Tel: 01282 661330  
Email: [ldf@pendle.gov.uk](mailto:ldf@pendle.gov.uk)**

**Framework**

Welcome to the 30<sup>th</sup> edition of Framework, the newsletter that keeps you up to date on emerging planning policy here in Pendle. We are pleased to announce that on Friday 10<sup>th</sup> October 2014, Pendle Council will publish what is considered to be the final version of the Core Strategy for a six week public consultation.

The consultation allows you to indicate to the Inspector appointed to conduct an independent examination of the Core Strategy, whether you agree that it represents the most appropriate way to promote sustainable development in the borough over the next 15 years.

Details of how you can view the consultation documents and submit your comments are included in this newsletter and on the Council's website.

**Core Strategy Public Consultation**

At a Council meeting on Thursday 27<sup>th</sup> September 2014, Councillors agreed to send the Pendle Core Strategy to the Secretary of State for examination. Following a six week public consultation, the consultation will be held in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

**Public Consultation**

The six week consultation period will run from Friday 10<sup>th</sup> October to Monday 24<sup>th</sup> November 2014.

As the Pre-Submission Report recently went to consultation, we are now in a position to submit the final version of the Pendle Core Strategy to the Secretary of State for examination. The purpose of this consultation is to allow you a final opportunity to comment on whether you consider that all legal and procedural requirements have been met and the council has drawn up a sound strategy. Comments can be submitted (using the official representation form where possible) on-line via the consultation portal, by email to [ldf@pendle.gov.uk](mailto:ldf@pendle.gov.uk) or by post to Planning and Building Council, Pendle Borough Council, Town Hall, Market Street, Nelson, BB9 7LG.

After the consultation has closed, the council will submit the relevant documents to the Secretary of State, who will appoint a planning inspector to hold an examination in public to determine whether the plan is sound. This is expected in the spring of next year, with the aim being to adopt the strategy in September. The provision of land for housing and employment are the two chief strands of the strategy.

Here, in the first of two special reports, we look at what the strategy says about housing.

**ISSUE 30 - OCTOBER 2014**

## Core Strategy Special Report

## Have your say on the future

By ANDREW SPENCER  
[andrew.spencer@pendle.gov.uk](mailto:andrew.spencer@pendle.gov.uk)  
@andrewspencer

People in Pendle have just 24 days left to comment on Pendle Council's core strategy – the key development plan document that will form part of the new local plan for the borough. It will set out the strategic planning policies the council will

use to help guide development to the most sustainable places over the 15-year period between 2015 and 2030. Specifically, it will establish:

- A settlement hierarchy and show how new development should be distributed across Pendle.
- How many new homes should be built in different parts of Pendle.
- How much employment land should be developed.

A broad framework for the protection and enhancement of our natural and historic environments. The public consultation on the strategy's pre-submission report will run until 5pm on Monday, November 24th. Representations must be received before the deadline to be valid. All the consultation documents can be viewed via [www.pendle.gov.uk/corestrategy](http://www.pendle.gov.uk/corestrategy). Reference copies are avail-

able at Number One Market Street in Nelson and the main libraries in Nelson, Colne and Barnoldswick. Summary information and representation forms for your comments are available from all Public Libraries and Council Shops. The purpose of this consultation is to allow you a final opportunity to comment on whether you consider that all legal and procedural requirements have been met and the

council has drawn up a sound strategy. Comments can be submitted (using the official representation form where possible) on-line via the consultation portal, by email to [ldf@pendle.gov.uk](mailto:ldf@pendle.gov.uk) or by post to Planning and Building Council, Pendle Borough Council, Town Hall, Market Street, Nelson, BB9 7LG.

After the consultation has closed, the council will submit the relevant documents to the Secretary of State, who will appoint a planning inspector to hold an examination in public to determine whether the plan is sound. This is expected in the spring of next year, with the aim being to adopt the strategy in September. The provision of land for housing and employment are the two chief strands of the strategy.

## 300 new homes a year needed until 2030

Pendle will have to build almost 300 new homes every year between now and 2030. That will mean increased focus on sites which Pendle Council has sought to protect from development over the last quarter-of-a-century but which it has had to include on a list of potential sites to avoid developers having a free rein to submit applications which it would not be able to prevent going ahead.

The list – known as the Strategic Housing Land Availability Assessment – includes sites such as the Lidgett Triangle in Colne, for years targeted by developers and which residents have successfully fought a number of campaigns to retain a 'green lung' in the northern end of the town, and the land at Gib Hill between Nelson and Colne which has seen a similar long-running fight to keep the land free from development. In



Site at Little Tom's Farm, Brierfield, the biggest site being considered

total, 20 sites across Pendle which could hold more than 100 new homes are identified in the strategy. The strategy says that the delivery of new housing will require the use of both brown field and green field land. "In order to aid the regeneration of the inner urban areas, brown field sites should be used in the first instance. "However, it is acknowledged that the financial viability of developing such sites can be challenging and to ensure that the delivery targets are

achieved in the early periods of the plan, some green field development will be required. "Furthermore, analysis of sites contained in the SHLAA show that there are not sufficient brown field sites to enable the delivery of the full housing requirement. It will therefore be necessary to allow the release of some green field sites in order to meet the housing needs of the borough during the plan period. "The delivery of housing has fluctuated in Pendle over the last decade. During the

period before the onset of the recession in 2007/08, completions were running at a consistent figure above 250 gross units per annum. A large proportion of this development was achieved on previously developed land.

"Delivery since 2008 has been lower than the annual requirement of 190 dwellings per annum in terms of both gross and net completions.

"The number of units required to meet the objectively assessed need for the borough has increased from 190 units per annum as set out in the now revoked Regional Spatial Strategy for the North West to 296 units per annum.

"There is a need for 40% of the total housing for the borough to be affordable housing. "In many of the inner urban areas, the current low values are currently low. Developing sites that are viable in the quantities that are needed

## Sites capable of holding 100 or more new homes

- Land off Kellbrook Road, Barnoldswick – 120 units.
- Land off Colne Road, Barnoldswick – 170 units.
- Stoney Bank Road, Earby – 208 units.
- Lidgett Triangle, Colne – 100 units.
- Leaches Road/Knots Lane, Colne – 168 units.
- Former Brierfield wastewater treatment works – 105 units.
- Little Tom's Farm, Brierfield – 455 units.
- Walk Mill, Colne – 207 units.
- Spring Gardens Mill, Colne – 100 units.

- Gib Hill, Nelson – 211 units.
- Windermere Avenue, Colne – 105 units.
- Land between Skipton Old Road and Castle Road, Colne – 282 units.
- Land to the rear of St Thomas's School, Barrowford – 197 units.
- Land at Trough Laith Lane, Barrowford – 481 units.
- Knotts Drive and former railway sidings, Colne – 212 units.
- Roodford Mill, Nelson – 134 units.
- Former James Nelson's sports ground, Nelson – 108 units.

to deliver the housing requirement is a fundamental issue to the delivery of the plan." The strategy says that

through the SHLAA review process, a number of additional sites, that were not previously considered, have been assessed to determine

**Andi Hanson**  
DESIGNER CLOTHES

**Mon 3rd to Sat 8th November**

**AUTUMN PROMOTION**

**WITH 25% TO 50% OFF BIG NAMES INCLUDING**

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TEL: 01943 816989

**Park Primary School**  
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Thursday 6th November  
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Tel: 01282 863225  
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## Why Pendle needs to have a core strategy

Pendle Council leader Coun. Joe Conney explains what the core strategy is all about. Pendle is a unique and special place: attractive, diverse, yet constantly changing. We care about our community, so it is important that we recognise the challenges that the future holds, and that we plan for those changes. We live in an age where rapid advances in technology are changing how we communicate, the way we shop, where and how we work and the life choices we make. We are living longer too and have higher expectations for a future where we expect to enjoy good health and greater prosperity.

We must direct future growth to the right locations and carefully manage regeneration activity. We need to provide guidance so that new development benefits those people who live and work in our towns and villages, whilst continuing to protect and enhance those assets that make the area both attractive and locally distinctive. In doing so we must carefully consider the social, economic and environmental impacts of our actions. Only in this way can we hope to realise our vision of making Pendle a better place to live, work, learn, play and visit.



### **Appendix 3**

#### Summary of Public Consultations

## You Choose the Future of Pendle

### The Town and Country Planning (Local Development) (England) Regulations 2004

- Regulation 25

#### Dates of consultation

- 22<sup>nd</sup> June to 3<sup>rd</sup> August 2007

#### Summary of organisations/individuals contacted

- Pendle Council – LDF database (specific, general and other consultees)..... 307
- Pendle Partnership – LSP database ..... 200
- Staff at Pendle Council, Pendle Leisure Trust, Liberata and Housing Pendle ..... 1,150
- Members of Pendle Citizens Panel ..... 1,350
- Schools and Colleges ..... 44
- Invitations to attend LDF Workshops ..... 247
- Invitations to attend SCS Workshops..... n/a

#### Number of organisations/individuals submitting representations

- Written representations ..... 266
- Attendees at LDF Working Groups ..... 112
- Attendees at SCS Working Groups ..... 77
- **Total** ..... **455**

#### Number of individual comments within representations

- Via written representations ..... 903
- Via LDF Working Groups ..... 285
- Via SCS Working Groups ..... 135
- **Total** ..... **1,323**

#### Where can I find a summary of the issues raised?

- Issues & Options Consultation Statement (Pendle Council, June 2008)

#### How have the main issues been addressed in the DPD?

- Issues & Options Consultation Statement (Pendle Council, June 2008)

## Pendle Core Strategy (Issues and Options Report)

### The Town and Country Planning (Local Planning) (England) Regulations 2004

- Regulation 25

### Dates of consultation

- 4<sup>th</sup> July to 18<sup>th</sup> August 2008

### Summary of organisations/individuals contacted

- LDF and LSP databases (specific consultees) ..... 77
- LDF and LSP databases (general and other consultees) ..... 672
- Pendle Council – Company, town centres and tourism databases ..... 1,168
- Pendle Council website (registered users)..... 805
- Pendle Council, Pendle Leisure Trust and Liberata (members of staff) ..... 1,020
- Pendle Citizens Panel (members) ..... 1,153
- Local Councillors ..... 49
- Schools and Colleges ..... 44

### Number of organisations/individuals submitting representations

- Written representations ..... 58
- Attendance at LDF Workshops ..... 71
- **Total** ..... **129**

### Number of individual comments within representations

- Via written representations ..... 1,171
- Via LDF workshops ..... 1,630
- **Total** ..... **2,801**

### Where can I find a summary of the issues raised?

- Issues & Options Consultation Summary of Responses (Pendle Council, December 2008)
- Preferred Options Consultation Statement (Pendle Council, September 2011) – Appendix 5

### How have the main issues been addressed in the DPD?

- Preferred Options Consultation Statement (Pendle Council, September 2011) – Appendix 5

## Pendle Core Strategy (Preferred Options Report)

### The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2008

- Regulation 25

#### Dates of consultation

- 28<sup>th</sup> October to 12<sup>th</sup> December 2011

#### Summary of organisations/individuals contacted

- Pendle Council – Planning Policy database (specific consultees) ..... 78
- Pendle Council – Planning Policy database (general and other consultees) ..... 1,604
- Pendle Partnership – LSP and Vision Board databases..... 175
- Pendle Council – Company, town centres and tourism databases ..... 457
- Pendle Council website (registered users)..... 1,834
- Pendle Council Facebook friends ..... 887
- Pendle Council Twitter followers ..... 1,259
- Pendle Citizens Panel (members) and Feedb@ck Online (registered users) ..... 495
- Pendle Council, Pendle Leisure Trust and Liberata (members of staff) ..... 784
- Local Councillors ..... 49
- Schools and Colleges ..... 44

#### Number of organisations/individuals submitting representations

- Written representations (letter) ..... 246
- Written representations (email / online) ..... 246
- **Total** ..... 246

#### Number of individual comments within representations

- **Total** ..... 1,118

#### Where can I find a summary of the issues raised?

- Publication Report Consultation Statement (Pendle Council, August 2012) – Appendix 6

#### How have the main issues been addressed in the DPD?

- Publication Report Consultation Statement (Pendle Council, August 2012) – Appendix 7

## Pendle Core Strategy (Publication Report)

### The Town and Country Planning (Local Planning) (England) Regulations 2012

- Regulation 19

### Dates of consultation

- 19<sup>th</sup> October to 3<sup>rd</sup> December 2012

### Summary of organisations/individuals contacted

- Pendle Council – Planning Policy database (via letter) ..... 692
- Pendle Council – Planning Policy database (via email) ..... 916
- Pendle Partnership – LSP database and Vision Board ..... 175
- Pendle Council – Company, town centres and tourism databases ..... 475
- Pendle Council website (registered users) ..... Not known
- Pendle Council Facebook ‘likes’ ..... 1,439
- Pendle Council Twitter followers ..... 2,459
- Pendle Council, Pendle Leisure Trust and Liberata (members of staff) ..... 370
- Pendle Citizens Panel (members) and Feedb@ck Online (registered users) ..... 495
- Local Councillors ..... 49

### Number of organisations/individuals submitting representations

- Written representations (letter) ..... 4
- Written representations (email) ..... 20
- Written representations (online) ..... 9
- **Total** ..... **33**

### Number of individual comments within representations

- Not applicable, references to ‘soundness’ and ‘legal compliance’

### Where can I find a summary of the issues raised?

- Framework Issue 24 (Pendle Council, January 2013)

### How have the main issues been addressed in the DPD?

- Not applicable

## Pendle Core Strategy (Further Options Report)

### The Town and Country Planning (Local Planning) (England) Regulations 2012

- Regulation 18

### Dates of consultation

- 10<sup>th</sup> January to 21<sup>st</sup> February 2014

### Summary of organisations/individuals contacted

- Pendle Council – Planning Policy database (via letter) ..... 679
- Pendle Council – Planning Policy database (via email) ..... 764
- Pendle Partnership – Vision Board ..... 38
- Pendle Council – Company, town centres and tourism databases ..... 475
- Pendle Citizens Panel (members) ..... 1,101
- Feedb@ck Online (registered users – Pendle)..... 122
- Pendle Council website (registered users)..... 9,264
- Pendle Council Facebook ‘likes’ ..... 2,476
- Pendle Council Twitter followers ..... 4,971
- Pendle Council, Pendle Leisure Trust and Liberata (members of staff) ..... 498
- Local Councillors ..... 49

### Number of organisations/individuals submitting representations

- Written representations (letter) ..... 77
- Written representations (email) ..... 42
- Written representations (online) ..... 9
- **Total** ..... **128**

### Number of individual comments within representations

- **Total** ..... **326**

### Where can I find a summary of the issues raised?

- Further Options Report Consultation Statement (Pendle Council, April 2014) – Appendices 1-3

### How have the main issues been addressed in the DPD?

- Further Options Report Consultation Statement (Pendle Council, April 2014) – Appendix 4



## Pendle Core Strategy (Pre-Submission Report)

### The Town and Country Planning (Local Planning) (England) Regulations 2012

- Regulation 19

### Dates of consultation

- 10<sup>th</sup> October to 24<sup>th</sup> November 2014

### Summary of organisations/individuals contacted

- Pendle Council – Planning Policy database (via letter) ..... 1,533
- Pendle Council – Planning Policy database (via email) (included in above figure)..... 881
- Pendle Council website (registered users)..... 9,264
- Pendle Council Facebook ‘likes’ ..... 2,671
- Pendle Council Twitter followers ..... 5,916
- Pendle Council, Pendle Leisure Trust and Liberata (members of staff) ..... 475
- Local Councillors ..... 49

### Number of organisations/individuals submitting representations

- Written representations (letter) ..... 17
- Written representations (email) ..... 40
- Written representations (online) ..... 6
- **Total** ..... **62**

### Number of individual comments within representations

- **Total** ..... **215**

### Where can I find a summary of the issues raised?

- Regulation 22(c) Consultation Statement (Pendle Council, December 2014) – Chapter 7.

### How have the main issues been addressed in the DPD?

- Not applicable.



## **Appendix 4**

### Framework Newsletter



# Framework



Welcome to the first edition of **Framework**, the newsletter that will keep you up to date on the latest developments in planning policy in Pendle.

The biggest news is that the Government has recently introduced a new planning system that seeks to get local people more fully involved in shaping the places in which they live. Over the next few years the Pendle Local Plan will be gradually replaced by a series of documents that will collectively be known as the Local Development Framework, or LDF for short.

The short articles in this and future issues of Framework will hopefully help you to cut through the jargon and gain a better understanding of what we are trying to achieve.

## LDF Update

The full production schedule for all LDF documents can be found in the Local Development Scheme (LDS).

### Recently Adopted

- Brierfield Canal Corridor (Housing) Planning Brief SPD

### In Preparation

- Core Strategy DPD
- Land Use Allocations DPD
- Proposals Map

### 1<sup>st</sup> Stage Public Consultation

- Bradley (Nelson) Area Action Plan  
February 2007

### 2<sup>nd</sup> Stage Public Consultation

- Statement of Community Involvement  
November 2006

### Independent Examination

- None

### Coming Soon

- Design Principles SPD
- Railway Street (Brierfield) Area Action Plan
- South Valley (Colne) Area Action Plan

## What is the LDF?

The Local Development Framework (LDF) contains three types of document:

Development Plan Documents, or DPDs for short, have legal standing and set out the policies that will be used to control development in Pendle.

Supplementary Planning Documents, or SPDs, provide more detailed information to that contained in a DPD for either a particular area of Pendle, such as the Forest of Bowland, or a specific subject matter like Development in the Open Countryside.

Finally a set of three 'process documents' are concerned with how people can become involved in the preparation of DPDs and SPDs; how the Council will monitor the effectiveness of the policies contained in these documents and the timetable for their production (see next issue).

## Consulting on the SCI

The first formal public consultation on the draft Statement of Community Involvement (SCI) took place in June and July.

The SCI is the 'process document' concerned with how the Council will involve people in the preparation of new documents for the Local Development Framework.



During the six-week consultation officers visited local libraries to answer questions on the SCI. Over 1,400 people saw the displays with 50 making detailed comments, or taking away representation forms to complete at a later date.

# Framework

## Area Action Plans

Area Action Plans are a form of Development Plan Document (DPD). They provide the planning framework for a specific location that is subject to conservation or regeneration. A key feature is their focus on implementation.

In Pendle, Area Action Plans will be used to aid the implementation of the Housing Market Renewal (HMR) programme.



## Regional Spatial Strategy

The Regional Spatial Strategy (RSS) sets out the framework for the future development of the North West of England.

The new RSS, which is currently in draft form, sets out the scale, priorities and broad locations for future development across the region – providing a framework for where and how much development should take place. It covers a broad range of issues, but in particular it establishes the housing figures for Pendle and broadly identifies where new

employment should be located in the region.



When adopted, the RSS will form part of the statutory development plan. This means that it will have a role in determining planning applications at a local level, as well as influencing policies to be included in the new Local Development Framework for Pendle.

The RSS is being prepared by the North West Regional Assembly, in partnership with a wide range of authorities, agencies, voluntary groups and individuals. Consultation on the draft RSS ran from 20<sup>th</sup> March to 12<sup>th</sup> June 2006. The comments made will influence the issues discussed at an Examination in Public, chaired by an independent Government appointed Panel to take place in Autumn 2006.



Visit [www.northwesteip.co.uk](http://www.northwesteip.co.uk) to view the provisional timetable and latest news on the Examination in Public.

## Joint Lancashire Minerals and Waste LDF

Lancashire County Council, Blackburn with Darwen Borough Council and Blackpool Borough Council, are in the early stages of preparing a Joint Minerals and Waste Development Framework (MWDF).

When it eventually replaces the existing Minerals and Waste Local Plan 2006, the MWDF will set out a strategy for future minerals and waste development and will focus on issues such as:

- mineral extraction
- waste management and recycling
- protecting mineral resources
- restoring minerals and waste sites

Like the RSS the MWDF will form part of the statutory development plan for Pendle.

## Further Information

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**Principal Planning Officer**

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**01282 661330**

**Email:**  
**[john.halton@pendle.gov.uk](mailto:john.halton@pendle.gov.uk)**

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**[www.pendle.gov.uk/planning](http://www.pendle.gov.uk/planning)**



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# Framework



Welcome to the second edition of **Framework**, the newsletter that keeps you up to date on the new Local Development Framework and emerging planning policy in Pendle. The first edition was well received, but we would welcome your views for future articles and further improvements.

If Pendle is home to your family or business, or you simply have an interest in the area, please get involved in our consultations, so you can have your say in its future. In November you will have the chance to comment on the Statement of Community Involvement, when it is submitted to the Secretary of State for approval. Meanwhile in Wigan, Pendle Council will be putting forward its views on the Regional Spatial Strategy at the Examination in Public.

## LDF Update

This regular feature shows you which documents are being worked on and what stage they are currently at.

## In Preparation

- Core Strategy DPD
- Land Use Allocations DPD
- Proposals Map

## 1<sup>st</sup> Public Consultation

- None

## 2<sup>nd</sup> Public Consultation

- Statement of Community Involvement

## Independent Examination

- Regional Spatial Strategy  
(document produced by the North West Regional Assembly)

The full timetable illustrating the production schedule for all documents to be included in the Pendle Local Development Framework, or LDF for short, can be found in the Local Development Scheme.

## Statement of Community Involvement (SCI)

Comments were received from 30 individuals and organisations during the six week public consultation in June this year.

After careful consideration the Council made a number of changes to the SCI, which was submitted to the Secretary of State for approval on Friday 10<sup>th</sup> November 2006. A further six week public consultation, starting on this date, provides a final opportunity for you to have your say on its contents.

Any representations received, during this period, will be considered by an independent inspector, appointed to examine the 'soundness' of the document. The Inspector will then produce a report with recommendations, which will be binding on the Council.

This means that the Council must incorporate any changes recommended by the Inspector, before the SCI can be adopted through the Council's normal Committee procedures in 2007.

## Housing Land Availability Assessment

The HLAA, as it is known for short, is a survey undertaken to provide evidence on which new planning policies for housing will be based.

Its purpose is to record all the sites in the Borough that are considered to be available, suitable and viable for housing and to calculate how many houses could be built on these sites.



A two week consultation on the HLAA methodology starts on Monday 30<sup>th</sup> October 2006 and the identification of sites will commence in November. Please note that sites identified in the HLAA will not necessarily be developed for housing. For further information contact Jonathan Dicken on 01282 661723.

# Framework

## Sustainable Community Strategy and the Core Strategy

The Sustainable Community Strategy (SCS) is not a planning document, so why refer to it in a leaflet on planning policy?

The SCS seeks to establish the community's long-term 'vision' for Pendle and identify priorities for action. Clearly many of these priorities will not be achieved without supportive planning policies.

These policies will be contained in the Core Strategy, the key document in the new Local Development Framework. When complete it will establish the key elements for planning in the Pendle area and set out:

- a spatial vision for Pendle;
- strategic objectives;
- a spatial strategy;
- core policies; and
- a framework for monitoring and implementation.

All other documents in the Local Development Framework must conform to the Core Strategy.

### What is Spatial Planning?

Spatial planning goes beyond traditional land-use planning. It brings together policies for the development and use of land with other policies and programmes, which influence the nature of places and how they function. In particular it has strong links with the SCS.

With the timescales for the preparation of both the Core Strategy and SCS coinciding, Pendle now has a unique



opportunity to establish a 'shared vision' for the future of the area, whilst at the same time developing new planning policies that will help to achieve this vision.

Early in the new year, a series of joint public consultation exercises will seek to actively engage the local community in the preparation of these important documents, so that they truly reflect locally identified needs and opportunities.

Further information:

Community Strategy

Rob Grigorjevs, Principal Policy & Partnership Officer on 01282 661771

Core Strategy

John Halton, Principal Planning Officer on 01282 661330

## Annual Monitoring Report

Submitted to the Government in December of each year, the Annual Monitoring Report (AMR) sets out how the Council's planning policies have been implemented in the previous year and whether it has achieved the milestones set out in its Local Development Scheme.

A number of 'core' indicators are assessed nationally with more locally relevant indicators used to help demonstrate the success of planning policy issues of specific importance to Pendle.

Work has started on updating the AMR for the 12 month period to 31st March 2006. So if you want to know how Pendle is performing, in relation to the current Development Plan, look out for the new AMR, which will be on our website early in the New Year.

## Further Information

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Principal Planning Officer

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**Website:**  
**www.pendle.gov.uk/planning**



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# Framework



Welcome to the third edition of **Framework**, the newsletter that keeps you up to date on the new Local Development Framework and emerging planning policy in Pendle.

The big news this month is the upcoming consultation on arguably the two most important Development Plan Documents, or DPDs for short, the Core Strategy and Land Use Allocations. Together with the new Sustainable Community Strategy, these will have a major impact on how Pendle is likely to change over the next 15-20 years. This first round of consultation will seek to find out what people who live and work in Pendle want from their local community; to highlight the issues and options that need to be addressed in order to help achieve their vision; to identify possible locations for future growth and areas that need to be protected from development in the future.

## LDF Update

This regular feature shows you which Local Development Framework documents are being worked on and the stages they have reached.

### Early Stages of Preparation

#### Issues & Options

- Core Strategy DPD
- Land Use Allocations DPD
- Proposals Map
- Bradley Area Action Plan

### 1<sup>st</sup> Public Consultation

#### Preferred Options

- None

### 2<sup>nd</sup> Public Consultation

#### Submission Draft

- None

### Independent Examination

- Statement of Community Involvement

The full timetable illustrating the production schedule for all the documents to be included in the Pendle Local Development Framework, can be found in the Local Development Scheme.

## What's in a Colour?

You may be aware that documents forming part of the Pendle Local Development Framework, share a similar cover design. But, did you know they have also been assigned a specific colour, to try and make their purpose as transparent as possible?

Those documents that set out the policies used to control development in Pendle, known as Development Plan Documents or DPDs for short, will have a dark-green cover.

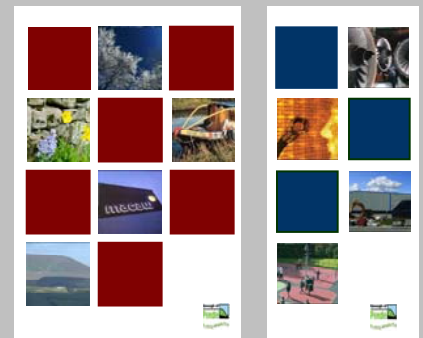
In contrast, Supplementary Planning Documents, which provide more detailed information on a specific issue or issues addressed in a DPD, will use a dark-blue colour scheme.

A dark-red cover will signify that you are reading one of the three so called 'process documents' - the Statement of Community Involvement, the Local Development Scheme or the Annual Monitoring Report.

Finally, the evidence base for the Local Development Framework will include reports on the availability of land for the development of housing, employment, retail and leisure uses, which have been produced annually for many years. Together with less frequent studies that consider issues such as open space provision and retail activity throughout the Borough, and any new reports that may be required, these publications will adopt the same cover design and a dark-grey colour scheme. The only exceptions will be where studies have been produced on behalf of Pendle Council by external consultants.



The standard colours and generic cover designs to be used for all Pendle LDF documents and leaflets



# Framework

## Core Strategy and Land Use Allocations DPD

Whilst work behind the scenes is well underway preparing the evidence base for the Core Strategy and Land Use Allocations DPD, it is your views on the future of Pendle that are most important.

We appreciate that in the last year a number of organisations have asked Pendle residents for their views on issues ranging from hospital closures to the location of new super schools.



To help reduce 'consultation fatigue' talks have already taken place to ensure that early public consultation exercises are carried-out alongside those for the new Sustainable Community Strategy.

This approach will help to emphasise the strong linkages between the two documents and help to identify the key issues that need to be addressed if we are to create a place where people want to live and work, now and in the future.

The Core Strategy is an important document. The allocation of land for new housing and employment or the creation of new transport links must follow the principles set out in the Core Strategy.

The first public consultation events are planned to take place shortly after Easter 2007.

## Local Development Scheme

Pendle Council will submit a revised version of its Local Development Scheme, or LDS for short, to the Government Office for the North West in February 2007. The main changes proposed are as follows:

- In the light of recent experiences in other local planning authorities, it is proposed to allow additional time for the preparation of a robust and credible evidence base *ahead* of identifying issues and options to be considered during the preparation of the Core Strategy and Land Use Allocations DPDs.
- The increased need to consult those people affected by potential clearance has resulted in a small slippage in the timescales originally proposed for the Bradley (Nelson) and South Valley (Colne) Area Action Plans.



- In light of this experience the timetable for the Railway Street Neighbourhood (Brierfield) Area Action Plan has also been amended.
- A key member of staff left Pendle Council during the early stages of preparing the Design Principles SPD, requiring a six-month delay in proceedings.

Should these amendments be accepted, the new LDS should be available in early April 2007.

## Open Space Audit

The Open Space Audit, last published in 2004 is to be updated in early 2007. A review of existing sites is already underway, but a public consultation exercise planned to take place in April 2007 will seek to identify sites that have been inadvertently included or omitted.



The audit will form part of the evidence base for policies to be included in the Local Development Framework. Sites are assessed and given a quality score to help identify those in need of improvement, or those that may possibly have potential for development.

## Further Information

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LIBERATA OUTSOURCING  
WHERE WORK FLOWS



# Framework



Welcome to the fourth edition of **Framework**, the newsletter that keeps you up to date on the new Local Development Framework (LDF) and emerging planning policy in Pendle.

The Statement of Community Involvement (SCI) passed through its public examination ahead of schedule in February. This has allowed Pendle Council to adopt the SCI by the end of March, rather than in August as originally envisaged.

As such, from now on, all public consultation associated with the preparation of a document that is to form part of the LDF will fully reflect the Council's commitment to community engagement, as outlined in the SCI.

## LDF Update

This regular feature shows you which Local Development Framework (LDF) documents are currently in preparation and the stages they have reached. The full timetable can be found in the Local Development Scheme.

## Early Stages of Preparation Issues & Options

- Core Strategy DPD
- Land Use Allocations DPD
- Design Principles SPD
- Pendle Conservation Area Design and Development Guidance SPD
- South Valley Area Action Plan
- Railway Street (Brierfield) Area Action Plan

## 1<sup>st</sup> Public Consultation Preferred Options

- Bradley Area Action Plan DPD

## 2<sup>nd</sup> Public Consultation Submission Draft

- None

## Independent Examination

- None

## Adoption

- Brierfield Canal Corridor SPD (October 2005)
- Statement of Community Involvement (March 2007)

## Early Consultation on the Core Strategy and Land Use Allocation DPDs

In June and July we will be holding a series of public workshops to learn more about the major issues affecting the day-to-day lives of people living and working in Pendle. We will also be seeking your views on potential solutions to help overcome any problems you identify.

The workshops are the centrepiece of a consultation process that will run from now until the end of October. Pendle Partnership will use the information from these workshops, and meetings with key partners, to prepare a new Sustainable Community Strategy for the Borough.



The findings will also be used to inform the preparation of the Core Strategy, which will contain new planning policies that will help to shape Pendle for future generations.

By involving you at the very start of the process we hope to draw-up policies that will help to address the issues that are most important to you, for example:

- to direct employment to where it is most needed
- to provide land for new housing, where it will make the maximum contribution to regeneration
- to preserve the best of our natural and built heritage
- to improve the design of new buildings, to create attractive communities, improve health and reduce crime
- to locate services where they are most accessible

You will have a further chance to comment on these new planning policies next year, when Pendle Council publishes its preferred options for a formal six-week public consultation in July and August 2008.

# Framework

## Meet the LDF team

The team responsible for preparing most of the documents that will be included in the new Local Development Framework consists of three officers working under the direction of the Planning Policy Manager, Christine Douglas.

Normally found in Nelson Town Hall, over the next few months we will be venturing out from behind our desks to find out your views on how Pendle needs to change, if it is to become a better place to live, work or visit. We want to know what we could do to make life in Pendle better for you and your children.

We look forward to meeting you at one of the focus groups or workshops we will be hosting throughout the Borough. Hopefully the photos below will help you put a face to the name of the person you are speaking to, even if we're just at the other end of the phone.

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## Evidence Base Update: Employment Land

Pendle Council is carrying out an Employment Land Review (ELR), in order to identify the likely future demand for employment land and to assess the suitability of the current supply of employment land.

Stage 1 will see a set of criteria drawn-up and used to assess whether sites that have previously been identified for employment use - by way of planning permissions, protections or allocations - continue to be suitable for this purpose.

Later stages of the review will consider market projections and the possible need to allocate new sites. The Review should be completed by September 2007.

## Statement of Community Involvement

A total of 19 responses were received during the six-week public consultation on the Submission SCI, which took place in November/December 2006.

All responses were forwarded to the independent Inspector, who chose to deal with them as written representations, meaning that a formal public hearing was not required.

Pendle Council received the Inspectors binding report in early February. As a result a number of minor changes were made to the SCI, which was adopted by Full Council on 29<sup>th</sup> March 2007.

Copies of the Inspectors report and SCI are available to view at local libraries and Council offices.

## Further Information

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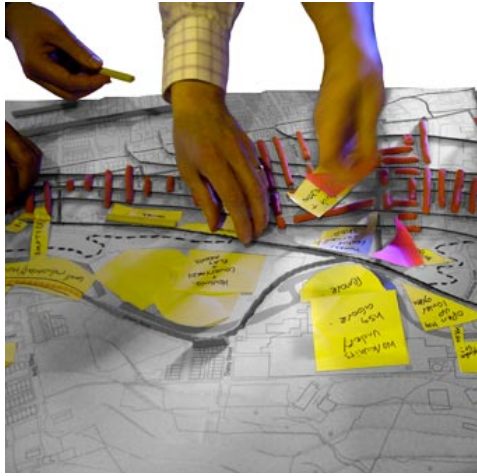
**Website:**  
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**LIBERATA** OUTSOURCING  
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# Framework



Welcome to the fifth edition of Framework, the newsletter that keeps you up to date on the Local Development Framework (LDF) and emerging planning policy in Pendle.

In this issue you can find updates on the various Area Action Plans, the initial consultations on two new Supplementary Planning Documents (SPDs), and the start of the Issues and Options consultation on the Core Strategy and Land Use Allocations DPDs.

In addition, the gathering of information for the LDF evidence base continues apace, with new reports on Housing and Employment land in preparation.

## LDF Update

This regular feature shows you which Local Development Framework (LDF) documents are currently in preparation and the stages they have reached. The full timetable can be found in the Local Development Scheme.

## Early Stages of Preparation Issues & Options

- Core Strategy DPD
- Land Use Allocations DPD
- Design Principles SPD
- Pendle Conservation Area Design and Development Guidance SPD
- South Valley Area Action Plan
- Railway Street (Brierfield) Area Action Plan

## 1<sup>st</sup> Public Consultation Preferred Options

- Bradley Area Action Plan DPD

## 2<sup>nd</sup> Public Consultation Submission Draft

- None

## Independent Examination

- None

## Adoption

- Brierfield Canal Corridor SPD (October 2005)
- Statement of Community Involvement (March 2007)

## Core Strategy and the Sustainable Community Strategy

Informal consultation, to identify the issues and options to be addressed in the Core Strategy and Land Use Allocations DPDs, has started. This work will run through to the end of October. In this initial phase, two separate consultation exercises are taking place.

### 1. Public Consultation

Leaflets (see opposite) have been widely distributed throughout Pendle to accompany an extensive publicity campaign in the local press and radio. These represent a joint consultation exercise between Pendle Council and Pendle Partnership (the Local Strategic partnership for Pendle). Responses will feed into the preparation of the Core Strategy and Land Use Allocations DPDs and the new Pendle Sustainable Community Strategy. Members of the public are invited to put forward their views on what they believe are the key issues facing Pendle over the next 10-15 years. Look out for the 'You Choose' leaflets and stands at local events in your area throughout June, July and August.



[www.pendle.gov.uk/future](http://www.pendle.gov.uk/future)

### 2. Workshops

Comments on spatial issues, received as part of the open public consultation, will be explored in greater detail at a series of workshops to be held in July. At these workshops, representatives from key organisations and community groups will explore the issues and options raised by the public consultation in greater detail.



[www.pendle.gov.uk/ldf](http://www.pendle.gov.uk/ldf)

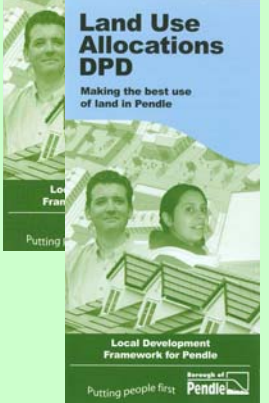
**YOU  
CHOOSE  
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FUTURE  
OF  
PENDLE**

[www.pendle.gov.uk/future](http://www.pendle.gov.uk/future)



**Core  
Strategy**  
The new spatial  
approach to planning

**Land Use  
Allocations  
DPD**  
Making the best use  
of land in Pendle





# Framework

## Evidence Base Update

### Housing Land Availability Assessment

Site visits for the Housing Land Availability Assessment were concluded in March. Initial site filtering has been undertaken to remove those sites deemed not to meet the inclusion criteria. The next stages of the assessment will quantify the number of dwellings that could be accommodated on each site and to consider constraints to the development of each site.



[www.pendle.gov.uk/hlaa](http://www.pendle.gov.uk/hlaa)

### Housing Market Assessment

Tenders for the Housing Market Assessment (being carried out in co-operation with Burnley Borough Council), have been received. Consultants will shortly be appointed and the assessment should be complete by the end of the summer.

### Employment Land Review

Stage 1 of the Employment Land Review is now complete. Key partners have been informed of the findings and work is progressing on Stage 2, which involves a detailed assessment of future requirements.

The 2007 Employment Land Survey, recently distributed to over 300 local businesses forms a key part of this work. This asked local businesses and companies about their expansion plans over the next 5 years. A positive response has been seen with over 50% of the forms returned.



[www.pendle.gov.uk/elr](http://www.pendle.gov.uk/elr)

## SPD Preparations

### Consultation

Informal consultation exercises are now taking place for two new Supplementary Planning Documents (see below).

A set of initial objectives has been drafted for each SPD and key partners have been invited to comment on these. The agreed objectives will help to guide the preparation of the draft documents, which will be formally consulted on in July 2007.

### Design Principles SPD

This will provide additional guidance for Development Control policies contained in the Replacement Pendle Local Plan (2001-2106), and subsequently the Development Control Principles DPD, scheduled for 2009. Its purpose will be to address detailed issues relating to the form and quality of design in new developments throughout Pendle.

### Conservation Area Design and Development Guidance SPD



This will help to inform planning decisions made within Conservation Areas. Amongst other things it will seek to raise the standard of design and ensure the appropriate use of materials in these sensitive areas.

## Area Action Plan DPDs

The Housing Market Renewal team are continuing work on three Area Action Plans.

### Bradley Area Action Plan

The Preferred Options report for the Bradley AAP is currently in preparation. This will be subject to a six week statutory consultation during the summer.



**South Valley, Colne and Railway Street, Brierfield Area Action Plans**  
Both of these AAPs are at the Issues and Options stage and a number of potential options have recently been developed for both areas.

Consultation on the various options under consideration for South Valley took place in March/April 2007. Consultation on the options for the Railway Street Neighbourhood is taking place during May/June 2007.

## Further Information

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**LIBERATA** OUTSOURCING **Putting people first**  
WHERE WORK FLOWS





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Finally, the next stages in preparing our Core Strategy and Land Use Allocations Development Plan Documents (DPDs) are highlighted on the reverse.

## Pendle LDF Update

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- Bradley Area Action Plan DPD
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## 2<sup>nd</sup> Formal Public Consultation Submission Document

- None

## Independent Examination

- None

## Adopted

- Brierfield Canal Corridor SPD (October 2005)
- Statement of Community Involvement (March 2007)

## Bradley Area Action Plan

Bradley, close to the centre of Nelson, is one of the most deprived wards in England and Wales. It was identified as a priority area for help, as part of the East Lancashire Housing Market Renewal (HMR) Programme, ELEVATE East Lancashire.

When complete, the Area Action Plan will set out the proposals for the regeneration of Bradley and the policies that will be used to guide future development, particularly for new housing. By making full use of the opportunities available, it will seek to provide creative solutions that address the problems associated with low demand housing, high vacancy rates, poor quality housing and the lack of quality open space. The purpose is to improve the local environment and create a high quality neighbourhood that the local community can be proud to call their home.

Prepared after consultation with local residents, community groups and other organisations, the **Preferred Options Report** will be available to view and comment on, during a six-week public consultation starting in early January 2008. The report sets out the vision and objectives for the regeneration of Bradley. It identifies not only the Council's preferred option, but all the options that were considered before reaching this decision. The accompanying **Sustainability Appraisal** looks at the possible effects of these options.

You will be able to view and comment on all the documents on the Council's website. They will also be available in public buildings such as Nelson Town Hall, Number One Market Street and Nelson Library.

### Riverside Mills site



### Nos. 8-16 Beech Street





## Conservation Area Design & Development Guidance SPD

In its 26 conservation areas, Pendle Council has to ensure that new development does not damage the historic environment, but 'preserves or enhances its character and appearance'. The new Conservation Area Design & Development Guidance SPD (Supplementary Planning Document) will support planning policy that seeks to protect areas of special architectural or historic interest, by providing detailed guidance that:

- Outlines the principles that new development should adopt in Conservation Areas;
- Carefully considers alterations to existing buildings, which provide much of their historic interest;
- Addresses the quality of public spaces, which plays a vital role in establishing the character of an area;
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Every Street, Nelson

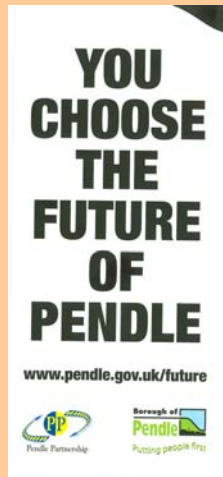


In January 2008, you can comment on the content of the SPD, or highlight any omissions during a six week public consultation. A second document, called a **Sustainability Appraisal**, will show how the environmental, social and economic effects of the proposals in the SPD have been considered during its preparation.

Copies of the draft SPD, Sustainability Appraisal and comment forms will be available on the Council's website and at the Town Halls, Council Shops and public libraries throughout Pendle.

## Core Strategy and Land Use Allocations DPDs

In the summer, the **YOU CHOOSE** campaign gave local residents, voluntary and community groups and key organisations such as the police and the health service, a chance to say what issues they think Pendle will need to address in the next 10-15 years, if it is to become a better place to live, work, learn and visit.



### Sustainable Community Strategy

The draft Sustainable Community Strategy, which is based on the findings of a number of consultations, including the You Choose campaign, will be available for partners to comment on by the end of the year.

### Core Strategy

In the new year a report on the key 'spatial' issues (i.e. those issues that affect the distribution of people and activities) that were raised during the consultation, and possible options to address these, will be available for public comment. The responses we receive will help to shape the Council's long-term vision and objectives for development in Pendle.

### Land Use Allocations / Site Search

The next challenge is to identify the best sites for new housing and employment, locations where transport improvements may be needed and areas which should be protected from development.

Our aim is to achieve a better balance between the economic, social, and environmental objectives for the area, so that we can provide a better quality of life for everyone, both now and in the future.

## Evidence Base Update

To inform work on the Core Strategy and Land Use Allocations DPDs two key evidence base documents have been prepared.

### Strategic Housing Land Availability Assessment (SHLAA)

The report considers the amount of land potentially available for new housing development in the future.

You will be able to comment on its findings during the public consultation on the draft document, which runs from Monday 3rd December 2007 to Monday 28th January 2008.

☎ [www.pendle.gov.uk/hlaa](http://www.pendle.gov.uk/hlaa)

### Employment Land Review (ELR)

The report looks at the current stock of vacant employment land and premises. It considers whether existing sites and premises are still suitable for employment and identifies those that should be protected from other uses, such as housing. It also looks at new sites, which may be required to meet future requirements to 2021.

The draft version will be made available for public comment in early January 2008.

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## Further Information

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December 2007





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**December 2007**

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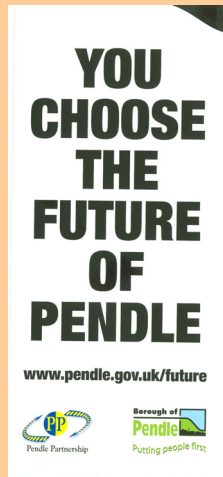


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**December 2007**



# Framework<sup>07</sup>



Welcome to the seventh edition of *Framework*, the newsletter that keeps you up to date on the Local Development Framework (LDF) and emerging planning policy in Pendle.

This is the first edition of 2008. It reports back on a busy period (see over), but also heralds the start of a new period of increased activity where we would once again welcome your active involvement.

The new Pendle Sustainable Community Strategy has now been adopted. It is largely based on the issues raised during last summers 'You Choose' public consultation. Its priority goals must be reflected in the Core Strategy and Land-use Allocations DPDs, two key components of the new Pendle LDF. The Issues and Options Report for the Core Strategy and Land-use Allocations DPDs will be out for public consultation in July.

## Pendle LDF Update

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- Bradley Area Action Plan DPD
- Pendle Conservation Area Design and Development Guidance SPD

## 2<sup>nd</sup> Formal Public Consultation Submission Document

- None

## Independent Examination

- None

## Adoption

- Brierfield Canal Corridor SPD (October 2005)
- Statement of Community Involvement (March 2007)

## Pendle Sustainable Community Strategy (SCS)

Following on from last years 'You Choose' consultation, this summer sees Pendle Partnership launch its new Sustainable Community Strategy.

The SCS sets out the key challenges we will need to address over the next 10 years. It will guide the future policies, strategies and action plans of a wide range of organisations active in the Pendle area. In effect it seeks to ensure that everyone with an influence on the future of Pendle is 'singing from the same hymn sheet.'

Eight priority goals will help us to achieve our agreed vision for the future of Pendle. These are:

1. Supporting strong, confident communities.
2. Creating a dynamic local economy.
3. Creating a vibrant housing market.
4. Making sure that people feel safe and are safe from crime.
5. Helping people to live long, healthy and independent lives.
6. Increasing understanding and respect for our environment.
7. Improving the life chances for our children and young people.
8. Helping older people to stay healthy and live in the way they choose.

Pendle Partnership will develop annual action plans for each of these priority goals and monitor progress.

## Core Strategy and Land-use Allocations DPDs

In the 'You Choose' consultation you told us about the issues that have the biggest impact on your quality of life. We are determined to do our best to address these issues.

Whilst the new Sustainable Community Strategy sets out our immediate priorities for action, the Core Strategy takes a longer-term approach. It is arguably the most important document in the LDF. It sets out a vision for the kind of place we would like Pendle to be in 15 years time. Its policies will guide the preparation of other planning documents and help to direct development to where it is most needed.

Those areas where new development can best meet these needs will be set out in the accompanying Land-use Allocations DPD. This document will also highlight those areas where development will be resisted, or required to meet higher standards, in order to help preserve our historic environments and picturesque countryside.

Together the Core Strategy and Land-use Allocations DPDs will establish the policies for physical changes to our towns, villages and countryside for the foreseeable future. In doing so they will seek to make the most effective use of land, wherever possible promoting the recycling of previously developed land.

## Conservation Area Design and Development Guidance SPD

A six-week public consultation, on the above document, was held between 18<sup>th</sup> January and 29<sup>th</sup> February 2008.

In total 17 individuals or organisations submitted representations on the Pendle Conservation Area Design and Development Guidance Supplementary Planning Document (SPD). Their comments contained 33 objections, 11 supports and 8 observations.

Based on these comments a number of changes were made to the Draft SPD, with new sections and wording added where it was considered to be appropriate.

Higherford Mill



The amended SPD was recommended for approval by Pendle Council's Executive on 22<sup>nd</sup> May 2008. It will now go to the next meeting of the Full Council on 17<sup>th</sup> July 2008, where, subject to the agreement of local councillors, it will be adopted.



Once the SPD has been adopted it will be used to help determine planning applications within Pendle's 26 conservation areas.

The advice contained in the SPD should also prove to be very useful for owners of traditional buildings located outside the conservation areas.

## Evidence base update

To inform work on the Core Strategy and Land-use Allocations DPDs three key evidence base documents have recently been adopted by Pendle Council, and two more will soon be available for public consultation:

### ADOPTED

#### Strategic Housing Land Availability Assessment (SHLAA)

The primary role of the SHLAA is to identify sites with the potential to be developed for housing. It also considers the number of dwellings that could potentially be built on each site and assesses when they are likely to be developed.

The SHLAA was adopted on 19<sup>th</sup> March 2008. For further information go to [www.pendle.gov.uk/hlaa](http://www.pendle.gov.uk/hlaa)

#### Employment Land Review (ELR)

The ELR assesses the potential demand for employment land and assesses this against the current supply of land. It also considers the suitability of sites currently available, highlighting those that should be safeguarded from competition for higher value uses, and those sites which are less suitable for longer term employment uses.

The ELR was adopted on 19<sup>th</sup> March 2008. For further information go to [www.pendle.gov.uk/elr](http://www.pendle.gov.uk/elr)

#### Strategic Housing Market Assessment (SHMA)

The Burnley & Pendle SHMA sets out:

1. The likely requirements for market and affordable housing across the two boroughs.
2. The likely profile of household types requiring market housing
3. An indication of the affordable need by ward and the size and type of affordable housing required.

The SHMA was adopted on 22<sup>nd</sup> May 2008. For further information go to [www.pendle.gov.uk/shma](http://www.pendle.gov.uk/shma)

## CONSULTATIONS

Draft versions of two evidence base documents will be made available for comment during a six-week public consultation, running from Friday 6<sup>th</sup> June 2008 to Monday 21<sup>st</sup> July 2008.

### Settlement Hierarchy and Sustainable Rural Settlements

This is an audit and assessment of the facilities and services available in each of our rural towns and villages. The report also proposes a settlement hierarchy, which could help to guide future growth in the borough.

For further information go to [www.pendle.gov.uk/shsrs](http://www.pendle.gov.uk/shsrs)

### Open Space Audit (OSA)

The OSA looks at the amount of open space in each ward, to highlight areas with low levels of provision. It also assesses the quality of these sites to illustrate which are in need of improvement. The information will be used to help target new open space provision and to determine which sites should be protected through the LDF.

For further information go to [www.pendle.gov.uk/osa](http://www.pendle.gov.uk/osa)

## Further Information

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Welcome to the eighth edition of *Framework*, the newsletter that keeps you up to date on the Local Development Framework (LDF) and emerging planning policy in Pendle.

In this edition we introduce you to the new Design Principles SPD and keep you up to date with the progress we are making 'behind the scenes' with our Core Strategy and Land-use Allocations DPDs.

I would also like to welcome Shelley Coffey to the Planning Policy team. Shelley joins us on secondment from our Development Control section and will help myself, Jonathan Dicken and Darren Tweed to prepare Pendle's Core Strategy for next summer's public consultation, when we will ask you to help us determine which approach we should take when considering future proposals for development and growth in Pendle.

## Pendle LDF update

This regular feature shows you what stage we have reached in preparing each of our LDF documents.

The full timetable can be found in the Local Development Scheme (LDS).

### Reg 25: Informal Consultation

#### Issues & Options

- Design Principles SPD
- Railway Street (Brierfield) Area Action Plan
- Core Strategy DPD
- South Valley Area Action Plan
- Land Use Allocations DPD

#### Consideration of Alternatives

- None

### Reg 27: Formal Public Consultation

#### Publication

- Bradley Area Action Plan DPD

### Reg 30: Independent Examination

- None

### Reg 36: Adoption

- Brierfield Canal Corridor SPD (October 2005)
- Statement of Community Involvement (March 2007)
- Pendle Conservation Area Design and Development Guidance SPD (August 2008)

## New planning regulations

In June 2008, the Government brought into force new regulations<sup>1</sup>, that took on board many of the lessons learnt since the new planning system was introduced in 2004.



In effect the changes should help to speed up the process of preparing development plan documents (DPDs). Key changes include:

1. Reducing the number of formal public consultations from two to one (Publication stage), but providing greater opportunity for informal public involvement in the early stages of preparation (new Regulation 25).
2. Moving the point where the DPD is submitted for examination by an independent Inspector, so that representations made at the Publication stage can be taken into account before the document is submitted to the Secretary of State.

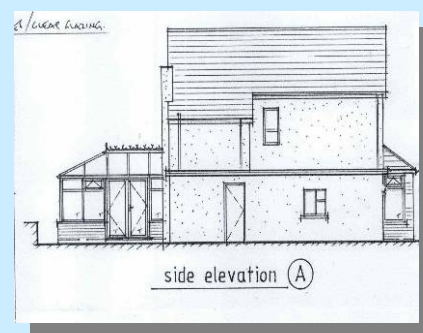
The examination of a DPD will now involve a legal compliance check and an assessment against just three 'tests of soundness' that require the DPD to be (1) justified; (2) effective and (3) consistent with national policy.

<sup>1</sup> The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 and Planning Policy Statement 12: Local Spatial Planning, together outline how LDF documents should be prepared.

## Design Principles SPD

Work has recently started on our new Design Principles SPD. This will look specifically at the design, layout and materials to be used for new house extensions, shop fronts and outdoor advertisements throughout the Pendle area.

The SPD will initially provide detailed guidance to support Policy 13: Quality and Design of New Development in the Pendle Local Plan, but it will be fully reviewed once the Core Strategy has been adopted in 2011.



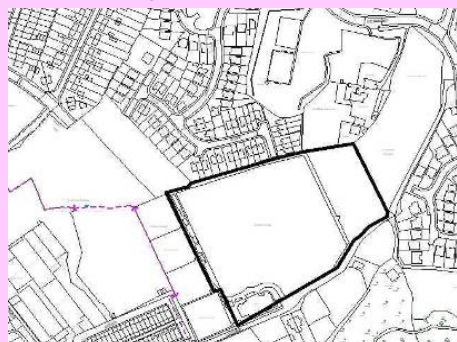
The SPD is being prepared by our new Development Control Manager Kieran Howarth (01282 661377), with help and advice from the Planning Policy team. The formal public consultation, where you will have a chance to comment on the contents of the draft document, will take place in February/March 2009.

We will then make any necessary amendments before adopting the new SPD in September 2009.

## LDF Site Search

Earlier this summer we ran two public consultations. The first asked you to comment on the *Issues and Options Report* for our Core Strategy (see article opposite). The second was the *LDF Site Search*.

Before taking the sites you put forward through to the next stage they must go through a rigorous appraisal process to see if they are capable of being developed for the uses proposed. We also need to assess the contribution they will make to the wider environmental, economic and social objectives identified in the Core Strategy (a process known as sustainability appraisal)



All the sites will be available to view on the Council's website from mid-October. However, with well over 150 representations to consider, it will not be possible to fully assess each of the sites before the end of the year.

As a result the second round of public consultation will now take place early in the new year.

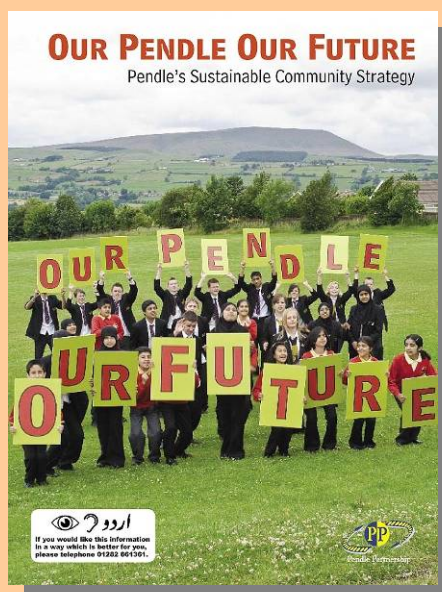


The final choice of sites to be included in the Land-use Allocations DPD will not be made until the Core Strategy has been adopted, which is expected to be in 2011.

## Our Pendle Our Future ... and the Core Strategy

Our Pendle Our Future is the name of Pendle's new Sustainable Community Strategy (SCS).

It has been prepared by Pendle Council on behalf of Pendle Partnership, the Local Strategic Partnership (LSP) for Pendle. The LSP brings together expertise from a wide range of community groups, voluntary organisations and public bodies.



Together they have created an exciting new plan which sets out how we can improve things in Pendle over the next 10 years.

Councillor John David, Chairman of Pendle Partnership and the Leader of Pendle Council, said, "I know that many people dismiss strategies and think they don't matter, but they do."

"By jointly agreeing these goals we're far more likely to make real progress. I encourage everyone to pick up and read one of the summary leaflets that are available at libraries and Council shops throughout the Borough, to see how they may be able to help make Pendle a better place to live, work or visit."

You can view or download a copy of Our Pendle Our Future at:

[www.pendle.gov.uk/ourpendle](http://www.pendle.gov.uk/ourpendle)

The eight strategic goals identified in Our Pendle Our Future will guide the preparation of the Core Strategy.

This important document sets out how planning policy will help to deliver many of the longer-term objectives of the SCS, by guiding new development and growth in Pendle to where it is most needed.

Work on our Core Strategy is already well underway. We recently completed a six-week public consultation to help us identify the key spatial issues Pendle needs to address.



Of course in several instances, different people have expressed different views on how we should address the same issue. As a result we need to carefully consider all the comments we have received to help identify the most realistic options for Pendle.

So next summer, we will once again be asking you to help us, by looking at these alternatives and letting us know which, in your opinion, offer the best way forward for Pendle.

## Further Information

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# Framework



Pendle Hill viewed from Weets

Welcome to the ninth edition of Framework, the newsletter that keeps you up to date on the Local Development Framework (LDF) and emerging planning policy in Pendle.

In the few short weeks since our previous issue was published, there have been some significant changes affecting planning policy in Pendle. The most important of these was the launch of the new North West Regional Spatial Strategy at the end of September. It replaces the Joint Lancashire Structure Plan and provides the wider context in which development proposals in Pendle need to be considered.

There have also been some changes to the Pendle LDF team (see over), but on behalf of those of us who remain may I take this opportunity to wish you all a ...

**MERRY CHRISTMAS AND HAPPY NEW YEAR** 

## Pendle LDF update

This regular feature shows you what stage we have reached in preparing each of our LDF documents.

The full timetable can be found in the Local Development Scheme (LDS).

### Reg 25: Informal Consultation

#### Issues & Options

- Design Principles SPD
- Railway Street (Brierfield) Area Action Plan DPD
- Core Strategy DPD
- South Valley Area Action Plan DPD
- Land Use Allocations DPD

#### Consideration of Alternatives

- None

### Reg 27: Formal Public Consultation

#### Publication

- Bradley Area Action Plan DPD

### Reg 30: Independent Examination

- None

### Reg 36: Adoption

- Brierfield Canal Corridor SPD (October 2005)
- Statement of Community Involvement (March 2007)
- Pendle Conservation Area Design and Development Guidance SPD (August 2008)

## Regional Spatial Strategy

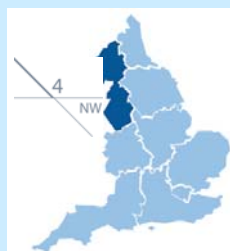
The new North West Regional Spatial Strategy (RSS) was published on 30<sup>th</sup> September 2008. This important document provides:

- The spatial plan for development and investment in the region to 2021.
- The policy framework for employment, housing, transport and the environment.
- The framework for the production of Local Development Frameworks.

The RSS forms part of the statutory development plan for Pendle (see opposite for explanation) and will be widely used when considering planning applications in the Borough.

It replaces the former RSS (RPG 13) and the Joint Lancashire Structure Plan - with the exception of Policy 29 Sites for Gypsy and Traveller Families, which has been extended and has not been replaced by this RSS.

The planning policy position on sites for gypsy and traveller families in the North West will be considered further during the Partial Review of the RSS, which is already underway, and in the preparation of the Pendle Core Strategy.



## LDF jargon buster

**Statutory Development Plan:** The starting point in considering planning applications for the development or use of land. In Pendle it will contain policies from the RSS and DPDs in the Pendle LDF and the Lancashire Minerals & Waste LDF. Until replaced by policies in the Pendle LDF, saved policies from the Local Plan will continue to form part of the Development Plan for Pendle.

**Planning Policy Statements (PPS):** Contain government guidance to assist the preparation of regional, sub-regional and local planning policy.

**Regional Spatial Strategy (RSS):** Its policies aim to deliver sustainable development in the region over the next 15-20 years. The Pendle LDF must be in general conformity with the RSS.

**Local Development Framework (LDF):** The collective name for planning documents prepared at the local level. The LDF includes:

**Development Plan Documents (DPD):** These outline the key development goals for the area and are subject to extensive public consultation and independent examination. The Core Strategy, which sets out the long-term spatial vision for the area and the strategic policies and proposals to deliver that vision, is the key document in the LDF.

**Supplementary Planning Documents (SPD):** Produced as needed to provide additional detail on a policy contained in a DPD. They do not form part of the statutory Development Plan.

**Statement of Community Involvement (SCI):** Sets out how Pendle Council will involve members of the public and key organisations in the preparation of LDF documents and in the determination of planning applications.

**Local Development Document (LDD):** The collective term used to describe DPDs, SPDs and the SCI.

To help plan, monitor and manage the LDF process two other key documents are produced. The Local Development Scheme (LDS), outlines the timetable for the production of LDF documents, whilst the Annual Monitoring Report (AMR), assesses the progress and effectiveness of the LDF.

# Framework

**PENDLE**  
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## Other LDF news

In October Pendle Council wrote to the Secretary of State requesting that the policies in the **Replacement Pendle Local Plan (2001-2016)** be saved beyond May 2009 - the end of the existing three-year saved period - until such time that they are replaced by policies in the new Pendle LDF.

To take account of the new planning regulations, introduced in June 2008, Pendle Council submitted the third revision of its **Local Development Scheme (LDS)** to the Government Office for the North West (GONW) in November. The LDS sets out the timetable for the production of documents to be included in the Pendle LDF.

Finally later this month Pendle Council will submit its **Annual Monitoring Report (AMR)** to GONW. Amongst other things the AMR sets out how planning policies have been used in Pendle over the last 12 months. This year it also includes an addendum to the **Statement of Community Involvement**, reflecting recent changes to the planning regulations.

## LDF team changes

There have been some recent changes to Pendle LDF team. Whilst Planning Policy Manager Christine Galvin is away on maternity leave John Halton has stepped-up to fill her post.

Leaving us on a more permanent basis is Darren Tweed who will take up a senior position with Calderdale Council in early December. We would like to thank Darren for the valuable contribution he has made to the team over the last four years and wish him every success in his new role.



To help us keep on track with the preparation of our LDF, Shelley Coffey has joined us on a temporary secondment from our Development Control team. Whilst Shelley is with us she will help Jonathan Dicken, the longest serving member of the Pendle LDF team, to take the Core Strategy through to the consideration of reasonable alternatives in Summer 2009.

Alan Duxbury is your point of contact for Area Action Plan DPDs linked to the Housing Market Renewal programme.

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## Evidence base update

Work has been continuing on a number of evidence base documents. We consulted on draft reports for the Sustainable Settlements Study and the Open Space Audit in the summer. As a result, a number of changes were made to these documents before they were adopted by Pendle Council in November.

The **Sustainable Settlements Study** looks at the provision of, and access to, services in our rural settlements. It concludes by recommending a settlement hierarchy for consideration in the preparation of the Core Strategy.

The **Open Space Audit 2008** records and assesses the quality of green and recreational spaces in the urban areas of the borough.

Finally an **Affordable Housing - Site Viability Study** is being undertaken by consultants Fordham Research to help establish the levels of affordable housing provision needed across Pendle.

## Final 'Call for Sites'

Before we move on with the preparation of our Core Strategy and Land-use Allocations DPDs we need to be sure we have identified:

- Those sites which offer the greatest potential for new development, by helping to achieve sustainable development objectives and securing long-term regeneration.
- Those areas which are highly valued by both local residents and visitors, where development should either be resisted, or required to meet higher standards.

In March 2009 we will launch the second stage of our LDF Site Search consultation. This will give you the opportunity to:

1. View and comment on sites put forward during the first stage of the consultation held this summer.
2. Submit details for any other sites you feel have been overlooked.

## Further information

**Pendle LDF**  
<http://www.pendle.gov.uk/ldf>

**North West RSS**  
<http://www.gos.gov.uk/497468/docs/248821/476846/NorthWestEnglandRSS>

**Planning Portal**  
Glossary of Planning Terms  
<http://www.planningportal.gov.uk/england/professionals/en/1018892037172.html>

**Framework**  
Past issues  
<http://www.pendle.gov.uk/framework>



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**December 2008**

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# Framework

**PENDLE**  
**L D F**



Welcome to the tenth edition of Framework, the newsletter that keeps you up to date on the Local Development Framework (LDF) and emerging planning policy in Pendle.

Most of you are hopefully aware that the public consultation for our Design Principles SPD\* is already underway, but there's still time to comment if you haven't done so already. Work continues on the evidence base for our Core Strategy and two new documents, for our Housing Market Renewal (HMR) programme - the Bradley Area Action Plan DPD\* and the Railway Street Neighbourhood (Brierfield) SPD, which will be published later this year.

Finally we hope you like the minor design changes we have introduced with this edition. The most noticeable change is that our regular feature 'LDF update' has been expanded and moved to the back page. In addition full contact details for the members of our LDF team will now appear in each issue.

\* SPD = Supplementary Planning Document, DPD = Development Plan Document

## Affordable Housing Site Viability Study

In last years Strategic Housing Market Assessment (SHMA), consultants Fordham Research identified a need to provide affordable housing (see article opposite) throughout Pendle.

Fordham's have recently completed a new study on behalf of Burnley and Pendle Councils looking at the economic viability of providing affordable housing on various types of site across the two boroughs.

In total 16 sites - eight in each borough - where housing development has already been permitted, or which have the potential to provide housing, were considered.

Both urban and rural locations were looked at, and sites ranged in size from 12 to 135 dwellings. To reflect the nature of the two Boroughs the majority of sites considered are classified as Brownfield sites (i.e. previously developed land) with only two Greenfield sites selected for consideration.

Reflecting current economic conditions, the results indicate that few sites are considered to be economically viable even for market housing. As such it is not feasible to set a target for affordable housing provision across the study area. However, it may be possible to establish a target for rural areas, where values are potentially higher.

The study will be published for you to consider and comment on, during April and May.

## What is affordable housing ...

Unattractive housing and bad neighbours are lingering images that still shape many peoples opinion of affordable housing.

Beckside, Earby



Today, affordable properties often form part of new market-priced developments, with an agreed percentage of the homes available set aside for specific income levels. Many of us will live next to affordable housing without ever realising it (see photo).

The people living in these homes can include nurses, fire-fighters, police officers, cooks, waiters, shop assistants, social workers, office staff, teachers, bank clerks, day care providers, bus drivers, cleaners, hotel workers and librarians. People like you and me.

But, why do we need to provide affordable housing when there's so much cheap terraced housing around?

Despite the current recession, the gap between wages and housing costs continues to grow. As a result, increasing

Continued over ...

## Design Principles SPD

This new Supplementary Planning Document (SPD) looks in detail at new house extensions, shop-fronts and outdoor advertisements.

A six week public consultation, which closes at 12:00 noon on Tuesday 14<sup>th</sup> April 2009, gives you the opportunity to have your say on this new guide. Its main purpose is to improve the quality and design of new development throughout Pendle.

Pendle Council's spokesperson on planning, Councillor David Clegg, said: "We've produced this design guide to help local people and developers."

"It gives them more information at the very start of the planning process. It tells them what type of development we are looking to encourage before they get any plans drawn up."



Design Principles SPD

Copies of the SPD can be viewed or downloaded from the Council's website. It is also available to view at Town Halls, Council Shops and libraries throughout Pendle. Representation forms are also available at these locations.

For more information, please contact Kieran Howarth, Development Control Manager, on (01282) 661377 or [kieran.howarth@pendle.gov.uk](mailto:kieran.howarth@pendle.gov.uk)

## Housing Market Renewal

The Bradley Area Action Plan will guide regeneration activity in the largely residential area immediately north-east of Nelson town centre. In particular it will support investment that helps to deliver the Government's Housing Market Renewal (HMR) programme.

It will also provide the basis for determining planning applications and the Council's need to use its compulsory purchase powers. By January 2009, Pendle Council had successfully acquired 102 residential and two commercial properties in Bradley, without the need for compulsory purchase. Six properties in Beech Street were demolished in March 2008 and around 450 homes and 50 business premises are earmarked for block improvement work.



Work has already started on some projects. The pavements along the A682 (Scotland Road) have recently been improved. A pilot study is currently being carried out by Groundwork East Lancashire, with a view to improving the condition of backstreets in the area.

The Environment Agency has recently completed culvert repairs and flood alleviation works along Hendon Brook. This will see the play equipment at Hey Street replaced and a new multi user sports area installed.

You will have a final opportunity to comment on the Bradley AAP this summer. It will then be submitted to the Secretary of State, for independent examination, later in the year.

Regeneration proposals in the Railway Street area of Brierfield can go ahead without the need to allocate land for development that would otherwise be contrary to policies in the existing Pendle Local Plan.

As such an Area Action Plan is no longer required and a Supplementary Planning Document (SPD) will now be prepared for the area. This approach should reduce the adoption process from three years, to a little over 12 months. As a result regeneration activity is expected to commence sooner than anticipated.

## ... and why do we need it?

... continued from front page.

numbers of families are simply being priced out of a decent home, or are living in crowded or sub-standard conditions.

Many working people are being forced out of the communities in which they grew up. As they, and their families, move away local businesses struggle to attract workers, customers, or both. As a result businesses close, or move out of the area.

More affordable housing is needed and planning has an important role to play in helping to create sustainable mixed communities where we can all live happily together.

Supporting higher density housing in our towns also makes efficient use of our existing community infrastructure such as water, sewer, and power systems, schools, and public transport. With everything close to hand walking and better public transport are realistic alternatives to the car.

## Your LDF team

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## Evidence base update

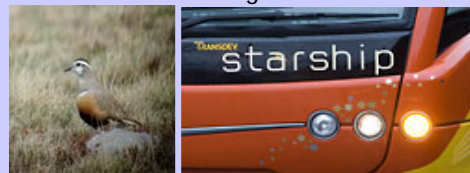
The Pendle LDF needs to be built on reliable evidence. Work has recently started on three new studies:

### Infrastructure Study

This will assess the existing capacity of infrastructure in Pendle and identify future requirements.

### Renewable Energy Study

Pendle's potential for large scale and small scale renewable energy production, will inform policies that address climate change.



### Biodiversity Audit

Essentially a 'stock take' of the species and habitats to be found in Pendle. It will help to inform the preparation of new planning policies that seek to protect and enhance Pendle's natural resources.

## LDF update

This summary, based on our Local Development Scheme, shows you what stage we have reached in preparing each of the documents for our LDF.

LDF document	Stage			
Core Strategy DPD	1			
Land-use Allocations DPD	1			
Development Control Principles DPD				
Bradley Area Action Plan DPD		2		
South Valley Area Action Plan DPD	1			
Conservation Area SPD				4
Open Countryside & AONB SPD				
Design Principles SPD		2		
Brierfield Canal Corridor SPD				4
Railway Street Area Action Plan SPD	1			
Statement of Community Involvement				4

- Regulation 25**  
A period of ongoing informal consultation seeking to identify the key issues to be addressed and consider all reasonable alternatives for dealing with these issues.
- Regulation 27 (DPD) or 17 (SPD)**  
Publication stage - a formal six-week public consultation to consider what the Council believes to be the 'final' version of its document.
- Regulation 30 (DPDs only)**  
Independent examination of the document submitted to the Secretary of State.
- Regulation 36 (DPD) or 19 (SPD)**  
Document adopted.

**Address:** Town Hall, Market Street, Nelson, Lancashire BB9 7LG  
**Website:** [www.pendle.gov.uk/ldf](http://www.pendle.gov.uk/ldf)





# Framework



**Welcome to the 11<sup>th</sup> edition of *Framework*, the newsletter that keeps you up to date on the Local Development Framework (LDF) and planning policy in Pendle.**

In this edition we tell you about the second stage of our search for the sites you think will offer us the best opportunity to deliver growth in the future.

We also announce the publication of the Bradley Area Action Plan and hope you will take the time to have a look and comment on our proposals.

Unfortunately work on the Core Strategy has fallen behind schedule and our proposed summer consultation will not take place until this autumn.

Finally our joint working with neighbouring authorities has increased and we are now working in partnership with Councils in Burnley, Rossendale, Hyndburn, Bury, Rochdale, Calderdale and Kirklees on various studies.

## What is sustainability?

Sustainability is a phrase we often hear on the evening news; but what does it mean? And why is it important?

People and politicians are increasingly aware of the fact that our way of life is placing an increasing burden on the planet. Without change we all face a future that is less certain and less secure.

Sustainable development offers the best hope for our future.

Sustainable Development  
Development that "meets the needs of the present without compromising the ability of future generations to meet their own needs."

Our Common Future (The Bruntland Report), April 1987

Spatial planning is one of the main ways we can help to deliver sustainable development. It considers how planning influences places and the way in which they function.

Before coming to any decision we will carefully consider the economic, social and environmental impacts of any development proposal. Factors that we look at are possible impacts on health, education, transport, waste, crime, employment etc.

Our final decision will, on balance, offer the best possible quality of life for all concerned, both now and in the future and make the best use of scarce resources such as land.

## Land-use Allocations

Last summer we asked you to tell us about sites you thought may be suitable for future development **and** those where you felt that development should either be resisted, or required to meet higher standards, because of the value they bring to our community – i.e. heritage (conservation areas), recreation (public open space), environment (nature reserves) etc.

In July we will publish information about the sites that have been put forward so far, for you to look at and comment on. You can also use this opportunity to submit details for any sites that may have been left out of the process.

In addition, we will be publishing details of minor amendments we intend to make to the settlement boundaries for each of our towns and villages. Where possible these line up with features that can be seen with the naked eye, such as streams, walls etc. They will also correct earlier mapping errors and show where new (approved) development has taken place.

### Development land, or protected site?



Your responses  
Will help us prepare the  
Land-use Allocations Development Plan  
Document (DPD).

**WHAT DO  
YOU THINK?**

## Core Strategy

Unfortunately this summer's public consultation, to look at the Council's preferred options for its Core Strategy, has had to be delayed until the Autumn. There are two main reasons for the delay.

Firstly, discussions on joint working with neighbouring local authorities took slightly longer than expected. But, until we receive the results of studies that will look at our ability to generate energy from renewable sources and assess our future infrastructure requirements we will not be able to fully assess all the options available to us.



The second has been a shortage of staff. It has not been possible to replace Darren Tweed, who left us just before Christmas to take a job closer to home. With Christine Galvin not due to return from maternity leave until September, progress on the Core Strategy has unfortunately fallen behind schedule.

We hope to be able to present a report outlining our preferred options and all other reasonable alternatives later this year. Your feedback will then help us to finalise the Core Strategy, which should be published around Easter 2010.

## Bradley Area Action Plan

The Bradley Area Action Plan is a key document in the emerging Pendle LDF. It will include new planning policies that help to deliver regeneration in this residential area close to the heart of Nelson.

This summer Pendle Council will publish what it considers to be the final version of the Bradley Area Action Plan for a formal six-week public consultation.

The various approaches we could take to regenerate Bradley have already been discussed, considered and tested in the earlier stages of preparing the Area Action Plan. This consultation will ask if you think the finished plan is sound – Are its actions justified? Are the proposals likely to be effective? Are they consistent with national policy?

**COMMENTS  
WANTED**



Elizabeth Street, Bradley

Only minor revisions can be made to the document before it is submitted to the Secretary of State in the autumn.

The Planning Inspector appointed to carry out the independent examination of the document in early 2010, will only consider representations made during this consultation.

The Inspectors report is expected to follow in the summer. This may approve or reject the plan, or recommend changes, which would be binding on the Council. This means that we **must** make any changes recommended in the Inspectors report before we can finally adopt the Bradley Area Action Plan.

## Design Principles

Thank you to everyone who took the time to respond to our consultation on the Design Principles Supplementary Planning Document (SPD).

Over 20 detailed responses were received. Officers have considered each of these comments and are now making minor changes to the SPD before it goes before the Council's Executive on 22<sup>nd</sup> September 2009 for adoption.

Once adopted copies will be made available in council shops, local libraries and on the Council's website. Anyone who asked to be notified about its adoption<sup>1</sup> will also be contacted.



<sup>1</sup> If any person is aggrieved by the SPD they may, within three months of the date of adoption, apply to the High Court for permission to apply for a judicial review of the decision to adopt the SPD.

## Evidence base update

Following initial in-house work, we have recently entered into joint working agreements with our neighbouring local authorities on two key evidence base studies. This has allowed us to commission more comprehensive work on infrastructure capacity requirements and our potential to generate energy from renewable sources, at a fraction of the cost it would have been to go it alone.

The third study, a comprehensive audit of our biodiversity resource, has been carried out wholly in-house. The audit brings together information from a wide variety of sources in a single document. Still far from complete we are now talking to key partners such as Lancashire Wildlife Trust before it comes to you for comment later this year.

So that the information does not date too quickly, links to various websites have been included. Whilst this means that when complete it will work best as a web based document, a limited number of copies will be made available to the public, key partners and for display in public libraries.

## Your LDF team

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Planning Policy Manager

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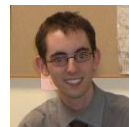
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Alan Duxbury, Principal Planner in our Housing Market Renewal team, is leaving Pendle Council in July. Our thanks go to Alan and his colleague Judith Watmough for getting the Bradley Area Action Plan to the Publication stage.

## LDF update

This summary, based on our Local Development Scheme, shows you what stage we have reached in preparing each of the documents to be included in the Pendle LDF.

LDF document	Stage			
Core Strategy DPD	1			
Land-use Allocations DPD	1			
Development Control Principles DPD				
Bradley Area Action Plan DPD		2		
South Valley Area Action Plan DPD	1			
Conservation Area SPD				4
Open Countryside & AONB SPD				
Design Principles SPD		2		
Brierfield Canal Corridor SPD				4
Railway Street Area Action Plan SPD	1			

- 1 Regulation 25**  
A period of ongoing informal consultation, which seeks to identify the key issues we need to address and considers all reasonable alternatives for dealing with these issues.
- 2 Regulation 27 (DPD) or 17 (SPD)**  
Publication stage – a formal six-week public consultation to consider what the Council believes to be the 'final' version of its document.
- 3 Regulations 30 and 31 (DPDs only)**  
Independent examination (Regulation 31) of the document submitted to the Secretary of State (Regulation 30).
- 4 Regulation 36 (DPD) or 19 (SPD)**  
Document adopted.

**Address** Town Hall, Market Street, Nelson, Lancashire BB9 7LG  
**Website** [www.pendle.gov.uk/ldf](http://www.pendle.gov.uk/ldf)



For an alternative format of this document phone 01282 661330



# Framework



Photo: Andrew Kennedy, British Cycling

Welcome to the 12<sup>th</sup> edition of *Framework*, the newsletter that keeps you up to date with the Local Development Framework (LDF) and emerging planning policy in Pendle.

In this edition we feedback on the second round of our 'Call for Sites' consultation, which took place over the summer. We look forward to this Autumn's important consultation on the preferred options for our Core Strategy. And we also have a brief summary of the results from our three annual monitoring reports, which look at land that has been developed in Pendle between 1<sup>st</sup> April 2008 and 31<sup>st</sup> March 2009.

Finally we welcome back Planning Policy Manager Christine Galvin and can announce that Shelley Coffey has joined us on a permanent basis.

Photo: Russell Downing, in third place, prepares to attack on the final climb of the day, to take this year's Tour of Pendle cycle race from Rob Partridge (front) and three time Olympic medallist Chris Newton.

## LDF Database

If you're on our mailing list, you'll notice that we've included a number of forms with this edition of *Framework*.

As we're asking you to take a few minutes of your time to complete these, we thought it only right to explain why this information is important to us.

### 1. LDF Database Update

To keep you informed about the Pendle LDF we need to know where you are and how to get in touch with you. It's as simple as that. In accordance with the Data Protection Act 1998 we will only use your details to help us prepare the Pendle LDF.

### 2. Customer Satisfaction Survey

We are always looking at ways we can improve the service we provide to you. Your answers to these questions will help us to do just that.

### 3. Monitoring Customer Information

Pendle Council is committed to providing equality of opportunity for all. To help us deliver a fair service that meets the needs of all our users, it is important that we know who our customers are.

This form uses the Government's standard question set. Its completion is entirely up to you. In order to maintain your privacy this information is not kept with your contact details. If you choose to complete the form, please place it in the separate envelope provided.

Thank you for your help

## Land-use Allocations

The Stage 2 LDF Site Search consultation has been extended by two weeks to take account of the summer holidays.

So there are still a couple of weeks left for you to comment on the suggestions put forward for over 150 sites across the Borough, during Stage 1 last year.

The closing date for comments is:

**5:00pm Monday 14<sup>th</sup> September 2009**

Public interest in this consultation has been particularly high with over 100 representations already received.



Pendle Hill

### Where Can I Find Out More?

All the documents for our LDF Site Search and Draft Interim Housing Policy (see article overleaf) consultations can be found in local libraries (including the mobile library) and council offices throughout Pendle.

They are also available to view or download from Pendle Council's website using the following links:

[www.pendle.gov.uk/landuseallocations](http://www.pendle.gov.uk/landuseallocations)

[www.pendle.gov.uk/interimhousing](http://www.pendle.gov.uk/interimhousing)

## Core Strategy

Work is nearing completion on our Preferred Options Report for the Core Strategy.

This document builds on two earlier rounds of public consultation:

- **You Choose** – a joint public consultation with the Sustainable Community Strategy back in 2007
- **Issues & Options** – in 2008 we highlighted the main issues facing Pendle. You helped us to identify ways in which they could be addressed.



Boundary Mill, M65 J14, Colne

The Core Strategy is the most important document in the Local Development Framework. All our other planning policy documents must conform to it.

Our Preferred Options Report will show you what we think is the best way forward for Pendle. All reasonable alternatives will also be shown, so you can consider any other options.

Your comments will be taken into account before we publish what we consider to be the final version of our Core Strategy next year.

## Interim Housing Policy

There are still a few weeks left for you to comment on the proposed changes to our housing policy in Pendle.

The Draft Interim Housing Policy sets out how we propose to deal with new planning applications for housing between now and 2011.

When finished, it will show what type of housing we will expect developers to build, and where. It will also make sure that the house types provided are both appropriate and affordable for the people of Pendle.

We want to know if you think our proposals are the right way of making sure we have the right houses, of the right quality, in the right place.



Councillor David Clegg, who leads on Planning in Pendle, said:

"We recognise that the moratorium imposed restrictions on the amount of new housing we could build in Pendle. In the current economic climate we need to encourage new house building, to make Pendle a better place to live.

"We also know that we have to do something to help people who cannot afford to buy houses in the places they grew up.

"That's why one of our key aims is to increase the levels of affordable housing in Pendle. To do this we will require developers to set aside part of their site for affordable housing for local people, where the proposal is for 15 units or more."



The closing date for comments is:  
**5:00pm Monday 14<sup>th</sup> September 2009**

## Your LDF Team

We've a couple of changes to announce this month.

You may have seen her picture in the last couple of issues of Framework, but this month we are pleased to introduce Shelley Coffey as a full-time member of the Planning Policy / LDF team.

Shelley had been on secondment from Development Control since September last year. In that time, she's worked on the 'preferred options' report for our Core Strategy, produced the Retail and Leisure Land Monitoring Report and helped to commission the Renewable and Low Carbon Energy study.

This month we also welcome back Planning Policy Manager Christine Galvin. She will be working on a part-time basis. So if you need to speak to her, please call on a Monday or Tuesday.

Finally you may have noticed Framework has had another small makeover this month. The layout remains unchanged, but there is increased use of our corporate colours.

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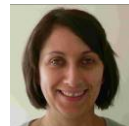
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## Evidence Base Update

Our three annual monitoring reports record the take-up of land in Pendle for the monitoring period 1<sup>st</sup> April 2008 to 31<sup>st</sup> March 2009.

**Housing:** Only 97 new dwellings were built during the last 12 months. Taken together with the first stages of demolition for the Housing Market Renewal programme in Brierfield and Nelson, this resulted in a net loss of 46 dwellings over the year. However, since 1<sup>st</sup> April 2003 a total of 1,304 new dwellings have been built in Pendle, 164 more than required by the Regional Spatial Strategy.

**Employment:** In contrast, the take-up of land for business use was the highest it has been in the last four years, with 3.96ha developed. Just over 23ha of employment land is currently available for development.

**Retail & Leisure:** Retail development has been higher than the short-term targets identified in the Pendle Retail Capacity Study (2007). The new Boundary Mill store and recent approvals for supermarkets in Colne (Sainsbury's) and Barrowford (Booths) are notable developments.

## LDF Update

This summary, based on our Local Development Scheme, shows you what stage we have reached in preparing each of the documents to be included in the Pendle LDF.

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Conservation Area SPD			4
Open Countryside & AONB SPD			
Design Principles SPD			4
Brierfield Canal Corridor SPD			4
Railway Street Area Action Plan SPD	1		

### 1 Regulation 25

A period of ongoing informal consultation seeking to identify the key issues to be addressed and consider all reasonable alternatives for dealing with these issues.

### 2 Regulation 27 (DPD) or 17 (SPD)

Publication stage – a formal six-week public consultation to consider what the Council believes to be the 'final' version of its document.

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Independent examination (Regulation 31) of the document submitted to the Secretary of State (Regulation 30).

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Document adopted.



# Framework



Summit of Pendle Hill (Photo: Mike Watson)

**Merry Christmas and a Happy New Year to everyone from the Planning Policy team at Pendle Council. This is the 13<sup>th</sup> edition of Framework, the newsletter that keeps you up to date on the Local Development Framework (LDF) and planning policy in Pendle.**

On this occasion thirteen has not proved to be an unlucky number. We have just learnt that Framework has been awarded a commendation by the Royal Town Planning Institute at its North West Planning Achievement Awards.

In this edition we bring you news about the adoption of our Design Principles SPD and the publication of our final version of the Area Action Plan for Bradley in Nelson. Finally we tell you about possibly the most important stage in the preparation of our LDF. Early in the new year we will be asking you to comment on the Preferred Options Report for our Core Strategy, which will guide development in Pendle over the next 15 years.

## Framework Wins Regional Planning Award

Framework has been awarded a commendation by the Royal Town Planning Institute (RTPI) at its North West Region Planning Achievement Awards.

Making the announcement in Manchester on Friday 4th December, Awards Co-ordinator 2009 Mike Eastham commented:

"The Judging Panel was impressed by the refreshing, jargon free approach that you and your colleagues at Pendle are advocating. Your determination to improve contact between planning and the local community is to be applauded."



Photo: Keith Nutter (left) of sponsors WYG Group presents the RTPI Award to John Halton and Planning Manager Neil Watson.

Principal Planning Officer John Halton, the editor of Framework, explained:

"On the face of it, Framework is nothing special. But, in the three years since we launched our newsletter we have received a lot of positive feedback, which is very unusual for planners!

"We were competing against much bigger and more expensive projects entered by regional planning consultancies and developers. So it came as a complete surprise when we learnt that we had won an award. It's a fitting reward for the hard work put in by our small team."



John added:

"I think Framework is so well received because articles are deliberately kept short and to the point and written in Plain English.

"As well as news items, we include short features to help people understand some of the complex issues we deal with. And if people want to know more, they are encouraged to get in touch with us."

Claire Tulloch, who promotes the use of Plain English throughout the Council, is delighted about the success. She said:

"We have been training staff in the use of Plain English for a couple of years now. It's brilliant that the planning team's hard work is being recognised. I'm very proud of their achievement."

Leader of the Council John David said:

"Planning issues are often very complex, but are relevant to everyone in Pendle. The beauty of Framework is that it helps to explain complicated issues as simply as possible.

"And we know that it is effective, people have told us they have been encouraged to take part in consultations as a direct result of reading an article in Framework."

## Land-use Allocations DPD and Core Strategy

We received a huge response to this summer's public consultation, which asked you to help us identify potential sites for development over the next 10-15 years.

Councillor David Clegg, the Council's representative on planning commented:

"Last year we asked local residents, landowners and developers to suggest sites that may be suitable for future development. They also told us about areas of land that should be protected from development. In total over 150 sites were put forward for consideration."



Your comments started to flood into the Council soon after the consultation started in July. And a further 50 sites were suggested.

From the 8<sup>th</sup> January 2010, you will have six-weeks to comment on these new sites. But there is no longer an opportunity to put forward new sites for consideration.

Councillor Clegg continued:

"Land is a precious resource, so the knowledge of local people is important in helping us to select only the best located sites for development in the future.

"And whilst a number of sites have received significant levels of opposition,

**Continued over**

## Land-use Allocations DPD and Core Strategy (continued)

### Continued

we must carefully consider all suggestions before deciding which sites to take forward to the next stage.

John Halton from the LDF team said:

"With over 1,000 comments already received, and more to come, this process will take some time to complete, so please bear with us."

Of those sites that pass through the appraisal process, only those that help to deliver the objectives of our Core Strategy will be taken forward.

The Core Strategy will guide development in Pendle over the next 15 years. A public consultation, offering you the opportunity to comment on the direction we propose to take in our Core Strategy, will take place early in the new year.

There will be another chance to comment on the Council's final choice of sites for our Land-use Allocations Development Plan Document (DPD), when we publish our *Preferred Options Report* later in 2010.

## Interim Housing Policy

This Summer we asked you what you thought about our Draft Interim Housing Policy. In total we received 75 comments from 25 individuals and organisations.

A number of changes have been made to address these comments. Most of these help to either clarify the wording of the policy, or explain in greater detail some of the new requirements we will expect developers to comply with.



The Interim Housing Policy, which was adopted at Full Council on 10<sup>th</sup> December 2009, updates Policy 17 of the Replacement Pendle Local Plan (2001-2016). In effect it relaxes some of the restrictions on new housing developments, but introduces new requirements relating to deliverability and the provision of affordable housing.

The Interim Housing policy will be used to help determine planning applications for new residential developments.

[www.pendle.gov.uk/interimpolicy](http://www.pendle.gov.uk/interimpolicy)

## Housing Market Renewal

James Ellis (pictured below) is the new Principal Planning Officer in our Housing Market Renewal (HMR) team. He replaces Alan Duxbury who left the Council in July.

James joined us from Craven District Council in North Yorkshire at the beginning of November. He will be responsible making sure that the various Area Action Plans and Supplementary Planning Documents (SPDs), prepared to assist regeneration activity in the inner urban areas of Brierfield, Nelson and Colne, are carried out in accordance with the Government's guidelines for Planning.



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Principal Planning Officer

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## LDF Round-up

### Design Principles SPD

Our new Supplementary Planning Document, specifically looking at house extensions, shop-fronts and advertisements was adopted at Full Council on 10<sup>th</sup> December 2009.

### Bradley Area Action Plan DPD

Having carefully explored all the options over the last couple of years, Pendle Council will publish what it considers to be the final version of its plan for the regeneration of Bradley in January 2010. There will be more on this in the January issue of Framework.

### Annual Monitoring Report (AMR)

Each year we are required to produce and submit a monitoring report to the Government. This provides details on the use of planning policies in the preceding year and information on a wide range of planning issues such as the number of new houses built and the amount of employment land available.

### Evidence Base

Reports looking at biodiversity and renewable and low carbon energy will be available early in the new year, with an infrastructure report following later.

## Your LDF Team

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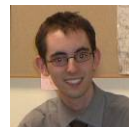
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## LDF Update

This summary, based on our Local Development Scheme, shows you what stage we have reached in preparing each of the documents to be included in the Pendle LDF.

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Land-use Allocations DPD	1
Development Control Principles DPD	
Bradley Area Action Plan DPD	2
South Valley Area Action Plan DPD	1
Conservation Area SPD	4
Open Countryside & AONB SPD	
Design Principles SPD	4
Brierfield Canal Corridor SPD	4
Railway Street Neighbourhood SPD	1

### 1 Regulation 25

A period of ongoing informal consultation seeking to identify the key issues to be addressed and consider all reasonable alternatives for dealing with these issues.

### 2 Regulation 27 (DPD) or 17 (SPD)

Publication stage – a formal six-week public consultation to consider what the Council believes to be the 'final' version of its document.

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Independent examination (Regulation 31) of the document submitted to the Secretary of State (Regulation 30).

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Document adopted.

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Website [www.pendle.gov.uk/ldf](http://www.pendle.gov.uk/ldf)



For an alternative format of this document phone 01282 661330



# Framework



Pendle Vale College, Nelson

**Welcome to the 14<sup>th</sup> edition of *Framework*, the newsletter that keeps you up to date on the Local Development Framework (LDF) and emerging planning policy in Pendle.**

This is a very important time in the preparation of our LDF. Articles in this issue cover the publication of what Pendle Council believes to be the final version of the Bradley Area Action Plan. We are also publishing details of 50 sites that have been suggested as either being suitable for development at some time in the future, or in need of protection from inappropriate development.

Work on our three important evidence base documents – infrastructure, renewable and low carbon energy and biodiversity – is a little behind schedule. As a result the public consultation on Preferred Options Report for our Core Strategy has been put back until after Easter.

## Bradley Area Action Plan

Over the last couple of years we have carefully explored a wide range of options for regenerating the Bradley area north of Nelson town centre.

Early and continuing consultation with local residents has been at the heart of this process. And their views have helped to guide the decisions we have taken along the way.

In February, Pendle Council will publish what it considers to be the final version of its long-term strategy for the regeneration of Bradley.

Once again you will have six-weeks to comment on our plan. Unlike the earlier rounds of public consultation, which helped us to identify the most appropriate solution to a particular issue, we are now asking you to comment on whether you think the plan is sound.

Government guidance on planning states that a sound plan should be:

1. Justified
2. Effective
3. Consistent with national planning policy.

The plan should also be based on a robust and credible evidence base, and offer the most appropriate strategy when compared with the realistic alternatives.

In addition, its proposals must be deliverable and flexible enough to allow for changes to be made, should our monitoring of its effectiveness indicate that this is necessary at some point in the future.

The six-week public consultation on the Bradley Area Action Plan will run from **18<sup>th</sup> February to 1<sup>st</sup> April 2010.**

Copies of the plan can be viewed at:

- Number One Market Street, Nelson
- Nelson Library

You can also view or download a copy of the plan from the Council's website at:

**[www.pendle.gov.uk/bradleyconsultation](http://www.pendle.gov.uk/bradleyconsultation)**

**Comment on our  
plan for Bradley**

Ideally your comments should be submitted on an official representation form. Copies are available from the above locations. If you prefer, you can send your views in the form of a letter, fax, or email.



## LDF Site Search

On Friday 8<sup>th</sup> January 2010, we published the LDF Site Search – Stage 2 Sites report for a six week public consultation.

The report contains details of 50 site suggestions put forward during last summer's public consultation. The sites listed include:

1. New sites that were put forward for consideration.
2. Any alternative proposals for the 158 sites that were included in last summer's consultation – i.e. someone may have suggested that it is more appropriate to develop a site for housing rather than employment use, or that a site should be protected from development rather than allocated for development.
3. Any other changes to the original 158 site submissions – i.e. minor boundary changes.

This consultation will **NOT** allow people to put forward new sites for consideration. It simply provides people with an opportunity to view proposals they may not already be aware of, and to comment on these if they wish to do so.

Once the consultation closes we will carefully consider all the proposals we have received. We will filter out those sites with obvious constraints – i.e. where the site is in a flood zone, the land is known to be unstable, or access is not practical from the highway etc. – and those that conflict with national or regional planning policy.

**Continued**

## LDF Site Search – The next steps

The initial filtering of sites should be completed by the summer. Those sites that pass through this stage will be sent to our consultants ENTEC. They will carry out a full sustainability appraisal for each site.

Whilst this work is taking place, we will ask you for your views on the preferred option for our Core Strategy. This is the key document in the Local Development Framework (LDF) and will guide all other documents to be included in the LDF.



Only when our consultation on the Core Strategy has been completed, can we start the process of identifying those sites that are considered to be the most appropriate to help deliver its strategic objectives.

Once these sites have been identified they will be included in the first draft of our Land-use Allocations DPD (Development Plan Document). This document will then be made available for a six week public consultation towards the end of 2010.

## Further information

**Planning Policy & Conservation**  
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BB9 7LG

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Email [ldf@pendle.gov.uk](mailto:ldf@pendle.gov.uk)

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## Your LDF Team

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Planning Policy Manager

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Principal Planning Officer

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Senior Planning Officer

**Shelley Coffey** 01282 661716  
Senior Planning Officer

**James Ellis** 01282 661042  
Principal Planning Officer  
in Housing Regeneration

## Customer Satisfaction Survey

We recently updated the details we hold for the 835 individuals and organisations on our LDF Database. This shows that:

- **45%** are individuals from the local community
- **22%** are associated with the development industry in some way
- **33%** represent other interest groups.

We would particularly like to thank the 125 people who took the time to complete our customer satisfaction and monitoring surveys. The results of these, which will help to inform future service improvements, are summarised in the table opposite and in more detail on the Council's website at:

[www.pendle.gov.uk/ldfsurvey](http://www.pendle.gov.uk/ldfsurvey)

### Key to table

	Strongly agree
	Agree
	Disagree
	Strongly disagree

Question	% Response			
Our staff				
... are courteous	72	24	2	1
... are helpful	63	32	4	1
... are knowledgeable	64	33	3	0
Your experience				
Staff are easy to contact	64	27	4	5
Receive prompt attention	55	37	7	1
Info. meets expectations	54	34	8	3
I'm treated fairly	64	31	3	2
I'm a valued customer	64	30	4	3
The Framework newsletter is ...				
... informative	52	42	5	1
... easy to understand	52	41	6	2
Public consultations are ...				
... well publicised	39	43	11	7
... easy to understand	42	39	15	4
Electronic communication				
Website is easy to use	39	45	12	5
Prefer information by email	61	17	4	17



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Railway Street Area Action Plan SPD	1			

### 1 Regulation 25

A period of ongoing informal consultation seeking to identify the key issues to be addressed and consider all reasonable alternatives for dealing with these issues.

### 2 Regulation 27 (DPD) or 17 (SPD)

Publication stage – a formal six-week public consultation to consider what the Council believes to be the 'final' version of its document.

### 3 Regulations 30 and 31 (DPDs only)

Independent examination (Regulation 31) of the document submitted to the Secretary of State (Regulation 30).

### 4 Regulation 36 (DPD) or 19 (SPD)

Document adopted.



For an alternative format of this document phone 01282 661330



# Framework



Riverside Mill Site, Bradley



**Comment on our plans for Nelson and Brierfield**

**Welcome to the 15<sup>th</sup> edition of Framework, the newsletter that keeps you up to date on the Local Development Framework (LDF) and emerging planning policy in Pendle.**

Please accept our apologies for the delay in issuing this edition of our newsletter and for the last minute cancellation of the public consultation on the Bradley Area Action Plan, announced in our last issue.

The early months of this year have been an uncertain period for planning. First our public consultation on the Bradley Area Action Plan had to be delayed to obtain additional evidence on affordable housing. Then the new Coalition Government announced that it would be making swift and decisive changes to the planning system. Following recent announcements by the Secretary of State the situation is now clearer and we are now able to proceed with public consultations on a number of LDF documents in the coming months.

## Housing Market Renewal

There is a heavy emphasis on our Housing Market Renewal (HMR) programme in this issue.

First we announce the publication of the Bradley Area Action Plan. Bradley is an area dominated by terraced housing close to Nelson Town centre. It is also an area of opportunity, as it is also close to Junction 13 on the M65 Motorway. The redevelopment of key sites, such as the former Coloroll manufacturing complex at Riverside Mills (pictured above), are at the heart of our regeneration plans. A new green route along the line of Walverden Water will help to establish better linkages with the regenerated Town Centre.



Consultation Workshop

Second is the upcoming public consultation on the Railway Street SPD, which addresses regeneration activity in an area close to the centre of Brierfield.

Here the focus is on the redevelopment of a former railway yard, the provision of new housing and environmental improvements along Railway Street and Sackville Street. Our plans are closely linked with the regeneration proposals set out in the Brierfield Canal Corridor SPD, adopted in 2005. This addresses the future of Lob Lane Mill and the clearance sites on Clitheroe Road and Holden Road.

## Bradley Area Action Plan

In early August, Pendle Council will publish what it considers to be the final version of its long-term strategy for the regeneration of Bradley in Nelson.

Once again you will have six-weeks to comment on our plan. But, unlike the earlier rounds of public consultation, which helped us to identify the most appropriate solution to a particular issue, we are now asking you to comment on whether you think the plan is sound.

To be considered sound the plan must be:

1. Justified
2. Effective
3. Consistent with national policy

The plan should also be based on a robust and credible evidence base, and offer the most appropriate strategy when compared with the realistic alternatives.

The six-week public consultation on the Bradley Area Action Plan will run from: **6<sup>th</sup> August to 20<sup>th</sup> September 2010**

Copies of the plan and representation forms can be viewed, collected or downloaded from:

- Number One Market Street, Nelson
- Nelson Library
- [pendle.gov.uk/bradleyconsultation](http://pendle.gov.uk/bradleyconsultation)

### How to tell us what you think:

Ideally we would like you to submit your views online, or by using an official representation form, available from the above locations.

But, if you prefer, you can send in your comments by letter, fax, or email.

## Railway Street SPD

In August 2006 consultants URBED were appointed to work with the local community to produce a Masterplan for the regeneration of the Railway Street Neighbourhood in Brierfield.

The process began with a round table workshop, which concentrated on identifying the 'Good, the Bad and the Ugly' in the area.

A one day design workshop followed. This developed different options for how the neighbourhood might look in the future. These options were then worked up and brought back to the community on a 'Big Red Bus' to get as many peoples views as possible.



Taking into account views expressed by the local community and other factors, the preferred option from the Masterplan work has now been worked up into a Supplementary Planning Document (SPD) that will guide future development in the area.

The six-week public consultation on the Railway Street SPD will run from: **20<sup>th</sup> August to 4<sup>th</sup> October 2010**

Copies of the plan and representation forms can be viewed, collected or downloaded from:

- Brierfield Town Hall
- Brierfield Library
- [pendle.gov.uk/railwaystreetspd](http://pendle.gov.uk/railwaystreetspd)

## Evidence Base Update

Maslen Consultants are currently finalising the draft South Pennine Renewable and Low Carbon Energy Study. This looks at the potential for generating heat and energy from renewable sources across Pendle, Burnley, Rossendale, Calderdale and Kirklees. The study will be made available for public comment shortly.



Brown Hare

The Pendle Biodiversity Audit looks at the distribution of wildlife habitats and animal and plant species throughout the Borough. Following a recent public consultation, the Council proposes to adopt the final document in September.

## Other LDF News

Planning Policy Manager Christine Galvin will be on maternity leave until February 2011. In her absence Planning and Building Control Manager **Neil Watson** will be leading the Planning Policy and Conservation section, which includes your LDF Team.

Work on our **Land-use Allocations DPD** continues apace. We are currently considering the 200 sites put forward during our two 'Call for Sites'. We are also processing over 2,000 letters of objection and support that have been submitted.

Once this work is complete the results will be passed to our external consultants ENTEC, who will carry out an independent appraisal of the sites. This process, known as Sustainability Appraisal, will consider the economic, social and environmental impact of the various site proposals.

It will take several months to complete this work. Only those sites that help to deliver the strategic objectives in our Core Strategy will be selected.

## Further information

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**Website** [www.pendle.gov.uk](http://www.pendle.gov.uk)

## Your LDF Team

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**John Halton** 01282 661330  
Principal Planning Officer

**Jonathan Dicken** 01282 661723  
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Senior Planning Officer

**James Ellis** 01282 661042  
Principal Planning Officer  
Housing Market Renewal

## Recent Changes in Planning

On the 6<sup>th</sup> July 2010 the Secretary of State for Communities and Local Government, the Right Honourable **Eric Pickles MP** announced the revocation of **Regional Spatial Strategies (RSS)** with immediate effect.

As a result the initial draft of our Core Strategy, which we had hoped to consult on later this month, is being re-written to exclude all references to the RSS.

The abolition of RSS means that it is no longer part of the Development Plan for Pendle. As such its policies will no longer be considered when determining planning applications. In addition the Council does not have to aim for regional housing targets. It is now possible to decide locally how many new homes to provide and where they will be built.

Other changes mean that **residential gardens** are no longer classified as previously developed (Brownfield) land. In effect this makes it more difficult for applicants to justify building new homes in such locations.

It was also announced that the national indicative **minimum density for new housing** developments of 30 dwellings



The Right Honourable **Eric Pickles MP**  
Secretary of State for Communities and Local Government



The Right Honourable **Greg Clark MP**  
Minister of State for Decentralisation (with responsibility for planning policy)

per hectare has been removed.

These measures are intended to help maintain and encourage the provision of green space in our urban areas.

Finally, in Pendle, Councillor Chris Tennant has taken over as the Executive Member with responsibility for planning policy.



Councillor **Christopher Tennant**  
Executive Member (with responsibility for planning policy in Pendle)

## LDF update

This summary, based on our Local Development Scheme, shows you what stage we have reached in preparing each of the documents to be included in the Pendle LDF.

LDF document	Stage		
Core Strategy DPD	1		
Land-use Allocations DPD	1		
Development Control Principles DPD			
Bradley Area Action Plan DPD		2	
South Valley Area Action Plan DPD	1		
Conservation Area SPD			4
Open Countryside & AONB SPD			
Design Principles SPD			4
Brierfield Canal Corridor SPD			4
Brierfield Railway Street Area SPD		2	

### 1 Regulation 25

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Independent examination (Regulation 31) of the document submitted to the Secretary of State (Regulation 30).

### 4 Regulation 36 (DPD) or 19 (SPD)

Document adopted.



# Framework



Brierfield Town Centre

Welcome to the 16<sup>th</sup> edition of **Framework**, the newsletter that keeps you up to date on the **Local Development Framework (LDF)** and emerging planning policy in Pendle.

The public consultations on our regeneration proposals for the Bradley area of Nelson the Railway Street Neighbourhood in Brierfield ended recently. Both of these are concerned with the successful delivery of our Housing Market Renewal (HMR) programme.

But, we still have two consultations underway. These are concerned with new evidence base reports. They look at the potential to generate energy from renewable sources in Pendle, and examine affordable housing provision across the Borough. Meanwhile, work on the Preferred Options Report for our Core Strategy is nearing completion and should be available for public comment by the end of the year.

## Renewable and Low Carbon Energy Study

We want to hear your views on the South Pennine Renewable and Low Carbon (RLC) Energy Study.

The study looks at the environmentally friendly ways we can use the energy generated by natural elements such as wind, water and the sun.

It also considers other possibilities such as biomass, where plant matter or waste is used to generate heat and electricity, and ground source heat pumps, which draw heat from the ground.

The study was commissioned by Pendle Council, together with Councils in Burnley, Rossendale, Calderdale and Kirklees.

By 2020, 15% of UK energy must be generated from RLC sources. But at present, just 0.1 megawatts (MW) of the 44.6 MW of energy used in Pendle each year is generated in this way.

The Council will use the report findings and public opinion to help draw up targets and policies that will increase Pendle's contribution to renewable and low carbon energy generation levels.

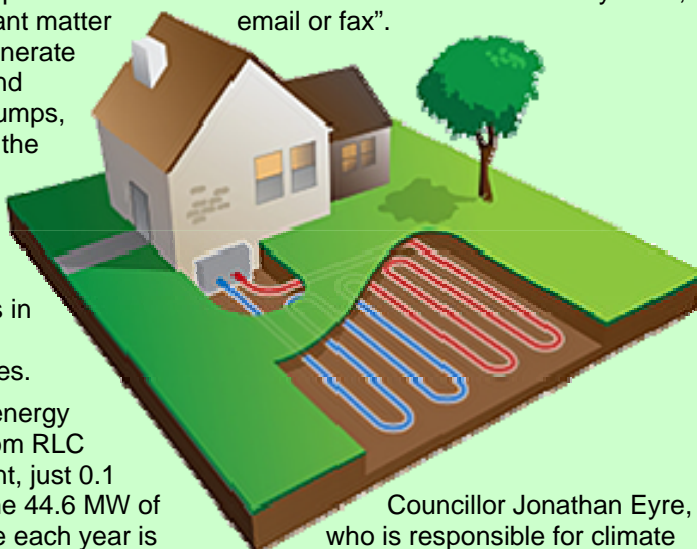
These policies will be included in our Core Strategy, which sets out the future direction for planning policy in Pendle.

Councillor Chris Tennant, who leads on planning policy in Pendle, said:

"The public consultation runs from the **17<sup>th</sup> September to 1<sup>st</sup> November 2010.**"

"Full copies of the study are available on the Council's website, at Number One Market Street in Nelson, and the public libraries in Nelson, Colne, Barnoldswick and Earby.

Comments can be sent to us by letter, email or fax".



Councillor Jonathan Eyre, who is responsible for climate change in Pendle said:

"It's vital that we make changes to the way we produce energy if we are to protect the planet for our future generations.

"I know local people have strong opinions about how we generate energy, so I would urge everyone to take this opportunity to have their say."

For further information go to:  
**[www.pendle.gov.uk/rlices](http://www.pendle.gov.uk/rlices)**

## Housing Market Renewal

The consultation on the Publication (pre-submission) version of the **Bradley Area Action Plan DPD** (Development Plan Document) recently came to an end.

The focus of this round of consultation was on whether the DPD is considered to be 'sound' – i.e. justified, effective and consistent with national policy.

In total 10 responses were received, and these are now being carefully considered by the Council. They will be submitted to the Secretary of State, together with the DPD and any suggested amendments proposed by the Council, in early 2011.

Early in the new year the DPD will be the subject of an independent examination, by a planning inspector, appointed by the Secretary of State.

The public consultation on the **Brierfield (Railway Street Neighbourhood) SPD** (Supplementary Planning Document) also closed in the last few days.



The SPD builds on the Masterplan that was produced for the area, and will help to guide future development to the west of Brierfield town centre.

## Affordable Housing

Fordham Research has recently completed an update of the Affordable Housing Site Viability Study (AHSVS), originally produced for Burnley and Pendle Councils in July 2009. The new study includes:

- An update of the financial appraisals for the original 16 sites, to reflect current market conditions.
- Further analysis on the viability of smaller sites, in order to help establish affordable housing threshold levels.
- Recommendations on the affordable housing targets that are now considered to be deliverable.
- A new 'Dynamic Viability Model', which allows for the setting of different affordable housing targets based on the prevailing economic circumstances.

A six-week public consultation will run from **Friday 1<sup>st</sup> October to Monday 15<sup>th</sup> November 2010**. Please send your comments to the address or email shown under "Contact Us."

## SHLAA Update

The SHLAA, or Strategic Housing Land Availability Assessment to give it its full title, looks at potential housing sites throughout Pendle. The study assesses whether these sites are **available** and **suitable** for new housing, and if their development is considered to be **achievable** – i.e. when is it likely to be economically viable to develop a particular site.



The first Pendle SHLAA was adopted in May 2008. The update reconsiders our earlier assumptions on economic viability. It then uses this information to reassess when each site is likely to come forward for development.

The SHLAA provides evidence to support the housing policies in our Core Strategy. It also indicates whether Pendle can demonstrate that it has a five-year supply of housing land, which it is required to do by the Government.

## Contact Us

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BB9 7LG

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## Your LDF Team

**Neil Watson** 01282 661706  
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**John Halton** 01282 661330  
Principal Planning Officer

**Jonathan Dicken** 01282 661723  
Senior Planning Officer

**Shelley Coffey** 01282 661716  
Senior Planning Officer

**James Ellis** 01282 661042  
Principal Planning Officer (HMR)

## Evidence Base Update

The key documents, prepared or commissioned by Pendle Council, for the evidence base that will underpin the planning policies in our Core Strategy are now in place. These include:

- 1 Pendle Retail Capacity Study**  
Nathaniel Lichfield & Partners  
– Adopted: May 2007
- 2 Lancashire Sub-Regional Gypsy & Traveller Accommodation and Related Services Assessment**  
University of Salford  
– Adopted: May 2007
- 3 Pendle Employment Land Review**  
Pendle Borough Council  
– Adopted: March 2008
- 4 Burnley & Pendle Strategic Housing Market Assessment**  
Fordham Research  
– Adopted: April 2008
- 5 Pendle Open Space Audit**  
Pendle Borough Council  
– Adopted: November 2008
- 6 Pendle Strategic Housing Land Availability Assessment**  
Pendle Borough Council  
– Adopted: May 2008
- 7 Pendle Sustainable Settlements Study**  
Pendle Borough Council  
– Adopted: November 2008

### 8 Burnley & Pendle Affordable Housing Site Viability Study

Fordham Research  
– Adopted: July 2009  
– Updated: July 2010 \*

### 9 Pendle Biodiversity Audit

Pendle Borough Council  
– Adopted: September 2010

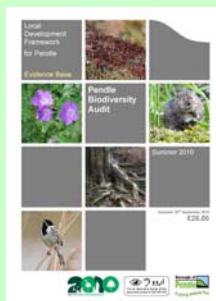
### 10 South Pennine Renewable & Low Carbon Energy Study

Maslen Environmental  
– Completed: August 2010 \*

### 11 Pendle Infrastructure Study

Pendle Borough Council  
– Completed: October 2010 \*

In addition we produce annual monitoring reports, which record the take-up of land for housing, employment, retail and leisure uses in Pendle.



We also monitor retail vacancy rates in our town centres with the help of colleagues in Economic Development & Tourism section.

\* Document not yet adopted.

## LDF update

This summary, based on our Local Development Scheme, shows you what stage we have reached in preparing each of the documents to be included in the Pendle LDF.

LDF document	Stage			
Core Strategy DPD	1			
Land-use Allocations DPD	1			
Development Control Principles DPD				
Bradley Area Action Plan DPD			3	
South Valley Area Action Plan DPD	1			
Conservation Area SPD				4
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Design Principles SPD				4
Brierfield Canal Corridor SPD				4
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Document adopted.



# Framework



Welcome to the 17<sup>th</sup> edition of **Framework**, the newsletter that keeps you up to date on the Local Development Framework (LDF) and emerging planning policy in Pendle.

December brought news of exciting changes to the planning system when the coalition Government introduced the Localism Bill and the concept of neighbourhood planning.

Have you ever thought that site down the road from you was suitable for housing? If it is, then the chances are it will feature in our Strategic Housing Land Availability Assessment (see below).

Our work on the Core Strategy (Preferred Options Report) is now complete and should be available for public comment after the Easter holidays. More about this important development in the next issue.

## Consultation Feedback

The South Pennines Renewable and Low Carbon Energy Study looks at the ways in which we can harness energy and heat generated by the natural elements (e.g. wind and water).

Eleven individuals and organisations provided a total of 169 separate comments on the findings of the report. Many of these have been reflected in a new annex to the report, which was adopted by Pendle Council in December 2010.

A total of five representations yielded 25 individual comments on the update of the Affordable Housing Site Viability Study. These will be considered at the Council's Executive on 8<sup>th</sup> February 2011, when the amended report will be adopted.



On 15<sup>th</sup> November 2010 we met with members of Pendle Partnership's Sustainable Places sub-group, to consider issues relating to biodiversity in Pendle.

As a result of the comments received, changes have been made to policies in the Preferred Options Report for the Core Strategy.

## SHLAA Update

The SHLAA or Strategic Housing Land Availability Assessment, to give it its full title, looks at potential housing sites in each of Pendle's towns and villages. It assesses whether:

1. A site is **available** for development.
2. A site is **suitable** for housing.

It also considers the timescales within which development is expected to be **achievable** on each site.

The SHLAA provides evidence to support the housing policies in our Core Strategy.

The first Pendle SHLAA was adopted in May 2008. The 2011 update reconsiders our earlier assumptions on the economic viability of sites. It then uses this information to reassess when each site is likely to come forward for development.



Copies of the 2011 update are in Council Shops and libraries throughout Pendle and available to view, or download, from the **Council's website**.

You can comment on the study, or submit additional sites for consideration, until **5:00pm Monday 28<sup>th</sup> February 2011**. All responses should be sent to the contact address on the reverse of this leaflet.

## Recent Developments

What are all these rules, regulations and consultations trying to achieve?

Below are a few examples of recent developments that will hopefully help to make Pendle a place where quality of life continues to improve and everyone aspires to reach their full potential.



<b>Live</b>	Executive Housing, The Locks, Colne
<b>Work</b>	New Advanced Manufacturing Facility, Rolls Royce, Barnoldswick
<b>Learn</b>	Building Schools for the Future, Pendle Vale College, Nelson
<b>Play</b>	Marsden Park Play Area, Nelson
<b>Visit</b>	Arts, Culture and Entertainment Centre, Nelson Town Centre

## Bradley Area Action Plan

The Bradley AAP was submitted to the Secretary of State in December 2010. An Inspector has now been appointed and the broad timetable for the examination is as follows:

### w/c 24<sup>th</sup> January 2011

- Inspector's paper on matters and issues to be circulated. This will set out a series of questions for the Council to address.
- Inspector's guidance notes and timetable for the examination and hearing session to be circulated.

### 25<sup>th</sup> February 2011

- Likely deadline for Council to submit statements on matters and issues.

### w/c 7<sup>th</sup> March 2011

- Inspector to issue agenda for the hearing session.

### 15<sup>th</sup> March 2011

- Hearing session – Most of the day will deal with issues relating to delivery, funding, flexibility and phasing.

## Regional Spatial Strategy

Does the North West Regional Spatial Strategy (RSS) remain a consideration when determining planning applications in Pendle?

In short the answer is YES.

The Secretary of State's decision to revoke regional strategies was declared unlawful by the High Court in December. So for the time-being the RSS remains part of the statutory Development Plan.

But the coalition Government's commitment to the abolition of RSS remains. And so does their advice to local planning authorities that this stance should be a material consideration in the determination of planning applications.

Until the Government lawfully abolishes the RSS, decisions will be taken on a case-by-case basis by the Planning Inspectorate, within the context of the local evidence base for housing.

## Your LDF Team

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**James Ellis** 01282 661042

Principal Planning Officer (HMR)

## Contact Us

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## Localism Bill

The planning system helps to decide who can build what, where and how. It also ensures that infrastructure, such as homes, schools, roads etc., are built in the right place and to the highest possible standards. A good planning system is essential for the economy, environment and society.

In the **Big Society** people will have more influence over decisions that make a difference to their lives. To this end the Coalition Government introduced the Localism Bill in December. The Bill launched the concept of neighbourhood planning, which will allow people to come together through their parish council to say where development should take place in their community. The aim is to make it easier and quicker for development to go ahead.

There are three key elements to the new system:

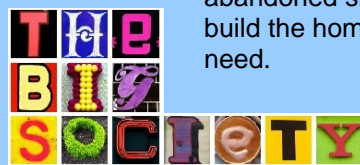
**Neighbourhood Development Plans** can be prepared by Parish Councils, if they wish to do so. They will form part of the statutory development plan, so development will need to be in accordance with their policies. The plan must also be consistent with national planning policy and conform to the

strategic elements of development plan documents prepared by the local authority, such as the Core Strategy.

**Neighbourhood Development Orders** grant planning permission for specified types of development. These can either be site specific – the sites are likely to be identified in a Neighbourhood Development Plan – or address an area where outline permission will establish the right to develop and only the details need to be approved.

**Community Right to Build Orders** are site specific and offer local people the chance to give the green light to small developments without the need for a planning application. They may help people to build their own homes, or support locally-led proposals that allow the community to regenerate

abandoned sites and build the homes they need.



**Plain English Guide to the Localism Bill:**

[www.communities.gov.uk/publications/localgovernment/localismplainenglishguide](http://www.communities.gov.uk/publications/localgovernment/localismplainenglishguide)

## LDF Update

This summary, based on our Local Development Scheme, shows you what stage we have reached in preparing each of the documents to be included in the Pendle LDF.

LDF Document	Stage
Core Strategy DPD	1
Land-use Allocations DPD	1
Development Management DPD	
Bradley Area Action Plan DPD	3
South Valley Area Action Plan DPD	1
Conservation Area Design SPD	4
Design Principles SPD	4
Open Countryside & AONB SPD	
Brierfield Canal Corridor SPD	4
Brierfield Railway Street Area SPD	4

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Document adopted.



# Framework



Welcome to the 18<sup>th</sup> edition of **Framework**, the newsletter that keeps you up to date on the Local Development Framework (LDF) and emerging planning policy in Pendle.

Pendle Council has recently made a number of key decisions affecting its Core Strategy and Land-use Allocations Development Plan Documents.

Work on the *Preferred Options Report* for the Core Strategy is now complete and it will be made available for public comment in the summer. This is later than anticipated and has delayed progress on the Land-use Allocations DPD (Development Plan Document), as it is not possible to identify the sites we will need to allocate or protect until our long-term strategy for development in Pendle, as set out in the Core Strategy, has been agreed.

## Pendle Core Strategy

This summer Pendle Council will make the Core Strategy (Preferred Options) report available for public consultation.

Getting to this stage has taken longer than expected. Work started as far back as summer 2007, when the *You Choose* campaign helped to identify those issues that were most important to the people of Pendle.

Over 2,000 comments were received and these provide the basis for two key strategic documents:

- Our Pendle Our Future: Pendle's Sustainable Community Strategy.
- Pendle Core Strategy.

The Sustainable Community Strategy (see opposite) was adopted by Pendle Partnership the following year.

The process for preparing a Core Strategy is prescribed in government legislation, and takes considerably longer. This is because the document:

- Influences the use of land and identifies broad locations for development over the next 15 years.
- Sets out policies that will influence the scale and type of development.

In particular new planning policy will seek to:

- protect and enhance the quality of the environment;
- offer a mix of high quality and affordable housing;
- provide for the jobs of the future; and
- ensure everyone has access to the services they need.

**Revised timetable  
for consultation on  
key LDF documents**

Our last public consultation considered what planning could do to address the issues highlighted in the *You Choose* campaign.

Subsequent changes in legislation and government have delayed progress, but we are now ready to take the next step in preparing our Core Strategy.

As its name suggests, the *Preferred Options* report sets out the Council's chosen strategy for addressing issues where planning can have a real influence.



This summer's public consultation offers you a final opportunity to help influence our choice of strategy.

We will be attending events and holding a series of exhibitions and workshops across Pendle throughout the summer. Please keep checking the Council's website and local press for details of an event taking place close to you.

## Sustainable Community Strategy

Pendle Partnership is the name of the Local Strategic Partnership (LSP) for Pendle. The LSP brings together representatives from the statutory, voluntary, community and private sectors. Together they develop strategies and initiatives that address local problems and allocate funding accordingly.



This process of joint working and community involvement helps to ensure that the allocation of resources in Pendle is both transparent and targeted, in order to achieve the best possible return on investment.

The key driver is the 30-page Sustainable Community Strategy (SCS). The SCS is often referred to as the '*plan of plans*' as it influences all other plans and strategies for the area.

The SCS identifies our long-term vision for the future of Pendle. It sets out the key tasks that individual partners must achieve, if we are to successfully address Pendle's needs and improve the well-being of the area. All project outcomes and targets are designed to help deliver this long-term vision.

As the 'spatial expression' of the SCS, the Core Strategy sets out the requirements for the development and use of land in the Borough up to 2026.



**ISSUE 18 : MAY 2011**



2006-2007  
Transforming the Delivery of  
Services Through Partnerships



## Land-use Allocations DPD

Delays to the Core Strategy have had a knock-on effect for progress with the Land-use Allocations DPD.

Without an agreed strategy in place, it is not possible to establish how much land is required for future development, or where it is needed.

As a result the consultation on the *Preferred Options Report* for the Land-use Allocations DPD, which will identify a range of site options for delivering the strategic objectives, set-out in the Core Strategy, has had to be put back to 2012.

This delay has given Pendle Council the opportunity to bring forward work on the Development Management Principles DPD. This will now be merged with the Land-use Allocations DPD.

Whilst this may also delay consultation on the Land-use Allocations DPD, the



production of a joint DPD will save money and provide greater certainty for developers at the earliest opportunity.

Officers continue to consider the 2,000 representations received when the 208 site proposals were made available for public comment.

Whilst some sites have received significant levels of public opposition, all sites will be carefully assessed against known constraints.

Those potentially suitable for development will be passed to our external consultants Entec. They will carry out a detailed sustainability appraisal; a process that considers the economic, social and environmental impacts of the proposed use for each site.

Pendle Council will only select those sites that help to deliver the objectives set out in the Core Strategy, which will guide all development in Pendle over the next 15 years.

## Your LDF Team

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**Jonathan Dicken** 01282 661723  
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## Other LDF News

Planning Policy has recently lost the services of two valued members of staff.

Planning Policy Manager **Christine Galvin** (nee Douglas) left the Council at the end of January. She is returning to Scotland to raise her young family before considering her next career move.



At the end of March we also had to say goodbye to **James Ellis**, the Principal Planning Officer in our Housing Market Renewal team, when his contract came to an end.



We would like to thank both Christine and James for the positive contribution that they have made to planning in Pendle, and offer them our best wishes for the future.

The Government's withdrawal of funding for Housing Market Renewal means that the Council is now debating whether it is appropriate to proceed with the **South Valley Area Action Plan DPD**, as it is unlikely that the anticipated level

of housing delivery will be deliverable in the foreseeable future.

In response to the recent six-week public consultation on the update of our **Strategic Housing Land Availability Assessment (SHLAA)**, 27 individuals or organisations provided 110 separate comments. These included a number of new site suggestions, some of which have been included in the revised report.

Other responses included additional information on flood risk and a request that site assessments should consider the potential for future mineral extraction, including coal.

All the comments, together with an officer response, can be viewed on the Council's website at:

[www.pendle.gov.uk/hlaa](http://www.pendle.gov.uk/hlaa)

The SHLAA Update will be considered at the Council's Executive committee on Thursday 26<sup>th</sup> May 2011.

Last published in 2006, the **Pendle Retail Survey** has been revised and updated, using town centre occupancy figures recorded by our Economic Development team in September 2009.

## LDF Update

This summary, based on our Local Development Scheme, shows you what stage we have reached in preparing each of the documents to be included in the Pendle LDF.

LDF Document	Stage			
Core Strategy DPD	1			
Land-use Allocations DPD	1			
Development Management DPD	1			
Bradley Area Action Plan DPD			3	
South Valley Area Action Plan DPD				
Conservation Area Design SPD				4
Design Principles SPD				4
Open Countryside & AONB SPD				
Brierfield Canal Corridor SPD				4
Brierfield Railway Street Area SPD				4

### 1 Regulation 25

A period of ongoing informal consultation seeking to identify the key issues to be addressed and consider all reasonable alternatives for dealing with these issues.

### 2 Regulation 27 (DPD) or 17 (SPD)

Publication stage – a formal six-week public consultation to consider what the Council believes to be the 'final' version of its document.

### 3 Regulations 30 and 31 (DPDs only)

Independent examination (Regulation 31) of the document submitted to the Secretary of State (Regulation 30).

### 4 Regulation 36 (DPD) or 19 (SPD)

Document adopted.



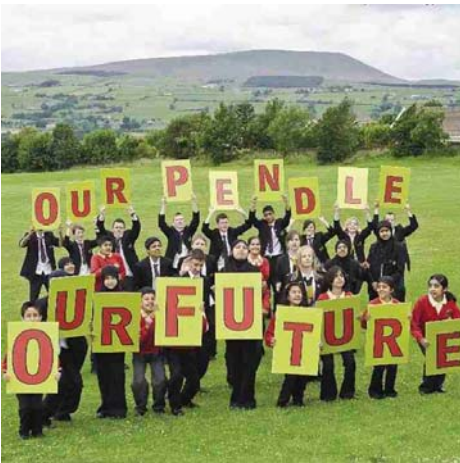
# Framework



Welcome to the 19<sup>th</sup> edition of *Framework*, the newsletter that keeps you up to date on the Local Development Framework (LDF) and emerging planning policy in Pendle.

This is the most important issue of *Framework* we have issued to date. It announces a six week public consultation to consider the Preferred Options Report for our Core Strategy. This is your opportunity to tell us if the strategic approach we are proposing to take, to guide development and growth in Pendle for the next 15 years, reflects the best approach we can take if we are to improve the area's fortunes in the future.

Also included are short articles on the draft National Planning Policy Framework and neighbourhood planning, which will be important features of the planning system in the years to come.



## Core Strategy: Preferred Options Report

**This is effectively your final chance to help us shape the way Pendle will look in 2026.**

The Core Strategy is one of the most important documents Pendle Council will produce for many years. It has far reaching implications, and will be used by planning officers on a daily basis to help determine planning applications for new development in the Borough.

The planning policies in Neighbourhood Development Plans (see separate article) will need to be in general conformity with the strategic policies in the Core Strategy.

The Preferred Options Report takes account of published evidence and new research. More importantly it has been influenced by two earlier rounds of public consultation and over 3,500 individual comments. This feedback from members of the public and partners, concerned with issues as diverse as highways, sewage, health, education, crime and the environment, has been invaluable.

## PUBLIC CONSULTATION

But, before we can take the Core Strategy forward we need to be sure that we have identified the right answers to the following questions.

- **What** type of development is needed?
- **Where** is development most needed?
- **How much** new development is needed?
- **Which** areas need to be protected from new development?

If we have got it right then the quality of life for people in Pendle should improve, and over time everyone will have a better chance to reach their full potential.

## Public Consultation

Our consultation of the Preferred Options Report will take place from:

**9:00am on Friday 28<sup>th</sup> October to 5:00pm on Monday 12<sup>th</sup> December**

All documents can be viewed or downloaded from the Council website at:

[www.pendle.gov.uk/corestrategy](http://www.pendle.gov.uk/corestrategy)

Reference copies will be available at Number One Market Street in Nelson and at the main libraries in Barnoldswick, Colne and Nelson.

A copy of the Preferred Options Report and representation forms are available in all Council Shops and local libraries.

Planning officers will also attend a series of **drop-in sessions** throughout Pendle during the course of the six-week public consultation (please see local press, Council website and consultation leaflet for more details).

**By working together we can help to make Pendle a better place to ...**



**ISSUE 19 : OCTOBER 2011**



**LIBERATA**



## Land-use Allocations

Up to this point our consultations on potential site allocations have taken place alongside those for the Core Strategy.

But, we need to agree our overall strategy before we can select those sites that are best placed to help deliver our strategic objectives for future development and growth in Pendle.

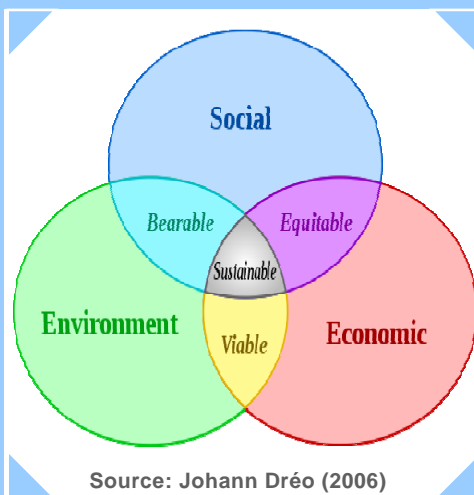
As a result the final public consultation, to consider all the sites that have been proposed, will not take place until mid-2012.



The land-use allocations document will also contain our detailed policies for development management. So from late 2013 our borough-wide strategic and detailed planning guidance, together with our site allocations will be in just two documents.

## Sustainable Development

Sustainable development seeks to use resources (land in the case of planning) in a way that meets human needs (economic and social) whilst preserving the environment, so that these needs can be met not only today, but for generations to come. The diagram below shows how this delicate balance is achieved.



## Your LDF Team

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## National Planning Policy Framework

The draft National Planning Policy Framework (NPPF) is a key part of the Coalition Government's reforms to make the planning system less complex and more accessible, and to promote sustainable growth.

The NPPF states that "planning must operate to encourage growth and not act as an impediment."

A presumption in favour of sustainable development is at the heart of the NPPF. This means that any development proposals that are consistent with the local development plan will be expected to go ahead without delay.

There has been much debate in the national and local press, speculating about what the NPPF will mean for the countryside and planning in general.

Whilst some of this may have been misleading, the final content of the NPPF will undoubtedly change.

**What is clear is that a plan-led system will remain.**



## Neighbourhood Development Plans

The Localism Bill, when enacted, will allow parish and town councils across Pendle to establish general planning policies for the development and use of land in their area.

The main way they can do this is to produce a Neighbourhood Development Plans (NDP). Whilst there is no obligation for a parish or town council to produce such a document, in areas where they are prepared they will be a significant factor in the determination of planning applications, as they will form part of the statutory Development Plan.

The Government recognises that neighbourhood planning will not operate sensibly if its policies are in conflict with those produced by the local planning authority, so all NDPs must:

- Have regard to national planning policies and advice in guidance from the Secretary of State.
- Be in general conformity with the strategic policies in the development plan for the area.

Pendle Council, as local planning authority will, through the Core Strategy, continue to establish the strategic context for planning in the Borough.

## LDF Update

This summary, based on our Local Development Scheme, shows you what stage we have reached in preparing each of the documents to be included in the Pendle LDF.

LDF Document	Stage			
Core Strategy DPD	1			
Land-use & Development Mgmt. DPD	1			
Bradley Area Action Plan DPD				4
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Independent examination (Regulation 31) of the document submitted to the Secretary of State (Regulation 30).

### 4 Regulation 36 (DPD) or 19 (SPD)

Document adopted.





**Merry Christmas and a Happy New Year to everyone from the Planning Policy team at Pendle Council.**

Welcome to the 20<sup>th</sup> edition of *Framework*, the newsletter that keeps you up to date on emerging planning policy here in Pendle.

As you may be aware the six-week public consultation on the Pendle Core Strategy (Preferred Options Report) closed on Monday 12<sup>th</sup> December 2011.

This edition of *Framework* provides you with some early feedback on the consultation. More importantly it tells you what we will do with all the comments we have received and sets out the next stages we must take before we can adopt our Core Strategy.

## The consultation

The six week public consultation on the Core Strategy took place between Friday 28<sup>th</sup> October and Monday 12<sup>th</sup> December 2011. During the consultation period a number of events were held throughout the Borough.



Presentations on the Core Strategy and its linkages with neighbourhood planning were made to many of the Parish Councils in Pendle.

In addition a series of drop-in sessions were held throughout Pendle at different times of the day, so that as many people as possible could visit an event close to where they live. These included a small exhibition, setting out the key requirements in the Core Strategy, with officers on hand to answer questions.

A total of 129 people attended the 13 drop-in sessions, some of which were held on STAN the Van (above). Unfortunately the drop-in sessions in Foulridge and Laneshaw Bridge, had to be cancelled when the generator on STAN needed to be repaired and alternative venues were unavailable.

## What happens next?

Pendle Council has received almost 240 valid representations (comments) from organisations, community groups and individual members of the public. Of these 91 were submitted electronically via the Council's website, or email.



Almost 240 comments received

Whilst the consultation may have finished, work on the Core Strategy continues.

Your comments are the key to how the document will change between now and the publication of the 'final' version of the Core Strategy.

Many of your comments address more than one issue, so over the next few months officers from the Council's Planning Policy team will:

1. Carefully consider each valid representation.
2. Identify the issues that need to be addressed.
3. Provide a response to each issue raised.
4. Where necessary, recommend a proposed change to the Core Strategy.

These proposed changes will be reported to two internal steering groups made up of:

- senior council officials
- elected members (councillors)

When an agreement has been reached, details of how your comments have influenced the Core Strategy will be set out in a Consultation Statement. This will accompany the Core Strategy, when it goes before the Council's Executive, hopefully in May 2012.

Once the Core Strategy has been agreed by the Executive, it must once again be made available for a six-week public consultation. At this time you will be able to comment on the soundness of the document (see article overleaf).

All the representations received during this consultation will be forwarded to the Secretary of State, who will then appoint an Inspector to conduct an independent examination of the Core Strategy.

Next Stages	Date*
1. Consider responses to Draft Core Strategy	Dec 2011
2. Report to Steering Groups	Jan 2012
	Feb 2012
3. Revise Core Strategy	Mar 2012
	Apr 2012
4. Report to Executive	May 2012
5. Publish Core Strategy	May 2012
6. Public consultation	Jun 2012
7. Submission to the Secretary of State	Aug 2012

\* Estimated dates

■ Six week public consultation

## Soundness and the Examination

Pendle Council will publish what it considers to be a *sound* document for later submission to the Secretary of State.

The assumption that the Core Strategy is sound will be the starting point for the examination; which will focus on two areas: legal compliance and soundness.

In determining the soundness of the document, the Inspector will consider whether it is justified, whether it is effective and whether it is consistent with national policy.

To be **justified** the Core Strategy needs to be:

1. Founded on a robust and credible evidence base arising from:
  - participation with the local community and others that have a stake in the Pendle area;
  - research and fact finding; showing that the choices made in the plan are backed up by the information available.

2. The most appropriate strategy when considered against all reasonable alternatives.

To be **effective** the Core Strategy must:

- be deliverable, flexible and capable of being monitored;
- be based on sound infrastructure delivery planning;
- have no regulatory or national planning barriers to delivery;
- have delivery partners who are signed up to it; and
- be coherent with the strategies of neighbouring authorities.

If the Core Strategy is not **consistent with national planning policy** Pendle Council must provide clear and convincing reasoning to justify its proposed approach.



## Allocating sites for development

The Core Strategy sets out our long-term strategy for development in Pendle.

It has been necessary to agree how we will accommodate growth in the future before considering the sites we will need to allocate for specific types of development (i.e. housing and employment).

Whilst the Core Strategy includes details on the amount of development proposed, it only identifies broad locations for future development.

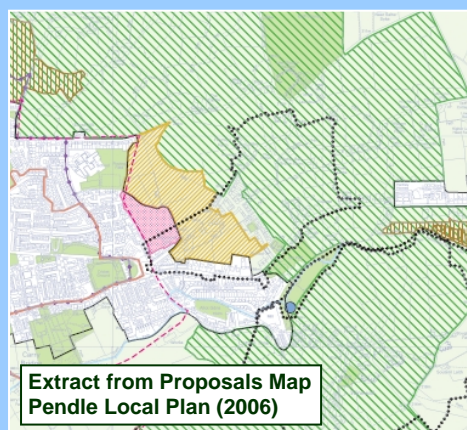
The allocation of specific sites will be carried out in the Land-use Allocations DPD. We have already held two 'call for sites' for this document and a third will be held in 2012.

In addition to allocating sites, the document will also establish the line of the settlement boundary. This is an important designation as it distinguishes between areas, where there will be a 'presumption in favour of development' and the open countryside where any proposed development must meet very specific policy requirements.

We will also identify those areas where development will be resisted, or required to meet higher standards of design.

The boundaries for some of these areas – particularly those protecting natural habitats and important landscapes – are already established by international or national legislation (e.g. Green Belt and Areas of Outstanding Natural Beauty)

Other designations (e.g. town centre boundaries, protected employment areas etc.) will be established through this plan.



The Land-use Allocations DPD will also contain our detailed policies to guide day-to-day development management decisions. This means that planning guidance for Pendle will be largely contained in this document and the Core Strategy.

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## Document Progress

This summary, based on our Local Development Scheme, shows you what stage we have reached in preparing each of the documents to be included in the Pendle Local Development Framework (LDF).

LDF Document	Stage			
Core Strategy DPD	1			
Land-use & Development Mgmt. DPD	1			
Bradley Area Action Plan DPD				4
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Publication stage – a formal six-week public consultation to consider what the Council believes to be the 'final' version of its document.

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Independent examination (Regulation 31) of the document submitted to the Secretary of State (Regulation 30).

### 4 Regulation 36 (DPD) or 19 (SPD)

Document adopted.



# Framework



The Bradley Hub

Welcome to the 21<sup>st</sup> edition of **Framework**, the newsletter that keeps you up to date on emerging planning policy here in Pendle.

The end of March was a particularly busy time in planning. Whilst officers in the planning policy team were busy considering the comments we received to our recent public consultation on the Core Strategy, the Government introduced new planning guidance and regulations aimed at transforming how we will manage development in the future.

Amidst all this we also had to say goodbye to Shelley Coffey, a valued member of the team for the last four years. We wish her well in her new job.

## Core Strategy Update

As reported in the last issue of Framework, we received 240 representations in response to the recent public consultation on the Preferred Options Report for the Pendle Core Strategy.

Since then officers in the planning policy team have carefully considered each of these representations and identified over 1,200 separate comments that need to be addressed.

The loss of a member of staff (see article overleaf) unfortunately means that it has taken slightly longer than expected to provide officer responses to the issues raised. We now anticipate that the representations and officer recommendations for changes to the Core Strategy will be reported to the Council's Executive Committee on 21<sup>st</sup> June 2012.

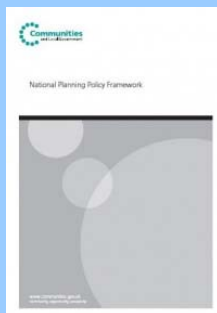
The committee report will be available on the Council's website one week prior to the meeting. This will include an appendix setting out the Council's response to all the comments that we received. If the report is accepted by the Council's Executive Committee, the Core Strategy will be amended accordingly.

Pendle Council will then publish what it considers to be the final version of its Core Strategy as soon as possible thereafter. At this time a further six week public consultation will allow you to say whether you consider this document to be sound, or unsound.<sup>1</sup>

<sup>1</sup> See the article on soundness in Issue 20.

## National Planning Policy Framework

The National Planning Policy Framework (NPPF) came into force on 27<sup>th</sup> March 2012. This 59 page document replaces thousands of pages of guidance previously contained in 44 planning policy statements (PPS), guidance notes (PPG) and circulars.



The policies in the NPPF set out what the Government considers to be sustainable development (see below).

**Sustainable development** meets the needs of the present without compromising the ability of future generations to meet their own needs.

The UK Sustainable Development Strategy *Securing the Future* sets out five 'guiding principles' of sustainable development:

1. Living within the planet's environmental limits
2. Ensuring a strong, healthy and just society
3. Achieving a sustainable economy
4. Promoting good governance
5. Using sound science responsibly

The presumption in favour of sustainable development is the recurring theme in both plan-making and decision taking, although the NPPF

does retain general restrictions in respect of:

- appropriate uses within town centres
- built heritage— listed buildings and conservation areas
- environmental and ecological designations – Green Belt and the countryside

Two documents were published alongside the NPPF:

- *Technical Guidance to the NPPF*, which deals with flood risk and minerals; and
- *Planning Policy for Traveller Sites*.

Planning Minister Bob Neill said: "What we're going to do now is look at the guidance that's around. We'll want to work methodically through it to see which bits it's useful to have."

The NPPF confirms that the plan-led approach is retained, with local authorities responsible for preparing local plans and parish and town councils encouraged to prepare their own neighbourhood development plans.

Planning policies adopted since 2004 will be given full-weight in the determination of planning applications for the next 12 months, after that time they should be replaced by an up to date local plan and will consequently be given less weight – the Replacement Pendle Local Plan (2001-2016) was adopted in May 2007.

The NPPF can be downloaded at:  
[www.communities.gov.uk/publications/planningandbuilding/nppf](http://www.communities.gov.uk/publications/planningandbuilding/nppf)

## Neighbourhood Planning

The Localism Act 2011 contains a wide range of measures, concerned with local government and planning.

The provisions of the Act are slowly being brought into force either automatically, by virtue of the Act itself, or through a series of 'commencement orders'.

The fifth and latest commencement order was published on 7<sup>th</sup> March 2012. This announced that the provisions introducing the new concept of neighbourhood planning – i.e. the ability to produce development plans and orders below local authority level – would come into force on 6<sup>th</sup> April 2012.

To help keep you informed about the latest developments we have set up a new Neighbourhood Planning page on the Pendle Council website:

[www.pendle.gov.uk/neighbourhoodplans](http://www.pendle.gov.uk/neighbourhoodplans)

At the moment this page directs you to sources of further information, including the regulations governing the preparation of Neighbourhood Plans.

## Your Planning Policy Team

It's a while since we had to report any staff changes, but at the beginning of February we had to say goodbye to Shelley Coffey, who left Pendle Council for a position in the private sector.

Shelley joined the planning policy team in September 2009, following a successful secondment from our Development Management section. In addition to working on policies for the Core Strategy, she had specialised in work associated with renewable energy provision.

We would like to thank Shelley for the positive contribution she made to the work of the team and wish her every success in the future.

Shelley's replacement may be familiar to some of our readers. Neall Bower has worked in the Conservation team at Pendle since August 2006. He brings with him a wealth of knowledge on built heritage issues and has previous experience in planning policy having joined Pendle from the forward planning team at Oldham MBC.

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## Allocating sites for development

Recent changes in national planning policy effectively mean that the Core Strategy will be the first document in a new two-part **Pendle Local Plan**.

The Core Strategy sets out our long-term strategy for future development in Pendle. Following its 'publication' later this year, we will turn our attention to the second part of our new Local Plan.

The combined Land-use Allocations and Development Management Principles Development Plan Document (DPD) will identify those sites that are best placed to help us deliver our vision for the future of Pendle, as set out in the Core Strategy.

It will also identify those areas where development will be resisted or required to meet higher standards of design and set out detailed policies to control development in such areas.

The process of identifying possible sites for future development started back in the summer of 2008. But without an adopted Core Strategy setting out our plans for spatial development across the borough, further progress has been delayed.



In addition to identifying new sites, we will also be reviewing the following site allocations and designations in the Replacement Pendle Local Plan:

- Settlement boundaries (1)
- Protected areas (3A)
- Sites of settlement character (12)
- Housing land allocations (17 & 18)
- Protected employment areas (22)
- Employment land allocations (23)
- Primary, secondary and local shopping frontages (26)
- Retail land allocations (27)
- Protected car parks (31)

### Notes:

1. The figures shown in brackets above refer to the relevant policy in the existing Local Plan.
2. Many designations such as those protecting historic buildings, natural habitats and valued landscapes are not established through planning policy, but the policies in Local Plans will support their objectives.

## Document Progress

This summary, based on our Local Development Scheme, shows you what stage we have reached in preparing each of the documents to be included in the Pendle Local Development Framework (LDF).

LDF Document	Stage
Core Strategy DPD	2
Land-use & Development Mgmt. DPD	1
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### 4 Regulation 36 (DPD) or 19 (SPD)

Document adopted.



# Framework



Welcome to the 22<sup>nd</sup> edition of **Framework**, the newsletter that keeps you up to date on emerging planning policy here in Pendle.

We are pleased to announce our intention to publish what we consider to be the final version of our Core Strategy at Full Council on Thursday 27<sup>th</sup> September 2012.

As we will not be able to alter the Core Strategy again before its submission to the Secretary of State for independent examination, a six week public consultation will follow. This will allow you to indicate if you agree that the Pendle Core Strategy represents the most appropriate approach to promoting sustainable development in the borough over the next 15 years.

Photo: Pendle Walking Festival: Saturday 1<sup>st</sup> September to Sunday 9<sup>th</sup> September 2012.

## Core Strategy The road to adoption

Planning officers have responded to over 1,200 individual comments on the Core Strategy, and have recommended a number of changes to the document.

These proposals will be considered by Pendle Council's Executive Committee and Full Council this September. The committee report and all supporting documents will be available to view, or download, from the Council's website from the beginning of the month.

If accepted by councillors, the Core Strategy will be published and made available for public comment as soon as possible after Full Council on 27<sup>th</sup> September.

This version of the Core Strategy represents what Pendle Council considers to be the final version of the document. A formal six week public consultation must be held to allow all interested parties to comment on whether the plan has met all legal and

procedural requirements and is considered to be sound (see opposite).

Once the consultation period has closed, Pendle Council will send a copy of the Core Strategy; any representations it has received, and all supporting documents to the Secretary of State for independent examination.

The examination officially begins on the date of submission. It will normally include a series of informal hearings on issues the Inspector would like to discuss in detail, with people invited to attend relevant sessions.

The Inspector will consider what he/she has heard and normally issue a report within four months of the final hearing session. If the Core Strategy is found to be legally compliant and sound, or can be made sound with some minor changes, the Council can proceed with its Adoption.

Reg <sup>1</sup>	Next Stages	Dates
-	Executive Committee	20 <sup>th</sup> September 2012
-	Full Council	27 <sup>th</sup> September 2012
19	Publication / Public Consultation	October / November 2012
22	Submission to Secretary of State	November 2012
-	Examination: Pre-hearing Meeting	January 2013 *
-	Examination: Hearing Sessions	March 2013 *
25	Receive Inspectors Report	June 2013 *
26	Adoption / Full Council	September 2013 *

<sup>1</sup> Town and Country Planning (Local Planning) (England) Regulations 2012

\* Estimated dates   Examination Period (Regulations 23 and 24)

## Core Strategy Is it sound?

The local planning authority (Pendle Council) should only submit a plan for examination, which it considers to be 'sound'; in other words that it is:

- **Positively prepared** – the plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and



Above: The NPPF and Pendle Core Strategy

- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (NPPF).

## Core Strategy

### Are your contact details up to date?

We are aware that planners are often the last people on your mind when a loved one passes away, you move house, or change your email account.



Over the next few weeks we will be sending out forms to help us refresh the planning policy database.

So we can tell you about the latest developments as quickly and cheaply as possible, we are making increased use of emails and the Council's website.

If you have an email account, please let us know. We promise not to clutter your inbox with unnecessary emails, or share your contact details with other Council departments or external organisations.

#### What to do

1. If you receive a form, make sure your contact details are correct and return it to us in the pre-paid envelope.
2. If you receive two or more forms, addressed to different individuals, please let us know if you would be happy to receive a joint notification in the future.
3. If you don't receive a form by the end of August, don't worry. To keep up-to-date on planning policy matters here in Pendle you can:
  - a. contact a member of the planning policy team, or
  - b. download a copy of the form from the Pendle Council website. Your completed form can be emailed or posted back to us at the address opposite.

## How to contact us

John Halton

Principal Planning Officer (Policy)

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**Website:** [www.pendle.gov.uk/planning](http://www.pendle.gov.uk/planning)

## Other news

The recent introduction of the National Planning Policy Framework (NPPF) has seen the return of some familiar planning terms. Gone is the portfolio of local planning documents known as a Local Development Framework, to be replaced, wherever possible, by a single Local Plan.

As we have almost completed work on our Core Strategy, it is likely that Pendle will have a two-part Local Plan for the foreseeable future.

#### Pendle Local Plan

**Part 1 – Core Strategy**

**Part 2 – Site Allocations and Development Policies**

Part 1 of the new Pendle Local Plan will contain the vision, strategy and strategic policies to promote sustainable development in the borough for the next 15 years, whilst Part 2 will:

1. Indicate which sites are considered to be best placed to help deliver the objectives set out in the Core Strategy, and identify their proposed use.
2. Establish the boundaries for areas where development will be resisted, or required to meet higher standards of design.
3. Set out detailed development management policies that will be used to inform day-to-day decisions on planning applications.

A review of the planning designations, established in the Replacement Pendle Local Plan 2001-2016 will form an integral part of our public consultation on the Site Allocations and Development Policies (Preferred Options Report) in 2013.

The new Town and Country Planning (Local Planning) (England) Regulations 2012 came into force on the 6<sup>th</sup> April 2012. As a result the numbers of the regulations relevant to the production and adoption of planning documents have changed. These are reflected in the table opposite.

Councillor Tony Greaves has taken



over as the Executive Member with responsibility for Planning Policy. Councillor Greaves, who represents the Waterside ward in Colne, also sits in the House of Lords having been made a life peer as Lord Greaves, of Pendle in the County of Lancashire, on 8<sup>th</sup> May 2000. He was the Liberal Democrat spokesperson in the House of Lords on DEFRA matters for seven years until earlier this year.

## Document progress

This summary is based on our Local Development Scheme. It shows you which stage we have reached in preparing each of the documents to be included in the Pendle Local Plan.

Document type / title	Stage
<b>Local Plan Documents</b>	
Core Strategy	2
Site Allocations & Development Policies	1
Bradley Area Action Plan	4
South Valley Area Action Plan	
<b>Supplementary Planning Documents</b>	
Conservation Area Design Guidance	4
Design Principles	4
Open Countryside & AONB	
Brierfield Canal Corridor	4
Brierfield Railway Street Area	4

#### 1 Regulation 18

A period of ongoing informal consultation seeking to identify the key issues to be addressed and consider all reasonable alternatives for dealing with these issues.

#### 2 Regulation 19 (12 SPD)

Publication stage – a formal six-week public consultation to consider what the Council believes to be the 'final' version of its document.

#### 3 Regulations 22 and 24 (not SPDs)

Independent examination (Regulation 24) of the document submitted to the Secretary of State (Regulation 22).

#### 4 Regulation 26 (14 SPD)

Document adopted.



# Framework



**Welcome to the 23<sup>rd</sup> edition of Framework, the newsletter that keeps you up to date on emerging planning policy here in Pendle.**

We are pleased to announce that we will publish what is considered to be the final version of our Core Strategy for a six week public consultation on Friday 19<sup>th</sup> October 2012.

This consultation will allow you to indicate to the Secretary of State, and the Inspector appointed to carry out the independent examination of the Core Strategy, if you agree that it represents the most appropriate approach to promoting sustainable development in the borough over the next 15 years.

Details of how you can view the consultation documents and submit your comments are included in this newsletter and on the Council's website.

## Core Strategy Public Consultation

Pendle Council's Executive authorised the Publication of the Pendle Core Strategy at its meeting on Thursday 20th September 2012. This decision was ratified one week later when Full Council met on Thursday 27th September 2012.

In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, a six week public consultation will take place between the following dates:

### Start:

**9:00am Friday 19<sup>th</sup> October 2012**

### Close:

**5:00pm Monday 3<sup>rd</sup> December 2012**

The purpose of this consultation is to allow you the opportunity to comment on whether all legal and procedural requirements have been met in the production of the Pendle Core Strategy and whether you feel that the Council has drawn up a sound strategy (see article on soundness).

**Pendle Council will make no further alterations to the Core Strategy at this time.**

As soon as practicable after the close of the consultation period, the Council will send a copy of the Core Strategy; any representations it has received and all supporting documents to the Secretary of State for independent examination.

The Council will draw up a schedule of proposed changes to highlight any wording that will need to be altered, or added to the final document.

This schedule will be updated regularly throughout the examination period as changes are agreed during the hearing sessions.

The schedule will then be submitted to the Inspector at the close of the examination hearing sessions for his/her consideration.

## PUBLIC CONSULTATION

Derek Thomas will once again be the Programme Officer for the examination. He has previously presided over the examinations for the Replacement Pendle Local Plan in 2005 and the Bradley Area Action Plan in 2011. We will publish his contact details in the next edition of Framework.

A timetable showing key stages and the dates of the Pre-hearing Meeting and individual Hearing Sessions will be published on the Council's website as soon as they are confirmed by the Planning Inspectorate.

To keep up to date with the latest developments, please keep checking our webpage:

[www.pendle.gov.uk/corestrategy](http://www.pendle.gov.uk/corestrategy)

## Core Strategy Is It Sound?

This article should look familiar to our regular readers, as it featured in the previous edition of Framework. It is included again to help reinforce that the Publication Report represents what is considered to be the final version of our Core Strategy.

We are no longer seeking suggested amendments to the overall strategy or individual policies. Instead we are looking to determine whether all legal requirements have been met in the production of the Core Strategy and if the document is considered to be 'sound'; in other words that it is:

- **Positively prepared** – the plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; **and**
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (NPPF).

## Core Strategy

### How Can I Take Part In The Consultation?

You can submit your comments to Pendle Council in a number of ways.

The quickest and easiest way is online via the dedicated consultation portal at:

[www.pendle.gov.uk/corestrategy](http://www.pendle.gov.uk/corestrategy)

Alternatively you can complete and return an official representation form via email, post or fax (see 'How To Contact Us' opposite).

You can also submit your comments in the form of a letter or email.

As there will not normally be another opportunity to make further comment, your representation should make it clear:

1. If you consider the document to be sound, or unsound.
2. Which part of the Core Strategy you are commenting on.
3. What evidence and supporting documentation you are relying on to justify your representation.

4. Any suggested changes you are proposing.

Copies of the Core Strategy and official representation forms are available at all venues. The following venues also hold copies of all supporting documents:

- Number One Market Street, Nelson
- Public libraries in Nelson, Colne and Barnoldswick.

The following venues only hold copies of the key supporting documents.

- Town Halls and Council Shops in Barnoldswick, Brierfield, Colne and Earby.
- Public libraries in Barrowford, Brierfield, Trawden and Wheatley Lane, and the mobile library.
- STAN the Van

**N.B. Please check with the venue to confirm opening times, before visiting**

### How To Contact Us

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**Website:** [www.pendle.gov.uk/planning](http://www.pendle.gov.uk/planning)

### Other Planning Policy News

In the recent Cabinet reshuffle, there was considerable change at the Department for Communities and Local Government (DCLG).

The full list of ministerial changes is set out below, with those primarily responsible for planning matters highlighted opposite.

- **Eric Pickles** stays as Secretary of State.
- **Nick Boles** replaces Greg Clark as Decentralisation, Planning Policy and Cities minister.
- **Mark Prisk** replaces Grant Shapps as Housing, Local Government and Regeneration minister.
- **Don Foster** replaces Andrew Stunell as Community Cohesion minister.
- **Brandon Lewis** replaces Bob Neill as Planning, Fire and Resilience minister
- **Baroness Hallam** stays as Productivity and Transparency minister.



**Top:** Eric Pickles and Nick Bowles  
**Bottom:** Mark Prisk and Brandon Lewis

Alongside the Core Strategy, we are also offering you the chance to comment on three recently updated reports that form part of the **evidence base** for new planning documents in Pendle.

The first is an update of the Lancashire Gypsy and Traveller Accommodation Assessment (GTAA) published in May 2007. This new edition looks at the implications any recent changes may have for the Burnley and Pendle housing market area.

Consultants Nathaniel Lichfield & Partners have updated the findings of the Pendle Retail Capacity Study, which also dates back to May 2007. The update takes account of changes in shopping patterns and retail expenditure following the onset of the economic recession and the increase in shopping on the internet.

Finally the Pendle Infrastructure Study has been amended and updated following the public consultation at the end of 2011.

### Document Progress

This summary is based on our Local Development Scheme. It shows you which stage we have reached in preparing each of the documents to be included in the Pendle Local Plan.

Document type / title	Stage
<b>Local Plan Documents</b>	
Core Strategy	2
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#### 2 Regulation 19 (12 SPD)

Publication stage – a formal six-week public consultation to consider what the Council believes to be the 'final' version of its document.

#### 3 Regulations 22 and 24 (not SPDs)

Independent examination (Regulation 24) of the document submitted to the Secretary of State (Regulation 22).

#### 4 Regulation 26 (14 SPD)

Document adopted.



# Framework



Welcome to the 24<sup>th</sup> edition of *Framework*, the newsletter that keeps you up to date on emerging planning policy here in Pendle.

This edition is shorter than usual as it deals with one important issue.

Following the recent six-week public consultation on the Core Strategy (Publication Report) it was clear that the currency of a key document within our evidence base would be challenged at examination had the Core Strategy been submitted to the Secretary of State.

After careful consideration of the options available, Pendle Council has concluded that it must update the Burnley and Pendle Strategic Housing Market Assessment (SHMA) and the Pendle Employment Land Review (ELR), which was also adopted in 2008. The Core Strategy will then be revised in light of this new information and re-published in summer 2013.

## Core Strategy Consultation Feedback

In accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012, a public consultation to consider the *Pendle Core Strategy (Publication Report)* was held over the six-week period from 9.00am on Friday 19th October 2012 to 5:00pm on Monday 3rd December 2012.

### Summary of Responses

A total of 33 valid representations were received during the consultation period. These were submitted by the following individuals and organisations:

1. Mr Arthur Stuttard
2. The Coal Authority
3. Dr Alison Birkinshaw
4. Mr. Peter Copestake
5. North Yorkshire County Council
6. Rolls Royce plc
7. The Theatres Trust
8. Pendle Constituency Labour Party
9. Network Rail Infrastructure Ltd.
10. Environment Agency
11. Dalesview Developments Ltd.
12. Pendle Vision
13. Mr John Metcalfe & Mrs. Rosalyn Wilson
14. Trustees of the Green Emmott Trust
15. Mr. James Hutchinson
16. Natural England
17. The Wildlife Trust for Lancashire, Manchester and North Merseyside
18. National Trust
19. Royal Society for the Protection of Birds
20. Mr. Andrew Ashworth
21. Canal & Rivers Trust
22. Barrowford Parish Council
23. Mrs. Sarah Cockburn-Price
24. Dr. John Plackett & Mrs. Alison Plackett
25. Lidgett & Beyond Group
26. Sainsbury's Supermarket Ltd.
27. Ms. Anna Predolac
28. Lancashire Local Enterprise Partnership
29. United Utilities
30. Peel Holdings Land & Property Ltd.

31. Burnley Borough Council
32. Lancashire County Council
33. Mr. Keith H. Thorp

### Outcome

Pendle Council acknowledges that in light of the comments made in these representations, some minor changes are required to the Core Strategy. The regulations require these to be presented in a *Schedule of Proposed Changes* submitted to the Secretary of State alongside the Core Strategy.

Government guidance also states that the Council should only submit a plan for Examination, which it considers to be sound.

Two factors required Pendle Council to reconsider whether its Core Strategy could be considered to be sound.

1. Two of the representations received challenged the currency of the Burnley & Pendle Strategic Housing Market Assessment (SHMA), which was adopted in May 2008. This is a key document in the evidence base, underpinning the requirement for new housing and eventually the amount of land that would need to be allocated for new house building.
2. The practice guidance on preparing an SHMA indicates that a review should only be necessary every five years. However, comments made by the Inspector conducting the Examination of the *East Hampshire Core Strategy* make it clear that he felt that an SHMA that is almost five years old would not allow him to properly consider whether the Plan met objectively assessed need [see paragraph six of his letter of

23<sup>rd</sup> November 2012, accessible via the following weblink].

[http://www.easthants.gov.uk/ehdc/formsfordownload.nsf/0/332B735DC756232280257AC900527E3E/\\$File/ID-17+Inspector's+Preliminary+Note+Nov+23+2012.pdf](http://www.easthants.gov.uk/ehdc/formsfordownload.nsf/0/332B735DC756232280257AC900527E3E/$File/ID-17+Inspector's+Preliminary+Note+Nov+23+2012.pdf)

These views have also been reflected in correspondence between the Planning Inspectorate and Ribbles Valley Borough Council.

After careful consideration Pendle Council concluded that the Core Strategy would be unlikely to be found sound at Examination and cannot be submitted to the Secretary of State at this time.

### What Happens Now?

Over the next few months the Core Strategy will be updated to address the comments that the Council agrees with and to reflect any new information that emerges from the SHMA and ELR updates.

The intention is to re-publish the Core Strategy in summer 2013 for a further six-week formal public consultation, in accordance with Regulation 19, before its submission to the Secretary of State for Examination.

### Further Information

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Principal Planning Officer (Policy)

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**Email:** [john.halton@pendle.gov.uk](mailto:john.halton@pendle.gov.uk)

As details become clearer updates will be posted on the Council's website at:  
[www.pendle.gov.uk/corestrategy](http://www.pendle.gov.uk/corestrategy)



# Framework



RiverSide Business Park  
M65 Junction 13  
Peel Land & Property

Welcome to the 25<sup>th</sup> edition of **Framework**, the newsletter that keeps you up to date on emerging planning policy here in Pendle.

As you may have read in the previous issue, in response to the recent public consultation on our Core Strategy, we received an unexpected challenge to a key component of our evidence base.

As a result, the early part of this year has been spent updating a number of studies, which will reconsider the evidence underpinning the housing and employment land requirements of the emerging Local Plan.

In addition, to demonstrate that the costs of any policy requirements, likely to be applied to development, such as the provision of affordable housing or open space, will not put the implementation of the emerging Local Plan at risk but will “facilitate development throughout the economic cycle” a new study looking at development viability has been commissioned.

## Local Plan Evidence Base

In order to address concerns raised during last December's public consultation on the Core Strategy, work is currently underway to update the evidence underpinning our policies on housing. This is primarily contained in two documents:

1. **Burnley & Pendle Strategic Housing Market Assessment**
2. **Pendle Strategic Housing Land Availability Assessment**

The opportunity is also being taken to update a third document; the **Pendle Employment Land Review**. Adopted by Pendle Council in 2008, this study considers the need to provide more and better quality employment land, to help fuel future economic growth and job creation in the Borough. The findings of these three reports will help to inform any revisions to our policies.

The new **Development Viability Study** will then consider how the financial aspects of different types of development will be influenced by the planning policy requirements set out in the Core Strategy, together with other market factors and site-specific issues.

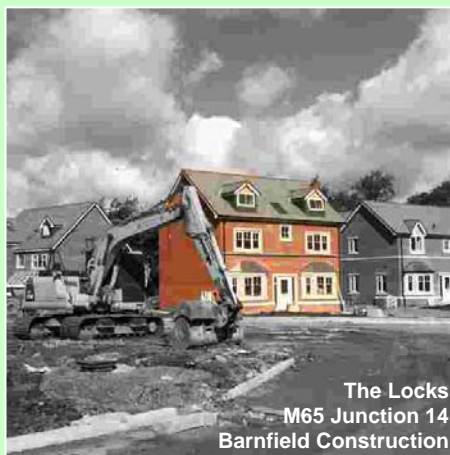


Articles, elsewhere in this edition of Framework, explain the roles of these documents in more detail.

## Strategic Housing Land Availability Assessment

The Strategic Housing Land Availability Assessment (SHLAA) is a list of over 300 sites, of differing sizes, which have been identified from a wide variety of sources and are believed to have potential for future housing development.

The first SHLAA was published in 2008 and its findings are updated annually in the Authority's Monitoring Report (AMR). This is the first review to consider sites outside a defined settlement boundary.



### Why do we need a SHLAA?

The Local Plan must identify sufficient land to accommodate the Borough's housing requirement (see article on the Strategic Housing Market Assessment).

The purpose of the SHLAA is to assess all housing sites and identify those that are considered to be deliverable or developable.

Sites that are included in the SHLAA should be capable of being delivered during the 15-year plan period.

The SHLAA must identify sufficient viable sites to meet the identified housing need for the first five years of the plan period.

### How are sites assessed?

Sites are assessed in two stages.

- Stage 1: Consists of a series of broad checks to determine whether sites are available for development and in a suitable location.
- Stage 2: Those sites that pass the broad checks at Stage 1 are then considered in greater detail. At this point additional information on matters such as financial viability is sought from landowners and developers, in order to make a final determination on site deliverability.

### What happens next?

Sites are assigned into the following categories to indicate when they are likely to come forward for development:

- 1 to 5 years
- 6 to 10 years
- 11 to 15 years.

The results reveal whether Pendle Council can demonstrate a five-year supply of housing land, as required by the National Planning Policy Framework (NPPF).

### Will all the sites be developed?

No, Pendle Council will only allocate sufficient land to meet its requirements over the plan period.

### Further information:

[www.pendle.gov.uk/shlaa](http://www.pendle.gov.uk/shlaa)

## Strategic Housing Market Assessment

The purpose of a SHMA, as it is commonly referred to, is to help obtain a clear understanding of the local housing market and in particular the likely needs and demand for housing.

The previous SHMA, adopted in April 2008, determined that Pendle shares its housing market with neighbouring Burnley, so the new SHMA will once again be a joint commission.

The consultants appointed to carry out the SHMA will report back in September. The principal outputs will indicate:

- The key drivers underpinning the local housing market.
- The number of households in 'housing need'.
- Our future housing requirement broken down by size, type and tenure for:
  - market housing
  - affordable housing
  - specialist housing requirements.

## Development Viability Study

The National Planning Policy Framework (NPPF) [Para. 173] requires local authorities to pay careful attention to viability and costs in plan-making and decision-taking. For plans to be deliverable, the scale of development and any sites identified should not be subject to policy burdens or obligations (e.g. provision of affordable housing, open space, or infrastructure) that place their ability to be developed at unnecessary risk.

Commercial real estate specialists Colliers International – working in partnership with property regeneration consultants Aspinall Verdi – has been appointed to prepare a study by August.

The key requirements are to look at the implications of proposals set-out in the Core Strategy; to help inform future site allocations and to consider the scope for introduction of a Community Infrastructure Levy (CIL) in Pendle.

## How To Contact Us

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**Website:** [www.pendle.gov.uk/planning](http://www.pendle.gov.uk/planning)

## Employment Land Review

The Council's first Employment Land Review (ELR) was adopted in 2007. Its purpose is to identify the likely future demand for employment land, review the suitability of existing sites to meet that demand and, if necessary, identify new sites to address identified deficiencies in the current stock of sites.

Work is well underway with Stage 1, which is an in-house review of the existing portfolio of 56 sites.

## Taylor Review

When the National Planning Policy Framework (NPPF) was published in March 2012, the government promised to review the continued need for over 7,000 pages of planning guidance, some of which dated back to 1963!

The aim was to produce an accessible and more effective set of practice guidance, dramatically reducing the amount of existing guidance and ensuring that new guidance supports effective planning.

The independent group, led by Lord Taylor of Goss Moor, published its findings in December 2012.

The vision is to create a web-based system of planning guidance, which must be clear, coherent and free to all. In addition the website should signpost organisations providing best practice guidance and other advice, although it will not endorse specific documents.

A total of 131 documents were identified as being unfit for purpose. The intention is to cancel, revise or edit these to include only the relevant parts. The majority of this work should be completed by July 2013.

Priorities for new and updated guidance were also highlighted in the final report.

## Document Progress

This summary is based on our Local Development Scheme. It shows you which stage we have reached in preparing each of the documents to be included in the Pendle Local Plan.

DOCUMENT TYPE / Title	STAGE
-----------------------	-------

LOCAL PLAN DOCUMENTS				
Core Strategy		2		
Site Allocations & Development Policies	1			
Bradley Area Action Plan				4

SUPPLEMENTARY PLANNING DOCUMENTS				
Conservation Area Design Guidance				4
Design Principles				4
Open Countryside & AONB				
Brierfield Canal Corridor				4
Brierfield Railway Street Area				4

- 1 Regulation 18**  
A period of ongoing informal consultation seeking to identify the key issues to be addressed and consider all reasonable alternatives for dealing with these issues.
- 2 Regulation 19 (12 SPD)**  
Publication stage – a formal six-week public consultation to consider what the Council believes to be the 'final' version of its document.
- 3 Regulations 22 and 24 (not SPDs)**  
Independent examination (Regulation 24) of the document submitted to the Secretary of State (Regulation 22).
- 4 Regulation 26 (14 SPD)**  
Document adopted.

## Regional Strategy

Following Baroness Hanham's Written Ministerial Statement of 27<sup>th</sup> March 2013, an Order to revoke the *Regional Strategy for the North West* has been laid in Parliament. The Order will come into force on 20<sup>th</sup> May 2013.

The decision follows the outcomes of the Strategic Environmental Assessment (SEA), which considered the environmental impacts in the region, arising from its abolition. Full details are contained in the Post Adoption Statement, available at:

<https://www.gov.uk/government/consultations/strategic-environmental-assessment-about-revoking-the-north-west-regional-strategy-environmental-report>



# Framework



The Shuttle – Nelson Town Centre

Welcome to the 26<sup>th</sup> edition of **Framework**, the newsletter that keeps you up to date on emerging planning policy here in Pendle.

It's been a few months since our last edition was published in April. A lot of work has been going on behind the scenes to update key parts of the evidence base, which underpins the strategic objectives and policies set-out in the Pendle Core Strategy.

In this edition we present a first look at the findings emerging from these updates. A six-week public consultation early in the new year, will allow you to look at the results of this new analysis in greater detail and consider any changes that have been made to the Core Strategy since it was made available for public comment in October last year.

Finally may we wish you a **Merry Christmas and a Happy New Year.**

## Strategic Housing Market Assessment

In April 2013, Burnley and Pendle Council's jointly commissioned consultants Nathaniel Lichfield and Partners to update their **Strategic Housing Market Assessment (SHMA)**.



Lob Lane Mill  
Brierfield

The new SHMA recommends:

- That 280-320 new dwellings need to be built each year to meet the "objectively assessed needs" for housing in Pendle over the 15-year plan period to 2030.
- The spatial distribution of new housing should be:
  - 70% in the M65 Corridor
  - 20% in the West Craven Towns
  - 10 in Rural Pendle.
- That 40% of all new housing should be of affordable tenures as follows:
  - Social Rent (30%)
  - Affordable Rent (20%)
  - Intermediate (50%)

The study also provides guidance on the types and sizes of homes that the future population of Pendle will need. These findings will inform revisions to housing policies in the Core Strategy.

## Strategic Housing Land Availability Assessment

Often referred to simply as the **SHLAA**, this document shows how much land is potentially available to provide new homes in Pendle, and forms an important part of the evidence base for the emerging Local Plan.

The SHLAA has been fully reviewed to ensure that there are sufficient:

- **Deliverable** sites for housing in the first five years of the plan period (the so called five-year supply).
- **Developable** sites to meet the overall housing requirement identified in the Core Strategy.

The findings show that around 2,200 dwellings could be built within five years. This figure includes sites with planning permission and sites without planning permission, where the landowner has provided evidence to show that there are no major issues to resolve and that the site can be delivered in the short-term.



The review process has considered each site against a range of criteria to determine whether it is available, suitable and achievable. This has included an assessment of viability using outcomes from the Development Viability Study.

## Employment Land Review

The previous **Pendle Employment Land Review (ELR)** was adopted by the Council in 2008.

Government guidance recommends that the ELR should be reviewed every five years and that any review should adopt the following three stage process.

### 1. Consider the continued suitability of sites that make up the current employment land portfolio.

A total of 31 sites were discounted at Stage 1 as they were either below the 0.25ha minimum site threshold, or no longer considered capable of meeting future business needs or sustainability requirements.

### 2. Establish the potential future demand for employment land over the 15 year plan period.

A range of scenarios looked at the likely need for employment land by considering future business needs (demand), population change (supply) and evidence of past take-up.

### 3. Identify any gaps in provision in terms of quantity, quality and geographical location.

Future site allocations will seek to address any identified needs in terms of the amount, location or quality of existing provision; to help facilitate and promote future economic growth.

The review of the Pendle ELR is almost complete. The new study will be made available for public comment alongside the Core Strategy (see article overleaf - What Happens Next?).

## Review of National Planning Guidance

A new **National Planning Practice Guidance** website was launched by planning minister Nick Boles on 28th August, initially only in a test mode for six weeks to allow public comment.

Following some initial problems accessing the site the Department for Communities and Local Government announced that there had been more than 2,000 visits to the website within the first 24 hours of it going live.

The new site has been produced in response to an independent review of planning guidance led by Lord Taylor of Goss moor, which published its findings last year (see Framework 25).

At that time the Taylor Report described the system as "unfit for purpose" and recommended that the 237 planning guidance documents currently in use should be replaced with a single, up-to-date online resource.

## Development Viability Study

In January 2013, Pendle Council appointed commercial real estate specialists Colliers International and property regeneration consultants Aspinall Verdi to prepare a study that would consider how the economic viability of different types of development would be influenced by the planning policy requirements set-out in the Pendle Core Strategy.

The results of this analysis indicate that most types of development are unlikely to be economically viable based on current market conditions.

This position is reflected throughout Pennine Lancashire and many other areas in need of regeneration across the country.



There will, however, be viable projects in parts of Pendle and improvements in the rate of economic growth will have a beneficial impact on the future viability of sites throughout the Borough.

## East Lancashire Transport Masterplan

Lancashire County Council recently consulted on its draft East Lancashire Highways and Transport Masterplan.

This document identifies a number of proposals to improve the transport network in East Lancashire in the coming years, to ensure that the necessary infrastructure is in place to support future economic growth.

The Masterplan includes proposals for major changes to the highway network, public transport, walking and cycling facilities. These changes will help to unlock planned housing developments and investment that will create new jobs. The proposals will also provide a transport network that is able to cope with the predicted increases in traffic and help to avoid gridlock on our roads.

The six-week public consultation ran from 23<sup>rd</sup> October to 13<sup>th</sup> December 2013 and further information can be found on the **County Council website**.

## Pendle Core Strategy: What Happens Next?

The revised version of the **Pendle Core Strategy** and several new evidence base documents were considered by the Council's Executive and Full Council, on the 12<sup>th</sup> and 19<sup>th</sup> December, respectively.



Councillors have agreed that these documents should be made available for a six-week public consultation, which will be held early in the New Year.

This consultation will represent a small 'step back', but is necessary because the **Core Strategy [Further Options Report]** proposes:

- A new housing delivery target.
- A new employment land requirement.
- To allocate two strategic sites for housing and employment.

Further information will be available in the January 2014 edition of **Framework**.

## How To Contact Us

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## Document Progress

This summary is based on our **Local Development Scheme**. It shows you which stage we have reached in preparing each of the documents to be included in the new Pendle Local Plan.

DOCUMENT TYPE / Title	STAGE
<b>LOCAL PLAN DOCUMENTS</b>	
Core Strategy	1
Site Allocations & Development Policies	1
Bradley Area Action Plan	4
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### 1 Regulation 18

A period of ongoing informal consultation seeking to identify the key issues to be addressed and consider all reasonable alternatives for dealing with these issues.

### 2 Regulation 19 (12 SPD)

Publication stage – a formal six-week public consultation to consider what the Council believes to be the 'final' version of its document.

### 3 Regulations 22 and 24 (not SPDs)

Independent examination (Regulation 24) of the document submitted to the Secretary of State (Regulation 22).

### 4 Regulation 26 (14 SPD)

Document adopted.



# Framework



Covey Bridge near Laneshaw Bridge

Welcome to the 27<sup>th</sup> edition of **Framework**, the newsletter that keeps you up to date on emerging planning policy here in Pendle.

The purpose of this issue of **Framework** is to tell you about the six week public consultation on the Core Strategy (Further Options Report).

Whilst a large proportion of this document remains the same as the previous version of the Core Strategy, a new public consultation is necessary as there are some significant changes; notably a new housing delivery target, a new employment land requirement and the allocation of two strategic sites.

This consultation gives you a chance to tell us what you think about these changes. It also provides you with an opportunity to comment on the overall approach we propose to use to guide development and growth in Pendle over the next 15 years.

## Core Strategy Public Consultation

In response to our previous public consultation on the Core Strategy (October-December 2012), we received 33 representations. Two of these raised concerns about age of the evidence base for housing (see Issue 24 for further information).

After careful consideration Pendle Council concluded that these objections meant that it was unlikely that the Core Strategy would be found sound at examination.

Rather than submit the Core Strategy to the Secretary of State, it was decided to take a 'step back' to update the evidence base documents listed below, and prepare a Development Viability Study (see Issue 26 for details):

- Burnley & Pendle Strategic Housing Market Assessment (SHMA)
- Pendle Strategic Housing Land Availability Assessment (SHLAA)
- Pendle Employment Land Review (ELR)

The changes made to the Core Strategy as a result of this work are considered in more detail overleaf.

The Core Strategy is an important document. It forms part of the Local Plan, which government legislation requires all local planning authorities to prepare, and will influence development in the Borough up to 2030.

The Core Strategy and **ALL** supporting documents can be viewed or downloaded from the Council's website at [www.pendle.gov.uk/corestrategy](http://www.pendle.gov.uk/corestrategy)

They will also be available at Number One Market Street in Nelson and at the

main libraries in Nelson, Colne and Barnoldswick.

The Core Strategy and **KEY** supporting documents will be available at local libraries and Council shops throughout Pendle.

Planning officers will attend a series of drop-in sessions during the consultation period to answer your questions:

Date	Time	Venue
20 Jan	16:00-20:00	Lower Municipal Hall, Colne
21 Jan	16:00-20:00	Rainhall Centre, Barnoldswick
22 Jan	16:00-20:00	Holmefield House, Barrowford
23 Jan	16:00-20:00	Town Hall Reception, Nelson
11 Feb	10:00-16:30	Town Hall Reception, Nelson

This public consultation represents the final chance for you to comment in detail on the policies in the Core Strategy. The next consultation – a return to the Publication stage – will only allow you to indicate whether you consider the document to be 'sound'.

Comments should ideally be submitted online, or on the official representation forms, which will be available at all of the above locations. Letters and emails are also acceptable.

**The six-week consultation period will run from:**

**9:00am Friday 10<sup>th</sup> January to**

**5:00pm Friday 21<sup>st</sup> February 2014**

## Core Strategy Earlier Consultations

Earlier issues of this newsletter have indicated why getting to this point has taken longer than originally anticipated.

Below is a brief summary of how the policies in the Pendle Core Strategy have evolved over time.

### Options Stage [Regulation 18]

#### You Choose [2007]

This campaign helped to identify those issues that were most important to the people of Pendle. These helped to inform both the Sustainable Community Strategy and the Core Strategy.

#### Issues and Options Report [2008]

The issues highlighted in the *You Choose* campaign, provided the basis for a range of strategic objectives, spatial strategies and planning policies that could be used to guide future development in the Borough.

#### Preferred Options Report [2011]

Taking account of the views expressed at the *Issues and Options* stage, this document set out the Council's chosen strategy for addressing those matters where planning can have a real influence on the future of the Borough.

### Publication Stage [Regulation 19]

#### Publication Report [2012]

Rather than the content of the Core Strategy, it was the overall 'soundness' of the document (see Issue 23) that was considered at this stage.

Pendle Council has now returned to the options stage (Regulation 18) and published the Core Strategy (Further Options Report) for public consultation.

## Core Strategy Housing

Policy LIV1: Housing Provision and Delivery has been amended to take account of the new evidence from the Strategic Housing Market Assessment.

The policy now requires 4,350 new homes to be built over the plan period (i.e. 2015-2030), equating to a delivery rate of 290 new dwellings per annum.

This level of house building reflects the projected growth in both population and households; takes account of the latest economic growth forecasts; and also acknowledges issues concerning the financial viability of delivering new housing in Pendle.

Policy LIV4: Affordable Housing sets baseline figures for the provision of affordable housing as part of any new housing development. The percentages identified represent the starting point for negotiations and vary according to the number of homes to be built, and the location and viability of the site.

## Core Strategy Strategic Sites

To provide the level of housing delivery and employment land that have been identified as being needed up to 2030, the allocation of two strategic sites is considered necessary. These will help to demonstrate that the plan is deliverable and can respond quickly as the country emerges from recession.

Strategic sites should be capable of being developed within the first five years of the plan period, be well located in respect of existing infrastructure and service provision, and able to accommodate a significant amount of development.

The site identified for housing is at **Trough Laithe Farm** near Barrowford. It is approximately 17 hectares in size and the landowner has stated that it is capable of delivering 481 new dwellings, at a rate of 50 new homes each year.

The proposed employment site would represent an extension of the existing **Lomeshaye Industrial Estate**. Around 16 hectares is considered to be developable for employment.

This site lies wholly within the Green Belt, so it will be necessary to amend the Green Belt boundary to allow the site to be allocated and developed.

## Core Strategy Employment Land

Policy WRK2: Employment Land Supply has been amended to take account of new analysis carried out for the update of the Employment Land Review.

The chosen methodology still uses past take-up rates as the basis for the calculation, but has been changed to reflect the approach being used by Nathaniel Lichfield & Partners [NLP] in neighbouring Burnley.

The NLP calculation replaces the 20% flexibility factor, used in the former Regional Spatial Strategy, with an allowance based on two years annual take-up, to provide flexibility of movement within the market. It also makes an allowance for future losses.

The results indicate that an estimated 56.6 hectares of employment land will be required over the plan period (i.e. 2015-2030). This means that an additional 18.3 hectares of employment land needs to be identified.

## Core Strategy Environment

The requirement for new developments to meet 10% of their predicted annual energy requirement on-site has been removed from Policy ENV3: Renewable & Low Carbon Energy Generation, as it no longer aligns with the Government's strategy, which has moved towards achieving carbon zero development.

The policy now follows the principle of the Zero Carbon Triangle (below).



In the first instance, the fabric of new buildings should be as efficient as possible, thereby reducing their energy and heating requirements. The second step is to provide as much heat and power from low carbon sources (e.g. solar panels) on the site. Together these stages are known as carbon compliance.

Where these measures still fail to render the buildings zero carbon, the developer can contribute towards 'allowable solutions' – off-site projects that will offset the remaining carbon emissions.

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Document adopted.



# Framework



Lomeshaye Industrial Estate

**Welcome to the 28<sup>th</sup> edition of Framework, the newsletter that keeps you up to date on emerging planning policy here in Pendle.**

In this edition we report back on our recent public consultation for the Core Strategy (Further Options Report). We also let you know how you can comment on any changes that are being proposed as a result of the comments we have received.

The government launched its new online National Planning Practice Guidance in March. This supports the National Planning Policy Framework and together they set-out the government's planning policies for England and how these are expected to be applied by local authorities.

Finally the Authority's Monitoring Report [AMR] looks at progress on the emerging Local Plan and the effectiveness of existing planning policy.

## Consultation Feedback

A public consultation to consider the **Pendle Core Strategy (Further Options Report)** was held over a six-week period from Friday 10<sup>th</sup> January to Friday 21<sup>st</sup> February 2014.

A total of 128 valid representations were received during the consultation period, from a wide range of individuals and organisations.

Between them these representations raised 326 different issues for further consideration by Pendle Council. The key concerns are highlighted below:

- The level of the annual housing requirement. Some felt it was too high, others that it was too low.
- The proposed allocation of 30ha of Green Belt land at Lomeshaye near Nelson, for a strategic employment site.
- The proposed allocation of 17ha of land at Trough Laithe Farm, to the west of Barrowford, for a strategic housing site.

With the exception of the two strategic sites, no site specific allocations were identified in the Further Options Report.

However, two petitions were submitted opposing future development on land off Skipton Old Road, Colne (493 signatories) and land off Barrowford Road, Colne (210 signatories).

Officer responses to the comments received by the Council were reported to the **Executive on Tuesday 25th March 2014.**

At this meeting, councillors took the decision to hold a Special Council meeting to consider the officer recommendations in more detail and to allow members of the public to speak, should they wish to do so.



As it was not possible to identify a suitable date for this meeting, ahead of the Council elections in May, the Core Strategy will now be considered in accordance with standard Council procedures at the following meetings:

- **Executive**  
7:00pm on Thursday 26<sup>th</sup> June 2014  
Wilson Room, Nelson Town Hall
- **Full Council**  
7:00pm on Thursday 17<sup>th</sup> July 2014  
Council Chamber, Nelson Town Hall

### How can I speak at a Council meeting?

**Executive** – Tell the Council by no later than midday **on the day of** the meeting that you wish to speak (for up to 5 minutes).

**Full Council** – Individuals and those representing an organisation can ask one question, which must be sent to the Council, either in writing, or by email, by no later than midday **on the day before** the meeting.

## What Happens Next?

The Core Strategy will be updated to reflect any changes that are recommended at Full Council. It will then be made available for a further six-week public consultation in early August, before it is submitted to the Secretary of State in late September.

The purpose of this public consultation is not to provide a further opportunity to recommend changes to the content of the document, but to determine whether it is considered to be legally compliant and sound. To be sound it must be:

**Positively prepared** – the plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

**Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

**Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; **and**

**Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (NPPF).

## National Planning Practice Guidance

The technical guidance for planning was often complex and repetitive, being catalogued in 230 separate documents containing 7,000 pages.

Following an external review headed by Lord Taylor, the government launched its new streamlined planning practice guidance on 6<sup>th</sup> March 2014.

This new online resource is simpler and easier to keep up-to-date. The user friendly format makes the technical guidance more accessible.

By providing much needed clarity to how the planning system operates in England, it is intended to increase levels of community involvement, giving power back to local communities.

You can view the new online planning guidance portal at:

<http://planningguidance.planningportal.gov.uk/>

## Recent Changes in the Policy Team

It is two years since we last reported any staff changes. But at the end of February, we said goodbye to Neall Bower, who left to take up a new role managing the Townscape Heritage Initiative for Lower Kirkgate in Leeds.

We would like to take this opportunity to express our thanks to Neall for the valuable contribution he made to the work of the team and wish him every success in the future.

Going forward, the planning policy team will initially operate with a reduced number of staff, although this will be reviewed in due course.

In April we refreshed and restructured the **planning policy pages** on the Council's website. A new splash screen offers visitors direct links our most visited pages and key documents that will form part of our new Local Plan.

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## What's in a colour?

Documents associated with the Pendle Local Plan use similar style covers, but employ a different colour to help identify the type of information they contain.

■ A dark green cover means that you are reading a Development Plan Document (DPD). These contain the planning policies used to assess applications for new development.

■ Supplementary Planning Documents (SPDs) provide more detailed guidance on how to interpret a policy contained in a DPD. These have a dark blue cover.

■ Aqua is used for 'supporting documents', which show you how public consultation and ongoing engagement with key organisations has informed the preparation of a DPD or SPD.

■ Dark Red is reserved for the three 'process documents' – the Local Development Scheme [LDS], Statement of Community Involvement [SCI] and Authority's Monitoring Report [AMR] – which are concerned with management and monitoring of the Pendle Local Plan.

■ Grey signifies a document forming part of the extensive evidence base underpinning policies in a DPD/SPD.

## Authority's Monitoring Report

Section 113 of the Localism Act 2011, requires all local planning authorities to produce a monitoring report each year, to update progress on the preparation of new Local Plan documents and to assess the effectiveness of existing planning policy.

The purpose of the Authority's Monitoring Report [AMR] is to evaluate and demonstrate that planning policy and decision making is:

- flexible and responsive to local circumstances;
- meeting the needs of the area; and
- helping to deliver sustainable development.

Identifying areas where objectives and targets aren't being met, helps to show where changes to policy or development management may be needed.

The AMR monitors a wide range of indicators, to assess the impacts of planning. It also includes an assessment of the five year housing land supply, and contains information on the completion of developments for housing, employment, retail and leisure developments in the past year.

For further information go to:

[www.pendle.gov.uk/amr](http://www.pendle.gov.uk/amr)

## Document Progress

This summary is based on our Local Development Scheme. It shows you which stage we have reached in preparing each of the documents to be included in the Pendle Local Plan.

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Publication stage – a formal six-week public consultation to consider what the Council believes to be the 'final' version of its document.

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### 4 Regulation 26 (14 SPD)

Document adopted.



# Framework



**Welcome to the 29<sup>th</sup> edition of Framework, the newsletter that keeps you up to date on emerging planning policy here in Pendle.**

It has been a busy period since the six-week public consultation on the Core Strategy (Further Options Report) ended on the 21<sup>st</sup> February. In the intervening months the Core Strategy has been amended to address a number of the comments that were received and the supporting evidence has been updated as necessary.

We have also received an advisory visit from the Planning Inspectorate (PINS) and a critical friend appraisal arranged by the Planning Advisory Service (PAS). Based on the advice we have received our consultation on the Core Strategy (Pre-Submission Report), originally planned for December, has been brought forward by three months. Find out how you can take part by reading the articles in this edition of Framework.

## Core Strategy Consideration of Changes

In response to the public consultation on the Core Strategy (Further Options Report), held earlier this year, Pendle Council received 128 valid representations, which between them raised 326 different issues for further consideration (see Issue 28 of **Framework**).

Officer responses to these comments were reported to the Council's Executive on Tuesday 25<sup>th</sup> March 2014.

On 29<sup>th</sup> May the Office for National Statistics (ONS) issued a revised set of population projections for England and Wales. These indicate how the population of the borough is expected to change over the next 25 years.

The new projections show that the population of Pendle is expected to reach 93,501 by 2030, the end of our plan period. This is 4,536 fewer people than suggested in the previous ONS population projections, which underpin the **Burnley & Pendle Strategic Housing Market Assessment** (SHMA).

To take account of this reduced level of population growth, Pendle Council commissioned a Housing Needs Study Update from the consultants who had prepared the SHMA.

Based on the findings of this study, it is recommended that the housing

requirement figure in the Core Strategy be set at 298 rather than 314, as recommended to councillors in March.

Officer recommendations and a revised version of the Core Strategy, which it is proposed to submit to the Secretary of State for independent examination, will now be considered at the following Council meetings:

### • Executive

7:00pm on Thursday 18<sup>th</sup> September  
Wilson Room, Nelson Town Hall

### • Full Council

7:00pm on Thursday 25<sup>th</sup> September  
Council Chamber, Nelson Town Hall

Should you wish to speak on a matter relating to the Core Strategy at one of the above meetings, details of how you can do so are set out below.

### How to speak at a Council meeting

**Executive** – Tell the Council's Committee Section by no later than **midday on the day of** the meeting that you wish to speak (for up to 5 minutes).

**Full Council** – Individuals and those representing an organisation can ask one question, which must be sent to the Council's Committee Section, either in writing, or by email, by no later than **midday on the day before** the meeting.

## Core Strategy Public Consultation

If councillors accept the officer responses and recommendations, the **Core Strategy (Pre-Submission) Report** will be made available for public consultation, as required by the government regulations.

**The six-week consultation period will run from:**

**9:00am Friday 10<sup>th</sup> October to  
5:00pm Monday 24<sup>th</sup> November**

This represents the final chance to comment on the Pendle Core Strategy.

Unlike earlier consultations it is not the wording of the individual policies that is under consideration, but whether the plan has met the legal and procedural requirements and is considered to be 'sound' (see article overleaf).

Although letters and emails will be accepted, comments should ideally be submitted on an official representation form, or by using the **online portal**.

### Availability of documents

The Core Strategy and **ALL** supporting documents can be viewed or downloaded from the Council's website at **[www.pendle.gov.uk/corestrategy](http://www.pendle.gov.uk/corestrategy)**

They will also be made available at Number One Market Street in Nelson and at the public libraries in Nelson, Colne and Barnoldswick.

The Core Strategy and **KEY** supporting documents will be made available at local libraries and Council shops throughout Pendle.



## Local Development Scheme

The Government requires local planning authorities, such as Pendle Council, to prepare and publish a **Local Development Scheme (LDS)**.

The LDS provides members of the public and any other interested parties with information on the emerging Pendle Local Plan.



The LDS timetable highlights when informal engagement will take place with key stakeholders and the anticipated dates of any formal public consultation required by the Regulations. It provides an up-to-date indication of the progress being made with the preparation of the **Core Strategy** and other development plan documents.

**Development Plan Documents (DPDs)**, as their name suggests, are form part of the statutory Development Plan for the borough. This is a collection of documents used on a daily basis by planning officers to help them assess and determine applications for planning permission.

In Pendle the Development Plan is made up of DPDs from the Pendle Local Plan (see Document Progress below right) and the **Joint Lancashire Minerals & Waste Local Plan**.

A revised LDS covering the period 2014-2017 was approved by the Council's Executive at its meeting on 26<sup>th</sup> June 2014. A minor revision reflecting the opportunity to bring production of the Core Strategy forward by three months will go before the Executive on 18<sup>th</sup> September.

## Core Strategy Is the Document 'Sound'?

Apologies to our regular readers, who may recognise this article from earlier editions of Framework. It is included once again to explain how this public consultation, which is being held in accordance with Regulations 19, 20 & 22 of **The Town and Country Planning (Local Planning) (England) Regulations 2012**, differs from those that have gone before.

As the Pre-Submission Report represents what is considered to be the final version of the Core Strategy, we are no longer seeking suggested changes to the overall strategy or individual policies. Instead, the purpose of this consultation is to determine if all legal and procedural requirements have been met in the production of the Core Strategy and whether the document is considered to be 'sound'; in other words that it is:

- **Positively prepared** – the plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives,

based on proportionate evidence;

- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (NPPF).

### What Happens Next?

Once the consultation period has closed, Pendle Council will send a copy of the Core Strategy; any representations it has received, and all supporting documents to the Secretary of State for independent examination.

The examination officially begins on the date of submission. It will normally include a series of informal hearings on issues the Inspector would like to discuss in detail, with people invited to attend relevant sessions.

The Inspector will consider what he/she has heard and normally issue a report within four months of the final hearing session. If the Core Strategy is found to be legally compliant and sound, or can be made sound with some minor changes, the Council can proceed with its Adoption.

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# Framework



Welcome to the 30<sup>th</sup> edition of **Framework**, the newsletter that keeps you up to date on emerging planning policy here in Pendle.

We are pleased to announce that on Friday 10<sup>th</sup> October 2014, Pendle Council will publish what it considers to be the final version of the Core Strategy for a six week public consultation.

This consultation allows you to indicate to the Inspector, appointed to conduct an independent examination of the Core Strategy, whether you agree that it represents the most appropriate way to promote sustainable development in the borough over the next 15 years.

Details of how you can view the consultation documents and submit your comments are included in this newsletter and on the Council's website.

## Core Strategy Public Consultation

At Full Council on Thursday 25<sup>th</sup> September 2014, councillors agreed to submit the **Pendle Core Strategy** to the Secretary of State for examination, following a six-week public consultation.

This consultation will be held in accordance with Regulation 19 of the **Town and Country Planning (Local Planning) (England) Regulations 2012**

### PUBLIC CONSULTATION

The six-week consultation period will run from:

**9:00am Friday 10<sup>th</sup> October to  
5:00pm Monday 24<sup>th</sup> November**

As the Pre-Submission Report represents what is considered to be the final version of the Pendle Core Strategy we are no longer seeking suggested changes to the document.

The purpose of this consultation is to allow you a final opportunity to comment on whether you consider that:

- all legal and procedural requirements have been met in the production of the document.
- the Council has drawn up a 'sound' strategy.



To be found 'sound' the document must be:

- **Positively prepared** – the plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (NPPF).

## Core Strategy What Happens Next?

As soon as practicable after the close of the consultation, in accordance with Regulation 19, the Council will submit the following documents to the Secretary of State:

- Core Strategy (Pre-Submission Report)
- Sustainability Appraisal (SA) Report
- Consultation Statement setting out:
  - who has been consulted in the preparation of the Core Strategy;
  - how they have been engaged in the process; and
  - a summary of the main issues raised in earlier consultations.
- Copies of ALL representations received in response to the current (Regulation 19) consultation.
- All supporting documents considered to be relevant to the preparation of the plan.

Pendle Council may also draw-up a schedule of proposed changes to highlight any wording that should be altered, or added to the document it submits for examination, but will not make further changes to the document itself.

This schedule will be updated throughout the examination period (see article overleaf) as changes are agreed during the hearing sessions. It will then be submitted to the Inspector at the close of the examination for his/her consideration.

## Core Strategy How Can I Comment?

Your comments can be sent to us in number of ways. The quickest and easiest option is to use our dedicated **Consultation Portal**.

Alternatively you should try to use the **official representation form**. Copies can be downloaded from the Council's website, or collected in person from your local library or Council shop. These can be returned via post, email or fax. A letter **email** is also acceptable, but as there will not normally be another opportunity for you to comment these should make it clear:

- If you consider the Core Strategy to be sound, or unsound, and why.
- Which part of the Core Strategy you are commenting on.
- What evidence and supporting documentation you are relying on to justify your representation.
- Any suggested changes that you are proposing.

Documents can be viewed at the following locations:

- Pendle Council Website** and Number One Market Street, Nelson.
- Public Libraries in Nelson, Colne and Barnoldswick.
- Council Shops and Local Libraries.

Document	Venues		
	A	B	C
Core Strategy	●	●	●
Representation Forms	●	●	●
SA Report	●	●	
SA Report NTS	●	●	●
Consultation Statement + Apx	●	●	
Consultation Statement	●	●	●
Habitat Regulations Asst.	●	●	●
Equalities Impact Asst.	●	●	●
Infrastructure Strategy	●	●	
Evidence Base documents	●		
Duty to Cooperate Statement	●		
Framework Newsletter	●	●	●

## Core Strategy Independent Examination

The examination period commences when the Core Strategy is submitted to the Secretary of State, which we hope will be in mid-December

### Programme Officer

On the date of submission, or as soon as possible thereafter, the Council will appoint a Programme Officer.

Working under the direction of the Inspector appointed to conduct the examination, the Programme Officer will be responsible for looking after the examination process. Any correspondence or queries relating to the examination must be directed to the Programme Officer, NOT the Council.

We hope to appoint Derek Thomas as the Programme Officer for the examination. He has previously presided over the examinations for the Replacement Pendle Local Plan in 2005 and the Bradley Area Action Plan in 2011. We will confirm contact details will be published in the next edition of Framework.

A timetable highlighting the dates of the Pre-hearing Meeting and individual Hearing Sessions will be published on the Council's website as soon as they are confirmed by the Planning Inspectorate (PINS).

### Pre Examination Hearing

A few weeks before the start of the formal hearing sessions, the Inspector may decide to hold a meeting to explain any procedures to be followed, or the programming of the examination.

### Hearing Sessions

These form an important part of the examination process. They provide the Inspector with an opportunity to clarify any remaining issues that may be fundamental to the legal compliance or soundness of the plan.

The Inspector will determine what issues need to be explored at these hearings and who is requested to participate at each session.

### Inspector's Report

Following the close of the hearing sessions the Inspector will prepare a report, which will set out whether the plan is legally compliant and sound. The report may also include a list of main modifications which will need to be made before the plan can be adopted.

Please keep checking the website for the latest news:

[www.pendle.gov.uk/corestrategy](http://www.pendle.gov.uk/corestrategy)

## How To Contact Us

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## Document Progress

This summary is based on our Local Development Scheme. It shows you which stage we have reached in preparing each of the documents to be included in the Pendle Local Plan.

Document type / title	Stage
<b>Local Plan Documents</b>	
Core Strategy	2
Site Allocations & Development Policies	1
Bradley Area Action Plan	4
<b>Supplementary Planning Documents</b>	
Conservation Area Design Guidance	4
Design Principles	4
Open Countryside & AONB	
Brierfield Canal Corridor	4
Brierfield Railway Street Area	4

### 1 Regulation 18

A period of ongoing informal consultation seeking to identify the key issues to be addressed and consider all reasonable alternatives for dealing with these issues.

### 2 Regulation 19 (12 SPD)

Publication stage – a formal six-week public consultation to consider what the Council believes to be the 'final' version of its document.

### 3 Regulations 22 and 24 (not SPDs)

Independent examination (Regulation 24) of the document submitted to the Secretary of State (Regulation 22).

### 4 Regulation 26 (14 SPD)

Document adopted.



## **Appendix 5**

Core Strategy (Pre-Submission Report)  
Representations (Regulations 19/20)

Pendle Local Plan Part 1: Core Strategy

838056 / 4 / DOC / - / 0 / 0	North Yorkshire County Council	Mr.	Carl	Bunnage
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	Thank you for consulting North Yorkshire County Council on the Borough of Pendle Core Strategy (Pre-Submission) Report. As an officer response, and from a strategic planning perspective, the Core Strategy (Pre-Submission) Report would not appear to raise significant cross-boundary issues for North Yorkshire. Indeed, the policy intent of the Report to seek to support existing advanced engineering operations at Barnoldswick is welcomed as this provides a source of highly skilled employment opportunities across both the West Craven and neighbouring areas. From a Local Highways Perspective we welcome the recognition expressed within the Report of the need to address any cross-boundary highways implications of the strategic housing site including in relation to pressures on the A59. Local Highways Authority colleagues would of course therefore welcome further discussions in relation to this matter, including in relation to the Traffic Assessments for the strategic housing site, in due course. Thank you once again for consulting North Yorkshire County Council on this matter. I hope that you will find this response helpful.			
Summary	Acknowledgement of support for existing advanced engineering operations and the potential for further discussions on cross-boundary highways matters.			

327801 / 5 / DOC / 0 / 0 / 0	Ribble Valley Borough Council	Mr.	John	Macholc
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	Please accept this email as a formal representation to the current consultation on the Pendle Core Strategy: Pre-Submission report. Having considered the consultation document, Ribble Valley Borough Council do not wish to make any specific representations on the consultation document at this stage. Many thanks for consulting us.			
Summary	No specific comment.			

807418 / 6 / DOC / - / - / -	Environment Agency	Mr	Dave	Hortin
Duty to Co-operate	We have worked closely with the Council in developing policies and providing evidence and feel that the Duty to Co-operate has been met.			
Legal Compliance	We consider that any legal and procedural requirements have been complied with in the preparation of the Core Strategy.			
Soundness	The Core Strategy has been prepared in accordance with the National Planning Policy Framework and we consider that the evidence used for those issues in our remit is suitable.			
Suggested Change				
Comment				
Summary	Support for document - Duty to Co-operate, Legal Compliance and Soundness.			

Pendle Local Plan Part 1: Core Strategy

379222 / 7 / DOC / 0 / 0 / 0	The Coal Authority	Miss	Rachael	Bust
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	<p>BACKGROUND ON THE COAL AUTHORITY The Coal Authority is a Non-Departmental Public Body sponsored by the Department of Energy and Climate Change (DECC). The Coal Authority was established by Parliament in 1994 to: undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues; and provide information on coal mining. The Coal Authority set up a Planning and Local Authority Liaison Department in 2008 to re-engage with the three planning systems across England, Scotland and Wales. The main areas of planning interest to the Coal Authority in terms of policy making relate to: the safeguarding of coal in accordance with the advice contained in The National Planning Policy Framework in England, Scottish Planning Policy in Scotland, and Minerals Planning Policy Wales and MTAN2 in Wales; and ensuring that future development is undertaken safely and reduces the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in The National Planning Policy Framework in England, Scottish Planning Policy in Scotland, and Planning Policy Wales and MTAN2 in Wales.</p> <p>COMMENTS ON THE PENDLE CORE STRATEGY - PRE-SUBMISSION CONSULTATION</p> <p>Surface Coal Resources and Prior Extraction: As you will be aware, the Pendle Borough Council area contains coal resources which are capable of extraction by surface mining operations. The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development. Where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process.</p> <p>Coal Mining Legacy: As you will be aware, the Pendle Borough Council area has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities. Within the Pendle Borough Council area there are approximately 184 recorded mine entries and around 20 coal mining related hazards have been reported to The Coal Authority. Coal mining legacy within the defined "Development High Risk" area affects approximately 3% of the plan area. Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by Planning Authorities to ensure that site allocations and other policies and programmes will not lead to future public safety hazards. Although mining legacy occurs as a result of mineral workings, it is important that new development recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable. As The Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of The Coal Authority may be required.</p>			
Summary	<p>General comment giving context of the role of the Coal Authority and an overview coal mining issues in the borough.</p>			

# Pendle Local Plan Part 1: Core Strategy

817585 / 11 / DOC / - / - / S1, S3, S4	JWPC Ltd	Mr	John	Willcock	Beck Developments Ltd
Duty to Co-operate					
Legal Compliance					
Soundness	<p>Beck Developments have previously submitted representations at Core Strategy (further Options) stage and wish to reiterate those concerns regarding the soundness of the Plan's delivery intentions, especially in relation to housing. The strong reliance upon the Trough Laithe Strategic Site is unrealistic as well as inconsistent with the intentions of the Settlement Priorities. That, in turn, impacts upon satisfaction of key housing needs (especially in the Plan period's early years) but also sends out the wrong messages about where the main development priorities will be. Barrowford is not a main settlement but its selection for the key Strategic Housing Site (intended to make a major impact upon the housing deficit by bringing forward "a significant proportion of the overall housing needed in the Borough" calls into question the overall settlement strategy. We wish to restate the representations made at Further Options stage.</p> <p>To be effective the Plan must provide a deliverable base for meeting the Borough's requirements. The Council undeniably has a difficult task to allocate and encourage new development of the right quality. It also has the major task of restoring developer confidence in order to meet deliverable housing and employment targets. Not at all an easy task. Its approach to identifying broad housing needs is supported, as well as to ensuring that project viability is not compromised by unrealistic levels of required contributions. However the Council should be more proactive in the early Plan (and pre adoption) years to promote a range of sites, even if these are unpopular to that immediate local community. If this is not the case, then the Plan adopts an unrealistic stance on true delivery capabilities in the early years.</p> <p>National policy emphasises the importance of addressing identified needs (and inherited deficits) robustly, and as quickly and effectively possible. We have doubts as to the effectiveness of the housing policies as currently drafted. The heavy reliance of the Trough Laithe Strategic Site is at variance with the intentions of the core settlement strategy and therefore gives inconsistent sustainability message which will weaken the Plan's ability to direct growth to the identified main settlements.</p> <p>See previous (Further Options) comments.</p>				
Suggested Change	<p>See previous (Further Options) comments.</p>				
Comment					
Summary	<p>The allocation of the Strategic Housing Site is inconsistent with the intentions of the settlement hierarchy. Barrowford is not a main settlement and the selection of the Strategic Housing Site in this location does not conform with the overall settlement strategy.</p> <p>The Council should be more proactive in the early years of the plan to promote a range of sites (even if these are unpopular with the local community) to ensure the deliverability of housing.</p> <p>The plan should address identified needs (and inherited deficits) robustly, and as quickly and effectively possible.</p>				

327529 / 17 / DOC / 0 / 0 / 0	Natural England
Duty to Co-operate	
Legal Compliance	
Soundness	
Suggested Change	
Comment	<p>Natural England have no further comments to make on the pre-submission version of the Core Strategy.</p>
Summary	<p>No specific comment.</p>



# Pendle Local Plan Part 1: Core Strategy

866837 / 19 / DOC / 0 / 0 / 0	Mr	G R	Bolton
Duty to Co-operate			
Legal Compliance			
Soundness			
Suggested Change			
Comment	Has the possible reopening of the Colne to Skipton railway been taken into account whilst compiling this Strategy Plan?		
Summary	Has consideration been given to the re-opening of the Colne to Skipton railway in the plan.		

866756 / 25 / DOC / 0 / 0 / 0	Ms	Emma	Hartley
Duty to Co-operate			
Legal Compliance			
Soundness	<p>With reference to the core strategy list of possible building sites in the local paper. To my horror I noticed that the area opposite my house was listed. I had absolutely no previous warning that this land had been selected and on downloading the plan from the website realised that during the consultation in 2008 this land was listed as Scholefield Farm Nelson. The area of land is between Knotts lane and Lenches Rd in Colne and is a haven for wildlife and should be being considered as an area for conservation not building. I have asked all my neighbours if they were aware that the land had been put forward as a potential site in 2008.</p> <p>None of us were aware that this piece of land was being considered and are shocked to see it suddenly appear on the final list. We feel that we have been denied the right to put our views forward due to the mislabelling of the area in 2008. We feel that the consultation has been flawed and unlawful as we have not been given accurate information. I await your response.</p>		
Suggested Change			
Comment			
Summary	<p>The land between Knotts Lane and Lenches Road should be considered as an area for conservation not development.</p> <p>The consultation has been flawed due to the mislabelling of this site. People have been denied the right to put their views forward.</p>		

Pendle Local Plan Part 1: Core Strategy

817556 / 29 / DOC / - / - / - David Lock Associates Ms Kate Skingley Rolls Royce plc

Duty to Co-operate

Legal Compliance

Soundness

Suggested Change

Comment

David Lock Associates (DLA) are pleased to respond to the Local Plan for Pendle: Pre-Submission Report consultation on behalf of Rolls-Royce plc (Rolls-Royce). As you will be aware, we previously made representations on behalf of Rolls-Royce in relation to the Further Options Stage of the Core Strategy Preparation in February of this year. Rolls-Royce are pleased to note that the Council has taken on board some of these comments and have made good progress in moving forward with the Plan. Rolls-Royce welcome the opportunity to make further comments on the content of the Strategy. It is noted that the consultation invites responses in relation to the Soundness and Legal compliance of the Plan in accordance with Paragraph 182 of the NPPF. The aim of these tests are to determine whether the Plan has been positively prepared, is justified and effective, and is consistent with National Policy. In reviewing the Pre-Submission version of the Plan, Roll-Royce consider the Plan to be both "Sound" and "Legally Compliant", and support the Council in its preparation. However, Rolls-Royce feel that it is important to reiterate their position in relation to the Plan making process, and suggest some important considerations for the Inspector when Examining the Plan. As such, whilst not challenging the effectiveness of the Plan, Roll-Royce wish to makes some suggestions and general constructive comments to assist the Council, and the Inspector in creating a robust Plan. They require assurances, as a major employer in the area, that the Plan is flexible and responsive to changing business needs. Pendle must be able to grow as a vibrant and thriving place to both live and work.

Conclusions: Rolls-Royce endorse and support the Council vision for Pendle. As major employers, Rolls-Royce are keen to ensure that the policies in the Plan are effective, justified, and consistent with the National Planning Policy. As indicated earlier in this statement, Rolls-Royce do not wish to challenge the Council on the soundness of the Plan. The company simply seek to ensure that the Plan reflects the spatial vision for the Borough and the wider region, and reflects the growing and changing needs of Pendle's major employers and investors. Rolls-Royce hope that the suggestions in this representation will assist the Inspector in ensuring the best possible Plan is adopted by the Council.

Summary

General comment stating Rolls Royce's support for the plan. However, they wish to seek assurances that the plan is sufficiently flexible to meet business needs.

# Pendle Local Plan Part 1: Core Strategy

818207 / 40 / DOC / 0 / 0 / 0	United Utilities Property Services	Ms	Jenny	Hope
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	<p>Thank you for your consultation seeking the views of United Utilities as part of the development plan process. United Utilities wishes to build a strong partnership with all Local Planning Authorities (LPAs) to aid sustainable development and growth within the North West. We aim to proactively identify future development needs and share our information. This helps:</p> <ul style="list-style-type: none"><li>- ensure a strong connection between development and infrastructure planning;</li><li>- deliver sound planning strategies; and</li><li>- inform our future infrastructure investment submissions for determination by our regulator.</li></ul> <p>When preparing the Development Plan and future policies, we can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances. Once adopted, the emerging Core Strategy will represent the key Development Plan Document (DPD) for Pendle. It will form a central part of the new Local Plan for the Borough by setting out the strategic planning policies the Council will use to help guide development to the most sustainable places over the 15 year plan period, between 2015 and 2030. United Utilities has commented on previous stages of the document's preparation, most recently submitting comments (UU Ref: DC-14-127) to the "Core Strategy Further Options" consultation on 21 February 2014. We now write to submit the following comments to the Council for consideration as part of the current "Core Strategy: Pre-Submission Report" consultation, which runs until 5pm on Monday 24 November 2014.</p> <p>GENERAL COMMENTS</p> <p>New Development: United Utilities recognises it is too early to comment on specific locations where the Council may be seeking to promote new development. Rather, this opportunity will arise once the Council progresses its Local Plan (Part Two): Site Allocations and Development Policies document. Nevertheless, we wish to highlight now that United Utilities will seek to work closely with the Council during the Local Plan process to develop a coordinated approach for delivering sustainable growth in sustainable locations. New development should be focused in sustainable locations which are accessible to local services and infrastructure. United Utilities will continue to work with the Council to identify any infrastructure issues and appropriate resolutions throughout the development of the Local Plan. Please note that United Utilities seeks to undertake further discussions with the Council on technical matters relating to site-specific development, such as site drainage and the Surface Water Hierarchy, once individual site allocations are identified. Many of the rural areas of the Borough will be supported by infrastructure which is proportionate to its rural location. Therefore disproportionate growth in any settlement, especially small settlements, has the potential to place a strain on existing water and wastewater infrastructure.</p> <p>Summary: We trust the above comments will be afforded due consideration by the Council in the preparation of its Local Plan: Core Strategy. United Utilities would welcome the opportunity to meet with the Council to discuss our response in detail.</p>			
Summary	<p>General comment on the involvement of United Utilities in the plan preparation process. Need to ensure engagement continues with the preparation of the Site Allocations and Development Policies plan. New development should be located in sustainable places where there is existing infrastructure capacity. In some instances it may be necessary to co-ordinate the delivery on new infrastructure with new development. Further work needs to take place relating to site-specific development and site drainage and the surface water hierarchy. Consideration needs to be given to development in rural areas so as not to put undue pressure of the infrastructure services in those areas.</p>			

# Pendle Local Plan Part 1: Core Strategy

867305 / 46 / DOC / 0 / 0 / 0	Persimmon Homes Lancashire	Mr	Chris	Gowlett
Duty to Co-operate	The Statement of Compliance with the Duty to Cooperate acknowledges the necessity of engaging with other key organisations to ensure a plan is found sound. This will allow for a strategic awareness geographically as the borough should not be considered in isolation. Persimmon Homes agrees that the Council has pro-actively engaged with key organisations in the preparation of the Core Strategy. This has been exemplified with the preparation of a SHMA with Burnley Borough Council. Strong cooperation will be necessary when preparing the site Allocations document, and an identification of land should be carried out with strong engagement of the complete housing market area, especially with Burnley Borough Council.			
Legal Compliance				
Soundness				
Suggested Change				
Comment	Thank you for giving Persimmon Homes Lancashire the opportunity to respond on the pre-submission Core Strategy report. We believe a thorough consultation with a variety of key stakeholders is necessary to implement a strong planning framework. We would also like to encourage the Council to resume the Local Plan Part 2 (Site Allocations and Development Policies) preparation as soon as possible to have a complete plan in place which will reduce risk in the planning process and be compliant with national policy. The National Planning Policy Framework (NPPF) ensures that it is necessary for a Local Plan to be produced by the Local Planning Authority as this is "key to delivering sustainable development that reflects the vision and aspiration of local communities" (paragraph 150, NPPF). The submission Core Strategy attempts to take forward the sustainability principles and make it the cornerstone of Pendle's vision. Sustainable development is at the centre of the NPPF and the Core Strategy taking this forward is supported by us. The general direction of this Core Strategy is one which supports growth. Although ambitious in some respects, this document will allow for deliverable sites to come forward and meet the growing need for new housing in the borough. The emerging Site Allocations document should be supportive of this and seek to amend settlement boundaries and undertake a green belt review if the dwelling numbers proposed in the Core Strategy cannot be met through existing viable sites.			
Summary	General support for the document in terms of promoting sustainable growth and co-operating with key organisations. However, the Council should bring forward the Site Allocations and Development Policies plan as soon as possible to ensure a complete plan is in place.			

755915 / 65 / DOC / 0 / 0 / S1, S4	Home Builders Federation Ltd	Mr	Matthew	Good
Duty to Co-operate				
Legal Compliance				
Soundness	Plan Period The proposed plan period is unsound as it is contrary to national policy and is not positively prepared. 4. The National Planning Policy Framework (NPPF (paragraph 157) identifies that Local Plans should be drawn up with a 15 year time horizon. The Core Strategy whilst having an end date of 2030 will, presuming it is adopted in September 2015, meet this requirement. However a significant element of the plan will be brought forward through the Site Allocations and Development Policies document. This document is not anticipated to be adopted until July 2017 at the earliest (Local Development Scheme, 5th Revision). This represents a significant slip in the time table upon previous iterations of the LDS and as such this adoption date must be viewed with caution. This means that a significant element of the plan will have a time horizon of less than 13 years from the date of adoption. This is particularly concerning given the significant elements of the plan which are deferred to this later document.			
Suggested Change	Recommendation 5. Given the preference within the NPPF for a minimum 15 time horizon (paragraph 157) it is recommended that the Council consider extending the plan period to 2032 or beyond.			
Comment	1. Thank you for consulting with the Home Builders Federation (HBF) on the further options document for the Pendle Core Strategy. 2. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock. 3. We would like to submit the following representations. Information 42. I would like to be kept informed of the progress of this document. In particular I would like to be made aware of the following; -Submission of the Core Strategy for examination; -The publication of the examiner's recommendations and any publicly available correspondence regarding the Core Strategy; and -The Adoption of the Core Strategy.			
Summary	The NPPF indicates that Local Plans should be for a minimum of a 15 year time horizon. The plan is not consistent with national policy or positively prepared. The plan period should be extended to 2032 or beyond.			



Pendle Local Plan Part 1: Core Strategy

755915 / 66 / DOC / 0 / 0 / 0	Home Builders Federation Ltd	Mr	Matthew	Good
Duty to Co-operate				
Legal Compliance				
Soundness	<div>Sustainability Appraisal</div> <div>6. The September 14 Sustainability Appraisal does not clearly identify whether the higher housing growth options identified within the 2013 Housing Needs Study and SHMA and subsequent update have been adequately tested for their impacts, both positive and negative across the area. Such testing should be undertaken to ensure that the plan is robustly prepared.</div>			
Suggested Change				
Comment				
Summary	<div>The Sustainability Appraisal does not clearly identify whether the higher housing growth options as identified in the SHMA have been tested for their impacts. Such testing is necessary to ensure the plan is robustly prepared.</div>			

755915 / 67 / DOC / DTC / 0 / 0	Home Builders Federation Ltd	Mr	Matthew	Good
Duty to Co-operate	<div>Duty to Co-operate</div> <div>7. The Duty to Cooperate is not a duty to agree. However, the duty requires more than consultation and meetings. It is the efficacy of the engagement throughout the plan making process and the outcomes which flow from such engagement which determine whether the duty has been met.</div> <div>8. The importance of identified actions resulting from fulfilment of the duty is clearly articulated within the NPPG which states ‘it is unlikely that this (the duty) can be satisfied by consultation alone’ and that ‘inspectors will assess the outcomes of the co-operation and not just whether local planning authorities have approached others’.</div> <div>9. The HBF notes the Council’s background paper Statement of Compliance with the Duty to Co-operate. This paper highlights a number of studies including the joint SHMA with Burnley as well as meetings and groups. Whilst it is clear that engagement has occurred there remains significant uncertainty with regards the outputs. A key cross boundary issue which appears to remain unresolved is the housing requirement. Paragraph 3.39 of the Statement of Compliance indicates that;</div> <div>‘Although Burnley Council has yet to confirm its housing figure, it will hopefully reflect a position that can be agreed by the two authorities’.</div> <div>10. The issue of housing delivery is a strategic priority for Government, paragraph 178 of the NPPF identifies it is essential that the Council provides clear evidence of joint working and appropriate actions on this issue. Therefore even if the Council intends to deal with its housing requirements within its own boundaries it must actively engage with neighbouring authorities as an adjacent Council may have issues which could have cross-border implications which need to be addressed jointly. The statement at paragraph 3.39 of the background paper indicates such agreement has not yet been met.</div>			
Legal Compliance				
Soundness				
Suggested Change	<div>Recommendation</div> <div>11. It is recommended that prior to submission of the plan the Council provides additional detail upon how it has complied with the duty and the actions that have been taken as a consequence of the issues raised.</div>			
Comment				
Summary	<div>Although it is clear engagement has taken place during the plan making process there is uncertainty about the outcomes of this work. A key cross boundary issue with Burnley relating to the housing requirement is unresolved. If the housing requirement is to be dealt with within the borough boundaries active engagement with neighbouring authorities must be carried out to address any implications arising from this approach. Agreement on this issue has not been met. Action needs to be taken to show how the duty has been complied with and how any issues have been resolved.</div>			

Pendle Local Plan Part 1: Core Strategy

818046 / 74 / DOC / 0 / - / S4 Barton Willmore Mr Michael Courcier Junction Properties Ltd

Duty to Co-operate

Legal Compliance

Soundness	<p>The Decision to Proceed with a Core Strategy</p> <p>2 It is now over two and a half years since the Government published the National Planning Policy Framework (NPPF) with its unequivocal guidance that local planning authorities should prepare a single comprehensive local plan rather than separate core strategy and allocation development plan documents (dpds).</p> <p>3 The NPPF paragraph 153 states:</p> <p>“Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances. Any additional development plan documents should only be used where clearly justified .” (our underlining and boldening)</p> <p>4 The Government has reiterated and strengthened its position on this matter in its Planning Policy Guidance (PPG) issued in March 2014. This says:</p> <p>“The National Planning Policy Framework makes clear the Government’s preferred approach is for each local planning authority to prepare a single Local Plan for its area (or a joint document with neighbouring areas). Whilst additional Local Plans can be produced, for example a separate site allocations document or Area Action Plan, there should be a clear justification for doing so .” (our underlining and boldening)</p> <p>5 The Council has given no justification -clear or otherwise- why it has not followed this key part of national policy. There are no local circumstances which would prevent the local authority preparing a comprehensive local plan. Also there can be no arguments of expediency as it is now over two and a half years since the issue of the NPPF. Even now, there would be a significant time-saving in the overall plan preparation process if the Council decides to proceed with a comprehensive local plan rather than separate core strategy and allocations dpds.</p> <p>6 The preparation of a core strategy followed by an allocations dpd creates a particular difficulty in Pendle because the policies of the Core Strategy will not produce a five year supply of deliverable housing land on adoption. This is because much of the deliverable supply identified by the 2014 Strategic Housing Land Availability Assessment is on sites where development would not be in accordance with the Adopted Local Plan, including policies relating to settlement limits (Policy 1), safeguarded land (Policy 3A) and areas of settlement character (Policy 12). The Core Strategy intends to keep these policies in force until the adoption of the Allocations DPD; and it provides no policy mechanism whereby the sites can be brought forward before then.</p> <p>7 The production of a five year requirement on adoption is a key requirement of national policy for local plans and the lack of it is capable of being a reason for unsoundness. The position would not arise if the Council prepares a single comprehensive local plan allocating sufficient housing land in accordance with national policy and guidance.</p> <p>8 In conclusion JPL considers that the Core Strategy should be found unsound as the decision to proceed with it rather than a single local plan is not in accordance with national policy.</p>
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Suggested Change

Comment

Summary	<p>There is no clear justification why Pendle is preparing a Core Strategy and Site Allocations Plan rather than a single Local Plan as required by the NPPF. The policies in the Core Strategy will not produce a five year supply of housing land on adoption as sites included in the SHLAA require a policy change which will not occur until the Site Allocations plan is adopted. The demonstration of a five year requirement on adoption is a key requirement of national policy. Without a five year supply the plan will be unsound. The Council should prepare a single local plan in line with national policy and which would allow the allocation of sites thereby demonstrating a five year supply of land.</p>
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Pendle Local Plan Part 1: Core Strategy

818046 / 75 / DOC / 0 / - / S1, S2, S3, S4 Barton Willmore Mr Michael Courcier Junction Properties Ltd

Duty to Co-operate

Legal Compliance

Soundness

The Housing Requirement

9 JPL considers that the housing requirement set out in Policy LIV1 is unsound in two respects:

the requirement for the overall period 2011 to 2030 (equivalent to 298 dwellings per annum (dpa)) will not meet the full objectively assessed housing needs of the area; and the staggering of the requirement over different phases has no basis in evidence and especially meeting objectively assessed housing needs in line with national policy.

10 The NPPF makes clear that Local Plans should meet the full objectively assessed housing needs of an area for market and affordable housing so far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period. The Council has not put forward any case that the Core Strategy should not meet the full objectively assessed housing needs of Pendle. In these circumstances, the issue is what are those full objectively assessed housing needs?

11 Nathaniel Lichfield & Partners (NLP) has produced for the Council a Housing Needs Study 2012-based SNPP Update. This sets out a wide range for the full objectively assessed housing needs of Pendle, from 250 dpa to 340 dpa net. On the basis of this range the Council has selected a housing requirement for the Pre-Submission Core Strategy of 298 dpa net which is roughly the mid-point.

12 In line with the PPG, the starting point to establish the full objectively assessed housing needs of an area is the latest CLG sub-national household projections (SNHPs). At the present time, these are the 2011-based SNHPs which identifies an annual need for Pendle of 312 dpa over the plan period which is well above the current Policy LIV1 requirement. The NLP has argued that the starting point should be the 2012-based sub-national population projections (SNPPs) to which it has sought to apply various headship rate assumptions. We consider such a starting point is not in accordance with the PPG.

13 The PPG emphasises that the CLG household projections are the starting-point rather than the end-point when assessing the full objectively assessed housing needs of an area. Other factors must be taken into account. The PPG makes clear that plan makers should consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates. Plan-makers should also consider whether employment trends and market signals justify an upward adjustment to the starting-point.

14 The NLP report does accept that a small upward adjustment is appropriate over its chosen starting-point. However the report is unclear how NLP has applied this adjustment to arrive at the very wide range it suggests as constituting the full objectively assessed housing needs of the area.

15 JPL considers that a much bigger upward adjustment is necessary because:

1. The NLP fails to recognise that the recent high rates of net internal out-migration from Pendle (on which the much lower 2012-based SNPP is based) have been heavily influenced by the very small number of dwelling completions in the Borough over the same period. Since 2008, there have been only 104 net additions to the housing stock in the Borough, which is equivalent to only 17 dpa. This very low level of completions has meant that housing needs have not been met and people have been forced out of the Borough to find appropriate housing. In these circumstances, it is not surprising that there has been high net out-migration. If the Council provides an adequate and attractive housing land supply, these trends can be reversed. In this respect the PPG is clear (2a-019-20140306) that historic low rates of development below planned levels (which is the case in Pendle) is likely to be a reason for a significant upward adjustment above the starting-point.

2. The NLP report does not take adequate account of the likely job growth which will result from the employment proposals of the Core Strategy. These proposals are planning for a significant increase in take-up rate of employment land and higher levels of employment. Such employment growth would create a need for housing well above the Policy LIV1 requirement, as demonstrated by Scenario J of the NLP report. In this respect, the PPG says:

“Where the supply of working age population that is economically active (labour force supply) is less than projected growth, this could result in unsustainable commuting patterns... and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could address these problems.”

3. Market signals indicate that a significant upward adjustment is required, much larger than that provided for by NLP. These market signals indicate severe stress in the Pendle housing market including problems of affordability, relatively large private rent increases and overcrowding. The Core Strategy itself (10.104) notes that there is a need for an additional 236 affordable dwelling per year which amounts to nearly 79% of the Policy LIV1 requirement.

16 On the basis of current evidence, JPL considers that the Policy LIV1 requirement for the plan period should be increased to at least 340 dwellings per annum.

## Pendle Local Plan Part 1: Core Strategy

17 Policy LIV1 staggers the housing provision of 5662 dwellings net for the plan period as follows:

2011/12 - 2014/15 220 dpa

2015/16 – 2019/20 250 dpa

2020/21 – 2029/30 353 dpa

The Pre-Submission Core Strategy gives no justification for this staggering of the requirement other than potential deliverability problems.

18 JPL objects to the proposed staggering of the housing provision. In particular, it will lead to housing needs not being met in the first part of the plan period. The provision up to 2020 is well below the full objectively assessed housing needs for the period. The available evidence is that housing needs will be higher in the first half of the plan period than the second half. In this respect the 2012-based SNPP shows the following levels of population increase for Pendle over the plan period:

2011 – 2016 +1100 persons

2016-2021 +1300 persons

2021-2026 +1000 persons

2026=2031 +600 persons

19 National policy and guidance makes clear that local plans should aim to meet objectively assessed housing needs. This must mean meeting needs as and when they arise.

20 The Council's only justification for the proposed staggering seems to be perceived difficulties of delivery. However one of the main causes of under- delivery in Pendle over the past five years has been the lack of a sufficient and attractive deliverable housing land supply. The Council has not had a five year supply for some years and has not taken any positive steps to remedy it. This is despite the fact that if suitable sites are brought forward in market-attractive locations in Pendle, they will be taken up by the house building industry.

21 In conclusion, the housing requirement proposed in Policy LIV1 both in total amount and phasing is unsound as it fails the tests of being positively prepared, justified, effective and consistent with national policy.

### The Five Year Supply and Allocations

22 The NPPF makes clear that the creation of a five year supply of deliverable housing land is a fundamental test of soundness for local plans. Paragraph 47 states that "to boost significantly the supply of housing", local planning authorities should:

"identify...a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under-delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land."

23 The 2014 Pendle SHLAA says that the Council can identify a supply of deliverable land of 5.3 years. However this is based on the staggered housing requirement set out in Policy LIV1 which has been deliberately constrained below the level of actual housing need. It is also based on an incorrect application of the 20% buffer which has not been applied to the under-delivery element in accordance with good practice. If the five year requirement is based on the overall net housing target of 298 dpa, and it is calculated in accordance with good practice, there would be significantly less than a five year supply.

24 In addition, and very importantly, the Council's identified deliverable supply contains a significant number of sites where development would be contrary to the policies of the Adopted Local Plan. Most of these sites are outside current development limits (Policies 1 and 3A) or are identified by the Adopted Local Plan as being Areas of Settlement Character (Policy 12). The Pre-Submission Core Strategy carries forward these policies and designations (see Appendix B), and contains no provisions that would override them in order to create a five year supply. Accordingly, any development of these identified SHLAA sites would have to be treated as being contrary to the development plan up to the adoption of the Allocations DPD which is unlikely to be before the end of 2017 at the earliest. This is a highly undesirable outcome and is a reason for the unsoundness of the Core Strategy.

25 Finally many of the committed and other sites identified as being part of the Council's five year supply are subject to significant market and constraints which means that they are not genuinely deliverable applying the tests set out in the NPPF and the NPPG. Appendix 3 gives further details. The SHLAA itself recognises that there are significant deliverability issues, saying (paragraph 5.6):

"The SHLAA highlights that although there is more than sufficient land to meet the overall housing requirement over the plan period, the anticipated delivery rates over the next five-year period remain fragile . The



# Pendle Local Plan Part 1: Core Strategy

	<p>SHLAA shows that there are deliverable sites available to provide a 5.3 year supply of housing land against the staggered housing requirement figures set out in Policy LIV1 of the Core Strategy. However, it is evident that a significant change in the economic circumstances of the Country as a whole, and more locally, is required to ensure that the under-delivery of new dwellings is not further exacerbated by a lack of supply of viable sites .” (our emphasis)</p> <p>26 In order to address the shortfall in deliverable sites, the Core Strategy identifies a strategic housing allocation at Trough Laithe. This is potentially helpful but not sufficient to remedy the problem. In particular the allocation of this single site will do little by itself to create the five year supply required by national policy. JPL considers that the Core Strategy should allocate sufficient sites to create a rolling five year supply up to the date of the adoption of the Allocations DPD. Alternatively the Core Strategy should be abandoned and a single comprehensive local plan should be prepared.</p> <p>27 In conclusion, the failure of the Core Strategy to produce a five year supply of deliverable sites means that it fails the soundness tests of being positively prepared, justified, effective and consistent with national policy.</p>
Suggested Change	
Comment	
Summary	<p>The overall housing requirement for 2011-2030 will not meet the objectively assessed housing needs of the area.</p> <p>The staggered requirement over different phases has no basis in evidence. It is not in line with national policy in terms of meeting the objectively assessed needs.</p> <p>The starting point for the objectively assessed need is the latest household projections. These are the 2011-based projections which indicate an annual need of 312 dwellings in Pendle. This is above the requirement in Policy LIV1. The use of the 2012-based population projections with various headship rates applied is not a starting point which is in accordance with the NPPG.</p> <p>An upward adjustment to the housing requirement should be made. The 2012-based SNPP has been influenced by the low completion rate in Pendle since 2008. This low level of house building has forced people to move out of the borough. If an adequate and attractive land supply was provided these trends could be reversed. The NPPG states that historic low rates of development below planned levels is a reason for a significant upward adjustment.</p> <p>There should be an upward adjustment to take account of the likely job growth which will result from the employment proposals of the Core Strategy (akin to Scenario J in the SHMA).</p> <p>There should be an upward adjustment to take account of market signals - there is severe stress in the housing market including problems of affordability, large private rent increases and overcrowding.</p> <p>The housing requirement in Policy LIV1 should be increased to at least 340 dwellings per annum.</p> <p>There is no justification for staggering the housing requirement.</p> <p>The staggered approach will lead to the housing needs not being met in the first part of the plan period. The evidence suggests that housing needs will be higher in the first half of the plan period than the second half.</p> <p>National policy is clear that Local Plans should aim to meet OAN for housing - this must mean meeting them when they arise.</p> <p>There is a lack of sufficient and attractive deliverable housing land supply. The Council has not had a five year supply for some years and not taken any positive steps to remedy it. If suitable site are brought forward in market-attractive locations in Pendle the housebuilding industry will take them forward.</p> <p>The housing requirement in Policy LIV1 (total amount and phasing) is unsound against all four tests.</p> <p>The SHLAA bases its five year supply calculation on a staggered housing requirement which deliberately constrains housing need. It also incorrectly applies the 20% as it is not applied to the under delivery element. If the five year requirement was based on the overall target of 298dpa and calculated in line with good practice there would be less than a five year supply.</p> <p>A number of sites in the deliverable five year supply are constrained by policy designations which are being carried forward in the Core Strategy. Any development of these sites would be contrary to the development plan until the Allocations DPD is adopted.</p> <p>Many of the committed sites identified in the SHLAA are subject to significant market constraints which mean that they are not genuinely deliverable.</p> <p>To address the shortfall the Core Strategy allocates a strategic site. This is potentially helpful but will not remedy the problem. A single site will do little to produce a five year supply. The Core Strategy should allocate sufficient sites to ensure a five year supply. Or it should be abandoned in favour of a single local plan.</p>

Pendle Local Plan Part 1: Core Strategy

818046 / 88 / DOC / 0 / 0 / 0 Barton Willmore Mr Michael Courcier Junction Properties Ltd

Duty to Co-operate

Legal Compliance

Soundness	<p>A2.1 The Council has published the 2014 Strategic Housing Land Availability Assessment (SHLAA) to support the Pre-Submission Core Strategy.</p> <p>A2.2 JPL considers that the SHLAA presents insufficient evidence to conclude that many of the sites identified as developable will actually come forward in the five year period. In particular, there are significant doubts over some of the sites allocated for housing development by the Adopted Local Plan. As the Local Plan was adopted in 2006, and the sites have not come forward since then for development, there must be considerable doubts over their deliverability.</p> <p>A2.3 The deliverability of many of the identified sites is highly speculative as there is little evidence that they are genuinely deliverable for housing in the five year period. Some are the subject of expired permissions; some are in alternative uses where there is no conclusive evidence that they will be made available for housing development; whilst the densities on others appear exaggerated, or not in accordance with current or future market demand. Significant further work needs to be undertaken to demonstrate actual deliverability within the meaning of the NPPF.</p> <p>A2.4 The SHLAA concludes that there is a five year supply of deliverable sites as required by the NPPF but this is based on the staggered housing requirement of the Pre-Submission Core Strategy. JPL considers that that there is not a five year supply even on this basis for the following reasons:</p> <p>1. The Council has not applied the 20% buffer to the shortfall since the start of the plan period. If this is done, it significantly increases the requirement.</p> <p>2. The SHLAA assumes that nearly all the sites with planning permission will be fully developed in the five years. Experience shows that this assumption is unrealistic, and there is likely to be a significant amount of non-implementation and slippage in Pendle.</p> <p>3. Some of the sites have significant physical, market and ownership constraints which affect their potential deliverability, including ransom strips, contamination and the presence of listed buildings.</p> <p>4. Some of the sites with permission are known not to be viable in their current consented form. This is supported by the Pendle Viability Assessment which shows viability is at best fragile for many brownfield and constrained sites. In some cases, the developers have walked off partially completed sites for this reason. In other cases, viability is dependent upon public funding but this not in place currently and may not occur in the five year period.</p> <p>5. Some of the existing permissions are for high density schemes which are unlikely to be taken up by the market in the foreseeable future. In particular, there are many smaller sites in the five year supply where owners have obtained permission but which are now more likely to be developed for much lower densities, if at all. The cumulative impact of these changes would be a significant reduction in the overall supply.</p> <p>A2.4 In conclusion, JPL considers that the SHLAA significantly over-estimates the supply of deliverable sites and the actual supply is significantly less.</p>
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Suggested Change

Comment

Summary	<p>The SHLAA presents insufficient evidence to conclude that the sites identified as developable will come forward in the five year period. A number of allocated sites have been identified from the Local Plan but these have yet to come forward.</p> <p>The deliverability of a number of sites is highly speculative - some are expired permissions, some are in alternative use and there is no evidence to show they will be made available for housing. Densities are exaggerated or not in accordance with demand.</p> <p>The five year supply calculation is flawed. The 20% buffer has not been applied to the shortfall since the start of the plan period. The SHLAA assumes the sites with planning permission will be fully developed in five years but this is unrealistic. Some sites have significant physical, market and ownership constraints. Some of the permissions are known not to be viable in their consented form. The Viability Study shows viability is at best fragile. Some sites are dependent on public funding which is not in place.</p> <p>Some permissions are for high density schemes which are unlikely to be taken up in the foreseeable future. Some smaller sites are likely to be developed a lower densities resulting in a reduction in the overall supply.</p> <p>The SHLAA therefore over-estimates the supply of deliverable sites and the actual supply is significantly less.</p>
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Pendle Local Plan Part 1: Core Strategy

327387 / 89 / DOC / 0 / 0 / 0	Wildlife Trust for Lancashire, Manchester and North Merseyside	Mr	John	Lamb
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	<div>Thank you for the opportunity to comment on the above report. I am writing on behalf of the Lancashire Wildlife Trust with comments outlined below and an assessment of compliance with the relevant biodiversity/natural environment requirements in the National Planning Policy Framework 2012. The Wildlife Trust hopes that following the preparation of the Land Allocation and Supplementary Planning Documentation, that there will be significant improvements in the compliance scores.</div> <div>In 2012, the Wildlife Trust carried out an assessment of compliance of the Pendle Core Strategy 2012 against the paragraphs in the NPPF (2012) that refer to biodiversity and the natural environment including geological conservation, Local Green Space, Green Infrastructure, Coastal Change Management Area, Shoreline Management Plans and climate change, where relevant.</div> <div>This assessment has been updated following the production of the Pendle Core Strategy 2014 as below, and the Trust is pleased to see a reduction from 56.3% total non-compliance to 36.8% and an increase in partial non-compliance from 19.5% to 37.9% but is disappointed that the fully compliant score has only increased from 3.7% to 4.8%. The proportion of non applicable paragraphs for Pendle remains the same at 20.6%, including those that are only applicable to the coastal authorities.</div> <div>I trust that the comments above and the NPPF compliance assessment will be taken fully into consideration.</div>			
Summary	Although the compliance of the Core Strategy with the NPPF has increased with regards to biodiversity and the natural environment there is potential for further improvement.			

327387 / 96 / DOC / 0 / 0 / 0	Wildlife Trust for Lancashire, Manchester and North Merseyside	Mr	John	Lamb
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	<div>The Trust is pleased to see a Habitat Regulations Assessment Screening Report for the Core Strategy, dated December 2010, which assesses the impact of the Core Strategy on sites designated as a Special Protection Area (SPA) and/or a Special Area of Conservation (SAC) under Regulation 10 of the 1994 Habitat Regulations. In Pendle this applies directly to the South Pennine Moors but potential impacts on other sites in the vicinity of the borough are also considered.</div>			
Summary	Support for the preparation of a Habitat Regulations Assessment Screening Report for the Core Strategy.			

Pendle Local Plan Part 1: Core Strategy

327387 / 97 / DOC / 0 / LC / 0	Wildlife Trust for Lancashire, Manchester and North Merseyside	Mr	John	Lamb
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	However, the Trust is concerned that the Sustainability Appraisal of the Core Strategy, dated October 2011, which was carried out before the publication of the National Planning Policy Framework (NPPF, March 2012), is not compliant with the policies in paragraphs 18 to 219 that, taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system (NPPF paragraph 6). For example, the impact of the Core Strategy on ‘coherent ecological networks that are more resilient to current and future pressures’ (NPPF paragraphs 109 and 165), wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation (NPPF paragraph 117) and Local Greenspace (NPPF paragraphs 76 to 78) is not identified and determined. Furthermore, the Sustainability Appraisal does not refer to the ‘Biodiversity Duty’ of the Natural Environment and Rural Communities Act (NERC) 2006 nor does it take account of the Habitats and Species of Principal Importance in England as defined in the NERC Act, hence its legal compliance can be questioned.			
Summary	Concern that the SA was carried out before the publication of the NPPF and is not compliant with NPPF paragraphs 18 to 219. The impact of the Core Strategy on coherent ecological networks, wildlife corridors, stepping stones, areas identified for habitat restoration or creation and Local Green Space is not identified or determined. The SA does not refer to the 'Biodiversity Duty' of the NERC Act or take account of the Habitats and Species of Principal Importance in England.			

867831 / 107 / DOC / 0 / 0 / 0	Mr & Mrs	Peter & Linda	Stringer
Duty to Co-operate			
Legal Compliance			
Soundness			
Suggested Change			
Comment	We would like to register our objections to the building of big housing estates and industrial units across Pendle, on some of our most valued green spaces - including Lidgett and Knotts Lane in Colne, Gib Hill between Nelson and Colne, off Wheatley Lane in Barrowford (197 houses behind St Thomas's Primary School), extending Lomeshaye Industrial Estate up as far as Fence.		
Summary	Object to the building of housing and industrial estates on valued green spaces. Including: Lidgett, Knotts Lane, Gib Hill, Land behind St Thomas's Primary School, Lomeshaye.		



Pendle Local Plan Part 1: Core Strategy

867836 / 109 / DOC / 0 / - / S1, S2	Ms	Angela	Arnold
Duty to Co-operate			
Legal Compliance			
Soundness	<p>William Hargreaves and I live at Wheatley Laithe Farm, Fence (currently known only as the Lomeshaye Industrial Estate Extension) and have researched the number of empty industrial units in the Pendle Area - 139 at the last count on the Regenerate Lancashire website. Both William Hargreaves and myself are quite at a loss as to understand WHY this extension has become so important - if we thought we were impeding progress and there was a real need for this development we may feel differently. However, we understand the farm is still classified as greenbelt land. The other concern is that Lomeshaye is a floodplain - so building a lot of tin tabernacles on the hillside above the river is hardly sensible. The Environment Agency spoke to us years ago when we complained that altering the watercourse on the existing Lomeshaye Estate had caused faster flowing water, washing away valuable farmland and also washing away Dawsons Conifers further downstream. We were told the EA were letting "nature take its course" - the river has slowly built up an island of stones in the centre, causing the water flow to increase against both banks and nobody bothers to drain, dredge or even look at it these days.</p> <p>This plan is a 15 year strategy. Why does everything have to be done in such a rush? Apparently the infrastructure (new roundabout and road from the A6068 bypass) has to be installed at the earliest opportunity. Why? We have a small, family business in Brierfield and would be delighted if the area could be returned to full employment and an industrial hive of activity. Reality says otherwise. We both accept that the urban sprawl has only one way to go - in our direction - and it will no doubt happen one day. There are also areas of the farm which have been classed as unsuitable for development - so what happens to these? Still too many questions.....</p>		
Suggested Change			
Comment	<p>Here's a list of co-habitees at Wheatley Laithe Farm:</p> <p>Squirrels, bats, toads, frogs, weasels, foxes, rats, roe deer, rabbits, swallows, swifts, martins, house and tree sparrows, blue tits, great tits, pied and grey wagtails, goldfinches, woodpigeons, rooks, crows, jackdaws, magpies, jays, thrushes, wrens, robins, curlews, lapwing (occasional these days), woodpeckers, owls, meadow pippet, blackbirds, skylarks, chiff chaffs, starlings, heron (occasional), buzzards, sparrow hawk, kestrels, mallards, common gulls, black headed gulls, herring gulls (gulls are frequent visitors). To the best of our knowledge there have never been any newts.....</p>		
Summary	<p>There are currently 139 empty industrial units in Pendle. It is unclear why the Lomeshaye extension has become so important.</p> <p>The farm is still classified as green belt land.</p> <p>The site is also in floodplain and it does not seem sensibly to build tin tabernacles up the hillside above the river.</p> <p>The river has washed away valuable farmland. It is not drained or dredged. It has built up an island of stone and is cutting away both banks.</p> <p>Why does the plan have to be rushed? Why does the roundabout onto the A6068 have to be installed at the earliest opportunity?</p> <p>It is unlikely that the area will return to full employment and industrial activity.</p> <p>There is a wealth of wildlife which occupy this site.</p>		

# Pendle Local Plan Part 1: Core Strategy

327580 / 113 / DOC / 0 / 0 / 0	Lidgett & Beyond Group	Mr.	Owen G.	Oliver
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	<p>The Lidgett &amp; Beyond Group broadly supports Pendle Council’s draft Core Strategy and considers that all legal and procedural requirements have been met in its production. The Strategy is “sound” in that it has been positively prepared, is justified, should be effective and is consistent with national policy, except we would like the following comments/observations to be considered/reflected, most especially to augment and update the Core Strategy in light of recent Government Guidance that has been issued.</p> <p>Our Area and our Group</p> <p>Lidgett &amp; Beyond (hereinafter “L&amp;B”), in line with Pendle’s draft Core Strategy, would like to work with Colne Town Council and Laneshawbridge and Trawden Parish Councils to draft a sustainable Neighbourhood Plan for our area which will complement the Borough’s Core Strategy, when approved. We would naturally also seek to provide community input to the Pendle Local Plan Part 2: Site Allocations and Development Policies and have already analysed the Strategic Housing Land Site Allocation Report and Appendix 5 of the SHLAA and have found points of dispute within the Council’s analysis of the viability of some of the potential housing sites included.</p> <p>L&amp;B continues to support all the Strategic Objectives listed in para 5.2 and, given our location covering East Colne, Laneshawbridge and Trawden, we support in particular SO9 and SO10 regarding protecting, enhancing and improving access to our green spaces, as well as having respect for our heritage and our landscape.</p> <p>Comment – Update for Government announcements</p> <p>A major issue is that, as the pre-submission draft was being finalised in recent months, the Core Strategy does not reflect the latest Government announcements on enhanced protection for the Green Belt.</p> <p>In a DCLG announcement of 6th October 2014, Ministers underlined the government’s commitment to protect the Green Belt from development. Communities Secretary Eric Pickles and Housing and Planning Minister Brandon Lewis said that thousands of brownfield sites are available for development, and should be prioritised.</p> <p>New guidance reaffirms how Councils should use their Local Plan drawing on protections in the National Planning Policy Framework (“NPPF”), to safeguard their local area against urban sprawl, and protect the green lungs around towns and cities. The guidance explains that, once established, Green Belt boundaries should only be altered in exceptional cases , through the preparation or review of the Local Plan. It also states that housing need does not justify the harm done to the Green Belt by inappropriate development. Councils should consider how they will protect and preserve important sites in their area, especially Green Belt sites.</p> <p>Eric Pickles said: “This government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don’t want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development. Today’s guidance will ensure councils can meet their housing needs by prioritising brownfield sites, and fortify the Green Belt in their area.”</p> <p>In a further announcement later in October 2014, Eric Pickles reiterated: "I am crystal clear that the Green Belt must be protected from development, so it can continue to offer a strong defence against urban sprawl. Today's new rules strengthen these protections further, and ensure that whether it’s new homes, business premises or anything else, developers first look for suitable sites on brownfield land.”</p> <p>In the Appendix to this letter we have included the updated paragraphs in NPPF. These statements must be reflected in the appropriate text of the Core Strategy and Policies that flow from them. The Council should consider and document how it will protect and preserve the Green Belt more strongly than is currently reflected in ENV1.</p> <p>In addition, the focus on prioritising brownfield sites and enhancing their availability and viability must be paramount in identifying strategic sites and approving planning applications for development, whilst applications in the Green Belt which solely cite that they are contributing to the housing target should be rejected.</p> <p>L&amp;B is aware of a document “Information for monitoring period 2013/14” which contains all the brownfield sites in the region and which identifies that they could be used to supply 2,364 dwellings – a proactive approach to these sites would go a long way towards meeting targets, especially for affordable homes, as well as enhancing the quality and appearance of our towns.</p>			

# Pendle Local Plan Part 1: Core Strategy

	<p>We close our response letter by reiterating that L&amp;B wholly supports the drive to protect and enhance the East Colne area as part of the Core Strategy’s overall aim to promote Pendle. For the Green Belt, L&amp;B wholly endorses Policy ENV1 where it says “Inappropriate development in the Green Belt will not be permitted. Only in very special circumstances, where any harm is clearly outweighed by other considerations, should development be allowed in the Green Belt. The Framework sets out those exceptions where development is not considered to be inappropriate.”</p>
Summary	<p>Broad support for the Core Strategy. Support for Strategic Objectives 9 and 10.</p> <p>Would like to prepare a Neighbourhood Plan with Colne Town Council, Laneshawbridge and Trawden Parish Councils.</p> <p>Disputes some of the evidence in the SHLAA.</p> <p>The Core Strategy does not reflect recent government announcements on the protection of the Green Belt.</p> <p>DCLG announced that the Green Belt should be protected from development and brownfield development should be prioritised.</p> <p>The new guidance reaffirms that councils should use their Local Plans to safeguard against urban sprawl. Green belt boundaries should only be altered in exceptional cases. Housing need does not justify harm to the Green Belt.</p> <p>Policy ENV1 should reflect the new guidance and consider how to protect and preserve the Green Belt more strongly.</p> <p>There should be a focus on prioritising brownfield sites ensuring they are available and viable when selecting sites and approving planning applications. Applications for housing in the Green Belt should be rejected.</p> <p>There should be a proactive approach to brownfield sites to meet the targets especially for affordable homes.</p>

# Pendle Local Plan Part 1: Core Strategy

379387 / 117 / DOC / 0 / 0 / 0

Mr & Mrs A Hoyle

- Duty to Co-operate
- Legal Compliance
- Soundness
- Suggested Change
- Comment

I wish to make comment on the proposed development S137

I wish to object to this proposal on the following grounds:

The proposal has no specific focus but is, I believe, a speculative attempt to make a profit from the land in any direction possible, irrespective of the local impact and loss of amenity,

The use of the land for employment purposes would be completely out of character for the district and should be dismissed, given there are many other areas within the locality that are either undeveloped or brownfield and available for that purpose.

There are many brownfield sites in the district that could be developed without the resorting to the destruction of a site with such a diversity of wildlife, so much appreciated and enjoyed by all who walk through the district. It is regrettable that the openness and natural beauty that makes the area so attractive and popular would be destroyed by this proposition. Speculators see an opportunity for profit and regardless of the community, persist in seeking development.

Increased industrial/commercial traffic would further exacerbate the problem on Barrowford Road and would be highly detrimental to the character of the district. This combined with the recent developments within Barrowford and the narrowness of the bridge in Barrowford would almost certainly mean that the only real proposition for access to this site would be down Barrowford Road from Colne, with the resultant increased congestion along North Valley Road and Vivary Way.

At certain times of the day, Barrowford Road is struggling to cope with traffic demands. Life for residents along Barrowford Road is becoming increasingly uncomfortable; the speeds restriction measures are recognition of the problem we are coping and living with.

If the proposition is accepted, the loss of the green space and additional pressure on local resources will further reduce the local community cohesion into a strip conurbation so often seen as development 'by stealth'.

We, as residents, must rely upon the integrity of our elected representatives to reflect the concerns of the electorate as stated in the Vision for Pendle to “protect and enhance areas that are of importance because of the habitats they support, their geological interest or their contribution to the landscape.”

Hopefully, our council members will realise that the spatial expression underpinning the Core Strategy requires any decisions made to manage change and growth need to be carried out in a positive way.

The decision made today is made for generations to come.

Once the land and wildlife has gone - it has gone for good.

Summary

The development of the land at Barrowford Road, Colne for employment purposes should be dismissed.

There are many brownfield sites that should be developed for this purpose.

The countryside and wildlife should be protected as this attracts people to the district.

Increased commercial traffic would further exacerbate the existing problems around Colne. Barrowford Road cannot cope with the traffic demands at certain times of the day.

The loss of green space and additional pressure of local resources will reduce local community cohesion.

The spatial expression underpinning the Core Strategy requires decisions made to manage change and growth to be carried out in a positive way.



## Pendle Local Plan Part 1: Core Strategy

731431 / 125 / DOC / 0 / 0 / S4	English Heritage	Ms	Emily	Hrycan
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Duty to Co-operate

A requirement of the NPPF (Paragraph 169) is that a sound local plan will be based on a strong up to-date evidence base about the historic environment. This should be used to assess the significance of the heritage assets in the area and the contribution they make to the town. English Heritage is unable to find the evidence base on the Council's website. Therefore, is unable to comment on its content.

Item	Current Value	Suggested Change
1. <b>Item 1: [Blank]</b>		
2. <b>Item 2: [Blank]</b>		
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The historic environment in Pendle is characterised by dispersed Pennine settlements from the Medieval Period with the development of industrial towns and villages in the valleys. Mill buildings and terraced housing dominates much of the townscape and the rural areas have a large number of farms and barns of historic significance.

The Local Plan

The historic environment in Pendle is an important part of the area’s identity and makes a contribution including its economic well-being. The Local Plan (currently) is considered to be unsound as it fails to meet the requirements of the NPPF regarding the following issues:

- It is not based on adequate, up-to-date and relevant evidence about the historic environment;
- It does not set out a positive strategy for the conservation, enhancement, improvement and enjoyment of the historic environment;
- It does not contain strategic policies to deliver the conservation and enhancement of the historic environment;

The Core Strategy fails to meet the NPPF requirements on the following:

- It is not based on adequate, up-to-date and relevant evidence about the historic environment.
- It does not set out a positive strategy for conservation, enhancement, improvement and enjoyment of the historic environment.
- It does not contain strategic policies to deliver the conservation and enhancement of the historic environment.

327467 / 158 / DOC / 0 / 0 / 0 Barrowford Parish Council Mr Iain Lord

6. That due to the short period of the consultation, in comparison with the time spent writing and researching planning policy to produce this strategy, this response can only give the basic salient points. Further detail and corroborating evidence will be available for the inquiry.

Suggested Change

Supporting documents provided.

The short consultation period has only allowed for the response to address the basic salient points. Further detail and evidence will be available for the inquiry.

# Pendle Local Plan Part 1: Core Strategy

868081 / 170 / DOC / 0 / 0 / S1, S2, S3, S4	JWPC	Mr	Stuart	Booth	Beck Developments Ltd
Duty to Co-operate					
Legal Compliance					
Soundness	<div><div>1. This documents forms an additional formal representation to Pendle Borough Council following publication of the Pre-Submission Report of the emerging Core Strategy. It is written on behalf of Beck Developments Ltd, a house building company active in the Borough and who wish to ensure that the Council’s policies will secure deliverable housing sites to meet development need. It follows on from the completed representation form submitted on behalf of Beck Developments on the 11th November.</div><div>2. In previous representations we presented the case that in order to improve the Borough economic base and housing offer, there was a need for an urgent and radical shift in housing strategy by encouraging high quality, more viable development, with less reliance upon currently questionable brownfield inner urban locations. We have since made comments that we do not consider the Council’s approach to this, of allocating a single Strategic Site for 500 houses at Barrowford, conflicts with the development strategy and has not been justified in a robust planning policy way consistent with guidance, and is therefore unsound.</div><div>3. As stated in the most recent comments, we consider that the Council should be more proactive in the early Plan (and pre-adoption) years to promote a range of sites, even if these are unpopular to that immediate community. To that end, we consider the plan should go further in providing evidence of where development could be located at the Settlements identified in the Strategy. There is currently an inconsistency in the strategy and policy wording that would mean the Core Strategy is undeliverable, both in terms of providing viable sites, but also ones that are consistent with the proposed Core Strategy itself.</div><div>4. By example, Rural Pendle is proposed to provide 12% of all housing requirement, but the Plans strategy states that the defined settlements in Rural Pendle will see limited growth, whilst development in the open countryside will be restricted, especially in those areas designated as Green Belt or AONB. This fails to consider that a significant majority of this development in Rural Pendle will need to be on developable greenfield sites outside of the existing settlements, likely across the Borough. Fence is an example of a settlement in Rural Pendle that is mentioned would be suitable for growth, but where the existing Green Belt boundary would restrict growth.</div><div>5. Similarly, the town of Barnoldswick, as part of the West Craven Towns, states in the settlement Strategy that ‘a limited amount of new housing will be provided to support the projected population growth in the town’. Given that this is a key service centre, and with significant levels of employment in the town, we consider that it would be capable of delivering significantly more housing growth in the short term due to its location and being considered more viable than the M65 Corridor area in the Council’s own evidence.</div><div>6. The Council’s evidence on Development Viability, indicates that the delivery of new houses is more likely in the more West Craven Towns and Rural Pendle, and conversely that housing development sites in the M65 Corridor are currently unviable. Given the recent significant undersupply of housing, over 500 in three years, it is paramount that the Council seeks to promote activity in the housing market. To this end, we consider that the Core Strategy should provide for an additional level of housing development in the early stages of the Plan within the West Craven Towns and Rural Pendle, but retain the overall focus of the majority of growth within the key towns during the plan period.</div><div>7. The Council has instead sought to limit housing development in the early stages of the Plan Period, through a phased housing requirement. However, in order to increase the amount of development in the short term, it is imperative that a larger number of housing sites are consented and development commenced, on sites at various locations across the Borough, to meet the shortfall and increase house building. A single site, no matter how large, is limited in the amount of houses it can provide within five years. A wide range of sites in different locations is needed to allow the housing development market to catch up on the shortfall and gradually improve the quality of the housing offer in the Borough.</div><div>8. The Development Viability Study, at Paragraph 3.56, explains that there has been a dearth of construction activity in recent years with very few national, or even regional, developers taking much of an interest in the Borough. It further states that Pendle is considered to offer a limited local market and its peripheral location away from the regional centre lessens that demand from further afield.</div><div>9. Beck concur with this understanding, and have been advised that developments in some areas even with planning consents will likely be unattractive to the volume house builders due to the slow sales rates and lower end values than other areas. In order to meet housing need and ensure houses are built to accommodate growth, the Council will need to attract house builders in the short term by releasing land in the better areas where demand is strong. This can create momentum and change the housing market of the whole Borough by attracting developers, whilst ensuring that the much needed new houses are built.</div><div>10. The Core Strategy states that the future Site Selection in Part 2 of the Local Plan should consider previously developed sites and sites within the settlement, before those outside of the settlement boundary. However, as mentioned in the Council’s evidence these sites are likely to unviable, so following this approach in the short term would therefore make the plan unsound.</div><div>11. With a view to allowing more development in viable locations in the short term, greenfield sites are required. Paragraph 2.6 of the Core Strategy states that “there are no plans to review the general extent of the Green Belt in Pendle.” Paragraph 8.46 further states that “a further review of the Green Belt boundaries will take place as part of the preparation of the Pendle Local Plan Part 2”, but that boundaries will only be amend to account for cartographic corrections or where exceptional circumstances exist. Such statements within the Core Strategy would not allow for changes to the Green Belt to accommodate the need for growth of the M65 Corridor and Rural Pendle areas currently surrounded by Green Belt. The Green Belt should be fully reviewed to allow for additional housing growth on suitable sites where they can meet housing need. If this is proposed to be undertaken at the Part 2 Phase of the Local Plan, this should be set out clearly in the Core Strategy.</div></div>				

# Pendle Local Plan Part 1: Core Strategy

12. It is unclear therefore how the Core Strategy will be able to accommodate viable and deliverable sites sufficient to meet the housing need set out in the Plan. Such an approach is therefore unsound, and will likely result in the existing reduced completion rates proceeding as unviable sites in the urban areas go undeveloped, leading to an enormous unsustainable shortfall of housing across the Borough that will neither meet housing growth nor support existing and future employment in the Borough. The plan is therefore unsound as it fails to comply with the NPPF, is not justified by presentable evidence, and will be ineffective in providing for the future growth of housing required.

Suggested Change

Comment

Summary

The Core Strategy is not considered to be sound, because the allocation of a single strategic site for housing in Barrowford (approximately 500 new homes):

- 1) Is not consistent with the development strategy
- 2) Has not been justified in a robust way that is consistent with planning policy guidance.
- 3) Is limited in the number of houses it can provide within five years - the allocation of a wide range of sites, in different locations, is needed to allow the housing market to catch-up on the shortfall and help improve the quality of the housing offer in the Borough.

The phased approach to housing delivery restricts housing delivery in the early stages of the plan period.

There is inconsistency in the strategy and policy wording, which means that the Core Strategy is undeliverable. It fails to consider that the majority of development in Rural Pendle will need to be on Greenfield sites outside existing settlement boundaries.

The Council should be more proactive in the early years of the Plan, by identifying a range of sites within different communities, even if these are unpopular to that immediate community.

Viability issues require the Core Strategy to provide for an additional housing development in the West Craven Towns and Rural Pendle during the early stages of the Plan, whilst retaining an overall focus on delivering the majority of housing growth within the 'key towns' over the plan period.

Pendle Local Plan Part 1: Core Strategy

868120 / 181 / DOC / - / - / -	Turley Associates	Mr	Andrew	Bickerdike	Peel Holdings (Land & Property) Ltd
Duty to Co-operate					
Legal Compliance					
Soundness					
Suggested Change					
Comment	<div><div>1. Introduction</div><div><p>1.1 These representations to the Pendle Core Strategy Pre-Submission Report are made on behalf of Peel Investments (North) Ltd (“Peel”). Peel has significant land interests in Pendle, including key development sites at Trough Laithe Farm and Riverside Business Park in Barrowford, the delivery of which will be critical to the achievement of the Core Strategy’s vision and objectives.</p><p>1.2 The Core Strategy will provide a framework for the future growth and development of Pendle. It plays a critical role in ensuring that the Borough delivers sufficient housing of the right type and in the right location to meet long term needs; that new business investment and employment can be attracted to Pendle; that Pendle provides thriving and vibrant town and local centres which meet the needs of its residents and that the Borough’s key environmental assets are protected and enhanced. To that end, Peel welcomes the further progression of the Core Strategy.</p><p>1.3 In accordance with the National Planning Policy Framework, the Pre-submission Report must satisfy the four identified tests of soundness. It must therefore be:</p><p>Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;</p><p>Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</p><p>Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and</p><p>Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</p><p>1.4 Following submission of the Core Strategy, it will be subject to an examination through which its soundness will be tested. This will also consider whether the plan has been prepared in accordance with the Duty to Cooperate and whether it satisfies legal and procedural requirements.</p><p>1.5 Peel is supportive of much of the Pre-Submission Report and considers that it generally satisfies the key tests of soundness, the Duty to Cooperate and legal and procedural requirements. However, Peel has a number of detailed comments to make regarding the overall spatial strategy for the Borough and a range of specific policies. Peel recommends that some limited changes are, therefore, needed to achieve a sound plan.</p><p>1.6 The comments contained within this report relate to the following policies / sections of the Pre-Submission Report and its evidence base:</p><p>Spatial Strategy</p><p>Policy SDP2: Spatial Development Principles</p><p>Policy SDP3: Housing Distribution</p><p>Policy LIV1: Housing Provision and Delivery</p><p>Policy LIV2: Strategic Housing Site: Trough Laithe</p><p>Policy LIV4: Affordable Housing</p><p>Policy WRK2: Employment Land Supply</p><p>Sustainability Appraisal</p></div><div><div>2. General Comments</div><div><p>2.1 Peel is supportive of the Core Strategy Pre-Submission Report. This sets out an appropriately ambitious vision for the future growth of Pendle and particularly seeks to make provision for a sufficient level of housing and employment development to meet the Borough’s needs and to promote its long term economic growth. The spatial strategy for the Borough achieves an appropriate balance between directing growth to key areas of opportunity and need and where the greatest long term benefit will be realised (principally within the M65 Corridor) whilst supporting a level of growth across the rest of Pendle which is proportionate to the role and character of the wider Borough and which responds to localised needs.</p><p>2.2 The plan identifies strategic sites for the delivery of new housing and employment, representing a positive approach to the Borough’s growth and ensuring early delivery of the Core Strategy’s key objectives.</p><p>2.3 The plan has been informed by a robust evidence base, particularly relating to the establishment of the Borough’s objectively assessed need for new housing and consideration of the viability of delivery.</p></div></div></div>				

# Pendle Local Plan Part 1: Core Strategy

Summary

2.4 It is evident that the Council has progressed the plan in consultation with surrounding local authorities and so ensuring that cross-boundary strategic issues have been considered throughout the process of the plan’s development and have informed the Pre-Submission Report.

2.5 Peel therefore considers that the plan to be generally sound. Notwithstanding this, Peel recommends that further limited changes are needed in order for all policies to achieve full soundness. These are considered in the following sections of this representations report.

Support much of the Pre-Submission Report and consider that it generally satisfies the key tests of soundness, the Duty to Cooperate and legal and procedural requirements. However, some limited changes are considered necessary to achieve a sound plan. The proposed changes relate to:

- Policy SDP2: Spatial Development Principles
- Policy SDP3: Housing Distribution
- Policy LIV1: Housing Provision and Delivery
- Policy LIV2: Strategic Housing Site: Trough Laithe
- Policy LIV4: Affordable Housing
- Policy WRK2: Employment Land Supply
- Sustainability Appraisal Report



Pendle Local Plan Part 1: Core Strategy

478805 / 191 / DOC / 0 / 0 / 0	Ms	Sheila	Smith
Duty to Co-operate			
Legal Compliance			
Soundness	<div>We, the under-signed, strongly object to Pendle Core Strategy on the following grounds:</div> <div>Lack of public consultation and insufficient time to respond to lengthy and overly complex documents, lacking clarity.</div> <div>Irreversible damage to wildlife and destruction of natural habitats and green fields</div> <div>Adverse impact on well-used and well-loved public footpaths. Loss of walking areas and places for relaxation and enjoyment, destruction of the surrounding countryside and views which is vital to the town’s image and identity and is one of the things which makes Colne such a special place to live in.</div> <div>Potential damage to the tourism industry, with a negative impact on jobs and the local economy.</div> <div>A lack of vision and no public negotiation and discussion involving alternative proposals at the planning stage. Such as using more brown field sites rather than the land grab of green fields and tackling the problem of absent landlords and rows of empty terracing, many of which ae worth preserving and renovating and could account for some of the housing allocation. As well as being unique and special part of our heritage, in keeping with the local landscape.</div> <div>An unfair proportion of housing development centred on Colne, compared to other areas of Pendle. We feel such large scale developments to be out of proportion to the local area and inappropriate in scale.</div> <div>The council’s poor track record of unreliable figures and statistics upon which vital decision are being made.</div> <div>If the housing and industrial over-development is to go ahead, particularly that proposed at Heirs House Lane, the introduction of the unpopular and unwanted bypass will be inevitable. Unwanted congestion and stress.</div> <div>To conclude :-</div> <div>We strongly object to the potential loss f Colne’s character and historical identity as a semi-rural town to that of a faceless bypass corridor and congested dormitory town. Woeful destruction and loss of green fields and countryside, damage to wildlife and nature and the negative impact this will have on our and future generations. We do not believe in profit before principles. Once the countryside has been built on, it will be lost forever. It is worth fighting for.</div>		
Suggested Change			
Comment	<div>This letter has been submitted as part of a petition signed by 158 people.</div>		
Summary	<div>Multiple objections to the Core Strategy on the basis of:</div> <div><div>- inadequate public consultation;</div><div>- irreversible damage to wildlife, destruction of national habitats and green fields;</div><div>- destruction of the countryside around towns and the adverse impact on footpaths;</div><div>- an unfair proportion of housing delivery in Colne;</div><div>- unreliable figures and statistical evidence;</div><div>- the introduction of an unpopular and unwanted bypass; and</div><div>- the loss of Colne's historical character and identity.</div></div>		

# Pendle Local Plan Part 1: Core Strategy

478805 / 192 / DOC / 0 / 0 / 0

Ms Sheila Smith

Duty to Co-operate

Legal Compliance

Soundness

I object very strongly to the proposals in the Core Strategy. I believe that they would damage Pendle’s communities and fear that they would do irreparable harm to the landscape, wildlife and the tourist industry.

Public Consultation

Due to the absence of a proper public consultation by the council, several people from Colne conducted their own, on Saturday, 22nd November, 2014. We discovered that most people were completely unaware of the housing allocations and the proposals for industrial sites. The council has had ample opportunity over the past few months to advertise the Core Strategy and to ensure that people realise what it is about and how it might affect Pendle in general and themselves in particular. It took only a few minutes for us to convey to each person the message that it was important to respond to the plan. So it is difficult to see why the council were unable to do so. In only a few hours, we received more than 140 signatures from people who opposed the plans.

The Core Strategy is very technical and extremely lengthy. In addition, the representation form asks the respondent to read further documents. I do not see how anyone can be expected to read and digest all the facts and figures in the space of six weeks. It is even less feasible if someone has less than a week in which to do so. I believe that the process has been made deliberately difficult. The documents have been available for viewing in libraries and council offices throughout Pendle, for six weeks. However, an invitation to complete a representation form about a Core Strategy is not immediately appealing to most people. Something more direct was needed, to capture the public’s attention and guide people to the most relevant sections. The council seems to be of the opinion that the process is too difficult for ordinary people to understand, and that their input would complicate and delay matters. They prefer to leave the decisions to experts. I find this attitude condescending and unreasonable. People are perfectly capable of understanding the issues involved and of making their views known, if only they are given the opportunity to do so.

The council may not have been able to afford a big consultation exercise but could have accessed other studies. For instance, an expensive and extensive public consultation took place in the South Valley area of Colne, in 2006, conducted by Urbed and facilitated by Pendle Council. Over a period of several months, residents discussed options, put forward their ideas and viewed housing developments in Manchester. The consultation was inclusive: all residents were properly notified and the people who took part were enthusiastic and committed. The residents unanimously supported high density housing, with quality open space, on brownfield sites within the town boundaries. No-one wanted to have the green fields around our town encroached upon.

According to Core Strategy guidelines, ‘Pendle Council recognises that not all sections of the community participate as readily as others. In order to ensure that everyone has an equal opportunity to have their say on the planning issues that will affect them, the Council will seek to employ a wide range of consultation techniques with the aim of securing a genuine input into the decision-making process at the earliest possible stage.’ This has clearly not happened.

Suggested Change

Comment

Summary

The Core Strategy is not based on adequate, or timely, engagement/public consultation.

# Pendle Local Plan Part 1: Core Strategy

478805 / 196 / DOC / 0 / LC / 0

Ms Sheila Smith

Duty to Co-operate

Legal Compliance	<p>Legality of the Core Strategy</p> <p>The ministerial foreword to the National Planning Policy Framework stresses that planning should be a collective enterprise. It notes that in recent years, planning has tended to exclude, rather than to include people and communities. It criticises the past policies of having targets imposed and decisions taken by bodies remote from them, and states that dismantling the unaccountable regional apparatus and introducing neighbourhood planning addresses this. By no stretch of the imagination can it be said that neighbourhood planning has been used to create this document. I therefore believe that the Core Strategy is not legally compliant.</p> <p>I believe that the housing figures are not viable, but have been produced in order to comply with central government requirements. Apparently, there is little local demand for new housing: a very small fraction of the 293 homes per year proposed in the Core Strategy is currently being built.</p> <p>To conclude, public consultation has been abysmal and needs to be addressed before decisions are made. I am not against development per se, and agree that Pendle needs to provide better quality jobs. I am also aware that many people from the building trade would support the proposals. But I know that options can be provided which are much more in keeping with the wishes of the majority of local people and which are much more sensitive to the environment. Building work could be provided inside the towns. A much more imaginative vision is needed.</p>
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Soundness

Suggested Change

Comment

Summary	<p>The Core Strategy is not legally compliant because it is</p> <ul style="list-style-type: none"><li>- not a product of neighbourhood planning;</li><li>- the housing figures are not viable, but simply comply with government requirements; and</li><li>- public consultation has been abysmal.</li></ul>
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868199 / 197 / DOC / 0 / 0 / 0

Mrs Angela Ross

Duty to Co-operate

Legal Compliance

Soundness	<p>We have family links to Colne but live near Preston and come here every year. The countryside is beautiful and it seems wrong to expand housing when you have solid 3 storey terraced houses which could be regenerated. I appreciate the need for more and affordable housing and the decision to boost economic development but please consider the heritage you have and also the tourist element.</p>
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Suggested Change

Comment

Summary	<p>The plan should promote the refurbishment of the existing terraced stock, for both market and affordable housing, rather than promote new housing development on Greenfield sites, which would damage the areas appeal to tourists.</p>
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Pendle Local Plan Part 1: Core Strategy

619588 / 201 / DOC / - / - / -	Friends of the Earth	Ms	Jane	Wood
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	<div>I wish to make comments on a number of areas of the strategy in particular environmental issues. Friends of the Earth also support the SELRAP (Skipton-East Lancashire Rail Partnership). Campaign to re-instate the Skipton to Colne line as it would bring environmental benefits and support people’s well-being and health. I have seen SELRAP’s response to this consultation. (Please find attached 2 sheets regarding my response).</div> <div>Friends of the Earth and the group KELFF (Kepp East Lancashire Frack Free) are concerned about shale gas extraction (fracking) and the social and environmental consequences of this process on communities. I am pleased to see that in the Core Strategy emphasis is placed on Pendle’s environment and the use of sustainable fuels which we believe to be the way forward for the borough.</div>			
Summary	<div>Welcome the support in the Core Strategy for the future re-instatement of the former Colne to Skipton railway line (Policy ENV4), the emphasis on protecting the environment (Policy ENV1) and the use of sustainable fuels (Policy ENV3), which will all help to bring about environmental benefits and support people’s well-being and health.</div>			

327812 / 211 / DOC / - / - / -	Mr	Clive	Narrainen
Duty to Co-operate			
Legal Compliance			
Soundness			
Suggested Change			
Comment			
Summary	<div>No comments made.</div>		

Pendle Local Plan Part 1: Core Strategy

868476 / 216 / DOC / 0 / LC / S1, S2, S3, S4				Ms	Pam	Smith
Duty to Co-operate	I haven't had time to read up on this, and comment on it.					
Legal Compliance	<ul style="list-style-type: none"><li>• No effective consultation – not many people know about this plan.</li><li>• Non-involvement of the public in the drawing up of the plans. Greg Clark, Minister for Planning, Specifically says, in his forward to the National Planning Policy Framework (NPPF) that it should be a “collaborative enterprise”.</li><li>• Bureaucratic silencing of the people whose lives are going to be so dramatically effected by your plans, you say that “There will not normally be an opportunity to make further representations” Why?</li><li>• Such as important decision which has such a devastating effect on people’s lives should not be taken so lightly. People have got to be able to speak out freely.</li><li>• It amounts to contempt of the people you claim to represent. Their views are not important to you and are merely irritants to be swept away by your grand plan.</li><li>• The aim of the NPPF, according to Greg Clark, is to allow “people and communities back into planning” (Foreword to the NPPF). He says that “in order to fulfil its purpose of helping achieve sustainable development planning must not simply be about scrutiny. Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives”</li><li>• Moving to the NPPF document itself, two of the 12 Core Planning Principles which should underpin both plan-making and decision-taking is that planning should:  “be genuinely plan-led empowering local people to shape their surroundings, with succinct (!! ) local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date and be based on joint-working and co-operation to address larger than local issues.”  “not simply about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives” (Page 5 of NPPF).</li><li>• Where is the desire for co-operation, and the apparatus whereby local people can contribute and draw up their own plans in accordance with their own vision for the area?</li><li>• You haven’t tied to engage people at all – you have tried – successfully – to keep it quiet. Most people I have talked to don’t even know about your plans and what you intend to do to our area and are absolutely outraged when told about it. The plan is deliberately made inaccessible, lengthy and remote. We have neither the time nor the expertise to wade through the hundred of pages in the report and to comment on them. People feel overwhelmed and helpless in the face of such a document, particularly when they know how devastating and irreversibly damaging the plans would be to the countryside and to their own well-being if they were to be carried out.</li><li>• What is not suggested is that the public is supposed to draw up a plan in equal partnership with the council in order to improve and enhance their environment in accordance with the aim and policy of the NPPF.</li><li>• Instead this plan, involving the wholesale and irreversible destruction of our much loved countryside is foisted upon us in a manner exactly the opposite to that in which the NPPF envisioned it should be.</li><li>• May I remind you what Greg Clark, Minister for Planning wrote in his foreword to the NPPF: “This should be a collective enterprise. Yet, in recent years, planning has tended to exclude, rather than to include, people and communities. In part, this has been a result of targets being imposed, and decisions taken, by bodies remote from them. Dismantling the unaccountable regional apparatus and introducing neighbourhood planning addresses this.</li><li>• In part, people have been put off from getting involved because planning policy itself has become so elaborate and forbidding – the preserve of specialists, rather than people in communities.</li><li>• This National Planning Policy Framework changes that. By replacing over a thousand pages of national policy with around fifty, written simply and clearly, we are allowing people and communities back into planning. Greg Clark in the foreword to the NPPF.</li><li>• However your plan is living proof that the above-mentioned “unaccountable regional apparatus” is alive and well. To conclude your Core Strategy is completely the opposite to what it should be as, laid down in the NPPF, and is therefore not legally compliant.</li></ul>					
Soundness	<ul style="list-style-type: none"><li>• These “objectively assessed development and infrastructure requirements” turn out to be not so very objective after all. They are predictions and guesswork based upon such things as birth and death rates and immigration figures – which are notoriously unreliable (particularly now in the economic downturn when many of the Eastern Europeans have returned home).</li><li>• Pendle Council has a poor track record of unreliable figures and statistics upon which such crucial decisions are made. How are we to believe the present projections on which the plan is based are any different?</li></ul>					



## Pendle Local Plan Part 1: Core Strategy

- Yet you are basing your whole strategy and plan for this area on a base of shaky unreliable projections.

- Also your plan is based on assumptions that are decidedly not objective – such as your complete lack of appreciation of our beautiful countryside and historical heritage of terraced housing and the belief that they should be expendable because they are of little value in your eyes.

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- You don't give other alternatives – your vision and your whole strategy is based upon the dismissal of the countryside as a commodity to be used for the purposes of industry and not something to be valued for its beauty, its natural habitats for wildlife, its production of a sense of well-being in the people who live and visit there, and crucially its role in the growing economic value of tourism in our area.

- Similarly, you show a complete lack of appreciation of our historical towns (and their potential, given the right planning)

- There are other alternative to your plan – but they have not been considered. You have not allowed people who live in the area an opportunity to put these alternatives forward.

- You propose building a huge industrial estate and give 5 options – all of them on greenfield sites and none of them on brownfield. All of them will have a devastating effect on the countryside and it is not just any old countryside – it ??? (includes?) the most beautiful in England, in some cases, and accounts for the growing number of tourists coming to our area. What is the justification of lumping all the industrial units into one huge site? Why can't they be located strategically in different suitable places in the towns? This would be the best solution for those light industrial unit which do not require lorries going to and from and for which the motorway link is not relevant. Many of the new businesses in the area are small scale and start-up businesses, which just don't require good transport links. Yet you would stick them all together into one massive ugly site, which would eat into our precious countryside. I would also question your figure for the sites needed.

- Again – what is the justification for building big housing estates in the greenfields in and around our towns, when there are plenty of neglected run-down brownfield sites where they could be built? If they were built on, not only would it save the green areas being concreted over, but it would also improve the town itself if good quality housing which fit in with the surrounding houses could be built in the run-down neglected areas. A case in point is the Waterside area of Colne, where there used to be a whole village as well as industrial mills. Good quality, family sized houses could be built here, around a village green, and the river could be opened up. Such a project would have the effect of lifting Colne. A much neglected, desolate part of the town will have been made into a fantastic place to live and the green spaces in the town would have been spared and the town would have been improved – in line with the NPPF guidelines the local people would like to see. This would be sensible, sensitive planning.

- What is the justification of building housing estate on greenfields where people love to walk and enjoy the view and experience a sense of well-being and freedom, when there are lots of empty houses going to waste and ruin.

- These should be compulsorily purchased and renovated and used to account for some of the housing allocation. This would have the added advantage of lifting the rundown and neglected housing stock, and making the town a better place to live.

- There is great affection for the old terraced housing both amongst people who live in them and people who visit the town. They are solidly built and part of our heritage giving our towns their unique character. Many new housing estates just look wrong they do not fit with the rest of the town. They are box-like and characterless, like many other houses throughout the country. However, given good design and materials it is possible to build houses that fit in with the rest of the town, so in the right areas I have no problem with them being built if there is the need for new houses as long as the terraced houses remain.

- According to a Pendle House condition survey 2009 quoted in your Pre-Submission Report the level of satisfaction with the home as a place to live was 82.8% even though a substantial section of the houses failed the Decent Homes Standard. Imagine their level of satisfaction if their houses were improved with the aid of grants!

- I think this satisfaction that local people have when living in their town derives from the semi-rural nature of the towns and the sense of freedom and well-being that the green spaces give. Robbing them of their green spaces and well-loved footpaths and views can therefore not be justified as it would detract from their well-being and enjoyment of their town.

- It is true that many large families feel cramped in their small terraced by knocking 2 houses into 1, in certain instances. The renovated houses in Whitefield, Nelson are fantastic examples of just what can be achieved with this type of housing.

- Also, as I said before, if houses were of the right design, and of good quality materials, and the right sites were found for them (e.g. in the Waterside area of Colne), so that the town was actually enhanced, then I would welcome some good quality family homes being built.

- What is the justification for destroying the special character of Colne? It is a great little town to live in, with great potential for the future. It is semi-rural, surrounded by fantastic countryside, with delightful little gems of green space, amongst the historic solidly built terraced housing. It is an historic town with an imposing main street. People feel a great sense of well-being and of freedom because of the green spaces.

- It is an up and coming town, drawing people from all over England because of its fantastic countryside, extending in all directions, and it individualistic, unusual shops and its thriving cafes. It hosts the International

Pendle Local Plan Part 1: Core Strategy

Blues Festival. It has been compared to Hebden Bridge, with which it has a lot in common – but much nicer countryside! Along with Foulridge and Barrowford it has a great future as a tourist attraction.

- Yet, instead of doing up the neglected, rundown parts of Colne, you intend to leave these to deteriorate further, in favour of building on the special green places, which help to give Colne its character – for example the land around the lodge near Lenches.
- Also – sacrilege! – you actually propose to build industrial estates in the very countryside which is helping to make Colne the centre of the tourist industry. Not only that – but a bypass alongside which you would undoubtedly build many more industrial estates. What short-sighted madness is this? You have already ruined Nelson with the Lomeshaye estate eyesore and now you want to do the same over at this end of the borough. But there is much more at stake here. This could be one of the great tourist areas of Lancashire, and instead of promoting it you want to ruin it.

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- I don’t believe it is effective, particularly with regard to the proposed industrial estates. Most of them – Heir’s House Lane, Colne Road, Barrowford and Foulridge – are not viable without the bypass – as you freely admit in your report. This bypass has not been accepted by the people who live here, so what is the point of proposing to build an industrial estate if the bypass upon which its viability depends, dos not exist?
- If you were to ask the people in this area (which you haven’t) most of them would be completely opposed to the idea of an industrial estate in the midst of our countryside.
- As I said before, it would completely destroy the tourist industry and condemn Colne to being just a run-down town like Nelson.
- We have in Pendle some of the most beautiful countryside in England and you as the council should be the custodians of it not wrecking it with your ill-considered and short-sighted planning.
- You will be viewed in the future as we now view your predecessors on the councils, who destroyed our heritage and ripped the hearts out of our towns in the sixties and seventies.
- You are doing the same to our countryside. You have no appreciation of the beauty of the landscape or the heritage of our towns. You are not fit to be in charge of planning.

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- As I previously stated (in question 1, when I commented on the strategy not being legally compliant) you have not consulted the people of Pendle.
- The NPPF states that planning should be about “empowering local people to shape their surroundings” Plans should be “based on joint-working and co-operation” page 5 NPPF.
- Most people don’t even know about the existence of your “Core Strategy” and it is only by my reading the NPPF that I now know that we have the right to have a say in the planning along with anyone else who wants to co-operate.
- You have kept this very quiet so you can foist your plans upon us without opposition just as you have done in the past.
- This goes against the directive in the NPPF where Greg Clark says:  
“This should be a collective enterprise. Yet, in recent years, planning has tended to exclude, rather than to include, people and communities. In part, this has been a result of targets being imposed, and decisions taken, by bodies remote from them. Dismantling the unaccountable regional apparatus and introducing neighbourhood planning addresses this.  
In part, people have been put off from getting involved because planning policy itself has become so elaborate and forbidding – the preserve of specialists, rather than people in communities. This National Planning Policy Framework changes that. By replacing over a thousand pages of national policy with around fifty, written simply and clearly, we are allowing people and communities back into planning.”  
Greg Clark Minister for Planning.
- He also says “Our natural environment is essential to our well-being and it can be better looked after than it has been”
- “Our historic environment – buildings, landscapes, towns and villages – can better be cherished if their spirit of place thrives rather than withers” (Foreword to NPPF)
- One of the Core Principles of the NPPF says planning should: “take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside ” (page 5).
- Another says: “encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided that it is not of high environmental value” page 6
- Another says: “Conserve heritage assets” page 6
- It is also stated that neighbourhood plans should: “support sustainable rural tourism and leisure developments that benefit businesses in rural areas and which respect the character of the countryside.” Page 9.
- On page 13 the plan states that “local planning should identify and bring back into residential use empty housing and buildings in line with local housing and empty homes strategies, and where appropriate acquire properties under compulsory purchase powers”.
- Developments should “respond to local character and history and reflect the identity of local surroundings and materials”.
- “Local communities...should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space, local communities will be able to rule out new developments other than in very special circumstances”. Page 18.

Suggested Change You need to meet up with concerned residents and listen to us! We demand to have a say in what is happening in our area - in accordance with the directives laid down in the NPPF.

Comment

- I feel you are moving completely in the wrong direction. Tourism should be promoted in Colne, Barrowford and Foulridge, and so on no account should industrial estates or the bypass be built on this land.
- Housing should be built on run-down brownfield sites - attractive well built housing - so that the town is enhanced by getting rid of neglected areas whilst keeping the green spaces intact.
- It is absolutely vital that the people who live in the area should now have their say. The council after all is supposed to be the representative of the people - that is how democracy is suppose to work.

# Pendle Local Plan Part 1: Core Strategy

Summary

The plan is not positively prepared because:

- it is based on unreliable projections, assumptions and guesswork rather than being objectively assessed

The plan is not justified because:

- it does not provide alternatives
- it undervalues the importance that easy access to the countryside surrounding the area's towns and villages has for the well-being of their residents
- none of the five options considered for a strategic employment site is on Brownfield land
- in supporting the provision of the Colne-Foulridge bypass it is promoting/facilitating development on the very countryside that has helped to boost tourism in the area
- there is no justification for building on Greenfield land in the countryside rather than supporting the regeneration of Brownfield sites
- it fails to promote the refurbishment and re-occupation of vacant (terraced) homes in favour of new build on Greenfield sites
- it fails to value the importance of the natural and historic environment

The plan is not effective because

- the industrial sites close to Colne are not viable without the construction of the Colne-Foulridge bypass
- development in the countryside will undermine the tourism potential of the area

The plan is not consistent with national policy because:

- public consultation and engagement with the local community has been inadequate
- it does not adequately recognise the intrinsic value of the character and beauty of the countryside and the importance that the historic environment will have for the future prosperity of the area
- it fails to adequately promote development on Brownfield sites, which will help to promote the vitality of the main urban areas, at the expense of development on Greenfield sites in the open countryside
- it fails to offer adequate protection to the Green Belt and open countryside or identify Local Green Spaces where development will be resisted

# Chapter 1: Preface

327387 / 90 / CHP1 / 0 / 0 / 0	Wildlife Trust for Lancashire, Manchester and North Merseyside	Mr	John	Lamb
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	<div>1.3 Defines sustainable development as "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs." From Our Common Future - The Bruntland Report (World Commission on Environment and Development, April 1987. However, paragraph 6 of the NPPF goes on to say that The UK Sustainable Development Strategy Securing the Future set out five ‘guiding principles’ of sustainable development, which includes living within the planet’s environmental limits.</div> <div>1.4 States that “Everything we do is about achieving a better future for Pendle and the people, who chose to live, work, learn or visit our community”, but the text that follows focuses only on the people and does not suggest how we can achieve a better future for the natural and built history of Pendle.</div> <div>1.5 Claims that Our Pendle Our Future: Pendle’s Sustainable Community Strategy (SCS) 2008-18, establishes a blueprint for the social, economic and environmental transformation of the borough. Whilst one of the objectives is to “Protect and enhance Pendle’s land, habitats and species”, it doesn’t even include NI197 as a measure of progress, let alone set out what could be called a blueprint for the environmental transformation of the borough.</div>			
Summary	<div>The NPPF's definition of sustainable development includes "living within the planet's environmental limits" as one of five guiding principles. This is different to the Brundtland Report definition quoted in paragraph 1.3. Paragraph 1.4 focuses on people and does not suggest how we can achieve a better future for the natural and built history of Pendle.</div> <div>Disputes that the SCS establishes a blueprint for the social, economic and transformation of the borough. There is no mention of NI197 as a measure of progress.</div>			

868022 / 164 / CHP1 / 0 / 0 / S4	Dr and Mrs	John and Alison	Plackett
Duty to Co-operate			
Legal Compliance			
Soundness	<div>Paragraph 1.4 is not consistent with national policy, i.e. NPPF paragraphs 2, 7, 8, 9.2, 17.9 and 17.10 and statutory obligations from Circular 6/2005, NERC Act Sections 40 and 41.</div> <div>NPPF paragraphs 8 &amp; 9.2: To achieve sustainable development economic, social and environmental gains should be sought jointly and simultaneously, moving from a net loss of biodiversity to achieve gains for nature.</div>		
Suggested Change			
Comment			
Summary	<div>The Preface is not consistent with the NPPF as it does not show how sustainable development will move from a net loss of biodiversity to achieving net gains for nature.</div>		

# Chapter 1: Preface

868022 / 165 / CHP1 / 0 / 0 / 0

Dr and Mrs      John and Alison      Plackett

Duty to Co-operate

Legal Compliance

Soundness

Paragraph 1.5 Pendle’s blueprint is its SCS. It is partially consistent with regards to biodiversity with the NPPF 7, 8, 9.2, 10, 14, 17.9, 10, 151, 152, 154, 155, 156.5, 157.1, 157.4, 157.7 and 157.8.

Pendle’s SCS should be able to demonstrate that:

- issues raised in the 2007 consultation
- knowledge of national and regional planning policy + statutory obligations
- strategies and action plans of organisations with an interest in Pendle
- published evidence and original research
- Local Biodiversity Action Plans
- Community Strategies as a whole are in informed by the purposes of biodiversity planning.

Have been used to help shape the Vision, Priority Goals and Strategic Objectives.

Suggested Change

Comment

Summary

The Sustainable Community Strategy, should be able to demonstrate how 'biodiversity planning' has been used to help shape the Vision, Priority Goals and Strategic Objectives.



## Chapter 2: About the Core Strategy

379222 / 8 / CHP2 / 0 / 0 / 0	The Coal Authority	Miss	Rachael	Bust
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	Paragraph: Paragraphs 2.7 and 2.8, Joint Lancashire Minerals & Waste Local Plan. Support: The Coal Authority supports the text in these paragraphs which sets out a suitable and necessary cross reference to the Joint Lancashire Minerals and Waste Local Plan. In particular it illustrates how that DPD is relevant to the Core Strategy, for example in relation to mineral sterilisation and it goes on to demonstrate how the Core Strategy links and takes account of minerals issues.			
Summary	Support for Chapter 2.			

327387 / 91 / CHP2 / DTC / 0 / 0	Wildlife Trust for Lancashire, Manchester and North Merseyside	Mr	John	Lamb
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	2.20 States that “The introduction of the Localism Act in November 2011 placed a Duty to Co-operate on planning issues that cross administrative boundaries and to carry out joint working on areas of common interest; a requirement that is reinforced in the Framework. Pendle Council has worked closely with neighbouring authorities and other bodies, such as utility providers, to prepare evidence and ensure that any local or cross-boundary impacts have been fully considered”. However, the Wildlife Trust cannot see any evidence of joint working in any of the policies / justification in the Core Strategy document and there does not appear to be any reference to cross boundary wildlife sites or links to ecological networks in adjoining authorities.			
Summary	There is no evidence of joint working in the policies/justification of the Core Strategy. There is no reference to cross boundary wildlife sites or links to ecological networks in adjoining areas.			

## Chapter 2: About the Core Strategy

Duty to Co-operate

Legal Compliance

Soundness

Concerns about handling of biodiversity in the SCS process

Consultation with local biodiversity partner and related voluntary groups did not take place until late 2010. (Although the Biodiversity Audit was not ready until 2010, both PBC and the biodiversity partner organisation held the necessary information for the biodiversity group to be included earlier in the process).

The final draft for the biodiversity element of the Sustainable Places Action Plan (Document A), with no inclusions or reference made to the 5 additional points, was never apparently generated.

An email attachment dated 17 th August 2010 (Document B) voicing concerns to planning personnel were never addressed.

It would appear that the SPG Action Plan adopted on biodiversity was the version generated from the general discussion on biodiversity from the initial meeting on 11 th August 2010. Had a version of the SPG Action Plan with all points discussed been generated, it could have correctly represented the elements of biodiversity the group felt needed to be brought forward for inclusion in the Core Strategy LDF.

One meeting with very little time in that meeting to discuss the draft Biodiversity policy meant that comments were the only way in which to express concerns (like any member of the public was allowed to do at consultation stages of the Core Strategy).

The biodiversity group were given limited time in which to finalise “Task and Finish” priorities (Document C).

At each stage (a-c)

- a) Action Plan: 1 meeting
- b) Biodiversity Policy: 1 meeting
- c) Task and Finish: 1 meeting

Little time was given to properly address any issues and problems; with the result that biodiversity was not represented in the critical processes and decision relating to the SCS, the Vision, Priority Goals, Guiding Principles, Strategic Objectives and Core Strategy DPDs.

Suggested Change

Comment

Summary

The preparation of the Sustainable Community Strategy (and the Core Strategy) failed to achieve adequate engagement with biodiversity partner organisations.

Chapter 3: Our Spatial Issues: Pendle Today

864766 / 57 / CHP3 / - / - / -	SELRAP	Mr	David	Penney
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	<p>Our Spatial Issues: Pendle Today - Connectivity (S3.93 -S3.96, Pages 29/30) highlights the relative isolation of Pendle and its poor transport accessibility and connectivity with links both into and out of Pendle for both rail and road when the Strategy admits the area is "at the end of a transport cul-de-sac". A higher priority should be given to improving connectivity for both rail and road East and West links, as good transport links are a key driver for social and economic regeneration.</p> <p>Our Spatial Issues: Pendle Today Key Challenges (S3.108, Page 32) to be addressed in Core Strategy. The Strategy lists one of the 17 issues/ challenges will be to "Improve transport linkages, both within and outside the borough". This issue/challenge should be given greater prominence as a key priority for action since so many other challenges depend on this one if they are going to be met and have a successful outcome.</p> <p>Our Spatial Issues: Pendle Today - 4 Headings under which these Issues/ Challenges will be addressed (S3.109, Page 32). The Strategy lists one of the 4 Principles to focus on the challenges will be "To protect and enhance the built and natural environment, managing the causes and impacts of climate change". In order to fulfil this criteria, it is well documented that rail has less environmental impact and causes less damaging climate change emissions than some other modes of transport . If the Borough is to reduce the impact of climate change, would it not be preferable to give a higher priority to rail connectivity?</p>			
Summary	<p>A higher priority should be given to improving connectivity by both rail and road, East and West links. Transport is the key driver for social and economic regeneration.</p> <p>The issue of improved transport links should be given greater prominence. To fulfil the aim of protecting and enhancing the built and natural environment, managing the causes and impacts of climate change it would be preferable to give rail connectivity a higher priority.</p>			

327387 / 92 / CHP3 / 0 / 0 / 0	Wildlife Trust for Lancashire, Manchester and North Merseyside	Mr	John	Lamb
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	<p>3.83 States that “Approximately one-third of the borough and over half of the open countryside is protected by an international, national or local environmental designation and a total of 18 UK BAP key habitats and 39 key species (of which 29 are UK Priority Species) have been identified in Pendle” (from JNCC 2007 UK Biodiversity Action Plan, reference 75). However, the Natural Environment and Rural Communities (NERC) Act of 2006, which places the ‘Biodiversity Duty’ on public bodies, including local authorities, lists Habitats of Principal Importance in England and Species of Principal Importance in England. Section 8.8 of the Core Strategy does refer to the NERC Act 2006 and 8.14 refers to Habitats and Species of Principal Importance, yet 8.15 lists UK Biodiversity Action Plan (BAP) key habitats. The Glossary in Appendix C includes a definition of ‘Biodiversity’ and ‘Biodiversity Action Plan’ but not Habitats of Principal Importance in England and Species of Principal Importance in England. It is confusing and unhelpful that there are such inconsistencies in the Core Strategy.</p> <p>3.97-3.99 Cross boundary issues does not refer to cross boundary wildlife sites or links to ecological networks in adjoining authorities.</p>			
Summary	<p>There a number of inconsistencies in the Core Strategy in relation to the different levels of protection for habitats and species. Specifically paragraph 3.83 references international, national and local designations, UK BAP key habitats and species but does not refer to Habitats and Species of Principal Importance in England (part of the NERC Act 2006). However, Paragraph 8.8 and 8.14 make reference to these but 8.15 refers UK BAP key habitats. The Glossary does not include definitions for Habitats and Species of Principle Importance. These inconsistencies need to be rectified.</p> <p>There is also no mention of cross boundary wildlife sites or links to networks in adjoining authorities.</p>			

# Chapter 3: Our Spatial Issues: Pendle Today

731431 / 126 / CHP3 / 0 / 0 / S4	English Heritage	Ms	Emily	Hrycan
Duty to Co-operate				
Legal Compliance				
Soundness	Despite the title of this section of the spatial portrait, it predominantly deals with the natural environment. There is only one brief paragraph on the historic environment. There has been no proper, accurate assessment of the historic environment in Borough of Pendle and the contribution it makes to its unique identity and special character (NPPF Paragraph 169). This section needs to be expanded to provide detail on the built heritage in the Borough to illustrate this.			
Suggested Change	The Plan needs to be amended to ensure that there is an accurate and descriptive portrait of the built and historic environment in Pendle and the contribution it makes to the area.			
Comment				
Summary	There has been no proper or accurate assessment of the historic environment and the contribution it makes to the borough's unique identity and special character. The plan needs to be amended to provide an accurate and descriptive portrait of the built and historic environment and the contribution it makes to the area.			

731431 / 127 / CHP3 / 0 / 0 / 0	English Heritage	Ms	Emily	Hrycan
Duty to Co-operate				
Legal Compliance				
Soundness	The list of spatial issues refers to built heritage. The historic environment is not just buildings and includes (Use definition from NPPF). Therefore the Plan needs to be amended to ensure that any issues affecting the whole of the historic environment is considered.			
Suggested Change	The Plan needs to be amended to ensure all elements of the historic environment is addressed in the Core Strategy policies: “Protect and enhance our valuable natural and (built heritage) historic environment ”. (Brackets indicate deleted text).			
Comment				
Summary	The plan needs to be amended to ensure all aspects of the historic environment are covered not just built heritage.			

# Chapter 3: Our Spatial Issues: Pendle Today

Duty to Co-operate

Legal Compliance

Soundness

Recent Historical Context: As the cotton industry declined at an ever increasing rate through the middle of the twentieth century so Pendle went into decline. The loss of the direct railway link into West Yorkshire in the early 1970s continued that trend and left this area of Lancashire isolated from the main transport links to the rest of the country. The building of the M65 should have improved Pendle’s viability, but again forces both internal and external to Pendle prevented the vision of a new motorway link through the Pennines to the main cities of West Yorkshire from being completed. This lack of vision and support by Pendle Councillors sent out the message that Pendle was a backwater with little economic value to larger industry and to businesses wishing to expand and relocate. The failure to push ahead with the motorway through to Yorkshire has stifled future growth and what growth there has been has had severe repercussions to traffic flow through places like Barrowford which is now perceived as a short cut to circumvent the abrupt culmination of the M65 at the boundary of Colne. Recent Regeneration and Urban Renewal The injection of massive amounts of outside funding, both European and government, attempted to halt this decline by reinvigorating the primary shopping centres, enticing new businesses to relocate and encouraging housing renewal for the worst areas in Nelson and Colne. The reality is that after massive investment all attempts to kick start both Nelson and Brierfield as prime shopping areas have failed, to achieve much improvement, whilst other areas have fared better. Retail and Shopping Barnoldswick, as a result of being awarded Market Town Status and the additional funding that came with it, has been able to rebrand itself and is currently thriving, recently winning a national award. Colne has taken longer to rebrand itself, but the improved shopping presence afforded by both the old town centre and the creation of a retail corridor through the sites formerly allocated to industrial and manufacturing on North Valley Road and Whitewall has seen its popularity as a shopping town on the rise. Although this has had the effect of kick-starting regeneration in Colne, it has led to more prime employment land with good motorway access being developed for retail. The down- side of this expansion is that the increased traffic flows generated by these retail sites have exacerbated the traffic problems at the start of the motorway and along the North Valley. Barrowford, although not a primary retail area, has successfully managed to rebrand itself as a niche shopping location through the endeavours of its own retailers. It has received no regeneration funding and has been positively discriminated against both in the dispersement of regeneration funding and the vagaries of the current local plan, which is based on outmoded empirical data and an outdated vision of Barrowford. Housing and Housing Renewal Forty years ago Barrowford house prices were the same as and in some cases lower than those in Nelson. However, the continued decline of Nelson, whilst Barrowford was reinventing itself, led to a large disparity in house prices with similar terraced properties being priced 100-120% higher in Barrowford before the financial crash. This and greater levels of difference still exist between Barrowford and the more deprived wards of Nelson and Brierfield. Elevate, the last government’s Housing Market Renewal initiative for East Lancashire, was primarily aimed at improving the housing stock by renovation or renewal and redressing this imbalance in property prices. Unfortunately, large amounts of time and money were wasted on consulting and formulating individual schemes once the funding had been made available. By the time the current government withdrew the funding little regeneration work had been completed. Some areas had been compulsory purchased and in some cases cleared, but few if any have seen any rebuilding. The only gain to Pendle was the full renovation of a few terraces of houses (e.g. Bright Street in Colne) and cosmetic regeneration of a few more. The net result was an overall reduction in available housing stock within these two towns. The cancellation of Elevate and the consequent failure to significantly improve the quality of the housing stock within Nelson and Brierfield and thus to reduce the differential in small-property values within Pendle casts a long shadow on the housing needs of the Borough and nowhere more so than Barrowford. Barrowford in its Current Context Barrowford is a long linear village following the course of Pendle Water, a tributary of the Calder, with most of the village situated to the west of the river. The A682, which originated as a turnpike road built early in the nineteenth century, for much of its length follows the river, with a large proportion of the older houses adjoining this road. Historically, Barrowford comprises four distinct small villages and hamlets, each still retaining a flavour of its origins. Higherford and Carrhall still contain only a small proportion of terraced houses and a higher proportion of larger detached Victorian and Edwardian properties and later semi-detached and bungalows built at different times from the 1920’s to the current day. Carrhall is the only area of Barrowford not reliant on the A682 as its main arterial route. Netherford, now the centre of the village was a mixture of textile manufacturing, shops and terraced workers’ houses. Lowerford (Newbridge) was predominantly textile manufacturing and workers’ housing with a terrace of Edwardian shops. These four components of modern-day Barrowford have evolved and changed over the last fifty years with the decline of textiles and saw the last weaving enterprise close a decade ago. Unlike some of its neighbouring textile towns Barrowford survived because of its gradual change from grimy industrial village to the place where residents from Nelson aspired to live. New housing and close proximity to the M65 opened the village to commuters: the unspoilt protected countryside of the Pendleside Villages and the evolution of the shops into niche shopping and high quality boutiques, a large central park and vibrant nightlife have made Barrowford the place to live. This popularity has seen several medium and large housing estates spring up over the last thirty years and as a result the village has grown more, proportionally, than most of the larger towns within Pendle. Growth is not a bad thing but it must be consistent across the Borough, raising the standards of housing, employment and quality of life equally. It should not allow any area to languish so far behind its near neighbours that it engenders despair and little hope of aspiring to a higher level. This type of disparity is most clearly shown if you look at the differences between Bradley and Whitefield Wards in Nelson and Carr Hall and Newbridge Wards in Barrowford. These wards are only separated by a small river but the difference in housing and life quality is as wide as any sea. The main driving force for this was the use of council grants in the 1980’s for house owners in the more rundown sections of Newbridge to improve their terraced housing along with the creation of new estates of semi-detached and detached housing in both wards. This, along with the other significant improvements within Barrowford, stabilised and improved property prices, with growth year on year fuelling the difference between it and areas where prices had stalled or even fallen. Barrowford is currently at a crossroads in its continuing evolution but has by and large reached saturation point in terms of its existing infrastructure. Although still popular with potential residents and even more so with potential developers, it is not perceived by existing residents to be thriving as it should, with quite a number of predominantly terraced houses not selling, or taking a long while to sell. Local shops and businesses are
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## Chapter 3: Our Spatial Issues: Pendle Today

	<p>struggling with the lack of parking, particularly in the centre of the village, and the ever increasing flow of traffic using the A682 as a way of avoiding the end of the motorway.</p> <p>Almost all of the side streets that join the A682 within Barrowford are either Victorian, Edwardian or earlier and laid out before the advent of the car. Main through routes such as Church Street, Pasture Lane, Higher Causeway and Nora Street are either subject to severe width restrictions or pinch points created by the ad-hoc building over the last two centuries, when the main transport was the horse, or of such narrow width within the urban core that on-street parking reduces the width to a single track. Parking restrictions cannot sensibly be applied to these streets, as they offer the only parking available within each area.</p> <p>Barrowford has also reached saturation point with other major local infrastructure needs that are necessary if future large housing developments are to enhance the village and not be a drain on it, reducing its desirability to the point where it goes into decline. These infrastructure needs include:</p> <p>1. Highways: Highways problems fall into two categories:</p> <ul style="list-style-type: none"><li>•Congestion on the A682 and the lack of road capacity at peak times, which cannot be improved by road widening schemes and could only be improved by restructuring junction 13 of the M65 and the building of the Foulridge Bypass. Relocation of Barrowford Primary School and rethinking of the access into Nelson &amp; Colne College would greatly ease traffic flow at peak times.</li><li>•Obstructions and restrictions on the minor roads leading from the A682 to the more rural outskirts are the main obstacle to edge of village development and are by and large insurmountable for larger developments. In most cases the solution is either not financially viable, involving the demolition of other buildings, or would mean such a reduction in the quality of life and amenity of existing residents that it would engender resentment and ultimately encourage people to move. This is most probable in areas where on street parking would have to be restricted to allow better access to a new development.</li></ul> <p>2. Schools: Barrowford currently has two primary schools, St Thomas C.E. School now occupying a recently built facility, and Rushton Street (Barrowford Primary School) which was built in the 1890’s on what was then an open field site to the front. St Thomas has a small annual intake of less than twenty and is always hugely oversubscribed. Rushton Street is currently running at or near full capacity and additional provision would need to be created if significant numbers of new houses are built.</p> <p>3. Health Services:</p> <ul style="list-style-type: none"><li>•Doctors’ Surgeries: Barrowford currently has two surgeries, neither of which is taking on new patients. Both surgeries are located on small sites within predominantly residential areas and, due to the size of the sites, any extension to the buildings would reduce the size of the patients’ car parks and have the knock-on effect of adding pressure to the existing limited on-street parking.</li><li>•Dental Provision: Barrowford has one dental practice that also has a small proportion of NHS patients, but this again is oversubscribed.</li><li>•Opticians: Barrowford has one optician.</li></ul> <p>4. Flooding: The low-lying parts of Barrowford are located on the flood plain and are susceptible to flooding. Flood alleviation measures within Newbridge have reduced this likelihood, but some house are difficult to insure. Any additional development on the upper levels of Barrowford which adversely impacted on surface water run-off could seriously affect the houses located on the floodplain.</p> <p>5. Sewage: The main foul drainage system within Barrowford is over a century old and was installed to service far fewer house than currently exist. What impact would large scale development have on the ageing sewer system?</p> <p>Insurmountable infrastructure problems should preclude some sites possibly for ever whilst others could be developed once major infrastructure problems have been satisfactorily overcome. More consideration should be given to the impact of these developments on the life quality and amenity of existing residents.</p>
Suggested Change	
Comment	Supporting documents provided.
Summary	<p>Historical context: - Decline in former industries and severing of transport links (railway) has left the area in a state of decline and isolation.</p> <p>Lack of vision in the past has reduced Pendle's abilities. Lack of transport links has limited growth. Barrowford now used as a short cut to avoid traffic problems in Colne. A massive amount of funding has been used to try to halt the decline with mixed results.</p> <p>Retail and Shopping: - Barnoldswick and Colne have managed to rebrand themselves with the aid of funding. Barrowford has rebranded itself through the endeavours of it own retailers and without funding.</p> <p>Housing and Housing Renewal:- Forty years ago house prices in Nelson and Barrowford were the same. However, as Barrowford rebranded, Nelson continued to decline leading to a disparity between prices. The Housing Market Renewal Initiative aimed to improve the housing stock. However, money was wasted through consultation on individual schemes and little regeneration work has actually been completed.</p> <p>Barrowford - Current Context: - Barrowford comprises of four smaller village components. Barrowford has changed from an industrial area to a place where people want to live with close its close proximity to the M65, unspoilt countryside and a range of niche shops/high quality boutiques. Council grant schemes in the 1980s allow home owners to improve their properties and this has led to a disparity with neighbouring wards in Nelson.</p> <p>Infrastructure: - Barrowford has reached saturation point with major infrastructure needs:</p> <p>Highways - Lack of road capacity on A682 - need for a restructuring of M65 Junction 13 and the building of the Foulridge bypass. Relocation of Barrowford Primary School and a rethink of access to Nelson and Colne college.</p> <p>- obstructions and restriction to minor roads leading from the A682 to more rural areas - these issues are insurmountable for large developments.</p> <p>Schools: - Both primary schools are either at our near capacity and oversubscribed - no capacity for additional places resulting from development.</p> <p>Health services: - limited provision and oversubscribed facilities.</p> <p>Flooding: - The low-lying areas of Barrowford are located in the flood plain. Flood alleviation measures have reduced the likelihood but development on the upper slopes could cause issues of surface water run-off.</p> <p>Sewage: - The main foul water drainage system is very old and was not built to deal with such large scale development.</p>

# Chapter 3: Our Spatial Issues: Pendle Today

619588 / 202 / CHP3 / - / - / 0	Friends of the Earth	Ms	Jane	Wood
Duty to Co-operate				
Legal Compliance				
Soundness	Our Spatial Issues: Pendle today – 4 Headings under which these Issues/Challenges will be addressed (S3.109, page 32). The strategy lists one of the 4 principles to focus on and this is the challenge ‘to protect and enhance the built and natural environment, managing the causes and impact of climate change’. This is a serious challenge – how will this be managed in connection to the other 3 principles?			
Suggested Change				
Comment				
Summary	<p>The spatial issues are summarised under four headings, but how can the need ‘to protect and enhance the built and natural environment, managing the causes and impact of climate change’ be managed in connection with the need to also:</p> <ul style="list-style-type: none"><li>- deliver a range of housing appropriate to the needs of the borough</li><li>- create a strong and dynamic economy</li><li>- address our infrastructure requirements, creating sustainable urban and rural communities</li></ul>			

# Chapter 4: Our Spatial Vision: Pendle Tomorrow

864766 / 58 / CHP4 / - / - / -	SELRAP	Mr	David	Penney
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	<div>Our Spatial Vision: Pendle Tomorrow (S4.4, Page 33). In order to achieve the Vision in the Pendle Sustainable Community Strategy the Borough should be guided by 8 Priority Goals, one of which is " To deepen our understanding and respect for the environment " .</div> <div>This goal should determine the mode of transport which is chosen as a priority to be developed, such as rail .</div>			
Summary	<div>Rail should be the transport priority so that the SCS goal to deepen our understanding and respect for the environment is achieved.</div>			

867824 / 112 / CHP4 / DTC / 0 / S1, S2	Mrs	Heather	Askew
Duty to Co-operate	<div>I don't know about the official 'Duty to Cooperate', as I have no knowledge or skills in planning, but as a local resident I certainly don't feel anyone is cooperating with us.</div>		
Legal Compliance			
Soundness	<div>I do not think that this plan has objectively assessed development requirements in our village. As a local resident of Barrowford, who has a child at St Thomas Primary School I certainly do not feel that we have been included in the discussion or planning, since I was only made aware of this over the weekend by another parent.</div> <div>The planned development of this greenfield land is something I am wholly opposed to and outraged to learn of at this seemingly very late stage. Your public, the local residents of Barrowford, who live, work and go to school in this village think this is an unwanted and unnecessary planned development, especially when there are so many brownfield areas with empty houses and mills which should be focussed on, rather than the destruction you propose for our beautiful surrounding green fields. You are turning us into a town, which we neither want or need. The local schools are already oversubscribed and the traffic through our village is already heavily congested.</div>		
Suggested Change			
Comment	<div>You state you strive for the 'best possible outcome for you, your children and Pendle' which I think is the complete opposite of what will happen if all this development goes ahead.</div>		
Summary	<div>The plan has not objectively assessed development requirements for Barrowford. Local residents have not been included in the discussion or planning.</div> <div>Opposed to the development of the greenfield site behind St Thomas Primary School. There are so many brownfield site with empty houses and mills which should be focussed on.</div> <div>The infrastructure is inadequate - schools are oversubscribed and there is heavy traffic congestion.</div>		

Chapter 4: Our Spatial Vision: Pendle Tomorrow

731431 / 128 / CHP4 / 0 / 0 / S4	English Heritage	Ms	Emily	Hryan
Duty to Co-operate				
Legal Compliance				
Soundness	The NPPF requires that the Local Plan should contain a strategy for the conservation and enhancement of the historic environment. The vision does not mention the built environment including the historic environment and Pendle’s local character and identity.			
Suggested Change	The Plan needs to be amended to ensure the vision for Pendle will conserve and enhance the historic environment and its unique local character and identity.			
Comment				
Summary	No mention of the built or historic environment in the Vision. The Vision needs to be amended to ensure that Pendle's historic environment and unique local character and identity is conserved and enhanced.			

327467 / 148 / CHP4 / 0 / 0 / 0	Barrowford Parish Council	Mr	Iain	Lord
Duty to Co-operate				
Legal Compliance				
Soundness	Vision of the Future of Pendle:  Barrowford Parish Council is one of the few Parish or Town Councils in Pendle to consistently discuss and respond to each individual consultation presented to it. It has responded with suggestions and comments designed to align the Borough of Pendle’s Core Strategy with both the Barrowford Parish Plan and the way in which it wishes the village to grow and prosper so as to meet the aspirations and vision of residents and businesses.  Barrowford Parish Council, unlike many of the seventeen Parish and Town Councils who wish to see no development at all within their respective areas, has taken the pragmatic view that Pendle needs to evolve and renew, or wither and die, and that this applies to Barrowford no less than elsewhere. The Core Strategy alludes to this principle and defines it as meeting the immediate needs and raising the aspirations of the Borough as a whole and its people through the life of the strategy.  This is a noble sentiment but Pendle in its fortieth year is no more a unified borough working with a single aim and purpose than it was in its first. Pendle scarcely exists as an identity to its inhabitants, with people not choosing to be “Pendlers” but identifying with the former constituent parts of the Borough. This has led to forty years of wasted opportunity when both political and geographic arguments coupled with hung councils have driven key policies on a piecemeal basis. This engendered a vision based on the former mill towns of Nelson, Colne and Brierfield being at the top of the local hierarchy.			
Suggested Change				
Comment	Supporting documents provided.			
Summary	Barrowford Parish Council has consistently discussed and responded to each Core Strategy consultation and has suggested changes to align the Core Strategy with the Barrowford Parish Plan in terms of how the villages should grow in order to meet the aspirations and vision of residents and businesses. Barrowford Parish Council takes a pragmatic view that Pendle needs to evolve and renew, or wither and die. The Core Strategy aims to meet immediate needs and raise the aspirations of the borough as a whole. However, the borough is not unified and this has led to a wasted opportunity as both political and geographic arguments have driven key policies on a piecemeal basis. This has produced a vision based on the former mill towns of Nelson, Colne and Brierfield being at the top of the hierarchy.			

Chapter 4: Our Spatial Vision: Pendle Tomorrow

868022 / 166 / CHP4 / 0 / 0 / S3, S4	Dr and Mrs	John and Alison	Plackett
Duty to Co-operate			
Legal Compliance			
Soundness	<div>Paragraph 4.9 – The Vision</div> <div>This is partially consistent with the NPPF in acknowledging the need to make a positive contribution to ecological networks. However, where pressure on biodiversity is greatest, the primary function of ecological networks (to connect core areas of high biodiversity value and in providing buffer zones) is not acknowledged.</div> <div>Protecting habitats in Rural Pendle alone is not justified. There are designated habitats in other areas of Pendle where measures to protect and enhance Habitats of Principal Importance and LBAP (Lancashire Biodiversity Action Plan) priority habitats, where priority species are likely to be present, must be considered in order to provide net gains in biodiversity, especially in these “threatened habitats” as they are “a focus for conservation action in England” – NPPF paragraphs 17.7, 17.10, 109.1, 109.3, 114.1. It is also important to acknowledge connectivity NPPF 117.1 to 17.4.</div> <div>This Vision is not effective. It should reflect the National Vision as a guide at the local level to “develop policies that support the Vision emphasising biodiversity.” (Natural England from Sustainability Appraisal Report 2006, Table B6).</div>		
Suggested Change			
Comment			
Summary	<div>The Vision is not effective and only partially consistent with the NPPF, as the primary function of ecological networks (to connect core areas of high biodiversity value and in providing buffer zones) is not acknowledged.</div> <div>Protecting habitats in Rural Pendle alone is not justified, as priority habitats exist elsewhere in the borough.</div>		

868022 / 169 / CHP4 / 0 / 0 / 0	Dr and Mrs	John and Alison	Plackett
Duty to Co-operate			
Legal Compliance			
Soundness	<div>Core Strategy: page 3, Section 4 Our Spatial Vision: Pendle Tomorrow: How is the Spatial Vision contributing to protecting and enhancing our natural environment and helping to improve? NPPF 7.3</div> <div>Which of the named thematic groups is suitably qualified to carry forward the subsumed LBAP which PBC need to demonstrate has been considered in the SCS? Circular 6/2005.</div> <div>Where in Our Spatial Vision for Pendle can PBC demonstrate that their Community Strategy as a whole has been informed by the purposes of biodiversity planning? Circular 6/2005.</div> <div>As the highest % of comments in the “You choose” consultation was about the environment, how is PBC applying priority goal 6 in delivering the SCS?</div> <div>Our Spatial Vision is like a rainbow with the central colour missing.</div>		
Suggested Change			
Comment			
Summary	<div>The Spatial Vision fails to offer sufficient recognition to the important role that 'biodiversity planning' can play in the regeneration of the area.</div>		



# Chapter 4: Our Spatial Vision: Pendle Tomorrow

478805 / 195 / CHP4 / 0 / 0 / 0	Ms	Sheila	Smith
Duty to Co-operate			
Legal Compliance			
Soundness	Vision <p>‘Our vision for Pendle’ states that you would want to protect and enhance our high quality landscapes and habitats, so that rural Pendle will become an increasingly attractive destination for tourism and leisure. But rural Pendle cannot be divorced from the towns. It is in the towns that much of the tourists’ money is spent. For instance, the Colne Blues Festival and now the Tour of Britain can bring so much wealth to Pendle, but they rely upon Colne being an attractive old mill town, surrounded by beautiful countryside. The character of Colne would be severely damaged by the major developments shown on your proposals.</p>		
Suggested Change			
Comment			
Summary	The vision stresses the importance of the borough's rural areas to its tourism appeal, but fails to acknowledge the important contribution that is also made by the areas towns.		

619588 / 203 / CHP4 / - / - / 0	Friends of the Earth	Ms	Jane	Wood
Duty to Co-operate				
Legal Compliance				
Soundness	Our Spatial Vision: Pendle Tomorrow (S4.6, Page 33) In order to achieve the Vision in the Pendle Sustainable Community Strategy the Borough should be guided by 8 priority Goals, one of which is ‘To deepen our understanding and respect for the environment’ This is a goal Friends of the Earth supports. <p>In our ‘Vision for Pendle’ (4.9 page 34) it states that ‘By 2030 Pendle will be a dynamic and beautiful location with a commitment to carbon reduction’.</p> <p>It is hope this is achieved and the landscape not blighted by ‘fracking’.</p> <p>The vision also says ‘Foster growth in the established manufacturing sector’</p> <p>There is no specific mention of green jobs which we need in order to lower carbon emissions.</p> <p>The Core Strategy Strategic Objectives talks about a greener urban environment, ecological networks and local biodiversity. (Table 5.1 p35) In particular:</p> <p>4) Respond to the causes and potential impacts of climate change through a process of prevention, mitigation and adaptation.</p> <p>9) Green open spaces...encouraging a greater appreciation of the enjoyment they provide and valuable contribution they make.</p> <p>If shale extraction were permitted to go ahead that would be contrary to this vision.</p>			
Suggested Change				
Comment				
Summary	Shale gas extraction (fracking) would be contrary to the vision for the borough to be "a dynamic and beautiful location with a commitment to carbon reduction". Furthermore, the vision makes no reference to 'green sustainable jobs' which will make a valuable contribution to lowering carbon emissions.			

Chapter 5: Our Strategic Objectives: What We Need To Do

864766 / 59 / CHP5 / - / - / -	SELRAP	Mr	David	Penney
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	Our Strategic Objectives: What we need to do (S5.2.5, Table 5.1, Pages 35/36). The Strategy lists 11 strategic Objectives of which the last is to "Deliver a safe, sustainable transport network that improves both internal and external connectivity, reduces the need to travel by car, supports long-term growth and contributes to an improved environment ". Again this Objective should influence the mode of sustainable transport to be delivered, based on the Principle listed in S3.109, Page 32: "To protect and enhance the built and natural environment, managing the causes and impacts of climate change".			
Summary	Objective 11 should influence the mode of transport to be delivered in accordance with the principle to protect and enhance the built and natural environment, managing the causes and impacts of climate change.			

731431 / 129 / CHP5 / 0 / 0 / S4	English Heritage	Ms	Emily	Hrycan
Duty to Co-operate				
Legal Compliance				
Soundness	The NPPF requires that the Local Plan should contain a strategy for the conservation and enhancement of the historic environment. The strategic objective refers to “man-made heritage” and the protection of sites. Reference is made to the definition of historic environment and heritage assets in the NPPF and the objective should be amended to reflect this.			
Suggested Change	The Plan should be amended to provide further clarity to its strategic objectives to ensure that the historic environment is conserved and enhanced.			
Comment				
Summary	Strategic Objective 10 should be amended to reference the historic environment and heritage assets rather than "man-made heritage" in line with the definitions in the NPPF.			

# Chapter 5: Our Strategic Objectives: What We Need To Do

327370 / 146 / CHP5 / - / - / S1, S2, S3, S4	National Trust	Mr	Alan	Hubbard
Duty to Co-operate				
Legal Compliance				
Soundness	<p>The Objective relating to natural and man-made heritage is not prepared in a positive manner having regard to the wider benefits of environmental assets and in particular their wider influence through their settings. There is a rational alternative to this Objective which can seek to ensure that the wider significance of environmental assets is recognised, safeguarded and enhanced through the proper consideration of development within and affecting their settings.</p> <p>The Objective will be ineffective in safeguarding and enhancing the settings of environmental assets if its wording fails to take these into account.</p> <p>The current wording proposed is not consistent with the advice in the NPPF about the importance of settings, especially in relation to heritage assets, and the contribution that they make to their significance, for example as set out in paragraphs 128/129 of the NPPF.</p> <p>The wording of Objective 10 remains limited and on normal reading would be interpreted to refer only to areas/sites specifically designated rather than to their wider settings to which they are intrinsically connected. The NPPF is especially clear about the contribution of settings to heritage assets (e.g. paras 128/129) and also in respect of ecological networks and eco-systems services in Chapter 11.</p> <p>There are particular concerns that these wider implications are not adequately understood or appreciated and as a consequence are not properly assessed or taken into account in the determination of planning proposals - there is a recent example of this in respect of the wider setting of a range of heritage assets at Gawthorpe Hall and development in the wider area at Reedley (application13/14/0393P relating to Moor Isles Farm, Woodend Road, Reedley).</p>			
Suggested Change	<p>Amend to read as follows:</p> <p>“Ensure that new development respects our natural and man-made heritage, by seeking to protect, maintain and enhance those sites and habitats (including their wider settings) which are valued for the positive contribution they make to the character of our landscape, townscape or biodiversity.”</p>			
Comment				
Summary	<p>Objective 10 is not prepared in a positive manner. It does not have proper regard to the wider benefits of environmental assets and their wider influence through their settings. The wider significant of environmental assets should be recognised, safeguarded and enhanced through the consideration of how development affects their settings. The wording of the objective is not consistent with the NPPF in relation to the importance of settings. The NPPF is clear on this matter in relation to heritage assets, ecological networks and eco-systems services.</p>			

# Chapter 5: Our Strategic Objectives: What We Need To Do

868022 / 168 / CHP5 / 0 / 0 / S3, S4

Dr and Mrs      John and Alison      Plackett

Duty to Co-operate

Legal Compliance

Soundness

Paragraph 5.2 (page 35) – Strategic Objectives
These objectives are partially justified, but not effective or consistent with national policy with regard to biodiversity.
Strategic Objective 4: the description is insufficient; it does not state in which aspects it will achieve sustainable development.
Strategic Objective 9: The description needs to define what is meant by green open space. The NPPF defines open space as areas of space which offer important opportunities for sports and recreation and can act as a visual amenity. This SO is unlikely to contribute to achieving sustainable development. This SO is not consistent with NPPF paragraph 151 as it does not contain a clear strategy for protecting and enhancing the natural environment.
Strategic Objective 10: This is only partially effective at achieving sustainability for bio/geodiversity as it will only seek to protect in new development. The sustainability object is to protect and enhance a hierarchy of designations of biodiversity irrespective of new development. If rearranged to read “Protect, maintain and enhance those sites and habitats.....landscape, townscape or biodiversity and seeking to ensure that new developments respect our natural and man-made heritage and landscape”, it would then be consistent with the sustainability objective.
The Strategic Objectives are not effective or deliverable with regard to NPPF paragraph 109.3 in contributing to the Government’s commitment to halt overall decline in biodiversity (habitat loss).
See also Entec SA report 30th June 2008: (Document 1)
There are no sustainability advantages for biodiversity in the Strategic Objectives 4, 9 and 10.
Page vi Table S2 Sustainability Appraisal Objectives (Document 2)
Strategic Objective 7: This should also make reference to protecting and enhancing habitats through the LBAP.
The NERC Act sections 40 and 41 and Circular 6/2005 have obligations with regard to Habitats of Principal Importance, LBAP priority habitats, irreplaceable habitats and geodiversity. Hence in this and following SA reports by AMEC (21st Oct 2011), Natural England comments regarding Pendle’s LDF should:
Indicate the location of all sites of importance including local sites identifying areas for restoration or creation of new priority habitats Include objectives which serve to support the protection of biodiversity. Consider objectives compatible with objectives of the LBAP. The SCS should be able to demonstrate that a LBAP has been considered within their community strategy. Hence Natural England suggest the need to include priority habitats in the LDF, their location, objectives for their protection and enhancement, baseline, target indicator and trending data.
It would appear that the Lancashire and UK Biodiversity Action plans were not considered in the SA processes re Pendle’s LDF.
AMEC SA report 2011: (Document 3)
Table 3.1 on p.16 bottom of first column does not make reference to Habitats of Principal Importance, which are NERC Act Section 40 and 41 habitats. (Document 4) Page 24 reveals that the Pendle LBAP habitats are all located in Special Protection Areas and SSSIs, which is untrue. Some LBAP priority habitats do exist there. Hence in Key Sustainability Issues on p.25 – Physical Environment – LBAP habitats fail to be mentioned as existing in the rest of Pendle.
The SA reports are not robust or credible in respect of information on the physical environment, which may impact on other SA objectives.

Suggested Change

Comment

## Chapter 5: Our Strategic Objectives: What We Need To Do

### Summary

Strategic Objectives 4, 9 and 10 are not effective or consistent with national policy (NPPF, paragraph 109, bullet point 3) with regard to biodiversity and the Sustainability Appraisal (SA) Report (30th June 2008) shows no sustainability advantages for biodiversity in respect of these strategic objectives.

The Lancashire and UK Biodiversity Action Plans do not appear to have been considered in the SA process and references to the NERC Act (Section 40 and 41 Habitats) have been omitted from the SA Report (21 October 2011).

The SA Reports are not robust or credible in respect of information on the physical environment, which may impact on other SA objectives.



## Chapter 7: Our Spatial Strategy: Where and How We Will Deliver

864766 / 60 / CHP7 / - / - / -	SELRAP	Mr	David	Penney
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	Our Spatial Strategy: Where and How We Will Deliver (S.7, Pages 59/60). The strategy underlines its Infrastructure Requirements under Policy SDP 6. A key component to deliver such developments will be the issue of accessibility and connectivity to transport networks . This should be reflected in Policy SDP 6 . SELRAP notes that under Pendle Local Plan Part 2: Site Allocations and Development Policies, the Council is recommending rejection of the Barrowford Road/Heirs House Lane Site option in Colne for Industrial Development, which would have involved incursion onto the rail track bed which is protected as a transport corridor.			
Summary	Policy SDP6 should explain that accessibility and connectivity to transport networks is a key component in delivering development and infrastructure. Industrial development at Barrowford Road/Heirs House Lane would involve incursion on to the rail track bed which is protected as a transport corridor.			

817541 / 100 / CHP7 / 0 / 0 / S4	Dickman Associates Ltd	Ms	Jane	Dickman	Green Emmott Trust
Duty to Co-operate					
Legal Compliance					
Soundness	Para 7.4 Spatial Strategy - Spatial Strategy sees only limited growth in Rural Villages. Restricting development in the open countryside does not reflect NPPF on sustainable development which would enable infill and development in identified sustainable settlements. Rural Villages have been identified as such even if they are the lowest tier. By enabling sustainable development it will boost existing facilities and community. Also in the case of settlements in West Craven and on the Keighley Road by encouraging development it will tie in with the CS objective of strengthening connections to W & N Yorks.  Also given the housing land undersupply and market conditions then consideration of sites that effectively are infill or rounding off in sustainable locations should not be discarded before being properly considered. Not consistent with NPPF				
Suggested Change					
Comment					
Summary	Spatial Strategy limits growth in Rural Villages and in the open countryside. This is not in line with the NPPF in terms of sustainable development. Infill development in identified sustainable settlement can boost existing facilities and community. Encouraging development in West Craven and on Keighley Road will strengthen connections to West and North Yorkshire. Given the current housing undersupply and market conditions consideration should be given to such infill sites.				

# Chapter 7: Our Spatial Strategy: Where and How We Will Deliver

868120 / 182 / CHP7 / - / - / 0	Turley Associates	Mr	Andrew	Bickerdike	Peel Holdings (Land & Property) Ltd
Duty to Co-operate					
Legal Compliance					
Soundness	<div>Spatial Strategy</div> <div>3.1 The Spatial Strategy confirms that the M65 Corridor comprises Nelson, Colne, Brierfield and Barrowford and will be the focus for the majority of development over the plan period. Peel is supportive of this Spatial Strategy for the Borough which represents a clear marriage of economic opportunity and regeneration need.</div> <div>3.2 The M65 Corridor contains the Borough’s largest settlements, benefits from strategic connections to the wider region and neighbouring authority areas and so provides the greatest opportunity to attract inward investment into the Borough and contains the areas of greatest regeneration need. Focusing development in this spatial area represents a sustainable approach to grow in accordance with the requirements of The Framework.</div> <div>3.3 Notwithstanding this, the important role that Barrowford will have to play in the growth of the Borough and its contribution to the M65 Corridor is underplayed. The reference to Barrowford having only a ‘supporting’ role does not reflect the significant level of housing and employment development which is to be located within the town through the Strategic Housing Site at Trough Laithe Farm and the development of the adjacent Riverside Business Park.</div>				
Suggested Change	<div>3.4 To ensure soundness the first sentence of the sixth paragraph of the Spatial Strategy should be amended to read:</div> <div>“Barrowford will play a key role in the growth of the M65 Corridor, providing new employment for the Borough through the delivery of Riverside Business Park and providing new high quality family housing at Trough Laithe Farm.”</div>				
Comment					
Summary	<div>The role that Barrowford will play in the growth of the Borough and its contribution to the M65 Corridor is underplayed within the spatial strategy, which should be amended to reflect the significant level of housing and employment development to be located within Barrowford through the Strategic Housing Site at Trough Laithe Farm and the development of the adjacent Riverside Business Park.</div>				

Policy SDP1: Presumption in Favour of Sustainable Development

817889 / 12 / SDP1 / 0 / 0 / 0	Turley Associates	Mr	George	Wilyman	Sainsbury's
Duty to Co-operate					
Legal Compliance					
Soundness					
Suggested Change	Amend the policy to specifically refer to development proposals for town centre uses to be given clear support where they balance the promotion of sustainable communities and enhancing the quality of the environment.				
Comment	On behalf of our client, Sainsbury's Supermarkets Ltd, we have reviewed the Pendle Borough Council Core Strategy Pre-Submission Report and would like to take this opportunity to comment on the document. Introduction: Overall, Sainsbury's considers the Pre-Submission Report to be sound, if a number of amendments are included and reflected in the next stages of the Core Strategy adoption. For clarity, our comments and recommended changes are detailed as bullet points below the relevant policies. Policy SDP1 (Presumption In Favour Of Sustainable Development) Sainsbury's continues to support Policy SDP1, particularly the inclusion of the presumption in favour of sustainable development as contained within the National Planning Policy Framework ("the Framework") and welcomes the expansion of the policy to include the promotion of joint working to ensure sustainable development. I trust that these comments will be taken into account in your consideration of the Pre-Submission Publication version of the Pendle Core Strategy.				
Summary	Policy SDP1 should include a specific reference to supporting the development of town centre uses where they promote sustainable communities and enhance the quality of the environment.				

867305 / 47 / SDP1 / 0 / 0 / 0	Persimmon Homes Lancashire	Mr	Chris	Gowlett	
Duty to Co-operate					
Legal Compliance					
Soundness					
Suggested Change					
Comment	The Spatial Strategy emphasises the role that Pendle plays in being the gateway between Lancashire and Yorkshire. The M65 Corridor is vital to this and directing the majority of the development here is the most sustainable strategy for the borough. The pro-active nature of Policy SDP1 is also supported by Persimmon Homes and it should be at the crux of all decision-making at the Council. This has been reflected with Policy SDP3, as 70% of all housing has been attributed to the M65 Corridor.				
Summary	Support for the Spatial Strategy and Policy SDP1.				

Policy SDP2: Spatial Development Principles

817889 / 13 / SDP2 / 0 / 0 / 0	Turley Associates	Mr	George	Wilyman	Sainsbury's
Duty to Co-operate					
Legal Compliance					
Soundness					
Suggested Change					
Comment	<div>On behalf of our client, Sainsbury's Supermarkets Ltd, we have reviewed the Pendle Borough Council Core Strategy Pre-Submission Report and would like to take this opportunity to comment on the document. Our comments are set out below. Introduction: Overall, Sainsbury's considers the Pre-Submission Report to be sound, if a number of amendments are included and reflected in the next stages of the Core Strategy adoption. For clarity, our comments and recommended changes are detailed as bullet points below the relevant policies. Policy SDP2 (Spatial Development Principles) Sainsbury's support changes made to this policy in line with their previous representation. I trust that these comments will be taken into account in your consideration of the Pre-Submission Publication version of the Pendle Core Strategy.</div>				
Summary	<div>Support for Policy SDP2.</div>				

866837 / 20 / SDP2 / 0 / 0 / 0		Mr	G R	Bolton	
Duty to Co-operate					
Legal Compliance					
Soundness	<div>In general, any site that is on a green belt land should be dismissed out of hand as a non starter. Brown field sites should always be considered first. Surely, there are many of these which can be used for industrial purposes.</div>				
Suggested Change					
Comment					
Summary	<div>Brownfield sites should be used first. Green Belt land should be dismissed.</div>				

867305 / 48 / SDP2 / 0 / 0 / 0	Persimmon Homes Lancashire	Mr	Chris	Gowlett	
Duty to Co-operate					
Legal Compliance					
Soundness	<div>The Site Selection criteria in Policy SDP2 should make clear that greenfield land alongside brownfield land is equally acceptable under the principles set out in policy SDP1 and that the Site Allocations document should in future adhere to this policy by allowing for the allocation of these sites.</div>				
Suggested Change					
Comment					
Summary	<div>Policy SDP2 should make clear that the development of Greenfield land is equally acceptable as the development of Brownfield land. The Site Allocations document should follow this approach.</div>				

Policy SDP2: Spatial Development Principles

755915 / 68 / SDP2 / 0 / 0 / S1, S4	Home Builders Federation Ltd	Mr	Matthew	Good
Duty to Co-operate				
Legal Compliance				
Soundness	<div>Policy SDP 2: Spatial Development Principles</div> <div>The policy is considered unsound as it is not positively prepared or consistent with national policy.</div> <div>12. The policy identifies that development will be supported in the identified settlements providing it is proportionate to the role and function of the settlement and sited within the settlement boundary. The policy further notes that the settlement boundaries may be amended as part of the Site Allocations and Development Policies document. The HBF is concerned that this policy does not address where and if settlement boundaries will need to be amended. The result is uncertainty towards future development opportunities which may impact upon delivery of the planned housing requirements. In the absence of a settlement boundary review the HBF considers broad areas of search should be identified and / or a criteria based policy provided to facilitate the release of sustainable sites outside the existing settlement boundaries. Such an approach would ensure that development can come forward in a sustainable manner prior to the adoption of the Site Allocations and Development Policies document in 2017 and is considered consistent with the NPPF and NPPG.</div> <div>13. The policy also identifies that site selection will provide a significant preference to the development of previously developed land. Whilst paragraph 17 of the NPPF does encourage such re-use the Council needs to provide a balanced portfolio of allocated sites for housing. This is particularly important to ensure that the Council can meet its housing requirement. An over-reliance upon previously developed land may have a significant impact upon development viability. The Council’s December 2013 Development Viability Study (DVS) indicates significant viability issues in the current market within Pendle. Therefore such an over-reliance upon the redevelopment of previously developed land will seriously jeopardise the Council’s ability to achieve its objectively assessed housing requirement.</div>			
Suggested Change	<div>Recommendation</div> <div>14. We recommend that the Council provides broad areas of search and / or a criteria based policy to enable development to come forward outside of the existing settlement boundaries. In addition the prioritisation of previously developed land should be removed in favour of a more balanced approach to development which ensures the Council can deliver its housing requirement.</div>			
Comment				
Summary	<div>The policy does not identify where and if settlement boundaries will need to be amended resulting in uncertainty with regards to future development opportunities. This may have an impact on the delivery of the planned housing requirement. Broad locations should be identified and/or a criteria based policy should be included to allow for the release of sustainable sites.</div> <div>The over-reliance on previously developed land will seriously jeopardise the ability to meet the objectively assessed housing requirement. A balanced portfolio of sites is required. There are significant viability issues in the current market in Pendle. The prioritisation of previously developed land should be removed.</div>			



# Policy SDP2: Spatial Development Principles

818046 / 76 / SDP2 / 0 / 0 / S1, S2, S3, S4      Barton Willmore      Mr      Michael      Courcier      Junction Properties Ltd

Duty to Co-operate

Legal Compliance

Soundness

Policy SDP2: Spatial Development Principles
A1.1 JPL welcomes the identification by Policy SDP2 of Nelson, Colne and Barnoldswick as ‘Key Service Centres’.
A1.2 These three settlements are the most sustainable for new development in the Borough and contain the greatest concentration of population, employment, services and facilities. They also have the best access to good quality public transport. This is confirmed by the Pre-Submission Core Strategy (7.16) which says:-  “Key Service Centres provide the main facilities and services that are needed to support the local population and their surrounding rural hinterlands. The accessibility of these towns and the current level of services provide a good base for future development”.
A1.3 Despite establishing a settlement hierarchy, Policy SDP2 does not provide a clear spatial development strategy for the Allocations DPD or decision-making on planning applications. In particular, it does not clearly specify the roles of each type of settlement in the settlement hierarchy or focus development onto the most sustainable settlements which are Nelson, Colne and Barnoldswick.
A1.4 JPL considers that the first part of Policy SDP2 should make clear that most development will be concentrated in the identified Key Service Centres as the most sustainable settlements with the best access to jobs, public transport and high order facilities without the need to use the private car. Such an approach would be consistent with the NPPF (30) which says:  “Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.”
A1.5 The second part of the Policy setting out priorities for site selection should be deleted. The clear evidence from the SHLAA and the Employment Land Review is that the housing and employment needs of the Borough cannot be met on previously developed land or within the Adopted Local Plan settlement boundaries, even in the short-term. As such this part of the policy has little meaning or relevance.
A1.6 For these reasons, the policy fails the soundness tests of being positively prepared, justified, effective and consistent with national policy.

Suggested Change

Comment

Summary

Policy SDP2 does not provide a clear spatial development strategy. It does not specify the roles of each type of settlement in the hierarchy or focus development onto the most sustainable settlements of Nelson, Colne and Barnoldswick. Policy SDP2 should state that most development will be concentrated in the Key Service Centres. The site selection part of the policy should be deleted. The evidence from the SHLAA and ELR show that the housing and employment land needs can not be met on previously developed land or within the current settlement boundaries and therefore the policy has little meaning.
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# Policy SDP2: Spatial Development Principles

817541 / 101 / SDP2 / 0 / 0 / 0	Dickman Associates Ltd	Ms	Jane	Dickman	Green Emmott Trust
Duty to Co-operate					
Legal Compliance					
Soundness	<p>Policy SDP2 –The amendment to the policy removes some of the flexibility compared with its earlier version especially as the review of settlement boundaries will not take place until the Local Plan Part 2 - Site Allocations. Any delay in this coming forward will mean a lack of certainty during that time. So whilst the basic idea of a review of settlement boundaries is encouraging we do have concerns about the intervening period when sites already identified in the 2013 SHLAA as suitable and sustainable but not currently within the often tightly drawn settlement boundaries of the smaller order settlements are dealt with should applications be made on them. We assume therefore NPPF para 14 would apply,</p> <p>‘Planning should operate to encourage not act as an impediment to sustainable growth’ (NPPF). Thus we also have concerns regarding Para 7.22 of this Reg 19 document as Rural villages are defined as settlements which will accommodate development primarily to meet local needs. See also our comments below on viability and affordable housing.</p> <p>Also NPPF advocates that LPAs should take account of local uses and respond to the different opportunities for achieving sustainable development in different areas. NPPF wants to achieve sustainable development and encourage new homes and jobs. To do this new housing sites across the borough will need to provide a range of house types and tenures so rural villages should also reflect this mix.</p>				
Suggested Change					
Comment					
Summary	<p>Concern about the flexibility of Policy SDP2 with regard to the review of settlement boundaries not taking place until the Site Allocations plan. This will delay sites outside of existing settlement boundaries coming forward, even though a number of them are identified in the SHLAA.</p> <p>The NPPF indicates that planning should encourage not act as an impediment to sustainable growth. The Core Strategy defines Rural Villages as settlements which will only accommodate development to primarily meet needs therefore not inline with the NPPF.</p> <p>New housing sites will need to provide a range of house types and tenures and Rural Villages should reflect this mix.</p>				

Policy SDP2: Spatial Development Principles

327580 / 115 / SDP2 / 0 / 0 / 0	Lidgett & Beyond Group	Mr.	Owen G.	Oliver
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	<div><div>Comment - Site selection and priorities</div><p>The SHLAA has identified land for 8,112 dwellings and L&amp;B remains concerned that profit-hungry developers will try to take the easy route to develop easily available land quickly, rather than waiting for the “right” land/site (i.e. better for the Borough’s longer term strategy, avoiding “doughnut development” and run-down town centres) to become available. L&amp;B restates its observation that any potential developer’s viability assessment should not automatically contain an assumed profit margin of 20% as this is a competitive marketplace and developers should compete for lower margin work, especially where brownfield sites are involved.</p><p>L&amp;B is concerned that documents, like the Strategic Housing Land Site Allocation Report, which have been prepared as part of the supporting evidence base give undue prominence to sites like Windermere Avenue and the land between Castle Road and Skipton Old Road when such sites are not in the frame to be considered as a short-term strategic development site like Trough Laithe, Barrowford. L&amp;B will continue to campaign strongly to protect these areas in East Colne as they act as green lungs leading up to the Pennines, are prone to flooding/run-off, have relatively poor infrastructure and are poorly positioned from a sustainability point of view as the likely employment centres will be in places like Lomeshaye and Barnoldswick – the traffic through town would become even worse than in currently is. This is in accordance with the new planning guidance announcements of the DCLG mentioned earlier.</p><p>As Shaun Spiers, Chief Executive of the Campaign to Protect Rural England, said in a recent blog “if we are to have a serious public debate about how to solve the housing crisis we need to move on from glib assertions about NIMBYs stopping development or the need (unexamined) to build on the Green Belt. Planning is important, but it is not the most important thing. The fact is that our dysfunctional housing system will not deliver the homes the country needs without major structural reform and much greater public funding.”</p><p>Public funding is important to counter the continuing slavish adherence to the implementation of the recommendations of the 2004 Barker Review which has led to a dramatic fall in the delivery of social/affordable housing whilst private developers are encouraged by relaxing the planning laws or other incentives. However, the stagnation in the housing market in the North has meant that it is not in their interest to increase the level of completions to the point where it has an adverse impact on their profits – supply does outweigh demand and hence prices are not or barely increasing. This has a knock-on impact on brownfield site viability calculations and hence leads to both land-banking and an undue focus on Green Belt.</p><p>We are aware that Policies SDP2 and SDP3 have Contingencies for the lack of housing distribution and delivery stating that Pendle Council will liaise with key partners (e.g. PBC Housing Regeneration, HCA, PEARL2) to market and help bring forward sites in appropriate locations. We have noted several successful Council projects with these key partners in recent years to bring old industrial buildings and empty/run-down houses back into circulation. L&amp;B expects the Council to proactively engage with development partners given the general apathy amongst commercial developers for housing and employment sites, especially on brownfield land.</p></div>			
Summary	<div><p>Developer's viability assessments should not automatically contain an assumed profit margin of 20% as this is a competitive market place and developers should compete for lower margin work e.g. on brownfield land. Undue prominence is given to sites to the East of Colne for development. These sites should be protected as they act as green lungs, are prone to flooding and have relatively poor infrastructure. They are not sustainably located in terms of their proximity to new employment sites.</p><p>There is a need for public funding to help deliver affordable housing.</p><p>The Council should proactively engage with development partners given that there is a general apathy of commercial developers to develop brownfield sites.</p></div>			

Policy SDP2: Spatial Development Principles

327467 / 150 / SDP2 / 0 / 0 / 0	Barrowford Parish Council	Mr	Iain	Lord
Duty to Co-operate				
Legal Compliance				
Soundness	<div>The Future of Barrowford within the Wider Context of the M65 Corridor</div> <div>As stated earlier, growth is not a bad thing if it is done for the right reasons, but not if it is done for the wrong reasons - such as developers’ profit being the only consideration when identifying sites for new house building. Another wrong reason would be Pendle Borough Council’s need to reach prescribed house building levels at all costs, thus allowing major deviation from the overall goals of the core strategy to meet that level of housing. The Council should be wary of this situation developing, as fulfilling short-term goals could mean that crucial long-term objectives on regenerating the most deprived wards are missed, leaving a wider gulf than currently exists.</div> <div>Barrowford Parish Council is well aware that the recent downturn in house building and the termination of the Elevate funding produced a double blow for Pendle as a whole and led to an overall reduction in housing stock. We are aware that there is a need for an instant large increase in house building and that Trough Laithe is the only large site within Pendle that could possibly meet that immediate need. But the needs and structured growth of Barrowford should be addressed over the life of the Core Strategy so that our own individual identity and aspirations, even if not wholly met, are at least not significantly diminished. The development of Trough Laithe, if carried out sympathetically, offering a varied mix of house types, sizes and settings to meet immediate local need, could be beneficial to Barrowford, but only if the developers are forced to redress infrastructure problems.</div> <div>The Parish Council’s main concern is the possibility of an entrance onto the Trough Laithe site from Wheatley Lane Road, as the highway problems would not be economically solvable and would have a detrimental effect on a large swathe of Newbridge. The 475 houses that this development represents is a significant increase in the number of houses within the village - around 20% - and around 12% of the total need in the M65 Corridor during the life of the strategy.</div> <div>Barrowford Parish Council feels that a development of this size, the largest single increase in the housing stock since before the war, may have a detrimental effect on the long term vitality of the village, but that the overall benefits to Pendle as a whole should outweigh Barrowford’s immediate concerns. This pragmatic attitude should be applauded and not abused in the future.</div>			
Suggested Change				
Comment	<div>Supporting documents provided.</div>			
Summary	<div>Growth is not a bad thing if done for the right reasons. However, developer's profit should not be a concern in identifying site for new housing. The Council should not pursue short-term goals of reaching prescribed building levels at all costs as this could mean crucial long-term objectives on regenerating the most deprived wards are missed.</div> <div>Barrowford Parish Council is aware of the need to increase house building and Trough Laithe is the only large site in Pendle that can meet the need - but the growth of Barrowford should be structured over the lifetime of the plan so as to address the individual identity of the village. The development of Trough Laithe could be beneficial if the infrastructure problems are addressed.</div> <div>The main concern regarding this site is the potential access off Wheatley Lane Road. The development represents an increase in housing of around 20%. It also accounts for 12% of the total need in the M65 Corridor. Barrowford Parish Council feels the development of this site may have a detrimental impact on the long-term vitality of the village, but the overall benefits to Pendle as a whole should outweigh Barrowford's immediate concerns. This pragmatic approach should not be abused in the future.</div>			

# Policy SDP2: Spatial Development Principles

327467 / 152 / SDP2 / 0 / 0 / 0	Barrowford Parish Council	Mr	Iain	Lord
Duty to Co-operate				
Legal Compliance				
Soundness	<p>Alterations Barrowford Suggested for Inclusion in the Core Strategy:</p> <p>Barrowford has responded to previous consultations primarily in relation to the division of the Borough into three distinct zones, each to be treated separately and slightly differently. These zones were purportedly made up of towns and villages which had attained similar levels in housing, education, employment, deprivation and other criteria, but in the case of Barrowford locale seemed to be the overriding factor. Barrowford nestles uncomfortably between Nelson and Colne, separated from its near neighbours by only the M65, Pendle Water and the Leeds and Liverpool Canal.</p> <p>But Barrowford is separated by far more than just these three physical obstacles. In housing, education, employment, deprivation and aspiration it has far more in common with other villages within Pendle than with the three larger towns of Nelson, Colne and Brierfield, and accords most closely with the other villages situated along Barrowford Road (the Padiham Bypass).</p> <p>Barrowford put forward a case for the creation of a fourth area along Barrowford Road, to include the villages of Barrowford, Fence, Old Laund Booth and Higham. Using empirical data in our response demonstrated this statistical link, and how the creation of a fourth zone would better meet the future aspirations of Barrowford, whilst giving Nelson, Brierfield and to a lesser extent Colne something to aspire to.</p> <p>Barrowford had and still has grave reservations that it has been included in the M65 Corridor to rectify the shortfall of developable greenfield sites (both housing and employment) within Nelson and Brierfield situated near or adjacent to a junction of the M65. The fact that the housing market for new build properties in Barrowford is still buoyant, with several small-scale developments under construction on brownfield sites within the Newbridge area of Barrowford, shows that some confidence has returned locally to the building industry.</p> <p>The same cannot be said of new house building in Bradley, which is still seeing demolition of terraced houses but no significant house building schemes on the swathes of large former mill and mill terraces land that have been cleared. This long term lack of interest in developing these readily available sites engenders the view that Barrowford is to be the sacrificial lamb when house building within Nelson and probably Brierfield falls below the necessary annual figures to meet the quota of new housing that the Core Strategy must supply.</p> <p>Barrowford asked at a previous consultation that, if the suggestions regarding the creation of a fourth zone were to be ignored, we would like to see the total requirements for both housing and employment within the M65 Corridor apportioned between the constituent towns and villages. The reluctance of Pendle Borough Council to apportion the 70% total requirement to be found in the Corridor amongst the three towns and one village, with either a definitive percentage or total number of houses allocated to each individual town or village, further adds to this apprehension.</p> <p>These concerns are not unfounded, as developers have shown keen interest in developing several other sites within Barrowford, particularly parcels of land adjacent to the proposed Trough Laithe Strategic Housing Site and to the rear of St Thomas School on Wheatley Lane Road. These two areas could see a further 300 plus houses on top of the 475 envisaged at Trough Laithe. Other areas under pressure include land adjacent to Barnoldswick Road and Red Lane, and Colne Road, which again could accommodate a large number of properties.</p> <p>This is not nimbyism on the part of the Parish Council but a grave concern that the spectre of overdevelopment will gradually destroy all the things that have enabled Barrowford to thrive through both the good and bad times of the last 150 years. This time period has seen the booming of the local textile industry, the mushrooming of Nelson, Colne and Brierfield and then the decline and depopulation of these textile boom towns. Barrowford has by and large not only survived but thrived through both economic upturns and downturns, even in recent years. This may be due to the fact that over such a long period of time and the variable economic conditions, the limitations of local infrastructure and access have had a significant role in allowing the population of Barrowford to slowly increase, enabling the village to feel comfortable within its own skin.</p>			
Suggested Change				
Comment	Supporting documents provided.			
Summary	<p>Previous representations have been made regarding the identification of the three spatial areas of the borough. Barrowford sits uncomfortably between Nelson and Colne and is separated by the physical barriers of the M65, Pendle Water and the Leeds and Liverpool canal. However, Barrowford has more similarities in terms of housing, education, employment, deprivation and aspirations with neighbouring villages. It was suggested that a fourth spatial area be included in the plan which would cover the settlements along Barrowford Road (Higham, Fence, Old Laund Booth and Barrowford).</p> <p>Barrowford Parish Council has reservations about Barrowford being included in the M65 Corridor Spatial area in order to rectify a shortfall of developable sites. Some confidence has returned to the house building industry in Barrowford, however this is not the case in the Bradley area of Nelson where the redevelopment of cleared sites is yet to be started. It is considered that Barrowford is being used to make up the shortfall in housing delivery because of stalled sites in the rest of the M65 Corridor.</p> <p>Barrowford Parish Council has previously asked for the M65 Corridor housing requirement to be divided between the individual settlements - this has not occurred and reinforces the view that additional development will be allowed in Barrowford to make up the shortfall.</p> <p>These concerns are not unfounded as developers have shown a keen interest in developing a number of sites on the edges of Barrowford.</p> <p>This is not nimbyism but rather a concern that such development will destroy the things that have enabled Barrowford to thrive over the last 150 years.</p>			

Policy SDP2: Spatial Development Principles

868120 / 183 / SDP2 / - / - / -

Turley Associates

Mr

Andrew

Bickerdike

Peel Holdings (Land & Property) Ltd

Duty to Co-operate

Legal Compliance

Soundness	<div>Policy SDP2: Spatial Development Principles</div> <div>3.5 Peel’s representations to previous stages of the Core Strategy consultation raised concerns about the proposed settlement hierarchy set out at Policy SDP2; in particular with respect to the position of Barrowford within that hierarchy.</div> <div>3.6 To that end, Peel supports the amendments made to Policy SDP2 which now distinguishes between settlements in the M65 Corridor (as the priority spatial area for growth) and settlements elsewhere. This provides additional clarification as to the level of priority to be given to different settlements in the Borough and serves to provide support for the allocation of Trough Laithe Farm as a Strategic Housing Site through Policy LIV2, as a site within the M65 Corridor.</div>
Suggested Change	<div>3.7 However Peel would recommend a small amendment to the policy reflecting that, in the context of the settlements listed in Policy SDP2, the M65 Corridor, and the settlements within this area, will be the priority location for growth. The first sentence of the policy should therefore read:</div> <div>“Proposals for development will be supported in the settlements listed below, provided that they are of a nature and scale that is proportionate to the role and function of that settlement AND THE SPATIAL AREA IN WHICH THE SETTL:EMENT IS LOCATED or where they have been specifically identified in this plan to help meet the strategic growth needs of the Borough .” ( OUR EMPHASIS )</div>

Comment

Summary	Support for Policy SDP2 - Spatial Development Principles, subject to a minor amendment to reflect that the M65 Corridor, and the settlements within this spatial area, will be the priority location for growth.
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# Policy SDP3: Housing Distribution

755915 / 69 / SDP3 / 0 / 0 / S1, S2, S3      Home Builders Federation Ltd      Mr      Matthew      Good

Duty to Co-operate

Legal Compliance

Soundness

Policy SDP 3: Housing Distribution

The policy is considered unsound as it is not positively prepared, justified by the evidence or effective. The current proposals lack flexibility.

15. The HBF does not wish to comment upon the appropriateness of the distribution set out within Policy SDP3. However it is important that the policy provides flexibility should the spatial areas fail to deliver the housing requirement.

16. The policy indicates that the majority (70%) of the proposed housing development will be accommodated within the M65 corridor spatial area. The HBF does not object to this quantum of development but notes paragraph 6.9 of the DVS identifies that;

‘It is clear that most non-residential development across Pendle and residential development in the parts of the M65 Corridor (excluding the north of this area) is not viable in the current market’.

17. To overcome such viability concerns it is important that the financial burdens placed upon sites within the M65 corridor are minimised. In addition flexibility is required within the policy. The HBF recommends this flexibility is two-fold. Firstly, in consistency with our comments upon Policy SDP2, a mechanism should be included to enable sustainable development to occur outside of existing settlement boundaries prior to the planned review taking place. Secondly the plan should provide sufficient flexibility to enable other spatial areas to take a greater proportion of development in the eventuality that the M65 corridor area, or indeed any other spatial area, fail to deliver the prescribed amount of development.

Suggested Change

Recommendation

18. In common with our recommendation upon Policy SDP2 the plan should provide opportunities for development outside of the existing settlement boundaries. The plan should also provide in-built flexibility to enable other spatial areas to accommodate any unmet requirements.

Comment

Summary

The policy is not flexible as it does not enable other spatial areas to accommodate unmet requirements. The policy should include a mechanism to allow for sustainable development out side of settlement boundaries. It should also include a flexibility factor to enable other spatial areas to accommodate additional development if the M65 Corridor or any other area fail to deliver the prescribed amount of development.

Policy SDP3: Housing Distribution

818046 / 77 / SDP3 / 0 / 0 / S1, S2, S3, S4	Barton Willmore	Mr	Michael	Courcier	Junction Properties Ltd
Duty to Co-operate					
Legal Compliance					
Soundness	<div>Policy SDP3: Housing Distribution</div> <div>A1.7 This Policy adds little to the overall strategy. The table should be transferred to one of the policies in the housing section such as LIV1. For the M65 Corridor, it should distinguish between the Key Service Centres and other centres in line with Policy SDP2.</div> <div>A1.8 The proportion of housing development being allocated to the M65 Corridor should be increased. The 70% guide figure is no more than the proportion of Pendle’s existing population in this area. It does not address the key spatial policy objective that development should be focussed upon the most sustainable settlements in the Borough which are the Key Service Centres in the M65 Corridor.</div> <div>A1.9 For these reasons, the policy fails the soundness tests of being positively prepared, justified, effective and consistent with national policy.</div>				
Suggested Change					
Comment					
Summary	<div>This policy should be deleted. The table should be moved to another policy and the percentage for the M65 Corridor should be distinguish between the different settlement levels. The proportion for the M65 Corridor should be increased to reflect the sustainability of developing in this area rather than following the current population levels.</div>				

817541 / 102 / SDP3 / 0 / 0 / 0	Dickman Associates Ltd	Ms	Jane	Dickman	Green Emmott Trust
Duty to Co-operate					
Legal Compliance					
Soundness	<div>Policy SDP3 - to be consistent Table SDP3a should show the M65 Corridor and M65 Corridor North with percentage total split so the categories are the same as in Policy LIV4 and so affordable percentages can be attributed to the M65 corridor north given the comment in the Pendle Strategic Housing Land Allocation document (Sept 2014) which notes that viability is greatest in the areas north of the M65 and Laneshawbridge so emphasis should be put on being able to deliver housing in these more affluent parts of the borough early in the plan period.</div>				
Suggested Change					
Comment					
Summary	<div>For consistency Table SPD3a should be split to show the M65 Corridor and M65 Corridor North in line with Policy LIV4 and the viability evidence. The Strategic Housing Land Allocation report notes that viability is greatest in the areas to the north of the M65 Corridor. Emphasis should be put on delivering housing in these more affluent parts of the borough.</div>				

Policy SDP3: Housing Distribution

327467 / 153 / SDP3 / 0 / 0 / 0	Barrowford Parish Council	Mr	Iain	Lord
Duty to Co-operate				
Legal Compliance				
Soundness	<div>Recommendations to the Inspector for Alterations to the Core Strategy</div> <div>Barrowford as the minor partner in the M65 Corridor, with the smallest population, the least number of homes and the smallest number of Councillors on Pendle Borough Council, is subject to the vagaries and whims of its larger neighbours at crucial votes held by the Borough Council and would like to see some protection from exploitation.</div> <div>The inclusion of fixed expectations for each town and village within the M65 Corridor included in the Core Strategy would allow the smaller towns and villages to consider and plan how best to mitigate and respond to the challenges that infrastructure growth inevitably brings. These expectations could either be in a percentage form or an actual figure for the number of houses to be built town by town and are essential if Pendle Borough Council’s dream of regenerating wards in Nelson and Brierfield is to become a reality.</div>			
Suggested Change				
Comment	<div>Supporting documents provided.</div>			
Summary	<div>Barrowford is the smallest settlement in the M65 Corridor and is subject to the decisions of its larger neighbours on the borough council.</div> <div>The Core Strategy should include fixed percentages or numbers of dwellings to be provided in each settlement in the M65 Corridor. This would then help each settlement to consider how best to mitigate and respond to the challenges brought by growth. This is essential if Nelson and Brierfield are to be regenerated.</div>			

868120 / 184 / SDP3 / - / - / -	Turley Associates	Mr	Andrew	Bickerdike	Peel Holdings (Land & Property) Ltd
Duty to Co-operate					
Legal Compliance					
Soundness					
Suggested Change					
Comment	<div>Policy SDP3: Housing Distribution</div> <div>3.8 Peel supports the approach taken to confirming the percentage of development which will be delivered within the three spatial areas of the Borough.</div> <div>3.9 It is noted that the spatial distribution has been updated since the previous stage of consultation (Further Options Report). This now better reflects the recommendations of the 2013 Strategic Housing Market Assessment (SHMA)1, which suggested that 70% of new housing should be located in the M65 Corridor, 20% in the West Craven Towns and 10% in Rural Pendle.</div> <div>3.10 The distribution now proposed in Policy SDP3 identifies that 70% of new housing development will take place within the M65 Corridor; in line with the recommendations of the SHMA. The proportion of development to be located in the West Craven Towns has decreased from the Further Options Report, to represent 18% of all housing development; with the remaining 12% to be located within Rural Pendle.</div> <div>3.11 This split is consistent with the overall Spatial Strategy for Pendle. As noted above, the emphasis given to the M65 Corridor as the priority location for development represents a sustainable approach to the Borough’s growth and is entirely consistent with the National Planning Policy Framework.</div> <div>3.12 The figures for the distribution of development within the West Craven Towns and Rural Pendle now included within Policy SDP3 are more in line with the SHMA’s findings than the previous version of the Core Strategy and so this amendment is supported by up to date evidence.</div> <div>3.13 Policy SDP 3 is therefore considered to be sound.</div>				
Summary	<div>Support for Policy SDP3 - Housing Distribution</div>				

Policy SPD5: Retail Distribution

817889 / 14 /SDP5 / 0 / 0 / 0	Turley Associates	Mr	George	Wilyman	Sainsbury's
Duty to Co-operate					
Legal Compliance					
Soundness	Policy SDP5 (Retail Distribution) Sainsbury's continues to support the aims of Policy SDP5, which seeks to locate major retail development within the main Town Centres of Nelson, Colne and Barnoldswick.				
Suggested Change	Expand the policy to make specific reference to identified capacity for additional convenience retail floorspace in the north of the Borough.				
Comment	On behalf of our client, Sainsbury’s Supermarkets Ltd, we have reviewed the Pendle Borough Council Core Strategy Pre-Submission Report and would like to take this opportunity to comment on the document. Introduction: Overall, Sainsbury’s considers the Pre-Submission Report to be sound, if a number of amendments are included and reflected in the next stages of the Core Strategy adoption. For clarity, our comments and recommended changes are detailed as bullet points below the relevant policies. I trust that these comments will be taken into account in your consideration of the Pre-Submission Publication version of the Pendle Core Strategy.				
Summary	Expand the policy to make specific reference to identified capacity for additional convenience retail floorspace in the north of the Borough.				

Policy SDP6: Future Infrastructure Requirements

818207 / 41 / SDP6 / 0 / 0 / 0	United Utilities Property Services	Ms	Jenny	Hope
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	Policy SDP 6: Future Infrastructure Requirements: As per our previous representations in February 2014, Unites Utilities wishes to support the inclusion of Policy SDP 6, which sets out the partnership approach to deliver the infrastructure necessary to support development within the Borough. In particular, we support the second paragraph of the policy which states: "Developers will need to carry out early engagement with relevant utility and infrastructure providers to ensure that sufficient capacity is available, or can be made available, to allow their scheme to proceed". In some circumstances it may be necessary to coordinate the delivery of new development with the delivery of future infrastructure. In accordance with paragraphs 156 and 162 of the NPPF, the Local Plan should include strategic policies to (inter alia) deliver the provision of infrastructure, and LPAs should work with other authorities and providers to assess the quality and capacity of infrastructure within their areas.			
Summary	Support for Policy SDP6 and the partnership approach to delivering infrastructure through new development.			

818046 / 78 / SDP6 / 0 / 0 / S1, S2, S3, S4	Barton Willmore	Mr	Michael	Courcier	Junction Properties Ltd
Duty to Co-operate					
Legal Compliance					
Soundness	<p>Policy SDP6: Future Infrastructure Requirements</p> <p>A1.10 In the absence of an adopted CIL scheme, the Policy should make clear that contributions for off-site infrastructure and services will only be required where they meet all the tests set out in paragraph 204 of the NPPF. These tests are that obligations must be:-</p> <p>necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.</p> <p>A1.11 The implication of Policy SDP6 (and especially the fourth and fifth paragraphs) is that contributions may be sought in circumstances where these national policy tests are not fully satisfied by a particular development.</p> <p>A1.12 For these reasons, the policy fails the soundness tests of being positively prepared, justified, effective and consistent with national policy.</p>				
Suggested Change					
Comment					
Summary	Policy SDP6 should make clear that in the absence of CIL contributions for off-site infrastructure and services will only be required where they meet the tests set out in the NPPF. Paragraphs 4 and 5 of the policy need to be consistent with this approach.				

Policy SDP6: Future Infrastructure Requirements

327580 / 116 / SDP6 / 0 / 0 / 0	Lidgett & Beyond Group	Mr.	Owen G.	Oliver
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	<div>Comment – Community Infrastructure Levy (“CIL”)</div> <div>Contributions by s106 or CIL are considered in para 7.58-7.66 and Policy SDP6 and the Strategy is relatively pessimistic on the opportunity for charges to be made.</div> <div>The Planning Advisory Service website (updated April 2014) states that there are many ways to approach setting a CIL. In one example, they suggest showing the proposed developments on a map and then to overlay a 'heat map' of the values of the different key development uses e.g. housing. This will assist in terms of what rate(s) to start testing and how much differentiation is relevant. If the vast majority of future development is all in one area, or in areas of a similar value, this will indicate that no differentiation is required.</div> <div>L&amp;B reiterates that it should be appropriate to set a CIL for any proposed development on a Greenfield site, either inside or most especially outside the settlement boundary, where profit margins and market attractiveness are likely to be high as this represents a clear differentiation with a brownfield site where there should be no CIL to enhance viability and prioritise development.</div>			
Summary	<div>The Core Strategy is pessimistic about being able to introduce CIL charges.</div> <div>PAS suggest that 'heat mapping' can be used to indicate where land values can support a CIL charge for different development types.</div> <div>It should be appropriate to set a CIL for proposed development of a Greenfield site. Particularly those outside of the settlement boundary where profit margins and market attractiveness are high. This represents a differentiation with Brownfield sites where no CIL should be charged.</div>			

327467 / 155 / SDP6 / 0 / 0 / 0	Barrowford Parish Council	Mr	Iain	Lord
Duty to Co-operate				
Legal Compliance				
Soundness	<div>3. The current population within the village situated along the A682 has reached critical mass, with local infrastructure coming under severe pressure. Barrowford Parish Council feels that further development, with the exception of small in-fill developments of 15 houses or fewer, should be refused until such time as major road improvements to the North Valley end of the M65 are undertaken and physically in place. These improvements may in the long term open areas to the east of Barrowford which could be considered for future development.</div>			
Suggested Change				
Comment	<div>Supporting documents provided.</div>			
Summary	<div>The local infrastructure is under severe pressure. No further housing developments should be approved, with the exception of small infill sites, until major road improvements have been made to the North Valley end of the M65. These improvements could in the long-term open up areas to the east of Barrowford for development.</div>			



# Chapter 8: Our Foundations for a Sustainable Future: Improving the Environment We Live In

864766 / 61 / CHP8 / - / - / -	SELRAP	Mr	David	Penney
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	<p>Our Foundation for a Sustainable Future: Improving the Environment We Live in (S.8, Policy ENV 1: "Protecting and Enhancing Our Natural and Historic Environments, Pages 69/7. In transport terms, rail connections and improvements would be more sustainable and have less impact on the natural and historic environments than other modes of transport.</p> <p>Policy ENV 2: Achieving Quality in Design and Conservation (Pages 76/77) - in particular, "designing development to move towards a low carbon future". Again, in order to comply with this Policy requirement more emphasis should be placed on rail.</p> <p>Under Promoting Sustainable Travel. SELRAP agrees with the statement in the Core Strategy (S.8.94, Page 86): "A number of other factors will influence the way we plan for transport in the future. Emissions from transportation are one of the main contributors to the causes of climate change . Spatial planning has an important role to play in helping to address climate change and one way of doing this will be to reduce the need to travel. By planning sustainably, providing more environmentally friendly modes of transport, and better public transport we can help to reduce car usage and subsequently carbon emissions".</p> <p>In order to achieve the objective of "planning sustainably, providing more environmentally friendly modes of transport, and better public transport we can help to reduce car usage and subsequently carbon emissions", rail should be given priority in the development plans .</p> <p>SELRAP agrees with the statement in S.8.104, Page 87: "There is a considerable amount of support for the reinstatement of the railway line between Colne and Skipton". But disagrees with the statement which follows in the same Section "however, funding has yet to be secured and there is no guarantee that it will be identified during the lifetime of the plan. This will significantly affect the deliverability of the project".</p> <p>There are clear indications that funding will be made available "during the lifetime of the plan" (before 2030). Negotiations are under way to include the reinstatement in the High Level Output Specification (HLOS) period (2019-2024). Action could be considered sooner as SELRAP is seeking the reinstatement to be included in the Rail North Strategy plans and HS3/One North proposals. This means that work on the railway would start before the proposed road bypass, which is not now due to begin until 2020/2021 according to Lancashire County Council.</p> <p>Under Strategic Transport S.8.122 (Page 89), the Document states: "The reinstatement of the Colne to Skipton railway line is a longer term scheme which is unlikely to be delivered during the plan period. However, it is necessary to consider the options for the future in order to ensure that development during the plan period does not compromise the potential for this scheme at a later date"</p> <p>While SELRAP agrees that any "development during the plan period does not compromise the potential for this (rail) scheme", it does question the statement that the rail scheme "is unlikely to be delivered during the plan period" for the reasons given above in the response to S.8.104. In SELRAP's opinion, the rail scheme should be considered in the medium term , as indicated in the response to S.8.104 above.</p> <p>Under Strategic Transport S.8.123 (Page 89), SELRAP agrees with the statement: "The Council will lobby the Government and appropriate agencies in order to progress these schemes as soon as possible"SELRAP is also actively pursuing this objective in relation to the rail scheme in consultation with Lancashire and North Yorkshire County Councils, the Department for Transport and other Regional Transport and Economic Agencies.</p> <p>Under Strategic Transport S.8.124 (Page 89) and Policy ENV 4: Promoting Sustainable Travel - Strategic Transport (Page 91), the Core Strategy states: "this policy will protect the route of the former Colne-Skipton railway for future transport use." As there is already a commitment to protect the double track railway route from any development which could compromise the reinstatement of the railway , would it not be advisable to strengthen the above statement to state specifically that "this policy will protect the route of the former Colne-Skipton railway for railway use"</p> <p>Under Policy ENV 5: Pollution and Unstable Land (Page 95), the reinstatement of the railway would cause minimal disruption, contamination and pollution, as it would follow the existing route of the old railway, compared with any other transport developments.</p> <p>Under Policy ENV 7: Water Management - Development and Flood Risk (page 105/6), there would be less risk of flooding with the reinstatement of the railway, as it would follow the existing track bed route.</p>			
Summary	<p>Rail connections and improvements are more sustainable than other modes of transport.</p> <p>More emphasis should be placed on rail to ensure the move towards a low carbon future.</p> <p>Support for paragraph 8.94 reducing car usage, providing more environmentally friendly modes of transport and better public transport - thereby helping to reduce emissions.</p> <p>To achieve reducing car usage - rail should be given priority in development plans.</p> <p>Support for re-opening of the railway line between Colne and Skipton.</p> <p>Disagree that funding for the railway has not been secured. Funding will be made available during the lifetime of the plan. Negotiations are under way to include the scheme in the High Level Output Specification period (2019-2024). Also seeking to include it as part of the Rail North Strategy plans and HS3/One North proposals. Work could therefore start within the plan period.</p> <p>Support for policy approach which aims to restrict development that may compromise the rail scheme coming forward.</p> <p>Disagree that the scheme is unlikely to be delivered in the plan period. If funding is secured it could come forward in the medium term.</p> <p>Support for the Council to lobby the Government and appropriate agencies to progress the transport schemes as soon as possible.</p> <p>Policy ENV4 should be strengthen by protecting the route of the railway for the reinstatement of the railway not transport use.</p> <p>The reinstatement of the railway would cause minimal disruption, contamination and pollution (in accordance with Policy ENV5).</p> <p>There would be less risk of flooding with the reinstatement of the railway compared to other forms of transport.</p>			

# Chapter 8: Our Foundations for a Sustainable Future: Improving the Environment We Live In

868022 / 167 / CHP8 / 0 / 0 / S3

Dr and Mrs John and Alison Plackett

Duty to Co-operate

Legal Compliance

Soundness	<div>Paragraph 8.6 (page 61_ - The Priority Goals of the SCS</div> <div>Goal 6 for the environment is to “deepen our understanding and respect for our environment”. This is not sound or effective with regard to biodiversity. Circular 6/2005 Part III “The plans – Local Biodiversity (Local BAP) and amongst the elements local authorities should build upon when preparing the overarching strategy required by Section 4 of the Local Government Act 2000”, which accords with NPPF109.3 and 114.2 AND “Authorities will need to demonstrate that the subsumed plans have been considered within their Community Strategy and that Community Strategies as a whole are informed by the purposes of biodiversity planning which accords with NPPF 117.</div> <div>The “actions” in this priority goal are not deliverable and not effective in achieving sustainable development as envisaged in the relevant paragraphs conserving and enhancing the natural environment of the NPPF 151, 152 and 156.5.</div>
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Suggested Change

Comment

Summary	<div>Priority Goal 6 of the Sustainable Community Strategy to "deepen our understanding and respect for our environment" is not sound or effective with regard to biodiversity. The “actions” for this priority goal are not deliverable or effective in achieving sustainable development, as envisaged in the relevant paragraphs conserving and enhancing the natural environment of the NPPF 151, 152 and 156 (bullet point 5).</div>
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# Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

379222 / 9 / ENV1 / - / - / -	The Coal Authority	Miss	Rachael	Bust
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	Support: The Coal Authority supports the inclusion of this policy in relation to mineral sterilisation and the potential of prior extraction of mineral resources ahead of development as issues in the Core Strategy. The policy referencing within Policy ENV1 is considered by The Coal Authority to ensure consistency across the Development Plan between DPDs and it further considered that the Policy accords with the National Planning Policy advice in the NPPF, paragraphs 143 and 144.			
Summary	Support for Policy ENV1.			

867305 / 49 / ENV1 / 0 / 0 / 0	Persimmon Homes Lancashire	Mr	Chris	Gowlett
Duty to Co-operate				
Legal Compliance				
Soundness	<div>Policy ENV1 will seek to protect the natural and historic environments in Pendle from inappropriate development. The landscapes in rural Pendle are an excellent resource which the Core Strategy seeks to maintain protection for. This is underpinned by the sustainable development vision set out in the NPPF and earlier in the Core Strategy document. Persimmon Homes is generally supportive of this as it will allow for a focussed release of more appropriate land that is located in strong market areas. However, it needs to be clear that development can still be permitted if there is a careful consideration of the surrounding landscapes. Persimmon Homes is also supportive of a green belt review, as this will allow more sustainable sites that are only constrained by policy to come forward and contribute to the growth of the borough. Although it is understood that a review will happen through the Site Allocations DPD, the principle for green belt modification needs to be emphasised in a strong manner in the Core Strategy and that to meet housing numbers, a modification may be necessary especially as it intersects the M65 Corridor.</div>			
Suggested Change				
Comment				
Summary	<div>General support the protect of valued landscapes and a review of the Green Belt. However, it needs to be clear that development may be acceptable if there is a careful consideration of the surrounding landscape. The principle for Green Belt modification needs to be made stronger in the Core Strategy.</div>			

Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

818046 / 79 / ENV1 / 0 / 0 / S1, S2, S3, S4 Barton Willmore Mr Michael Courcier Junction Properties Ltd

Duty to Co-operate

Legal Compliance

Soundness

Policy ENV1: Natural and Historic Environments

A1.13 Policy ENV1 does not fully accord with the NPPF or the PPG. One example is that it does not reflect NPPF paragraph 113 which states:

“Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives inappropriate weight to their importance and the contribution that they make to wider ecological networks.”

A1.14 For these reasons, the policy fails the soundness tests of being positively prepared, justified, effective and consistent with national policy.

Suggested Change

Comment

Summary

Policy ENV1 does not accord with national policy as it fails to set a criteria on which to judge development proposals on or affecting protected wildlife, geodiversity sites or landscape areas. Furthermore it should make distinctions between the hierarchy of different designations so that the level of protection is appropriate to their status.

Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

327387 / 93 / ENV1 / 0 / 0 / 0	Wildlife Trust for Lancashire, Manchester and North Merseyside	Mr	John	Lamb
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	<div>8.11 States that "The Framework (paragraph 109) identifies the following requirements for the planning system in respect of biodiversity:</div> <div>Recognise the wider benefits of ecosystem services; Minimise impacts on biodiversity and provide net gains in biodiversity, where possible, to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures". However, the Core Strategy does not go on to require development to provide net gains in biodiversity, where possible, or to confirm that the Local Plan Part 2 will identify coherent ecological networks on the proposals map(s).</div> <div>8.12 States that "At the local level an integrated approach should be taken to identify:</div> <div>the location of designated sites and their importance for biodiversity and geodiversity; any areas or sites for the restoration or creation of new habitats; existing habitat networks and the potential for the creation of new networks within developments. However, the Core Strategy does not confirm that the Local Plan Part 2 will identify these on the proposals map, or elsewhere. Furthermore, the identification of existing habitat networks and the potential for the creation of new networks needs to be done both within and outside of developments, i.e. Borough-wide and linking in with adjacent authorities as a cross-boundary issue.</div> <div>8.36 Refers to ecological networks and quotes (Lawton et al) but Lawton et al is not included in the references at the bottom of the page or in Appendix D.</div> <div>8.50 The Trust welcomes and supports the addition of this statement, i.e. that the identification and designation of Local Green Spaces will be used to protect those green areas which are of particular importance to the local community.</div>			
Summary	<div>The Core Strategy does not require development to provide net gains in biodiversity, where possible, and does not confirm that the Local Plan Part 2 will identify coherent ecological networks on the proposals map. This is contrary to the NPPF.</div> <div>The identification of existing habitat networks and the potential for the creation of new networks needs to be done both within and outside of developments - i.e. borough-wide and linking in with adjacent authorities. Lawton et al should be included in the references at the bottom of the page (paragraph 8.36) or in Appendix D.</div> <div>Support for the inclusion of wording at 8.50 regarding the identification and designation of Local Green Spaces.</div>			

731431 / 130 / ENV1 / 0 / 0 / 0	English Heritage	Ms	Emily	Hryan
Duty to Co-operate				
Legal Compliance				
Soundness	<div>Whilst we welcome the list of actions that will contribute towards the overall strategy for the historic environment. This would be better positioned in the policy itself which is rather generic and does not detail how the presumption in favour of sustainable development will be applied locally to the Borough of Pendle.</div>			
Suggested Change	<div>This should be incorporated into a strategic policy for the historic environment.</div>			
Comment				
Summary	<div>The list of actions in the justification text of Policy ENV1 relating to the protection and enhancement of the historic environment should be incorporated into a strategic policy for the historic environment.</div>			

# Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

731431 / 131 / ENV1 / 0 / 0 / S1, S4	English Heritage	Ms	Emily	Hrycan
Duty to Co-operate				
Legal Compliance				
Soundness	The NPPF requires that Plan Policies should contain a positive strategy for the conservation and enhancement of the historic environment. In particular it should contain strategic policies for the conservation and enhancement of the historic environment. Whilst we welcome the inclusion of a specific policy for heritage, it does not properly address how the presumption in favour of sustainable development should be applied locally (Para 15). The policy as drafted is generic and does not detail the priorities for Pendle and the long term strategy for its historic environment. This should ideally be informed from the evidence base and the spatial portrait of the Borough. At the moment, there is little to localise this policy. English Heritage is concerned that the policy does not put forward a positive strategy for the historic environment and is therefore contrary to the requirements of the NPPF and the 1990 Act.			
Suggested Change	The Policy should be amended to ensure that it accords with the requirements of the NPPF and 1990 Act.			
Comment				
Summary	The Core Strategy does not include a strategic policy for the conservation and enhancement of the historic environment. Policy ENV1 does not address how the presumption in favour of sustainable development should be applied locally. The policy does not include the priorities for the borough or a long term strategy for the historic environment. The policy is not localised. It should be informed by the evidence base. It does not put forward a positive strategy for the historic environment and contrary to the NPPF and 1990 Act.			

731431 / 132 / ENV1 / 0 / 0 / S1, S4	English Heritage	Ms	Emily	Hrycan
Duty to Co-operate				
Legal Compliance				
Soundness	The NPPF requires that the Local Plan should contain a strategy for the conservation and enhancement of the historic environment. The NPPF requires that the historic environment/heritage assets should be both conserved and enhanced. Para 1, does not accord with the NPPF in that it requires proposals to conserve but only in particular circumstances enhance. The Policy appears to see this being delivered though designation of assets and conservation areas and not the management of Pendle’s historic environment through the Plan. English Heritage is concerned that the policy does not put forward a positive strategy for the historic environment and is therefore contrary to the requirements of the NPPF and the 1990 Act.			
Suggested Change	The Policy should be amended to ensure that it accords with the requirements of the NPPF and 1990 Act.			
Comment				
Summary	Paragraph 1 of Policy ENV1 does not accord with the NPPF as it requires proposals to conserve but only in some circumstances enhance the historic environment/heritage assets. Furthermore this is to be delivered through the designation of assets and conservation areas and not through the management of the historic environment through the plan. This policy does not offer a positive strategy for the historic environment.			



# Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

731431 / 133 / ENV1 / 0 / 0 / S4	English Heritage	Ms	Emily	Hrycan
Duty to Co-operate				
Legal Compliance				
Soundness	The Council has a statutory duty under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its conservation areas. This includes ensuring development within or in proximity to does not affect its significance (NPPF). The policy only requires development within conservation areas to have regard to a relevant character appraisal or management plan and does not go far enough or provide a framework for development proposals.			
Suggested Change	The Policy should be amended to ensure that it accords with the requirements of the NPPF and 1990 Act.			
Comment				
Summary	The policy only requires development within a conservation area to have regard to the relevant character appraisal or management plan. The NPPF requires that development in proximity should not affect the significance of a conservation area. The 1990 Act requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.			

731431 / 134 / ENV1 / 0 / 0 / S4	English Heritage	Ms	Emily	Hrycan
Duty to Co-operate				
Legal Compliance				
Soundness	The assessment of development proposals cannot be made using the national heritage list for England or the other sources of evidence. They contain a register of information e.g. heritage assets and do not provide a framework for assessment. This paragraph or that contained in ENV 2 does not provide an adequate policy for the historic environment. Therefore this policy is considered unsound.			
Suggested Change	The Policy should be amended to ensure that it accords with the requirements of the NPPF and 1990 Act.			
Comment				
Summary	Development proposals cannot be assessed against the National Heritage List for England as this is a list of assets not a framework for assessment. Policy ENV2 does not therefore provide an adequate policy for the historic environment.			

# Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

868022 / 159 / ENV1 / 0 / 0 / S4

Dr and Mrs John and Alison Plackett

Duty to Co-operate

Legal Compliance

Soundness

Open Space, Green Infrastructure and Local Green Space:

Open Space and Green Infrastructure (GI):

When first encountered the definitions of these terms caused confusion. So much so, an email was sent to the government asking for clarification.

The response (Document R) defines open space as it appears in the NPPF glossary. The definition of GI in Document R differs from the one in the NPPF as it places more emphasis on the support of “natural and ecological processes” (a clearer definition). Moreover the TCPA definition of GI includes still and running water whilst in the NPPF includes these in the definition of open space! Some clarity from the government is required. Open Space and Green infrastructure may be differentiated by the functions they serve. Open space is primarily for “high energy” sport. Green infrastructure is for biodiversity (to stop fragmentation and isolation of wildlife habitats and to allow species migration in response to climate change) and less strenuous recreational activities such as walking, gentle cycling and fishing or for peaceful enjoyment.

The NPPF paragraph 114, first bullet point, should plan positively for the creation, protection, enhancement and management of networks of GI. This implies that GI is a separate entity from Open Space and that its management involves a different approach compared with caring for sports pitches etc. Inevitably the areas will overlap; but the amount of overlap envisaged is subject to argument. Ideally they should be separate, Pendle Borough Council (PBC) favours more overlap.

PBC’s view is reinforced by its Sustainability Appraisal of Core Strategy report (Regulation 18 Further Options Report (Regulation 18) Addendum, published in December 2013. In this document on page A7 (Document S), footnote 5 gives PBC’s own definition of Open Space, which is different from the one in the NPPF. Pendle’s definition includes features which are green infrastructure.

Policy ENV1 is unsound because its policy on Open Space is not consistent with national policy.

Local Greenspace:

Policy ENV1 now includes Local Green Space. It is important that areas which match the required criteria are acknowledged and considered as Local Green Space and, as with ecological networks, are mapped before other designations are made, to ensure consistency with Paragraph 76 of the NPPF.

Suggested Change

Comment

Summary

Policy ENV1 is unsound because its policy on Open Space is not consistent with national policy.

Areas which meet the required criteria for Local Green Space should be mapped before other designations are made, to ensure consistency with Paragraph 76 of the NPPF.

Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

Duty to Co-operate

Legal Compliance

Soundness

Pendle’s wildlife sites – Jewels in the Crown or Oases in the desert?

Ecological networks:

Pendle’s Core Strategy policy ENV1 states the intention of PBC to create ecological networks. Mention is made, for example, of creating an ecological network by linking pockets of ancient woodland (paragraph 3.89). Intention is one thing, taking action is another. Some years ago I asked about the location of wildlife corridors mentioned in the current local plan at a council meeting. In fact there were none on the ground.

It is vital to identify coherent ecological networks and map their components to ensure they are mapped before other land allocations such as settlement boundaries and proposed economic zones are made; otherwise sites with biological interest, such as core areas of high nature conservation value, are at risk of being isolated and fragmented. Mapping will be of benefit to everyone e.g. wildlife enthusiasts will know positive steps have been taken to protect biodiversity and developers will know where developments can occur to help to minimise their effect on wildlife. The NPPF, paragraph 117, states “planning policies should...identify and map components of the local ecological networks.” PBC has not produced a map yet.

Leaving the creation of ecological networks until after the siting of other developments has been designated is unacceptable. This runs a danger of cutting wildlife sites off from any networks which may have been established. An example of such a problem currently exists on Gib Hill (site 385 in SHLAA), a wildlife site on the boundary between Nelson and Colne. A planned all-weather pitch at SD878390 looks set to cut off one of the last routes for wildlife to cross the M65 corridor.

Ecological networks must also link in with networks in adjacent authority areas. As Pendle has not created any networks yet, it is unclear if this is achievable.

This policy is unsound as it is not effective and not consistent with national policy in NPPF paragraph 117.

Suggested Change

Comment

Summary

The policy is not effective or consistent with the NPPF (Paragraph 17).

It is vital to identify coherent ecological networks and map their components before defining settlement boundaries and allocating sites; otherwise areas of high nature conservation value, are at risk of being isolated and fragmented.

Ecological networks must also link with networks in adjacent local authority areas, but it is unclear if this is achievable.

# Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

868022 / 162 / ENV1 / 0 / 0 / 0

Dr and Mrs      John and Alison      Plackett

Duty to Co-operate

Legal Compliance

Soundness

The work of PBC’s Sustainable Places Group:	
Introduction: Biodiversity is a core component of sustainable development and ha an important role to play in developing sustainable communities. Planning for biodiversity is an important part of the work of the Local Strategic Partnership and local authorities in development Community Strategies. The Local Government Act 2000 requires local authorities to prepare Community Strategies for the economic, social and environment well-being of their areas.	
DETR circular 04/2001 said that “Local Biodiversity Action Plans are among the elements local authorities should build upon when preparing Community Strategies and that Local Sites are important components within local Biodiversity Action Plans”	
In November 2002 the ODPM identified local Biodiversity Action Plans a one of the plans to be subsumed into Community Strategies. Local authorities will need to demonstrate that local biodiversity planning has been considered within their Community Strategy and that Core Strategies as a whole are informed by the purposes of biodiversity planning.	
Sustainable Places Group: Document A which is a letter written to PBC in 2011 expressing concerns about PBC’s approach to biodiversity. It gives a time line showing how matters developed, including some matters not covered below.	
After the initial work of Pendle’s Local Strategic Partnership (LSP) in carrying out its “You Choose” public consultation, establishing its Priority Goals and Strategic Objectives, PBC set up is Sustainable Places group to develop an Action Plan relating to 8 areas including biodiversity. A chairman was appointed in July 2008 and its first meeting took place on 19th September 2008. Short accounts of this meeting and subsequent ones are shown below.	
Meetings of the Sustainable Place group:	
19th September 2008: The minutes of this meeting are in Document B. These are included because they are no longer online. The attendance list show that no one from the Lancashire Wildlife Trust had been invited to this (or subsequent meeting apart from December 2008-see below).	
At this September meeting under Item5 of the agenda, Terms of Reference were discussed (Document C – page 6 – shows the membership of the group. No name is given for a representative from the Lancashire Wildlife Trust.) A question was asked about the role of existing groups the interest of which fell under the remit of the of the Sustainable Places group. Interested groups were required attend the next Sustainable Places group meeting bringing a report requesting to be approved as Task and Finish groups. One such group, with an interest in biodiversity, was the Local Nature Reserves (LNR) steering group. The next meeting of the LNR steering group was held on 4th November 2008. The minutes of this meeting show no reference was made to the formation of a Task and Finish group on biodiversity.	
24th October 2008: Item 5 reported on progress on the Action Plan with an update to be given at the next meeting.	
4th December 2008: This was the only time a Wildlife Trust employee attended a meeting. They gave a presentation on NI197 (item 6). A draft Sustainable Places Action Plan was submitted. It was agreed that the plan would be brought to the next meeting on 9th January 2009. His January meeting was cancelled.	
There were no reported meetings of the Sustainable Places group between January and September 2009. However dates and sketchy details of (proposed?) meetings were available on the PBC website (Document A). For a meeting schedule for 5th April, details of the final draft of the Sustainable Places Action Plan could be found. This was downloaded in part (Document D) and the biodiversity part was included in Document A. During this time neither minutes nor agendas of Sustainable Places meetings were published, so what went on is unclear.	
9th September 2009: From September “normal service” was resumed (see document A). Biodiversity was off the agenda.	
4th November 2009 & 27th January 2010: there were no agenda items referring to biodiversity.	
10th March 2010: A new group member pointed out in item 4 that targets/indicators were needed for biodiversity as “there is a gap in the action plan”.	
21st April 2010: There was no mention of biodiversity.	
28th July 2010: Under item 9, it was reported that the action plan was being revised to reflect the added value actions of partner organisations. Meetings with partners would be arranged.	

Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

One action taken was to contact Friends of Parks with an interest in biodiversity in early August inviting them to a “planning” meeting at Nelson Town Hall on the 11th August. It was attended by a Wildlife trust employee, a wildlife trust member, a LSP member and a friend of a Pendle park (see Document A).

11th August 2010: My wife and I attended a meeting without an agenda about biodiversity at Nelson Town Hall. It was unclear whether this was related to the Sustainable Places Group (see Document A under “Early August 2010”).

22nd September 2010: Under an item on the action plan it mentioned issues had been raised about co-ordinating the work on biodiversity better. It was agreed that a meeting with interested parties would be organised. This was arranged for Monday 15th November 2010 at 10am.

15th November 2010: 18 people attended of whom 10 were members of local organisations and voluntary groups. I think council officials seemed surprised by the turnout. The agenda included Biodiversity and the Core Strategy, the draft biodiversity policy from the Preferred Options report, developing an Ecological Framework for Pendle etc. Unfortunately, for many of those present, it was the first time they had encountered the new planning procedure and its associated jargon, so much of the time was taken up explaining these. The planned agenda was not covered. A follow-up meeting was needed but none was organised.

17th November 2010: It was noted that the meeting on biodiversity on 15th November had been held. Also it was agreed to review and finalise the action plan in February 2011.

8th March 2011: A short paper recommending the formation of a Biodiversity Task and Finish Group was produced by interested parties (Document E).

16th March 2011: A draft Biodiversity Task and Finish group proposal was produced by interested parties (Document F).

12th April 2011: This document was the subject of a meeting with a council official who said it would be presented to the LSP AGM in June (Document G).

19th April 2011: The LSP rejected this proposal for one on climate change.

21st April 2011: An email from a council employee reported the outcome of this LSP meeting and suggested “we consider our plan B (?)”, i.e. extending the remit of the LNR steering group – the very organisation the Sustainable Places group had failed to invite into their group in September 2008, but who are now expected to deliver the policy (Document H).

Conclusions, the NPPF and soundness:

Paragraph 155 of the NPPF states that “early and meaningful engagement and collaboration with.....local organisations.....is essential”. No one from the Lancashire Wildlife Trust of Pendle’s LNR steering group appears to have been invited to any of the initial meetings of the Sustainable Places group. They could have made meaningful contributions to the group’s work on biodiversity. Members of the LNR group should have been invited to join the group and not required to make an application in the form of a report (see 19th September meeting above). This is not helping to proactively engage a wider section of the community as paragraph 155 suggests. When the Council finally invited interested members of the public to attend a Sustainable Places meeting in November 2010, it was too late for anything meaningful to be achieved. Even later in the day (March/April 2011), PBC’s agreeing to the formation of a biodiversity Task and Finish group seems, at the very least, to be “going through the motions” as the Sustainable Places group had agreed at their meeting on 17th November to finalise their Action Plan in February 2011.

The minutes of the December 2008 meeting state a draft action plan will be presented at the January 2009 meeting. However, minuted meetings of the Sustainable Places group ceased in December 2008 until September 2009. Why was this? There was no reported meeting where the contents of the Action Plan were discussed.

Did PBC engage anyone with professional expertise from outside the council to assist with its work on biodiversity? Why was no one from the Wildlife Trust invited to join the Sustainable Places group?

Paragraph 158 of the NPPF requires a plan should be based on up-to-date and relevant evidence. There is no indication in the action plan of what evidence has been used.

We think the Plan relating to biodiversity is unsound for the reasons stated above.

Suggested Change

Comment

Summary

The preparation of the Sustainable Community Strategy (and the Core Strategy) failed to achieve adequate engagement with biodiversity partner organisations.

Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

619588 / 204 / ENV1 / - / - / -	Friends of the Earth	Ms	Jane	Wood
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	Another statement in the document which we support and mentioned earlier is: Our Foundation for a Sustainable Future: Improving the Environment We Live In (S.8, Policy ENV1) ‘Protecting and Enhancing Our Natural and Historic Environments’, (Pages 69/70)			
Summary	Support for Policy ENV1 -Protecting and Enhancing Our Natural and Historic Environments			



Policy ENV2: Achieving Quality in Design and Conservation

818207 / 42 / ENV2 / 0 / 0 / 0

United Utilities Property Services

Ms

Jenny

Hope

Duty to Co-operate

Legal Compliance

Soundness

Suggested Change

Comment

Policy ENV 2: Achieving Quality in Design and Conservation: United Utilities supports Policy ENV 2, which directs that "new development should be designed to have a positive, or at least neutral impact, on climate change" by seeking to adhere to a number of criteria including (inter alia): "Maximising the use of permeable surfaces (including hardstandings) and Sustainable Drainage Systems (SuDS) where appropriate (see Policy ENV7). Incorporating water saving and recycling measures where possible to minimise water usage." We would like to emphasise the importance of incorporating water efficiency measures as part of the design process for all new developments. There are a number of methods that developers can implement to ensure their proposals are water efficient, such as utilising rainwater harvesting and greywater recycling for example.

Summary

Support for Policy ENV2. Developments should incorporate water efficiency measures into their designs.

# Policy ENV2: Achieving Quality in Design and Conservation

867015 / 52 / ENV2 / DTC / - / S4	Canal & River Trust	Mr	Martyn	Coy
Duty to Co-operate	<p>The Leeds &amp; Liverpool canal is a key component of green infrastructure within the Borough that provides sustainable transport options, leisure and recreation opportunities, regeneration benefits and habitat for biodiversity to flourish. The canal also provides a physical link between neighbouring Local Authority's from Bradford and Craven in the east to Burnley and Hyndburn to the west.</p> <p>This physical linkage provides an opportunity for cooperation between the Local Authority's to develop policies that conserve and enhance the natural and historic environment, including landscape as recommended by paragraph 156 of the National Planning Policy Framework (NPPF).</p> <p>Policy A6 of Hyndburn Borough Councils Adopted Core Strategy specifies the design requirements for development adjacent to, or in the vicinity of, the Leeds and Liverpool Canal. In its current form, Policy ENV 2 does not consider the approach of neighbouring Hyndburn Council in formulating a policy relating to promoting good design and therefore does not comply with the Duty to cooperate requirements set out in paragraph 156 of the NPPF.</p>			
Legal Compliance				
Soundness	Policy ENV 2 is not sound as it is not consistent with national policy as it does not meet the 'Duty to cooperate' requirements as set out in the NPPF.			
Suggested Change	<p>Therefore, we recommend that Policy ENV 2 is amended to include specific reference to achieving good quality design in development that is adjacent to or will have an impact on the Leeds &amp; Liverpool Canal. Such an approach has been undertaken in Policy A6 of Hyndburn Borough Councils Adopted Core Strategy. Policy A6 states that:</p> <p>" development adjacent to, or in the vicinity of, the Leeds and Liverpool Canal will be expected to:</p> <p>a) Be of a high quality design that integrates the canal into the development proposal in a way that treats the waterway as an area of usable space;</p> <p>b) Integrate the waterway, towing path and canal environment into the public realm in terms of the design and management of the development;</p> <p>c) Improve access to, along and from the waterway and improve the environmental quality of the waterway corridor;</p> <p>d) Optimise views of water and generate natural surveillance of water space through the siting, configuration and orientation of buildings, recognising that appropriate boundary treatment and access issues may differ between the towing path and offside of the canal, and;</p> <p>e) Improve the amenity of the canal. Development that would have an adverse impact on the amenity of the canal by virtue of noise, odour or visual impact will not be supported. When off-site improvements to the canal are required these will be delivered by the developer through the use of Grampian conditions or planning obligations."</p> <p>We recommend that this wording is either included within the Policy ENV 2 or a separate policy relating to canals is included within the Plan.</p>			
Comment				
Summary	Policy ENV2 is not consistent with national policy as it does not meet the 'Duty to Co-operate'. The policy should be amended to include specific design criteria for developments that are adjacent to, or will have an impact on, the Leeds & Liverpool Canal.			

Policy ENV2: Achieving Quality in Design and Conservation

818046 / 80 / ENV2 / 0 / 0 / S1, S2, S3, S4	Barton Willmore	Mr	Michael	Courcier	Junction Properties Ltd
Duty to Co-operate					
Legal Compliance					
Soundness	<div>Policy ENV2: Quality in Design and Conservation</div> <div>A1.15 The Policy will add significantly to the costs of some developments, particularly in its requirements for materials, water saving and recycling, fabric energy efficiency, and on-site low-carbon heat and power. The impacts of these onerous requirements have not been properly assessed or shown to be viable by the Development Viability Study (December 2013). As such, their proposed imposition is contrary to the NPPF (174).</div> <div>A1.16 For these reasons, the policy fails the soundness tests of being positively prepared, justified, effective and consistent with national policy.</div>				
Suggested Change					
Comment					
Summary	<div>The requirements in Policy ENV2 have not been assessed through the Development Viability Study and have not been shown to be viable. They will add a significant cost to development and therefore is contrary to the NPPF.</div>				

731431 / 135 / ENV2 / 0 / 0 / S1, S4	English Heritage	Ms	Emily	Hrycan
Duty to Co-operate				
Legal Compliance				
Soundness	The NPPF requires that Plan Policies should contain a positive strategy for the conservation and enhancement of the historic environment. In particular it should contain strategic policies for the conservation and enhancement of the historic environment. This policy does not accord with the requirements contained within Policy ENV 1 and is inconsistent.			
Suggested Change	Bullet 2 should be amended to read: “Proposals should contribute to the sense of place (by) and making a positive contribution to the historic environment and local (context) identity and character ”. (Brackets indicate deleted text).			
Comment				
Summary	Policy ENV2 is inconsistent with the requirements contained in Policy ENV1. Bullet point 2 should be amended to include reference to making a positive contribution to the historic environment, local identify and character.			

619588 / 205 / ENV2 / - / - / 0	Friends of the Earth	Ms	Jane	Wood
Duty to Co-operate				
Legal Compliance				
Soundness	<div>Policy ENV2: Achieving Quality in Design and Conservation (pages 76/77) in particular ‘designing development to move towards a low carbon future.’</div> <div>It is also important that whenever possible new housing which includes the vital social/affordable housing constructed to these standards are built on brownfield sites as a priority and you are promising to do this.</div>			
Suggested Change				
Comment				
Summary	<div>Policy ENV2: Achieving Quality in Design and Conservation should require any new housing developments, which include an element of social/affordable housing, to be built on previously developed (Brownfield) land.</div>			

Policy ENV3: Renewable and Low Carbon Energy Generation

731431 / 136 / ENV3 / 0 / 0 / S4	English Heritage	Ms	Emily	Hrycan
Duty to Co-operate				
Legal Compliance				
Soundness	The NPPF requires that Plan Policies should contain a positive strategy for the conservation and enhancement of the historic environment. In particular it should contain strategic policies for the conservation and enhancement of the historic environment. The policy does not accord with the NPPF as it refers to unacceptable impact on the “value” of a heritage asset and does not refer to setting. Any proposals for renewable energy should not harm the significance of heritage assets including their setting and the policy should be amended to reflect this.			
Suggested Change	The policy should be amended to ensure that any proposals for renewable energy will not harm the significance of heritage assets including their setting.			
Comment				
Summary	The policy does not accord with the NPPF as it refers to unacceptable impact on the value of a heritage asset and does not refer to the setting. Proposals for renewable energy should not harm the significance of heritage assets including their setting.			

619588 / 206 / ENV3 / - / - / 0	Friends of the Earth	Ms	Jane	Wood
Duty to Co-operate				
Legal Compliance				
Soundness	P81 Renewable and low carbon energy generation.  8.81 ‘Supporting the delivery of renewable and low carbon energy and its associated infrastructure’  Again shale gas extraction would be contrary to this core strategy statement			
Suggested Change				
Comment				
Summary	Shale gas extraction (fracking) would be contrary to Policy ENV3: Renewable and Low Carbon Energy.			

Policy ENV4: Promoting Sustainable Travel

327500 / 3 / ENV4 / - / - / -	Highways Agency	Mrs.	Lindsay	Alder
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	The Highways Agency's management of the M65 motorway as part of the strategic road network (SRN) extends from junction1 to junction 10. Junctions 14, 13 and 12 within the Borough of Pendle which would experience a direct impact due to any development within the Borough of Pendle are the responsibility of Lancashire County Council. The Agency has an integral part to play in assisting economic growth in East Lancashire and to maximise growth opportunities we aim to ensure that the M65 operates effectively and integrates with the local highway network to deliver the aspirations of the Core Strategy and the East Lancashire Highways and Transport Masterplan. In relation to transport matters, we support Policy ENV4 and the delivery of a safe and sustainable network that improves connectivity by encouraging the use of public transport and reduces the reliance on private car usage. This in turn contributes to a reduction in carbon emissions and improves air quality. We welcome the development of walking and cycling facilities as a travel mode. The Agency is keen to encourage and facilitate cycle routes and we are working with Sustrans to look at opportunities throughout the NW. The M65 corridor suffers from congestion at peak times at certain junctions and will operate at or near capacity in the future years. As proposals for new development come forward, it is essential that we are consulted as part of the planning process, where it is likely that any development may have significant implications for the SRN. We would expect to gain a thorough appreciation of the transport implications through transport assessments and travel plans. The Agency is keen to work with the Borough of Pendle and welcomes the opportunity to be involved in the LDF process.			
Summary	Support for Policy ENV4.			

818401 / 23 / ENV4 / 0 / 0 / 0	Mr	Anthony J	Peacock
Duty to Co-operate			
Legal Compliance			
Soundness	<div>I have read a considerable portion of the strategy documentation and did attempt to register on your consult system, but gave up half way through. Why does that process have to be so involved and long-winded? As far as the strategy itself is concerned, I found only passing reference to the problem of traffic which is blighting some of our towns and villages right now, and can only get worse as more development takes place. We have near gridlock in Barrowford, rat-runs through Red Lane and Barnoldswick Old Road, as well as the ever present queues on North Valley Road, all of which will only become worse.</div> <div>Is it part of the strategy to press County/Government for the building of the Colne bypass?</div>		
Suggested Change			
Comment			
Summary	<div>There is only limited reference to existing traffic problems and these will get worse as more development takes place. Especially in Barrowford and North Valley Road.</div> <div>Is it part of the strategy to press County/Government for the building of the Colne bypass?</div>		

Policy ENV4: Promoting Sustainable Travel

817556 / 35 / ENV4 / - / - / -	David Lock Associates	Ms	Kate	Skingley	Rolls Royce plc
Duty to Co-operate					
Legal Compliance					
Soundness					
Suggested Change					
Comment	Travel and Transport: Rolls-Royce continue to support the Council's aspiration to move towards sustainable modes of travel. The company stress the importance of this being in the context of economic growth and the need for developments to not be overburdened by policy requirements as prescribed by Paragraph 174 the NPPF. Rolls-Royce are, therefore, pleased to note the inclusion of a sentence at paragraph 8.133 of the Plan that... "it should be acknowledged that certain types of employment require people to work shift patterns which do not necessarily align with public transport service timetables". This is a point that Rolls-Royce have made repeatedly to the Borough Council and note the recognition of the limitations of existing public transport provision and the need for plans to allow for adequate parking provision. In relation to parking, Policy ENV 4 indicates that new development should continue to comply with the existing maximum car and cycle standards until they are replaced in the Part 2: Site Allocations and Development policies. Rolls-Royce continue to highlight the need for parking to be considered on an individual needs basis and to reflect the sustainable transport options available as indicated at para 8.133 of the Plan. Rolls-Royce welcome the steps taken to recognise this issue but until such time that revised standards are brought forward (in consultation with the local community) urge that a pragmatic approach to reviewing development should continue to be the baseline position. As such Rolls-Royce ask that they be consulted on the Local Plan Part 2 once it has been prepared.				
Summary	Support for Policy ENV4. However, a pragmatic approach to car parking standards should be taken and this should reflect the availability of different sustainable transport options.				

378754 / 98 / ENV4 / 0 / 0 / 0	Lancashire County Council	Mr	Marcus	Hudson
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	Thank you for the opportunity to respond to the publication of the Pendle Local Plan: Core Strategy Publication Report. Please find below this authority's comments on the report.  The County Council's service priorities relate to, promoting sustainable economic growth, improving roads and transport, improving our environment and health and wellbeing.  In line with these priorities I offer the following comments:  Whilst I am supportive of Policy ENV 4, I feel that the supporting narrative references a number of outdated documents and initiatives, e.g. the Lancashire Bus Strategy, A Subregional Transport Framework for Lancashire, TravelWise etc. In this regard I would recommend that the supporting narrative to this policy incorporates a much stronger integration of the schemes and studies outlined in the Transport and Highways Masterplan for East Lancashire. I hope that the above comments will be of assistance to you in the development of the Core Strategy.			
Summary	The supporting narrative to Policy ENV4 should be based on the schemes and studies outlined in the Transport and Highways Masterplan for East Lancashire. A number of the strategies currently referenced are out-of-date.			



# Policy ENV4: Promoting Sustainable Travel

818314 / 120 / ENV4 / 0 / 0 / 0

P Daniel

Duty to Co-operate

Legal Compliance

Soundness

My comments on the Core Strategy are based on the “sound” principle which is a value judgement, on which people differ rather than a legal one which no doubt the Council has covered.

1)     Cycling

The Core Strategy proposes to modify lifestyles (Section 3.91). Where are the measures to reduce car travel (section 5.2).

Traffic and car travel will increase on the A6068 if access to the road is allowed for the industrial unit. Access to the motorway is already available and other areas should not be blighted to provide access for ease of the traffic management.

Cycling should be promoted with more cycle paths and lanes either alongside main roads or dual use of footpaths for pedestrians and cyclists.

Cycle routes should be thought through and provide a coherent pattern. E.g. the Guild Wheel at Preston.

A major development along the Colne/Skipton railway line should be developed to provide a trail to rival those in many other areas.

Carbon reduction strategies do not seem to be at the forefront of the document.

Suggested Change

Comment

Summary

Where are the measures to reduce car travel.

Access to the new industrial units will increase car travel on the A6068. Access to the motorway is available and other areas should not suffer for ease of traffic management.

More cycle paths and lanes should be provided and cycling promoted. Cycle routes like the Guild Wheel in Preston should be provided.

The Colne/Skipton railway line should be developed to provide a trail.

Carbon reduction strategies are not at the forefront of the document.

Policy ENV4: Promoting Sustainable Travel

868113 / 179 / ENV4 / 0 / LC / S3, S4	Mr	M	Gordon
Duty to Co-operate			
Legal Compliance			
Soundness	<div>I write in response to the consultation on the Pendle Core Strategy</div> <div>I consider the Core Strategy to be unsound and I doubt whether it is consistent with NPPF, or even legally compliant. I apologise that time constraints have precluded a more detailed response but I can draw attention to the following.</div> <div>The process of preparing the plan has been flawed. It has been prepared largely by professionals who have achieved little engagement with the local community. Even those residents who take a very active interest in the future of their community and local planning issues have failed to be engaged. There is a strong consensus amongst those who have now seen the strategy that it is fundamentally unsound.</div> <div>The stated commitment to sustainable development is laudable but preparation of the plan does not seem to be based on any real grasp of the concept. The approach to this key objective has been piecemeal at best.</div> <div>Transport is an area of particular weakness in the strategy. Basing the strategy around development of new “bypasses” for the A56 is a serious error. Similar schemes have already been rejected on several occasions and have proven to be deeply divisive. Despite several attempts to manufacture public support for such a road scheme, none has ever been convincingly demonstrated. The idea that such a road corridor is deliverable at all is optimistic. The authority needs to let go of the historic commitments to new road building which would cost the area so dearly and follow through on sustainable development rhetoric by putting its weight fully behind the rail reopening scheme, which has demonstrated widespread, genuine public support and a better return on investment</div>		
Suggested Change			
Comment			
Summary	<div>Considers the plan to be unsound because:</div> <div>- it has been prepared largely by professionals who have achieved little engagement with the local community.</div> <div>- the plans stated commitment to sustainable development is laudable, but not based on "any real grasp" of the concept.</div> <div>A strategy based on a commitment to sustainable development should put its weight firmly behind the reinstatement of the former Colne to Skipton railway line rather than support the provision of a bypass to the west of Colne, which may not be deliverable.</div>		

## Policy ENV5: Pollution and Unstable Land

379222 / 10 / ENV5 / - / - / -	The Coal Authority	Miss	Rachael	Bust
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379222 / 10 / ENV5 / - / - / -	The Coal Authority	Miss	Rachael	Bust
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379222 / 10 / ENV5 / - / - / -	The Coal Authority	Miss	Rachael	Bust
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379222 / 10 / ENV5 / - / - / -	The Coal Authority	Miss	Rachael	Bust
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379222 / 10 / ENV5 / - / - / -	The Coal Authority	Miss	Rachael	Bust
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Legal Compliance

Suggested Change \_\_\_\_\_

Support: The Coal Authority welcomes and supports this policy which addresses mining legacy which is a locally distinctive issue and sets out an appropriate and suitable planning policy framework for assessing land instability. As such the policy is considered to conform with the National Planning Policy advice in the NPPF, paragraphs 109, 120, 121 and 166.

Support for Policy ENV5.

867015 / 53 / ENV5 / - / - / -	Canal & River Trust	Mr	Martyn	Coy
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867015 / 53 / ENV5 / - / - / -	Canal & River Trust	Mr	Martyn	Coy
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867015 / 53 / ENV5 / - / - / -	Canal & River Trust	Mr	Martyn	Coy
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867015 / 53 / ENV5 / - / - / -	Canal & River Trust	Mr	Martyn	Coy
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867015 / 53 / ENV5 / - / - / -	Canal & River Trust	Mr	Martyn	Coy
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We support Policy ENV 5 which seeks to minimise impacts of pollution and land instability that may result from new development. In our experience, issues of pollution and land stability are important factors to consider when assessing new development along side the Leeds & Liverpool canal. These issues need to be fully investigated to ensure that any negative potential impacts are mitigated so that the canal is not adversely affected by pollution and land instability which have the potential to create problems to the ecological balance of the waterway and its structural integrity. Therefore the Policy would be consistent with paragraph 120 of the National Planning Policy Framework and help to ensure that the Plan meets the test of soundness.

Support for Policy ENV5

619588 / 207 / ENV5 / - / - / 0	Friends of the Earth	Ms	Jane	Wood
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619588 / 207 / ENV5 / - / - / 0	Friends of the Earth	Ms	Jane	Wood
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619588 / 207 / ENV5 / - / - / 0	Friends of the Earth	Ms	Jane	Wood
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619588 / 207 / ENV5 / - / - / 0	Friends of the Earth	Ms	Jane	Wood
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619588 / 207 / ENV5 / - / - / 0	Friends of the Earth	Ms	Jane	Wood
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Some of the concerns with 'fracking' include pollution, unstable land and water contamination.

Policy ENV5: Pollution and Unstable Land (page 95)

These policies reflect that Pendle Council would have a responsibility to deal with such issues if shale gas extraction went ahead in the future.

Policy ENV5: Pollution and Unstable Land should address the possible implications for pollution and land stability arising from shale gas extraction (fracking).

Policy ENV7: Water Management

817556 / 37 / ENV7 / - / - / -	David Lock Associates	Ms	Kate	Skingley	Rolls Royce plc
Duty to Co-operate					
Legal Compliance					
Soundness					
Suggested Change					
Comment	Rolls-Royce also note that the Council have not amended Policy ENV 7 relating to Water Management in response to Rolls-Royce's concerns that it may be overly prescriptive in relation to the management of Surface Water runoff. It is noted that this policy has been prepared in consultation with the EA and United Utilities, however, as Rolls-Royce still have concerns about this policy, they request the Inspector be satisfied if that the policy is effective and compliant with the NPPF in this regard.				
Summary	Policy ENV7 is overly prescriptive in relation to the management of Surface Water runoff.				

818207 / 43 / ENV7 / 0 / 0 / 0	United Utilities Property Services	Ms	Jenny	Hope
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	Policy ENV 7: Water Management: As per our previous comments, United Utilities supports the inclusion of Policy ENV 7, which focusses on the key principles to managing development and flood risk, including the need to direct development to areas with the lowest possibility of flooding, and in particular, the need for surface water arising from new developments to discharge in accordance with the Surface Water Hierarchy. Further to our previous comments, United Utilities wishes to support the inclusion of the additional paragraph which states that the Council "will encourage the construction of buildings that are water efficient, thereby helping to protect and improve the environment". Improvements in water efficiency help to reduce pressure on water supplies whilst also reducing the need for treatment and pumping of both clean and wastewater. In new residential development, we encourage the achievement of the target water use identified in Level 3/4 of the Code for Sustainable Homes.			
Summary	Support for Policy ENV7. New residential developments should be encouraged to achieve the target water use identified in Levels 3/4 of the Code for Sustainable Homes.			

Policy ENV7: Water Management					
378754 / 99 / ENV7 / 0 / 0 / -	Lancashire County Council	Mr	Marcus	Hudson	
Duty to Co-operate					
Legal Compliance					
Soundness					
Suggested Change					
Comment	<p>Thank you for the opportunity to respond to the publication of the Pendle Local Plan: Core Strategy Publication Report. Please find below this authority's comments on the report.</p> <p>The County Council's service priorities relate to, promoting sustainable economic growth, improving roads and transport, improving our environment and health and wellbeing.</p> <p>In line with these priorities I offer the following comments:</p> <p>I am pleased to see in Section 8.173 recognition has been made to the Lancashire and Blackpool Local Flood Risk Management Strategy which was formally adopted on 9 April 2014 and is a material consideration during plan making. In this regard I am supportive of Policy ENV 7 Water Management</p> <p>I hope that the above comments will be of assistance to you in the development of the Core Strategy.</p>				
Summary	Support for Policy ENV7 and the recognition of the Lancashire and Blackpool Local Flood Risk Management Strategy.				

619588 / 208 / ENV7 / - / - / 0	Friends of the Earth	Ms	Jane	Wood	
Duty to Co-operate					
Legal Compliance					
Soundness	<p>Some of the concerns with ‘fracking’ include pollution, unstable land and water contamination.</p> <p>Policy ENV7: Water Management – Development and Flood Risk (page 105/6)</p> <p>These policies reflect that Pendle Council would have a responsibility to deal with such issues if shale gas extraction went ahead in the future.</p>				
Suggested Change					
Comment					
Summary	Policy ENV7 - Water Management should address the possible implications for water contamination arising from shale gas extraction (fracking).				

Chapter 10: Living: Creating a Vibrant Housing Market

Duty to Co-operate

Legal Compliance

Soundness

I understand that it is proposed to build 197 houses on a piece of land behind St Thomas's School on Wheatley Lane Road, Barrowford. I wish to raise the following concerns:  
1. The access to this site is near a bend in the road and there are over hanging trees which makes for poor visibility. I have lived in the area since 1974 and to my knowledge there have been two fatalities of pedestrians on Wheatley Lane Road close to this spot.  
2. There is a primary school close by and there is the safety of the children arriving and leaving school.  
3. Wheatley Lane Road becomes Church Street as you approach the centre of Barrowford. This section of road is very narrow with very limited footpaths for pedestrians. There are cars parked on both sides of the road - residents cars and others belonging to people using the shops and other facilities in Barrowford -which makes visibility and access difficult. I do not feel that this section of road can cope with any more traffic.  
4. Local facilities such as schools could not cope with the increase in numbers.  
5. Green fields are being taken for housing when there are brown field sites which are not being developed e.g. the Coloroll site in Nelson.  
6. I feel there is a need for more affordable housing to cater for a variety of age groups. Statistics show that the population is ageing and there is a need for suitable accommodation for this age group -not everyone wants or needs a four or five bedroomed house.  
  
I hope you will consider the points I have made and keep me informed of developments.

Suggested Change

Comment

Summary

The development of this site would cause a number of traffic related problems - the access would be in a dangerous location, it is near a school and capacity of Church Street can not cope with an increase in traffic.  
There is not sufficient capacity at local schools.  
Brownfield sites should be developed before Greenfield sites.  
More affordable housing for a variety of age groups is required. Housing for older people should be provided.



# Chapter 10: Living: Creating a Vibrant Housing Market

474133 / 28 / CHP10 / 0 / 0 / 0

Mr Martin Stanworth

Duty to Co-operate

Legal Compliance

Soundness

Response to the Pendle Borough Strategic Housing Land Availability Assessment

I refer to the above and the inclusion in the council's core strategy development plan document, regarding the proposal to include land to the rear of St. Thomas's School, Barrowford (S199) for housing.

This Greenfield land is situated outside the Settlement Area on the skyline of Barrowford. It is an area of outstanding natural beauty. In the past twelve months I have seen Deer, Badgers, Foxes, Bats, Owls and numerous Birds. It is also home to Frogs and Toads.

This development of 190 units, which when it comes to planning will probably yield approximately over 200 hundred houses, will access this site through one entry/exit point onto Wheatley Lane Road in Barrowford. At an average of 1.5 cars per house this means there will be at least 300 cars using this access point.

It is not safe to have all these cars using roads leading from this access for the following reasons:

1. The exit point does not have a clear view to the left, where there is St Thomas's primary school. This school, which has over 120 pupils, is next to the access road and is extremely busy when children are attending and leaving school.
2. People who wish to use the motorway, or to travel to the Colne, Skipton, Keighley area will have to use, a) Church Street, which is very narrow, being only 5.5 meters wide at one point. For most of its whole length there is only room for single file traffic due to residential parking on both sides of the road. Parking restrictions will only move the vehicles to other side roads causing congestion there. (there are no immediate side roads off this road). B) The other alternate route to the motorway and towns to the East, is using Higher Causeway. This road is a residential area with 20 mph speed restrictions and road calming measures on the road.
3. Less than half a mile away from this access point on Wheatley Lane is Trough Laithe Farm. This is a site identified for the building of 500 houses. If access is allowed onto Wheatley Lane from this site, motorists will use it as a quicker way to get to the Motorway and to travel East. All using Church Street and Higher Causeway.

Barrowford has a population of just over 5,000. If the proposed building plans for the area at the rear of St Thomas's go ahead it could increase the population of Barrowford by 8%. If you add on the site at Trough Laithe Farm then it could increase by 25%.

There is no mention in the Core Strategy Development Plan Document of the traffic congestion in Barrowford town centre. It is well known locally that Barrowford is a bottleneck for traffic, at peak time vehicles come to a stop. Major road improvements must be made before the extra vehicles from any future housing developments can be considered.

Suggested Change

Comment

Summary

The land to the rear of St Thomas's School, Barrowford is Greenfield land outside of the settlement boundary and a significant amount of wildlife is present on the site. The proposed access is not suitable for over 300 cars. There are not clear views on to Wheatley Lane Road. The access is next to a school which gets very busy. The traffic has two options to reach the motorway both of which have problems. Additional traffic will be generated from the Strategic Housing Site at Trough Laithe. There is no mention of traffic problems associated with these sites in the Core Strategy. Major road improvements must be made before the extra vehicle from future housing developments can be considered.

Chapter 10: Living: Creating a Vibrant Housing Market

867267 / 39 / CHP10 / 0 / 0 / 0	Mr	Carl	Hammond
Duty to Co-operate			
Legal Compliance			
Soundness	<div>I wish to officially state my opposition to the proposal by Pendle Borough Council to build 197 houses on land at the rear of St Thomas's School, Barrowford.</div> <div>I live on Church Street, and the traffic is horrendous, especially at school opening and closing times.</div> <div>My driveway opens direct onto Church Street and access is dangerous to myself and passing (often speeding) vehicles.</div> <div>More people every day are using Church Street as a shortcut to Nelson and the by-pass and using it to avoid the congestion in the village. I think the term is "rat-run". Only last week, an accident occurred outside our house between a car and a motor cyclist, fortunately not resulting in any fatalities, but the police and ambulance had to be called out.</div> <div>With this projected number of dwellings, there could be upward of 200 extra vehicles - but more likely 300+ - using Church Street.</div> <div>The entry/exit road to the estate will probably be at the most dangerous point of Wheatley Lane Road, on the bend at the bottom of the incline within close proximity to the school.</div> <div>Gisburn Road is a massive traffic-jam at rush hours at the moment, making it very difficult to access the motorway. The village infrastructure cannot take any more traffic even without the extra demands which the building work would produce.</div>		
Suggested Change			
Comment			
Summary	<div>The development of this site would cause a number of traffic related problems - the access would be in a dangerous location, it is near a school and capacity of Church Street can not cope with an increase in traffic.</div> <div>The development of this site will lead to major traffic problems in Barrowford which already suffers from severe congestion.</div>		

867850 / 108 / CHP10 / 0 / 0 / 0	Ms	Gayle	Dunkley
Duty to Co-operate			
Legal Compliance			
Soundness			
Suggested Change			
Comment	<div>As a former resident of Pendle who still has many relatives living there and I come back often, I am writing to express my concerns at the plans for housing development in our beautiful green spaces. There is so much brown field land I cannot understand why you would even think of building in places such as Gib Hill, which is a wild life haven. Pendle needs to retain it's unique green fields and countryside to keep people wanting to live there. I only moved away for work reasons but would like to return home in the future. However if it becomes over developed this would change my view and I know many others who would think about moving away.</div> <div>Please assess other options for housing plans, including bringing back into use vacant houses and redevelopment of brown field sites. Once the green fields go they are gone forever.</div>		
Summary	<div>Concern regarding housing development on greenspaces such as Gib Hill. Brownfield sites should be used. Green fields need to be retained to keep people wanting to live in Pendle. Other options for housing should be assessed such as bringing vacant houses back into use and redevelopment of brownfield sites.</div>		

# Chapter 10: Living: Creating a Vibrant Housing Market

867852 / 110 / CHP10 / 0 / 0 / 0

Mrs Alex Roberts

Duty to Co-operate  
Legal Compliance  
Soundness  
Suggested Change  
Comment

I would like to register my objections regarding the two proposed housing sites in Barrowford. I understand that the area behind St Thomas' School along with the Trough Laithe area have been primed as potential areas for development within the councils core strategy.	
1. Both areas are beautiful green spaces which should not be developed upon in a village which is already running to capacity.	
2. Resources in Barrowford can NOT cope with this extra demand. Particularly the school, which is already over subscribed and accepting more children than it should.	
3. Traffic in Barrowford has been horrendous of late due to the Booths development. People use the Wheatley Lane and Nora Street areas as short cuts already and it is absolutely hideous. The double parking is dangerous and traffic gets backed up at prime times of the day with people driving dangerously on this notorious rat run. Access on to his burn road (opposite the pet store) is dangerous and getting worse.	
4. Access to both sites would be problematic.	
5. There are currently 3 new sites around the Pendle Street which are not on the same scale as these proposals yet are still unsold and remain empty.	
6. We have had enough of the constant disruption due to building work over running.	
Summary	Object to housing development at Trough Laithe and behind St Thomas' School. These green areas should not be developed. The resources in Barrowford are already at capacity and cannot cope with additional demand (especially the school). There are major traffic problems with Wheatley Lane Road and Nora Street being used as 'rat runs'. Development would make this problem worse. Access to the sites would be a problem. Housing on three small sites in the village remain unsold and empty. Building work in the village causes constant disruption and over runs.

# Chapter 10: Living: Creating a Vibrant Housing Market

847067 / 118 / CHP10 / DTC / LC / 0	Mr. & Mrs.	Jeff & Jacquie	Noon
Duty to Co-operate			
Legal Compliance			
Soundness			
Suggested Change			
Comment	<p>Earlier this year the residents of Wheatley Lane Road attended the Town Hall for a meeting regarding the plans. On arrival we were told they were not going to be discussed that evening, our details were taken so we would be contacted to let us know of the rearranged meeting. This doesn't seem to have happened.</p> <p>I have tried reading through the strategy and have liaised with my neighbours. We all agree that it is beyond the "man in the street" to understand and comment on.</p> <p>Is this the council's policy to make it too difficult to object to? There doesn't seem to be a key with the site allocation map.</p> <p>We feel that brownfield sites have been neglected in favour of the easier greenfield option. Will the percentage of school/hospital/GP/dental/prison places etc increase in line with the housing. How will the already congested streets of Barrowford be managed with the increase in traffic? Etc etc.</p> <p>The residents would prefer face to face consultations.</p> <p>Talking of traffic problems – we already have a ridiculous amount of traffic speeding and over-taking each other (dangerously) past our house-traffic that comes from Barrowford to the Padiham By-pass and vice versa.</p> <p>Where would you plan to take the traffic into the new housing site-surely not Wheatley Lane Road?? There's talk that there could be at least 700 houses including the plans near St Thomas', most properties have 2 vehicles per household now-can this area really cope with that impact?</p> <p>We also have bats flying around our house don't you have a duty to look after them?</p> <p>There are plenty of sites in Nelson where buildings have been pulled down and the land is still unused, why not build on these?</p>		
Summary	<p>Not informed of the rearranged council meeting. Prefer face to face consultations.</p> <p>The strategy is too complex to understand.</p> <p>There is no key with the site allocation map.</p> <p>Greenfield sites have been chosen over brownfield sites. Will the amount of infrastructure increase in line with the housing. How will the additional traffic be managed.</p> <p>Traffic problems are already a major concern and the area would not be able to cope with the impact of 700 new houses.</p> <p>There are bats present in this area which need to be protected.</p> <p>Unused sites in Nelson should be used instead.</p>		

# Chapter 10: Living: Creating a Vibrant Housing Market

818314 / 122 / CHP10 / 0 / 0 / 0

P Daniel

Duty to Co-operate

Legal Compliance

Soundness

My comments on the Core Strategy are based on the “sound” principle which is a value judgement, on which people differ rather than a legal one which no doubt the Council has covered.

1) Housing

Large new estates do not bring a feeling of community to an area and usually provide limited social housing

Small housing units are needed to provide for the growing number of small family units, elderly people and single people.  
There are large numbers of empty town centre offices and empty spaces over shops. Surely these could be converted to dwellings before more land is taken for buildings.  
Do the close relationships with builders always work in the best interests of the people.  
I grew up in the First Garden City which planned for people to have space, recreational areas and planned business areas. There seems to be at present development dribbling out in the wrong places.

Suggested Change

Comment

Summary

Large housing estates provide limited social housing and do not have a community feel.  
Smaller housing is needed for small families, elderly and single people.  
Empty town centre offices and spaces over shops should be used for dwellings rather than developing new land.  
Are the close relationships with builders in the best interests of the people.  
Garden cities were planned for people to have space and recreational areas and business areas. At present development seems to be coming forward in the wrong places.

867921 / 124 / CHP10 / 0 / 0 / 0

Mr Christopher Johnson

Duty to Co-operate

Legal Compliance

Soundness

I wish to object to the proposed development by Persimmon Homes on the land adjacent to Knotts Lane, Colne.

I am objecting on the grounds of vehicular access to the proposed site and also the site being unsuitable for development due to the existence of coal mine tunnels beneath the site.

I wish to speak at the appropriate council meeting along with other fellow objectors in this area.

Suggested Change

Comment

Summary

Object to the development of the land adjacent to Knotts Lane, Colne because of vehicular access into the site and the existence of coal mine tunnels beneath the site.

Chapter 10: Living: Creating a Vibrant Housing Market

327467 / 151 / CHP10 / 0 / 0 / 0	Barrowford Parish Council	Mr	Iain	Lord
Duty to Co-operate				
Legal Compliance				
Soundness	<div>Regeneration in Bradley and Whitefield</div> <p>Barrowford is exceptionally keen to see the neighbouring wards of Bradley and Whitefield developed either for housing or employment or a mixture of both. To achieve this, an outside-the-box mentality may need to be adopted to force developers to begin the regeneration process. Once some housing regeneration has started and the houses are sold and occupied, and property value levels start to rise, small scale in-fill developments may continue the process, as has happened in the Lowerclough Street area of Barrowford.</p> <p>The catalyst for this regeneration could be as simple as the Council negotiating a pro-rata agreement to build and market affordable houses on council owned demolition sites within the Elevate areas, instead of compelling developers to build affordable homes on sites with high land on-costs, which only benefit the first buyer. This could, with the co-operation of developers, be a win-win situation, with developers being able to exploit expensive sites to their full potential and having a second bite at the cherry by selling affordable homes on free former council land. The upside for the council is that it could increase the number of houses that are built, and have at least some built in the areas that Pendle wishes to redevelop.</p> <p>If this approach was explored and negotiated during the early years of the strategy it could provide a springboard for the deprived areas. Future development could be further enhanced by allocating defined numbers of houses for each of the three boroughs and the village (Barrowford) that make up the M65 Corridor. These figures should not be arbitrary but enforceable by moratorium once the maximum figure is reached for each town or village for the life of the plan. These measures would help stop some of the cherry picking of sites and give the developers a reason to want the urban renewal of both Nelson and Brierfield to succeed.</p>			
Suggested Change				
Comment	<div>Supporting documents provided.</div>			
Summary	<p>Barrowford Parish Council would like to see the wards of Bradley and Whitefield be developed for housing or employment. Developers should be forced to begin the regeneration process. Once houses are built an occupied, property values will increase and further development would continue the process.</p> <p>The Council could negotiate with developers to build and market affordable homes on council owned demolition sites instead of compelling developers to build affordable homes on site with high land on-costs. The developers could exploit expensive sites to their full potential and also sell the affordable housing on free former council land.</p> <p>This approach could provide a spring board for the deprived areas.</p> <p>The plan should allocate defined housing number to each settlement and make them enforceable one the maximum figure for each settlement is reached for the lifetime of the plan. This would stop developers cherry picking sites.</p>			



# Chapter 10: Living: Creating a Vibrant Housing Market

868022 / 161 / CHP10 / 0 / 0 / 0

Dr and Mrs      John and Alison      Plackett

Duty to Co-operate

Legal Compliance

Soundness	<div><p>Gib Hill (Site 385 in SHLAA):</p><p>This site, which lies on the Colne/Nelson boundary, has long been contentious. It is owned by PBC who wish to use it for the building over 100 houses. However, the site contains a deciduous wood planted to celebrate the millennium, a hedgerow of importance and a number of fields with a mix of MG3 and MG4 grassland types, part of which form a Biological Heritage Site *BHS) and a proposed site of Local Natural Importance (LNI). This proposed LNI site has matched the required criteria but has not yet been adopted as an LNI site. In 2010 the site was recommended by Lancashire County Council ecologists as fields for restoration and incorporated into the BHS management plan. (BHS is a designation for sites important for their biodiversity at a county level and LNI applies at a local level).</p><p>This site should not be built on. It should be removed from the proposed settlement area because:</p><p>1) It has considerable biodiversity interest. 2) In paragraph 8.15 of the Core Strategy states that “increasing and improving woodland and tree cover is a key objective for the borough”; so destroying the woodland by building defeats one of PBC’s key objectives. 3) The whole site is a suitable site for restoration and recreation of its priority grassland habitat. NPPF paragraph 117. Alternatively it could form part of a mosaic with additional priority habitat nearby. 4) It matches all the criteria, NPPF paragraph 77, for designation as Local Green Space. 5) Request it is removed from the SHLAA list.</p></div>
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Suggested Change

Comment

Summary	<div><p>The site at Gib Hill on the boundary between Nelson and Colne has considerable biodiversity value and woodland cover and should not be built on. The site should be removed from the Strategic Housing Land Availability Assessment and considered for designation as a Local Green Space.</p></div>
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Chapter 10: Living: Creating a Vibrant Housing Market

868089 / 171 / CHP10 / 0 / 0 / 0	Ms	Susan	Fletcher
Duty to Co-operate			
Legal Compliance			
Soundness	<div>I object most strongly to building on green belt land to the rear of St. Thomas’ School, Barrowford.</div> <div>I live on Lupton Drive which is supposed to be 20 mph. Drivers going to and from Roughlee cuts through the housing estate – this includes large cranes to lift canal boats, large trailers carrying canal boats and large trailers carrying static caravans because the bottom of Pasture Lane is not suitable for such large vehicles. It will only be a matter of time before Lupton Drive’s sewer/road collapses again.</div> <div>Accessing Church Street from Lupton Drive can be quite challenging, especially at school times and working hours when folk are using it to avoid heavy traffic on Gisburn Road. Because Church Street narrows near to the entrance of Lupton Drive I often witness cars, travelling faster than 30 mph, coming to a screeching halt to allow cars coming up Church Street. Further down Church Street the road opens out but because cars are parked on either side it is a nightmare to access – double yellow lines are desperately needed on one side.</div> <div>Drivers use Barrowford to avoid heavy traffic on North Valley and it is not going to get any better once Booths opens in December. Surely, Barrowford has had more than its fair share of developments over the years and continues to do so with the Booths and Morrison’s stores, two small housing developments in the New Bridge area and the large proposed Trough Laithe development.</div> <div>Pendle has many brown field sites which are surrounded by older properties; surely building on them would enhance these areas for existing residents and stop the land being used for fly-tipping etc.</div> <div>Allowing every amenity and more housing in Barrowford is not doing Nelson any favours. PLEASE listen to residents that have to negotiate Barrowford on a daily basis.</div>		
Suggested Change			
Comment			
Summary	<div>Opposes building on Green Belt (sic) land to the rear of St. Thomas's School, Wheatley Lane Road, Barrowford.</div> <div>The development of Brownfield sites within Nelson should be prioritised in order to help stimulate regeneration.</div>		

# Chapter 10: Living: Creating a Vibrant Housing Market

868098 / 172 / CHP10 / 0 / 0 / 0

Mr and Mrs Christopher and Ann Webster

Duty to Co-operate

Legal Compliance

Soundness

Badgers
Currently Barrowford is overloaded with traffic and Wheatley Lane Road is being used as a “rat run” for commuters attempting to avoid congestion in the Village. Once these new “roadworks are complete” in the Village the new road layout going to snarl traffic up to an even greater extent than before the Booths Works commenced. What we needed was the traffic freeing up to ease the flow and not cause CONGESTION.
The entry/exit road to the estate behind St Thomas’s School will be at the most dangerous point of Wheatley Lane Road, on the bend at the bottom of the incline where there have been many accidents over the past years. (This is especially true in either winter conditions or when it is wet.) This is now compounded with the exit from the new flats just on the bend of Wheatley Lane Road. Also the proposed exit will be virtually opposite Ridgeway so giving rise to further traffic problems.
The area cannot cope with a further 197 dwellings and potentially double that number of vehicles.
Church Street is already congested with parked cars, mainly because the two excellent car parks that we had, have been built on or taken over by retail companies.
Church Street is narrow and at peak times becomes easily blocked so with further families wishing to get to work/home the problem is likely to become worse. The exit from the top of the proposed site would be via Appleby Drive and Lupton Drive which again is a feeder route to Church Street. These routes are not suitable for further traffic and especially pedestrians walking along Church Street.
In the locality we have Bats roosting in the trees and Owls which are protected species
We also have other wildlife in the form of Deer wandering in the local fields, this is their habitat and they should not be deprived of it.
There are other small animals frequenting the wet meadows in the form of Frogs, Toads, Newts which should not be disturbed.

Suggested Change

Comment

Summary

Large Brownfield sites (i.e. the former sites of Reedyford and Riverside Mills in Nelson, but close to M65 Junction 13) should be developed ahead of Greenfield sites.
Further housing development in Barrowford will lead to overcrowding in schools and hospitals, together with further congestion on an already overloaded road network.
The site behind St Thomas's School on Wheatley Lane in Barrowford is a haven for wildlife, including protected species (bats and owls) and should not be developed.

# Chapter 10: Living: Creating a Vibrant Housing Market

868098 / 173 / CHP10 / 0 / 0 / 0

Mr and Mrs Christopher and Ann Webster

Duty to Co-operate

Legal Compliance

Soundness

OBJECTIONS

There are brownfield sites in the locality namely where Findels Store was and also the site off Reedyford Road. These are two very large areas which could be developed before any consideration is given to the green belt behind St Thomas’s school.

The area cannot cope with a further 197 dwellings and potentially double that number of vehicles.

Currently Barrowford is overloaded with traffic and Wheatley Lane Road is being used as a short cut by commuters attempting to avoid congestion in the Village. Once these new “roadwork’s are complete” in the Village this is going to snarl traffic up to an even greater extent. With this projected number of dwellings there will be families with children. Walkways on Church Street are very narrow and are not suitable for young children, it can be visualise there being accidents due to parked vehicles and inconsiderate drivers. Currently the schools are overloaded – where are the children going to attend. This of course will cause even more congestion in the morning and evening especially with Lancashire County Council deliberately having altered the road structure in the village. It was not good previously but now it is going to be even worse!

The entry/exit road to the estate will be at the most dangerous point of Wheatley Lane Road, on the bend at the bottom of the incline where there have been many accidents over the past years. This is now compounded with the exit from the new flats just on the bend of Wheatley Lane Road also the exit will be virtually opposite Ridgeway.

If an alternative entry/exit to the estate is considered onto Appleby Drive I would believe that the road system at this end is totally inadequate to take any more traffic loading.

Church Street is already congested with parked cars, mainly because the two excellent car parks that Barrowford had have been built on or taken over by retail companies. If a new estate is established where are the inhabitants going to shop, people these days do not walk they expect to drive. The shop keepers of Barrowford expect their custom. In this case where is the parking? Has any consideration been given to this aspect?

Due to the forgoing local traders are suffering due to the short stay kerbside car parking – shoppers are having insufficient time to shop also the charges are exorbitant. The shorter the time, the higher the charge the more store keepers are being driven out of business!

Church Street has blind exit/entrances onto the carriageway and there is likely to be more accidents in the area if a new estate uses Church Street as a route to Gisburn Road.

In the locality we have Bats roosting in the trees, these are a protected species and as such priority should be given their preservation. (It should be noted that if officers are seeking to observe them they must come up in the evening or at night)

In the locality we have Owls in the trees, we should not be disturbing the local wildlife. There are also frogs, toads, newts, hedge hogs and other forms of wildlife living in the fields and small rivers.

There is other wildlife in the form of Deer wandering in the local fields, this is their habitat and they should not be deprived of it.

It is anticipated that we will need more access to Doctors Surgeries and Hospital Beds. At the moment we are a good half an hour from the nearest Hospital – if it has a vacant bed. How is this going to be catered for?

Suggested Change

Comment

INTRODUCTION

I note that the 30th edition of Framework was published on the internet on the 10th October but a leaflet version giving details was not delivered until 19th November – literally at the 11th hour! I also note that the Council have been discussing this topic for some time and it was at a full Council meeting on Thursday 25th September 2014, councillors agreed to submit their core strategy. Where was the Rate Paying Publics contribution to this most serious topic and the distribution of information to each household so that we the residents of Pendle could make our contribution.

Barrowford currently has houses for sale and new houses being constructed within the confines of the village. We have further land that could be utilised for new housing within the confines of the village without the necessity of straying onto Greenfield sites. A prime example of unnecessary building was “ Booths ” – this was not needed and neither was “ Morrison’s” . The land there could have been more sensibly used for housing. Road alterations would not have been required at some great expense and I can imagine that once fully opened will be to the frustration of the driving public. Also the local shop keepers at the bottom of Halstead Lane will be deprived of their living due to the lack of parking, which they have been during this construction process, and no doubt Booths will control the car park on Halstead Lane which previously was free for all to use!

# Chapter 10: Living: Creating a Vibrant Housing Market

Summary	<p>The development of large Brownfield sites (i.e. the former sites of Reedyford and Riverside Mills close to M65 Junction 13) should be developed ahead of Greenfield sites.</p> <p>Further housing development in Barrowford will lead to overcrowding in schools and hospitals, together with further congestion on an already overloaded road network.</p> <p>The site behind St Thomas's School on Wheatley Lane in Barrowford is a haven for wildlife, including protected species (bats and owls) and should not be developed.</p>
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# Chapter 10: Living: Creating a Vibrant Housing Market

817934 / 178 / CHP10 / DTC / LC / S1, S2, S3, S4

Mr

Paul

Henderson

Duty to Co-operate

The process of maintaining communication flow has been ad hoc; advertisement of the process has been narrow with majority of respondents being informed by opposing party propaganda material; as a result full and proper representations during both consultation periods have been missed by would be respondents; responses to representations by opposing respondents have been played down whereas responses to developer representations were written in a positive and in favour of developers issues. My personal representation was edited for the first pass consultation by removing photographic evidence relating to my response. Therefore I do not trust the unbiased and balanced requirements of the whole consultation process.

The reasons provided to address the justification of the strategic development land at Trough Laithe are extremely loose. There is no scientific approach to address demand analysis and housing types. Peel holdings have a preference for executive housing and have informed the council as such. The council have therefore inputted this into their housing projections. This is clearly an unsound methodology for development appraisal and for developments in Pendle going forwards. From social media communication with Andrew Stephenson MP and following a meeting with Councillor Joseph Cooney (21.11.14), it is clear that the Council is being backed into a corner by the developer and are willing to be led by the developer of Trough Laithe in order to achieve quick wins to address housing delivery.

Legal Compliance

The process of maintaining communication flow has been ad hoc; advertisement of the process has been narrow with majority of respondents being informed by opposing party propaganda material; as a result full and proper representations during both consultation periods have been missed by would be respondents; responses to representations by opposing respondents have been played down whereas responses to developer representations were written in a positive and in favour of developers issues. My personal representation was edited for the first pass consultation by removing photographic evidence relating to my response. Therefore I do not trust the unbiased and balanced requirements of the whole consultation process.

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Soundness

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Suggested Change

The Greenfield sites as suggested at Trough Laithe for Housing need to be critically reviewed for their scientific soundness and ultimate inclusion into the adopted plan. The current plan does not provide this comfort with the suggestion that it is only being considered as a quick win due to the readiness to deliver from a large and influential developer.

The Council needs to show that they are in control of the destiny of Pendle, not developers!

Comment

Summary

The Core Strategy is considered unsound because:

- The public consultation process has been flawed
- Developer responses have been given greater regard than those of the public
- The development appraisal and justification for allocating the strategic development site at Trough Laithe Farm is not robust

# Chapter 10: Living: Creating a Vibrant Housing Market

478805 / 193 / CHP10 / 0 / 0 / 0

Ms Sheila Smith

Duty to Co-operate

Legal Compliance

Soundness

Housing
<p>The council is of the opinion that most people want to live in a new house with a garden. This is untrue. The market may currently favour this type of housing, but the majority of people who actually live in terraced housing are happy with their homes: according to the Core strategy pre-submission report, 82.8% of the people in Pendle are satisfied with their homes. Of the people who were dissatisfied, most were in rented accommodation. This is obviously due to the poor standards of the landlords, rather than the type of housing they live in.</p>
<p>Pendle was second in the national table for empty and boarded up homes in 2013. According to council officers, it is not cost-effective to renovate empty homes and they would rather wait until one of them blights the entire street. They would then pull the entire street down and replace it with new housing with gardens. I believe this policy to be extremely wasteful. If just one house were to be renovated at an early stage, then it could save an entire street, or even an entire area from destruction. This would be far more cost effective than demolishing and replacing homes, and would preserve communities. It is said that the people who return to renovated homes neglect them and the neighbourhood soon becomes derelict again. This, if it were true, would not be due to the type of housing, but to poverty.</p>
<p>Pendle needs accessible housing. Old terraced housing is cheap and can be very attractive. It is mainly stone-built, and was built to last. If well-insulated, terraced properties can be economical to heat. In other areas of the country, such homes are extremely desirable. More should be made of their qualities: the council should be promoting terraced housing, instead of denigrating it.</p>
<p>Terraced housing is of much greater density than modern housing estates. Pendle’s terraced housing is about 80 per hectare, compared with less than 30 on a modern estate. The replacement of terraced housing by new estates would therefore cause a huge demand for land. This is unacceptable. It is correct that terraced housing lacks open space, but only small amounts of land are required in order to achieve this. Of particular importance are play areas which are overlooked by housing, where parents and children can congregate and feel that they are safe. An area such as this can transform a neighbourhood and make it instantly more attractive to home buyers.</p>

Suggested Change

Comment

Summary

<p>The replacement of terraced properties with new housing estates built at much lower densities results in a huge demand for (Greenfield) land, which is unacceptable when 82.8% of residents are satisfied with their existing homes.</p>
<p>The refurbishment of terraced properties is more cost-effective than a programme of demolition and replacement. Whilst terraced housing lacks open space, only small amounts of land are required in order to create attractive (green) spaces where parents and children can congregate and feel that they are safe, helping to transform a neighbourhood and make it more attractive to home buyers.</p>



Policy LIV1: Housing Provision and Delivery

866837 / 21 / LIV1 / 0 / 0 / 0	Mr	G R	Bolton
Duty to Co-operate			
Legal Compliance			
Soundness	One final point, Why do we need more new houses when there are hundreds of houses standing empty in Pendle. When all of them have been occupied then you can build some more.		
Suggested Change			
Comment			
Summary	There a hundreds of empty homes in Pendle so why do we need to build more.		

817556 / 30 / LIV1 / - / - / -	David Lock Associates	Ms	Kate	Skingley	Rolls Royce plc
Duty to Co-operate					
Legal Compliance					
Soundness					
Suggested Change					
Comment	Housing: Rolls-Royce support the proposed increase in housing to be provided over the Plan Period from the previous figure of 4,350 to 5,662, which represents an annual figure of 298. This will support economic growth in Pendle as endorsed by the NPPF at paragraph 17, and reflects the economic and employment ambitions for the Council. This is therefore supported by Rolls-Royce and underpins the Soundness of the Plan. Rolls-Royce however, encourage a mix of housing type and tenure to be provided, and assurance that sufficient housing will be provided in the right locations, to support existing employment locations, such as the West Craven Town.				
Summary	Support for Policy LIV1. However, the plan should encourage the provision of a mix of housing types and tenures, and ensure that sufficient housing will be provided in the right locations, to support existing employment locations, such as the West Craven Towns.				

867305 / 50 / LIV1 / 0 / 0 / 0	Persimmon Homes Lancashire	Mr	Chris	Gowlett
Duty to Co-operate				
Legal Compliance				
Soundness	The housing requirement is proposed under policy LIV1. The plan period put forward for this is 2011 to 2030 and the majority of the dwellings required has been loaded to the last part of the plan (between 2021 and 2030). The net number of dwellings calculated using the Strategic Housing Market Assessment (SHMA) (and the 2013 HNS Update) as evidence is 5,662. For accuracy, it is recommended that the start date for the Core Strategy be brought forward to 2014 as a minimum, and the number of dwellings required should be adjusted to take into account net completions between 2011 and 2014. The figure therefore needs adjusting, and the staggered approach should be dropped. A more pro-active approach to development is required in this policy and a Sedgfield structure is recommended as this is a growth-friendly approach which will encourage development and not stifle potential economic prosperity.			
Suggested Change				
Comment				
Summary	The start date for the Core Strategy should be 2014 as a minimum and the number of dwellings required should be adjusted to take into account net completions between 2011 and 2014. The staggered approach should be dropped. A more pro-active approach to development is required. The Sedgfield method should be used which is a growth friendly approach.			

Policy LIV1: Housing Provision and Delivery

755915 / 70 / LIV1 / 0 / 0 / S1, S4 Home Builders Federation Ltd Mr Matthew Good

Duty to Co-operate

Legal Compliance

Soundness

Policy LIV 1: Housing Provision and Delivery
<p>The policy is considered to be unsound as it is not positively prepared and will place a restraint upon economic growth within Pendle. It is also inconsistent with national policy as it will not meet the full need for both market and affordable housing within the area.</p>
Housing Requirement
<p>19. The plan identifies a housing requirement of 5,662 net new dwellings between 2011 and 2030, this equates to a net annual requirement of 298 dwellings per annum (dpa).</p> <p>20. The NPPG is clear that the most recent household projections should be the starting point for assessing housing needs. At the time of writing the 2011 interim household projections are the most recent household projections, however these are likely to be updated shortly. The 2011 interim projections are known to be representative of a period of recession. In such cases the recent case of Gallagher Homes Limited &amp; Lioncourt Homes Limited v Solihull Metropolitan Borough Council [2014] EWHC 1283 (Admin) indicates at paragraph 37;</p> <p>‘....An objective assessment of housing need may result in a different figure from that based on purely demographics if, e.g., the assessor considers that the household projection fails properly to take into account the effects of a major downturn (or upturn) in the economy that will affect future housing needs in an area....’</p> <p>21. Therefore whilst the 2011 interim projections provide a useful context they cannot be considered in isolation. It is, however, notable that the raw 2011 interim household projections indicate a requirement of 293dpa for Pendle. Given that the 2011 interim projections are indicative of a recessionary period the housing requirement should be above this requirement. The current proposed housing requirement is just 5dpa greater than the 2011 interim projections.</p> <p>22. The NPPG further identifies that plan makers should assess employment trends (ID 2a-018-20140306), indeed the NPPF (paragraph 158) indicates that local plans should seek to integrate housing and economic needs taking account of relevant market and economic signals. In this regard the 2013 ‘Housing Needs Study and SHMA’ undertaken by NLP on behalf of both Pendle and Burnley provides a good analysis of various scenarios and the effect they have upon the housing requirement. It is noted that the 2013 NLP report identifies that the housing requirement should be set within the range of 280 to 320 dwellings per annum (dpa) (paragraph 5.9). The Council has subsequently updated this work (2014 Housing Needs Study Update) based upon the 2012 Sub-National Population Projections (SNPP). This updated study suggests a housing requirement of between 192dpa and 416dpa. The proposed 298dpa is identified as being indicative of the Council’s ‘policy on’ approach (scenario I). However the ‘policy on’ approach (scenario I) appears to downplay the economy of Pendle when past take up rates of employment land are considered. The only scenario which takes account of such past economic trends within Pendle is scenario J. This scenario suggests a housing requirement of 416dpa, even allowing for reducing commuting rates a requirement of 323dpa is needed under this scenario.</p> <p>23. It is unclear to the HBF why the Council has discounted past rates of economic growth in favour of a more conservative requirement. The NPPG suggests that assessments of housing need should take account of past trends (ID 2a-018-20140306). The 2014 SHLAA indicates a 5 year deliverable supply of 2,090 dwellings (average 418dpa) and a 15 year supply of 8,261 dwellings (average 550dpa). Therefore there are no supply constraints evident within Pendle which would suggest a reduction below such previous trends.</p> <p>24. The NPPF is very clear that Local Plans need to plan to meet their objectively assessed need for housing (paragraphs 14, 17, 47, 159 and 182). Paragraph 47 of the NPPF further clarifies in terms of housing plans should meet the full, objectively assessed needs for market and affordable (our emphasis) housing in the housing market area. The NPPF (paragraph 159) states that the SHMA should be used to determine ‘the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period’.</p> <p>25. Paragraph 11.8 of the ‘Housing Needs Study and SHMA’ document identifies a net annual need for 672 affordable dwellings over next five years (including addressing current backlog). Paragraph 11.9 further notes that even when this requirement is considered against net household projections this still equates to 236 per annum (approximately 80% of the proposed housing requirement). The viability of sites across Pendle dictates that the percentages of affordable housing supplied from market sites is unlikely to achieve significant volumes. To assist in the delivery of affordable housing the Council should therefore consider increasing its housing requirement, particularly in the more viable locations.</p>
Stepped housing requirement
<p>26. The policy identifies a stepped housing requirement of 220dpa until 2014/15, raising to 250dpa between 15/16 and 19/20 and finally 353dpa between 20/21 and the end of the plan period. This effectively means that Pendle are not planning to meet their own demographic change requirement, based upon the 2011 interim household projections until 2020. It is unclear how this unmet need will be dealt with early in the plan period.</p>

Policy LIV1: Housing Provision and Delivery

27. The HBF does not support a stepped approach to housing delivery and the plan does not provide any justification for such an approach other than to reduce its 5 year housing land supply requirement. Yet as noted previously the SHLAA identifies a five year supply equivalent to 418dpa.

28. Whilst the HBF acknowledges that development levels with Pendle have been low in recent years the plan provides an opportunity to create a ‘step-change’ in development in the area by providing a wide variety of sites which are more attractive to the market. The economy has and will continue to play a role in the delivery of housing and as such the plan must react to this in a positive manner by identifying sites which are viable and able to deliver early in the plan period. The lack of sites or areas of search identified within the Core Strategy hamper the prospects of increasing housing delivery early in the plan period. The current stepped housing requirement will simply slow the economic progress within Pendle ensuring that the economic success envisaged is either not met or postponed until late in the plan period.

Early Review

29. The intention for an early review of the plan if a significant deviation from the trajectory is generally welcomed. However, as currently written it provides no certainty over the trigger for such a review. An early review clause should not be used in an attempt to justify an unsound approach.

Viability statements

30. The policy places a requirement upon applicants to justify the viability of a site including financial appraisals for sites of 10 dwellings or more. This is an unjustified requirement by the Council and simply places a further bureaucratic burden upon the development industry and Council officers which is likely to slow the development process. The Council should only justifiably ask for such information where a developer is seeking to vary Council policy based upon viability grounds.

Suggested Change

Recommendation

31. The HBF recommends a higher housing requirement which more closely accords with past economic trends and provides greater opportunities to meet the need for affordable housing across Pendle. The requirement should be a flat requirement over the whole plan period.

32. The requirement for financial appraisals on all residential developments of 10 units or greater should be deleted.

Comment

Summary

The most recent household projections should be used as the starting point for assessing housing needs. The 2011 projections provide the latest figures but represent a period of recession. The Objectively Assessed Need for housing may differ from a figure based solely on demographics. The proposed housing requirement figure is only 5dpa greater than the household projection figure.

An assessment of employment trends should be carried out and housing and economic needs should be integrated. The SHMA and Housing Needs Study considers a number of scenarios. However, the chosen 'policy on' scenario downplays the Pendle economy. The scenario relating to past employment land take-up rates suggests a much higher figure. It is unclear why the plan has opted for a lower figure. The SHLAA suggests there is both sufficient deliverable and developable land to provide for new housing and therefore no supply constraint.

The NPPF is clear that Local Plans should meet their objectively assessed need for housing - both market and affordable. The SHMA indicates that there is a high affordable need. This coupled with the viability issues of delivering sites across Pendle means that a high housing requirement should be considered in order to ensure that sufficient affordable housing can be delivered.

There is no justification for the stepped approach to housing delivery. The plan offers the opportunity to create a step-change in development in the area by providing a wide variety of sites which are attractive to the market. Viable sites should be identified to ensure delivery early in the plan period. The lack of sites or areas of search in the plan restrict the possibility of increasing housing delivery in the early years. The stepped approach will slow economic progress.

There is no trigger for an early review. An early review clause should not be used to justify an unsound approach.

The requirement for applicants to provide a financial viability statement is unjustified.

The housing requirement should be increased to align with the economic trends and to ensure the delivery of more affordable housing. The housing requirement should be a single, annual rate. The requirement for financial appraisals should be deleted.

Policy LIV1: Housing Provision and Delivery

818046 / 81 / LIV1 / 0 / 0 / S1, S2, S3, S4	Barton Willmore	Mr	Michael	Courcier	Junction Properties Ltd
Duty to Co-operate					
Legal Compliance					
Soundness	<div>Policy LIV1: Housing Provision and Delivery</div> <div>A1.17 JPL objects to the proposed housing requirement, including its staggering for the reasons already given.</div> <div>A1.18 JPL considers that the period covered by the policy should be extended to at least 2032. This would take into account that an allocations dpd will need to be prepared following the adoption of the core strategy to achieve the comprehensive local plan coverage required by the NPPF. The Core Strategy is unlikely to be adopted before 2016 at the earliest (taking into account the likely need for main modifications). On this basis, the allocations dpd is unlikely to be adopted until 2018 and should provide a land supply for a reasonable period after adoption.</div> <div>A1.19 JPL considers that the housing requirement should be expressed as a minimum by the inclusion of the words “at least”. This would bring it into accordance with similar policies in other core strategies in the North West Region. It is accepted that the policy would allow additional dwellings to be provided “where evidence of further need or demand is identified.” However there may be reasons other than need and demand why it may be desirable in the future to exceed the requirement, such as to maximise regeneration potential. The Council has presented no evidence why the Policy LIV1 requirement should be treated as a cap in the way proposed.</div> <div>A1.20 The policy requirement for applicants to produce a financial viability assessment “to help determine the amount of affordable housing to be provided” should be deleted as it is contrary to national policy and is an unduly onerous information burden upon proposers of new housing development. We give further details in our representations on Policy LV4.</div> <div>A1.21 The housing trajectory shown in Figure LIV1a is unrealistic as it exaggerates the likely number of dwellings that the committed supply will produce in the first part of the plan period. We give further details in Appendix 3.</div> <div>A1.22 For these reasons, the policy fails the soundness tests of being positively prepared, justified, effective and consistent with national policy.</div>				
Suggested Change					
Comment					
Summary	<div>The plan period should be extended to 2032 to ensure the Local Plan covers the period required by the NPPF and to ensure that the Allocations DPD provides a land supply for a reasonable period of time following adoption.</div> <div>The housing requirement should be expressed as a minimum and not a cap as proposed.</div> <div>The requirement for applicants to provide a financial viability assessment should be deleted as it is an unnecessary burden.</div> <div>The housing trajectory is unrealistic as it exaggerates the likely number of dwellings that the committed supply will produce in the first part of the plan period.</div>				

# Policy LIV1: Housing Provision and Delivery

817541 / 103 / LIV1 / 0 / 0 / S2, S3, S4	Dickman Associates Ltd	Ms	Jane	Dickman	Green Emmott Trust
Duty to Co-operate					
Legal Compliance					
Soundness	<p>Policy LIV1 - This policy has had a significant rewording compared to its previous version yet still fails to meet NPPF and the test of soundness. The overall and net average number of dwellings have been increased which is welcomed but we question whether they have been sufficiently increased to cater for the proposed economic growth. The 5662 dwellings over the plan period to 2030 should be clearly identified as a minimum in this opening paragraph of the policy. This needs to be made clear in order comply with NPPF.</p> <p>Table LIV1a header does say minimum number of dpa. However the housing trajectory and annual target for dpa over the first 5 years and the second 5 years (years 6-10) are lower than in the later years of the plan. Pendle has had a housing undersupply and the 20% extra in para 47 of NPPF applies so the earlier years (0-5) should be recouping that shortfall not the later years. Table LIV1a is therefore the total opposite of what is required by NPPF.</p> <p>It is utterly erroneous to believe by allocating a Strategic Housing site that the under delivery shortfall in housing will be addressed now. This is unsound and not justified . It fails to understand how the house building sector and the housing market works. One big site will not be a ‘quick fix’ for a number of reasons. Whilst the proposed strategic site could give 481 units these will not all come forward in the 0-5 year time frame as they depend on the infrastructure being in place and depending upon the number of access points it may mean only one developer will be building out as we understand it at 50dpa which in itself seems high when only 25-30dpa are being achieved elsewhere in Pennine Lancs. Furthermore the strategic site does not yet have consent and thus at best may start to produce houses in 3-4 years’ time once planning consent and infrastructure are in place. A variety of sites in different locations and offering a range of housing types would better address the shortfall and is more akin to how the house building sector operates.</p> <p>We note and welcome the fact that proposals on other non-allocated sites will be supported where they are sustainable and make a positive contribution to the 5 year HLS. However it is unclear what weight will attach to this against a later sentence in LIV1 that proposals should use land in a sustainable way by following the site selection approach set out in SDP2, about which we have already expressed our objections.</p> <p>If a site has been identified in the SHLAA then it has already met the tests of availability, suitability, achievability and is deliverable will a statement supporting any applications on such sites still be required or does this requirement only apply to sites not identified through the SHLAA? Policy LIV1 is not clear on this point.</p> <p>We also note that a financial viability assessment is required to determine the amount of affordable housing to be provided. This should apply to all sites. We will comment further on affordable matters in response to Policy LIV4. Not consistent with NPPF</p>				
Suggested Change					
Comment					
Summary	<p>Unclear whether the increase in housing is sufficient to cater for the proposed economic growth. The overall housing requirement should be expressed as a minimum in the policy.</p> <p>The housing trajectory and annual target for the first and second 5 year periods are lower than in the later years of the plan. The shortfall should be recouped in the early part of the plan not the later years.</p> <p>The Strategic Housing site will not deliver the shortfall. One big site will not be a quick fix. Not all the units will come forward in the 0-5 year period. Infrastructure will need to be put in place. The build rate of 50dpa is high compared to elsewhere in Pennine Lancashire (25-30dpa). The site does not yet have planning permission and therefore at best will only start to deliver in 3-4 years time. A variety of sites in different locations and offering a range of housing types would better address the shortfall.</p> <p>It is unclear what weight will be given to allowing proposals on non-allocated sites where they are sustainable when the policy also requires proposals to follow the site selection approach outlined in Policy SDP2.</p> <p>It is unclear whether a statement showing availability, suitability and achievability will be required for sites already tested through the SHLAA process.</p> <p>The requirement for a financial viability assessment to determine the amount of affordable housing should apply to all sites.</p>				

Policy LIV1: Housing Provision and Delivery

327580 / 114 / LIV1 / 0 / 0 / 0	Lidgett & Beyond Group	Mr.	Owen G.	Oliver
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	<div>Comment - Housing targets</div> <p>L&amp;B is disappointed that the housing target has only had a minor downward amendment from 5,764 new households to 5,662 (para 10.32) even though the Communities and Local Government Household Projections indicate an increase of only 531 households by 2021 and 4,220 by 2033 (para 3.34). The Pendle target is 34% above those Projections. As the DCLG will soon be issuing new figures on household projections, L&amp;B expects the targets in the Core Strategy to be adjusted, if appropriate, in light of this new information.</p> <p>The 5,662 target is stated as being towards the upper end of the OAN range (para 10.33) and includes the 5% buffer to ensure choice and competition and the 20% uplift for persistent under-delivery required by the NPPF para 47. As referred to in an Article in Planning magazine in June 2012 regarding the issues with Wigan and Hull Councils, despite having done so well in meeting housing targets in earlier years, boroughs like Pendle find themselves classed as “under deliverers” simply because of a stagnant housing market in their areas.</p> <p>It is interesting to note that the under-delivery has not resulted in house prices rocketing, which is the usual consequence of demand exceeding supply – this can only mean that the previous supply targets were too high and the Council is now compounding that by rolling the error into the new target. It is also true to say that having too much supply will mean that house prices are kept down and this will threaten the viability of having new developments on brownfield sites. Whilst L&amp;B is pleased to see that annual housing targets are staggered (Policy LIV1), to take some account of economic/market signals, we note that the Authority’s Monitoring Report (AMR) seems to only subject to review every five years.</p> <p>L&amp;B would expect the AMR to have a high-level review every year, based on available population and household information, to ensure that any material deviation from original forecasts can be reflected promptly in adjustments to housing targets.</p> <p>We note several new Triggers have been introduced into Policies (e.g. SDP3 on page 50 and LIV1 on page 118) and we are pleased that these have been set at what seem to be appropriate levels. We note the Contingencies in place for LIV1, but L&amp;B suggests that “Consider an early review of the plan” should be the first action, in line with our recommendation above on the annual review of the AMR, including revisiting projections and targets so that strategic plans do not make the area a “hostage to development quotas”.</p> <p>On a question of detail, Planning for Housing by Louise Smith (June 2014), Section 2.4 states that for the inclusion of the catch-up of the previous under-delivery, planning legislation permits two methods – the “Sedgefield method”, which has the shortfall caught up in the first five years, and the “Liverpool method”, which spreads any housing shortfall over the whole remaining plan period.</p> <p>L&amp;B would like to know which method has been employed and suggests that, to avoid setting itself an onerous target, the Liverpool method is employed.</p> <p>NPPF para 47 footnote 11 states that “sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans”</p> <p>L&amp;B is pleased to hear that 750 of the 990 houses on sites given planning permission have been included in the calculations of the 5 year supply target. These not yet started or part-completed or moth-balled developments around the Borough may need help or focus in being delivered.</p>			
Summary	<p>The housing requirement in the Core Strategy should be amended to reflect the new household projections once they are released.</p> <p>Questions the application of the 20% as the borough has only under-delivered due to housing market stagnation.</p> <p>The under-delivery has not resulted in higher house prices which would be a consequence of demand exceeding supply. This suggests the previous target was too high and this error is now being rolled forward into the new target.</p> <p>Too much supply will keep house prices down and will threaten the viability of brownfield sites.</p> <p>The AMR should make a high-level review of the housing requirement every year based on available population and household information.</p> <p>The early review of the plan should be listed as the first contingency if monitoring triggers such action to ensure that the area is not "hostage to development quotas".</p> <p>The Liverpool method should be used for dealing with any under-delivery so as not to set an onerous target.</p> <p>The inclusion of sites with planning permission in the five year supply target is supported. Help should be given to moth-balled / incomplete developments.</p>			

Policy LIV1: Housing Provision and Delivery

857197 / 143 / LIV1 / 0 / 0 / 0	Burnley Borough Council	Ms.	Kate	Ingram
Duty to Co-operate				
Legal Compliance				
Soundness	<div>Housing Provision and Delivery</div> <p>Since 2008 and the completion of the first Strategic Housing Market Assessment for the joint Housing Market Area of Burnley and Pendle, there has been an ongoing working relationship on the preparation of housing evidence between the two councils. Most recently this has included the joint commissioning of the Burnley and Pendle Councils Housing Needs Study and SHMA (the SHMA) which was issued to the councils by Nathaniel Lichfield and Partners in December 2013.</p> <p>Since the SHMA was issued in December 2013, further work has been undertaken. In the case of the Housing Needs Study 2012-based Update, this has been prepared separately by Pendle Council for the purposes of supplementing the evidence for your Pre-Submission report. It is noted that the evidence on which your Core Strategy relies also includes an updated version of the SHMA issued and approved by Pendle Borough Council in September 2014.</p> <p>In Burnley, work to date on the new Local Plan for the Borough has been based on the SHMA issued in December 2013. The update to this in September 2014, which takes account of additional economic-based scenarios, has not yet been accepted by Burnley Borough Council. This will be looked at as we consider representations relating to housing need and supply received during our recently closed Issues and Options consultation.</p> <p>With regard to housing supply, we note the current trajectory (2014/15 housing trajectory) and the significant step change in housing delivery required to meet your 5 year supply. Also noted are your triggers that will be monitored with regard to delivery and the contingency of an early Plan review which may be a consequence of under-delivery. As a neighbouring authority, within a joint housing market, we would welcome the opportunity to maintain our ongoing dialogue with regard to housing delivery and the potential impacts on the joint housing market.</p>			
Suggested Change				
Comment	<div>I am writing in response to the letter dated 9th October 2014 from John Halton inviting comments on the Pre-submission Report. As a neighbouring authority, with existing joint working arrangements on a number of planning matters we welcome the opportunity to comment.</div> <div>In line with the Duty to Co-operate, in relation to cross-boundary strategic matters and as a specific consultee, we would make the following comments.</div>			
Summary	<div>There has been an ongoing working relationship on the preparation of a joint housing evidence base since 2008. The 2013 Housing Needs Study and SHMA was jointly commissioned by both councils. It is noted that additional work has been undertaken to support the Pre-submission report, including an updated version of the SHMA. This version has not yet been approved by Burnley Borough Council. It is noted that the 2014/15 housing trajectory will require a significant step change in delivery to meet the five year supply. Also noted are the triggers which may require an early review of the plan as a consequence of under-delivery. Burnley Borough Council would welcome the opportunity to maintain ongoing dialogue regarding housing delivery and the joint housing market.</div>			

327467 / 157 / LIV1 / 0 / 0 / 0	Barrowford Parish Council	Mr	Iain	Lord
Duty to Co-operate				
Legal Compliance				
Soundness	<div>5. Measures including a moratorium need to be applied to towns and villages that have reached their allotted quota of house building, to stop these figures from being ignored and exceeded by both developers and the Borough Council as the local planning authority.</div>			
Suggested Change				
Comment	<div>Supporting documents provided.</div>			
Summary	<div>Measures such as moratoriums should be applied to town and villages that meet their housing requirements in order to stop developers and the council ignoring and exceeding the targets.</div>			



Policy LIV1: Housing Provision and Delivery

Duty to Co-operate

Legal Compliance

Soundness

HOUSING NUMBERS			
We consider that the housing completion numbers that underlie the policies in the Core Strategy are fundamentally flawed. They are not deliverable over the period of the Local Plan and therefore the strategy fails on the criterion of Effectiveness.			
The Council’s Development Viability Study of December 2013 shows quite clearly that this is the case. It states in its Conclusions and recommendations that:			
6.9 It is clear that most...residential development in the parts of the M65 Corridor...is not viable in the current market. [...] this is reflected on the ground with the lack of actual development coming forward.”			
It makes it clear that this is not due to current Council policies, but			
6.10 [...] It is more the case that weak development viability stems from low property values associated with limited demand in Pendle.			
It then goes on, illogically, to support the policies in the Core strategy, without any explanation of how or why the “limited demand” is going to change to any significant extent.			
It is our view that the figure of 5,662 net dwellings (298 per annum) from 2011 to 2030 is hopelessly unrealistic, and the proposal to stagger this figure from 220 to 353 is just whistling in the wind, hoping for something to crop up on the basis of no evidence.			
The actual figures for net dwellings in the last five years are:			
2009/10	+29	-96	net -67
2010/11	+62	0	net 62
2011/12	+122	-61	net 61
2012/13	+69	-39	net 30
2013/14	+90	-27	net 63
TOTAL	+372	223	net 149
The net number for 2011-14 (the first three years of this Local Plan) is 154, an annual rate of 51, which is already 514 dwellings behind schedule, even on the dubious annual phasing proposed.			
It should be noted that many of the completions last year and those expected this year are from the Council-sponsored PEARL developments and not from the private sector, whose performance is even worse than that suggested by these figures. (It should be noted that new applications for planning permission are no indication of a willingness to build out those permissions, as we have seen in recent years; it may be that the applicants’ main interest is in increasing the value of their land).			
The annual figures proposed are therefore hopelessly unrealistic and there is no evidence put forward that granting large numbers of additional planning permissions will make much difference. We therefore suggest that the annual figures of housing completions should be substantially reduced.			
In line with this we suggest that the following sites should be deleted from the Strategic Land Availability Assessment (SHLAA) which provides supporting evidence for the housing numbers in the Core Strategy:			
<div>- Off Skipton Road, Barnoldswick</div> <div>- Behind Raikes Cottage, Barnoldswick</div> <div>- Off Gisburn Road, Barnoldswick (Lane Ends Farm and Foster Road)</div> <div>- At Wapping</div>			

# Policy LIV1: Housing Provision and Delivery

	- At Windermere Avenue/The Rough, Colne - Lidgett Triangle, Colne.
Suggested Change	
Comment	
Summary	<p>The housing requirement numbers, which underlie the policies in the Core Strategy, are unrealistic and fundamentally flawed.</p> <p>The housing requirement figure should be reduced and six sites (listed below) removed from the SHLAA:</p> <ul style="list-style-type: none"><li>• Land off Skipton Road, Barnoldswick</li><li>• Land behind Raikes Cottage, Barnoldswick</li><li>• Land off Gisburn Road (Lane Ends Farm and Foster Road, Barnoldswick</li><li>• Land at Wapping, Barnoldswick</li><li>• Land at Windermere Avenue (The Rough), Colne</li><li>• Land at Lidgett Triangle, Colne</li></ul>

327997 / 177 / LIV1 / 0 / 0 / S3 Vernon & Co Mr Peter Vernon

Duty to Co-operate

Legal Compliance

Soundness	<p>Thank you for the opportunity to make a submission regarding Pendle Councils Core Strategy Pre-Submission Report.</p> <p>Having been through the Submission, I am in broad agreement with many parts of it and the proposed allocations, but feel that the sites that it relies upon to deliver its future housing supply are in locations that are insufficiently viable or available to be able to provide the required supply of housing.</p> <p>This means that there will continue to be an undersupply of housing provision. I would welcome the opportunity to appear at any future Examination of the Core Strategy to evidence this further.</p> <p>The Council needs to bring forwards more land, and earlier in the planning process to achieve its required targets.</p>
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Suggested Change

Comment

Summary	<p>The sites relied upon to deliver its future housing supply (see Strategic Housing Land Availability Assessment) are in locations that are insufficiently viable or available to be able to provide the required supply of housing.</p> <p>More land should be brought forward earlier in the plan period.</p>
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Policy LIV1: Housing Provision and Delivery

868113 / 180 / LIV1 / 0 / LC / S1, S4	Mr	M	Gordon
Duty to Co-operate			
Legal Compliance			
Soundness	<div>I write in response to the consultation on the Pendle Core Strategy</div> <div>I consider the Core Strategy to be unsound and I doubt whether it is consistent with NPPF, or even legally compliant. I apologise that time constraints have precluded a more detailed response but I can draw attention to the following.</div> <div>The process of preparing the plan has been flawed. It has been prepared largely by professionals who have achieved little engagement with the local community. Even those residents who take a very active interest in the future of their community and local planning issues have failed to be engaged. There is a strong consensus amongst those who have now seen the strategy that it is fundamentally unsound.</div> <div>The stated commitment to sustainable development is laudable but preparation of the plan does not seem to be based on any real grasp of the concept. The approach to this key objective has been piecemeal at best.</div> <div>Equally weak is the need assessment for development land. The assumptions made in preparing the figures are incorrect and have led to far too much land being assigned. I estimate the oversupply as two to three times what may be required, much of it on green field sites. This will likely result in unnecessary impact on the attractions of the area, hindering the process of urban regeneration.</div>		
Suggested Change			
Comment			
Summary	<div>Considers the plan to be unsound because:</div> <div>- it has been prepared largely by professionals who have achieved little engagement with the local community.</div> <div>- the plans stated commitment to sustainable development is laudable, but not based on "any real grasp" of the concept.</div> <div>The assumptions made in preparing the figures used to assess the need for development land are incorrect and overestimate the requirement, leading to the need to develop on Greenfield sites.</div>		

Policy LIV1: Housing Provision and Delivery

868120 / 185 / LIV1 / - / - / -	Turley Associates	Mr	Andrew	Bickerdike	Peel Holdings (Land & Property) Ltd
Duty to Co-operate					
Legal Compliance					
Soundness	<div>Strategic Housing Requirement</div> <div>3.8 Peel supports the proposed strategic housing requirement. This has been informed by the Strategic Housing Market Assessment, and updated in light of more up-to-date population forecasts (2012-based Sub-National Population Projections (SNPP)).</div> <div>3.9 The Housing Needs Study 2012-based SNPP Update, which was prepared by Nathaniel Lichfield &amp; Partners (NLP) in September 2014, provides an up-to-date evidence base which justifies the proposed housing requirement for Pendle. The study indicates that the latest population forecasts (2012-based SNPP) are significantly lower than the previous forecasts. This is as a result of a lower birth rate than previously expected, coupled with a stable mortality rate and lower levels of inward migration (Paragraph 2.18, Housing Needs Study 2012-based SNPP Update (Nathaniel Lichfield &amp; Partners, September 2014)). However, the Government’s Planning Practice Guidance makes clear that the latest household projections should “provide the starting point estimate of overall housing need”(Reference ID: 2a-015-20140306) when calculating objectively assessed needs.</div> <div>3.10 NLP has re-run 18 scenarios which provide a range of housing requirements over the period from 2011 to 2030. The scenarios suggest that the strategic housing requirement within Pendle should be between 132 dwellings and 416 dwellings per annum (i.e. 2,508 - 7,904 dwellings between 2011 and 2030). This compared with the range suggested in the SHMA of between 243 – 314 dwellings per annum.</div> <div>3.11 NLP’s clear recommendation is that Pendle adopts a housing requirement which reflects that there is limited evidence of worsening housing market signals in the Burnley and Pendle housing market area. The requirement must also incorporate past under delivery, which equates to 220 dwellings (or 12 dwellings per annum between 2011 and 2030).</div> <div>3.12 Overall, NLP recommend that the housing requirement for Pendle be modified, from the 280 – 320 dwellings per annum range in the 2013 SHMA, to between 250 and 340 dwellings per annum (Paragraph 5.20, Housing Needs Study 2012-based SNPP Update (Nathaniel Lichfield &amp; Partners, September 2014)). This range encompasses the majority of the economic-led projections and allows Pendle to meet its demographically driven housing need in full, with an appropriate uplift to promote economic growth. NLP consider that this range comprises the Full Objectively Assessed Needs for housing in Pendle (Paragraph 5.24, Housing Needs Study 2012-based SNPP Update (Nathaniel Lichfield &amp; Partners, September 2014)).</div> <div>3.13 Pendle’s strategic housing requirement set out in Policy LIV1 makes provision for 5,662 dwellings between 2011 and 2030. This equates to an average of 298 dwellings per annum, and is at the upper end of the range suggested in NLP’s most recent assessment. This reflects that the plan is appropriately ambitious and seeks to facilitate growth rather than aiming to maintain the existing status-quo. This is consistent with a plan that is positively prepared.</div> <div>3.14 The strategic housing requirement is, therefore, considered to be justified. The requirement is also consistent with national policy as it represents the full objectively, assessed need for housing in Pendle throughout the Core Strategy plan period.</div> <div>3.15 Notwithstanding this, and consistent with The Framework requirement for plans to boost significantly the supply of new housing (paragraph 47), the strategic housing requirement of 5,662 dwellings should be expressed as a minimum level of provision rather than a target not to be exceeded. Subject to the suitability and sustainability of potential sites, there is no reason why this figure should not be exceeded.</div>				
Suggested Change	<div>3.16 To achieve soundness Policy LIV1 should therefore be amended to express the housing requirement as the minimum level of provision rather than a target.</div>				
Comment					
Summary	<div>Support for the level of housing provision identified in Policy LIV1 - Housing provision and Delivery, but to be consistent with the NPPF requirement for plans to boost significantly the supply of new housing (paragraph 47), the strategic housing requirement of 5,662 dwellings should be expressed as a minimum level of provision.</div>				

Policy LIV1: Housing Provision and Delivery

868120 / 186 / LIV1 / - / - / S4	Turley Associates	Mr	Andrew	Bickerdike	Peel Holdings (Land & Property) Ltd
Duty to Co-operate					
Legal Compliance					
Soundness	<div>Demonstrating Deliverability</div> <div>3.17 Policy LIV1 sets out a requirement for applicants to provide a deliverability statement confirming the availability, suitability and achievability of their proposal as well as a financial viability assessment.</div> <div>3.18 Peel has previously set out their view that this provision of the policy cannot be justified. Applications for planning permission should be assessed on the overall sustainability of the proposal reflecting the planning system’s core purpose of delivering sustainable development. Availability and achievability are not considered to be aspects of sustainability and so developers should not be required to provide evidence relating to these matters.</div> <div>3.19 Moreover, the reference to ‘deliverable’ in the Framework relates to the requirement for the Local Authority to identify deliverable sites so as to ensure maintenance of a five year supply of housing sites. Whilst the Local Authority may consult with active developers and promoters of sites to gather information on deliverability, this exercise would usually be carried out outside the planning application process.</div> <div>3.20 Including such an onerous requirement could deter developers from submitting applications for housing developments due to reluctance to disclose sensitive financial information unnecessarily. This proposed requirement could, therefore, have an unintended impact on the propensity of developers to progress housing schemes in Pendle, undermining the delivery of the Core Strategy and contrary to the Framework’s requirement to “boost significantly the supply of housing” (Paragraph 47, National Planning Policy Framework).</div> <div>3.21 In summary this provision of Policy LIV1 is not justified, could impact the plan’s effectiveness and is not consistent with national policy</div>				
Suggested Change	<div>3.22 To achieve soundness this requirement should be removed from the policy.</div>				
Comment					
Summary	<div>Oppose the requirement in Policy LIV1 for applicants to provide a deliverability statement confirming the availability, suitability and achievability of their proposal, as well as a financial viability assessment.</div> <div>The core purpose of planning is to deliver sustainable development and neither availability, nor achievability, are considered to be aspects of sustainability. Whilst the local planning authority may wish to gather information on deliverability, to help to inform the five-year supply of housing sites, this would normally be undertaken outside the planning application process.</div>				

Policy LIV1: Housing Provision and Delivery

857212 / 212 / LIV1 / - / - / S2	Lancaster City Council	Mr.	Maurice	Brophy
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	<p>Lancaster City Council recognises that Pendle Council’s chosen housing requirement of 298 dwellings per annum (dpa) falls within the range of 250-340 as recommended in the Burnley and Pendle Strategic Housing Market Assessment (2013) (SHMA). The chosen housing figure aligns with the economic scenarios of the SHMA and its joint production with Burnley Council helps to satisfying the duty to cooperate; both of these factors accord with the National Planning Policy Framework.</p> <p>Pendle Council’s Strategic Housing Land Availability Assessment Update Report 2013/14 identifies a five year land supply plus a 20% buffer and has been tested against their Development Viability Study (2013). The supply of homes over the next 15 years is 8,261 dwellings, with 2,090 dwellings deliverable in the next 5 years (2014/15 – 2018/2019). This would deliver 302 more dwellings than the minimum requirement.</p> <p>Policy LIV1 goes on to formally set Pendle Council’s objectively assessed need (OAN) of 298 dpa and outlines the following staggered approach to housing delivery while the economy improves:</p> <ul style="list-style-type: none"><li>2011/12 – 2014/15 =&gt; 220 dpa</li><li>2015/16 – 2019/20 =&gt; 250 dpa</li><li>2020-21 – 2029/30 =&gt; 353 dpa</li></ul> <p>This staggered approach would deliver 1,220 dwellings over the next 5 years compared to the 2,090 dwellings that have been viability tested in the SHLAA. This policy seems somewhat disconnected from the evidence base. The justification is that the housing market is still recovering and completions are still below the OAN of 298 dpa, this suggest that either the evidence is not as firm as paragraph 10.23 suggests or that the justification for this approach needs to be strengthened.</p>			
Summary	<p>The staggered approach to housing delivery, proposed in Policy LIV1 - Housing Provision and Delivery, will deliver 1,220 dwellings over the next 5 years compared to the 2,090 dwellings that have been viability tested in the Strategic Housing Land Availability Assessment (SHLAA). This either highlights a disconnect with the evidence base (paragraph 10.23), or requires the justification to be strengthened.</p>			

Policy LIV1: Housing Provision and Delivery

818030 / 214 / LIV1 / 0 / LC / S1, S3	PWA Planning	Mr	Paul	Walton	Mr Marcus Kinsman
Duty to Co-operate					
Legal Compliance					
Soundness	<div>SUBMISSIONS IN RESPECT OF POLICY LIV1</div> <div>PWA Planning are retained on behalf of the owners of land north of Wheatley Lane Road, Barrowford to make representations to the Pendle Core Strategy Pre Submission Report. The following responses follow the format set out in the pro-forma representation document.</div> <div>What are your concerns about this section of the document?</div> <div>The minimum housing requirements are set below the lower end of the range advised in the NLP SHMA report which evidences the Core Strategy. It is considered that the annual requirement should be increased to a minimum of 340 dwellings per annum, representing a total requirement over the plan period of 4,800 dwellings; this represents the upper figure in the range given in the SHMA. Only by maintaining requirements at the upper end of the range will the authority achieve the NPPF requirement to boost significantly the supply of housing. Use of a lower figure will not achieve the housing provision required to support economic and general growth throughout the plan period</div>				
Suggested Change	<div>The housing requirement across the plan period should be increased to 4,800 dwellings, with a minimum annual housing provision of 340 dwellings.</div> <div>Policy LIV1 should be amended to state :-</div> <div>“A minimum of 6,460 (net) dwellings will be provided in Pendle between 2011 and 2030, equating to 340 dwellings per annum.</div>				
Comment					
Summary	<div>The minimum housing requirement (i.e. the annual housing requirement) is set below the lower end of the range advised in the Burnley and Pendle SHMA (i.e. in the first five years of the plan period the figure is set at 220 dpa).</div> <div>Policy LIV1 - Housing Provision and Delivery should be amended to maintain a requirement at the upper end of the range for the Objectively Assessed Need (OAN), across the plan period, to significantly boost the supply of housing.</div> <div>It is considered that the annual requirement should be increased to a minimum of 340 dpa, equating to a total requirement for 4,800 new dwellings between 2011 and 2030.</div>				



Policy LIV2: Strategic Housing Site: Trough Laithe

817934 / 22 / LIV2 / 0 / 0 / 0

Mr Paul Henderson

- Duty to Co-operate
- Legal Compliance
- Soundness
- Suggested Change

Comment	I've taken the time to review documents available on line and understand the issues presented to the Council in terms of delivery of housing. I appreciate that something needs to be done. Even though I'm a resident directly adjacent to Trough Laithe, I still believe that this is very much developer lead and the Council has unfortunately been taken along with the pressure applied by central government. That said, if Trough Laithe does ultimately continue as the chosen land for housing, please could we seek some assurances that the Council would be looking out for incumbent residents in terms of design, site master planning, scale and privacy. For instance, the retirement development at Gibfield Road in Colne is right up to the rear gardens of Clare Avenue. This for the residents of Wheatley Lane Road would clearly be unacceptable I'm not sure what the answer is, but I think we would be needing representation from within the Council to look after our interests and so that issue doesn't degenerate into an emotionally charged argument.
Summary	The allocation of the Strategic Housing Site is developer led and the Council has been taken along due to the pressure from central government to deliver more housing. If development at the Strategic Site goes ahead residents should be involved with the design and master planning of the site especially in terms of scale and privacy.

866861 / 26 / LIV2 / 0 / - / 0

Mrs Christine Clinch

- Duty to Co-operate
- Legal Compliance
- Soundness
- Suggested Change

Comment	I am concerned about the large number of houses on the Trough Laithe site in Barrowford. Local schools do not have the capacity to provide for the number of children that these houses will introduce. Even if all traffic is taken onto the bypass, the Barrowford roundabout near the college is already clogged up at 8-9am. The alternative route will be to go up Carr Hall Road and add to the "rat run" on Wheatley Lane Road and chaos on Church Street.
Summary	The number of houses proposed for the Strategic Housing Site will cause a capacity issue at local schools and cause further traffic problems.

Policy LIV2: Strategic Housing Site: Trough Laithe

818207 / 44 / LIV2 / 0 / 0 / 0	United Utilities Property Services	Ms	Jenny	Hope
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	Policy LIV 2: Strategic Housing Site: Trough Laithe: United Utilities supports the inclusion of the additional criterion within Policy LIV 2, requiring that, prior to the development of strategic housing site at Barrowford, "early engagement between the applicant and infrastructure providers is carried out to address any capacity issues and ensure the relevant infrastructure (e.g. utilities, open space etc) is provided" . We would like to emphasise that it is difficult for United Utilities to fully understand the potential impact of this strategic housing site on our infrastructure until we have more details on connection points, the nature of the development, the timing for the delivery of the development and also the approach to surface water management and drainage. Given the size of this site, it may be necessary to co-ordinate infrastructure improvements with the delivery of the development once more details become available. In addition, it may be necessary to ensure that the delivery of development is guided by strategies for infrastructure which ensure coordination between phases of development over lengthy time periods and by numerous developers. On both of the strategic sites, we would be interested to better understand whether there is fragmented ownership. If ownership is fragmented, we would strongly recommend that the council establishes, prior to publication, how the landowners intend to work together to ensure the coordinated delivery of infrastructure in the most sustainable fashion. We believe coordinated delivery of infrastructure on strategic sites can only be secured on sites in fragmented ownership where there is a clear legal agreement between land owners. This legal agreement will ensure the coordinated site-wide delivery of infrastructure in the most appropriate way alongside an associated site-wide mechanism for drawing down land value proportionately between landowners on all development parcels, whilst also making proportionate contributions to key infrastructure as the delivery of the site takes place.			
Summary	Support for additional criteria in Policy LIV2 relating to early engagement between the applicant and infrastructure provider to ensure the relevant infrastructure and capacity is available. However, there is a need for infrastructure providers to have a better understanding of the following aspects of the development of the strategic site to gain a full appreciation of the impact: details of connection points, timing of delivery, surface water management and drainage, site ownership.			

Policy LIV2: Strategic Housing Site: Trough Laithe

818046 / 82 / LIV2 / 0 / 0 / S1, S2, S3, S4	Barton Willmore	Mr	Michael	Courcier	Junction Properties Ltd
Duty to Co-operate					
Legal Compliance					
Soundness	<div>Policy LIV2: Trough Laithe Strategic Housing Site</div> <div>A1.23 JPL considers that the Council has not properly justified the identification of the Trough Laithe Site as the only housing allocation of the Core Strategy.</div> <div>A1.24 The evidence to support the decision to proceed with a single strategic housing allocation at Trough Laithe is set out in the Council evidence base document ‘The Strategic Housing Land Allocation.’ This document is totally flawed as it relies almost entirely for its rationale for a single strategic site on national policy (PPS12) and advice from the Planning Advisory Service that has now been withdrawn. In this regard, national policy and guidance no longer refers to the identification of strategic sites in these terms. Moreover the document does not seek to address the central question of why only a single site allocation has been proposed when it is insufficient by itself to provide a five year supply of national policy which is a key soundness test.</div> <div>A1.25 The identification of a ‘strategic site allocation’ at Trough Laithe Farm is not in accordance with the spatial strategy set out in Policy SDP2. Barrowford is only a second-tier settlement in the settlement hierarchy established by that policy.</div> <div>A1.26 The Policy LIV2 explanation (paragraph 10.55) says that:-  “Through the SHLAA review process a number of additional sites, that were not previously considered, have been assessed to determine their sustainability, availability and achievability. The findings of the SHLAA show that there is only one site of a size which could be put forward as a potential strategic allocation..... This is the site at Trough Laithe Farm”.</div> <div>A1.27 However, there is no minimum size set by national policy for proposed allocations by core strategies. In this regard, sites of greatly differing sizes have been identified by core strategies as allocations and found to be acceptable by Inspectors. A recent example is the Knowsley Core Strategy where the Inspector has agreed that a wide range of site sizes should be allocated to make up a five year supply at adoption.</div> <div>A1.28 To ensure that there is a five year supply of deliverable sites on adoption of the Core Strategy, JPL considers that the Core Strategy should identify more sites that can come forward immediately after the plan is adopted. These sites should be identified in accordance with the spatial strategy identified in Policy SDP2. Particular priority should be given to the identification of sites in and around the Key Service Centres of Nelson, Colne and Barnoldswick as these are the most sustainable locations for new development in the Borough.</div> <div>A1.29 One example is the land to the north east of Colne between the existing urban edge and the Green Belt boundary. The land is already identified by the SHLAA as suitable for housing development. It can be delivered immediately as it is in the control of a house builder; its development now is viable; it can contribute a significant number of dwellings over the next 5 years; and there are no environmental or other constraints that would prevent development. Its location adjoining Colne would help achieve the settlement strategy set out in Policy SDP2.</div> <div>A1.30 For the above reasons, the policy fails the soundness tests of being positively prepared, justified, effective and consistent with national policy.</div>				
Suggested Change					
Comment					
Summary	<div>The evidence used to justify the inclusion of the Strategic Housing site is flawed. It is based on guidance which has now been withdrawn. It is unclear why only one site has been selected when this alone cannot provide a five year supply of housing land.</div> <div>The site at Trough Laithe is not in accordance with the spatial strategy set out in Policy SDP2. Barrowford is a second-tier settlement.</div> <div>There is no minimum size set by national policy for allocations in Core Strategies. A range of sizes has been accepted.</div> <div>The Core Strategy should identify sites that can come forward immediately to ensure that there is a five year supply on adoption. The identification of these sites should be in line with Policy SDP2.</div> <div>Land to the north east of Colne between the urban edge and the Green Belt should be included. It can be delivered immediately, contribute to the five year supply, has no environment or other constraints which would prevent development.</div>				

Policy LIV2: Strategic Housing Site: Trough Laithe

817541 / 104 / LIV2 / 0 / 0 / 0	Dickman Associates Ltd	Ms	Jane	Dickman	Green Emmott Trust
Duty to Co-operate					
Legal Compliance					
Soundness	Policy LIV2 – As the strategic site for nearly 500 new dwellings and greenfield the figure of 20% affordable seems low when compared to greenfield strategic sites elsewhere in Pennine Lancashire where 30% affordable has been agreed. The Strategic site should be able to accommodate more affordable given its location in the area north of the M65 Corridor which is one of the affluent areas of Pendle and has the greatest viability according to the Pendle Strategic Housing Land Allocation document (Sept 2014).				
Suggested Change					
Comment					
Summary	The 20% affordable housing figure for the strategic site is low compared to other Strategic Sites in Pennine Lancashire where 30% has been agreed. A higher affordable housing target should be included given the location of the strategic site in the northern part of the M65 Corridor where viability is better.				

731431 / 137 / LIV2 / 0 / 0 / S4	English Heritage	Ms	Emily	Hrycan
Duty to Co-operate				
Legal Compliance				
Soundness	<div><p>The site is adjacent to the Laund Farmhouse and Cottage (Grade II listed) and also includes some land within the Carr Hall and Wheatley Lane Conservation Area.</p><p>The NPPF considers that any substantial harm to the significance or loss of a Grade II listed heritage asset (including setting) should be exceptional. The Council has a statutory duty under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its conservation areas.</p><p>Therefore, before allocating the site there will need to be some evaluation of the impact the development of the site might have upon those elements that contribute to the significance of the heritage assets including their setting. This assessment should be included as part of a heritage impact assessment undertaken for all sites prior to the next stage of the Plan to inform their suitability as an allocation, to provide evidence of the impact on the historic environment and put forward mitigation measures to minimise harm. Without this assessment, the Plan cannot demonstrate that the principle of development and the quantum (numbers) can be achieved on the site without harm to the historic environment.</p></div>			
Suggested Change				
Comment				
Summary	<div><p>As the strategic site is adjacent to a Grade II listed building (Laund Farmhouse and Cottage) and also partly within the Carr Hall and Wheatley Lane conservation area an evaluation of the impact the development of the site may have on those elements that contribute to the significance of these assets and their settings needs to be carried out.</p><p>Heritage impact assessments will need to be carried out for all sites to inform of their suitability for allocation in order to provide evidence of the impact to the historic environment and to help identify mitigation measures to minimise harm.</p><p>Without such an assessment the plan cannot demonstrate that the site can be delivered without harm to the historic environment.</p></div>			

Policy LIV2: Strategic Housing Site: Trough Laithe

867961 / 142 / LIV2 / 0 / 0 / 0

Ms Samantha Ward

Duty to Co-operate

Legal Compliance

Soundness

My initial comments concern the distinct lack of public awareness that such a document has been produced! Surely, for a public consultation to be in any way effective Pendle Council has some sort of duty to inform its residents and to invite participation. Why was I not informed? We get a leaflet drop about a change in bin collection - are you saying that one could not have been arranged fro something of such importance?

I only became aware of the Core Strategy consultation via a chance social media post by a friend over the weekend. One cannot help but feel the Pendle wish to let this one slip in unnoticed so as not to attract too much public objection.

In regards the strategy - which I feel is both fundamentally flawed and gives little thought or attention to the direct impact on residents, I have strong objections to Barrowford being selected as an area for major development over a 15 year period and more specifically to the planned residential development on green fields to the rear of St Thomas' Primary School, off Wheatley Lane Road, Barrowford.

This area of pasture land (identified in your plan as 'Trough Laithe') has been earmarked for a colossal development or near-on 200 residential dwellings, not withstanding the quite clear 'Stage 2' at some later stage that will no doubt more than triple the plans as they currently stand, given that our small rural village has been earmarked by Pendle Council as an area of major development.(50 dwellings per year over 15 years is 750 homes!)

Barrowford is a small village, already at saturation point - it simply cannot withstand the impact of introducing 500+ residents and 400+ vehicles, all of which one assumes will be required to squeeze through a small bottleneck of an access point off Wheatley Lane Road. Whilst we may be geographically close to junction 13 of the M65 it is not easily accessed at peak times, particularly from that end of Barrowford. There is no option to alter the road network in Barrowford so any increase in traffic will just make matters worse both for existing and incoming residents. Pendle's strategy shows a desire for there to be less reliance on the car - this is a good thing. However, by selecting Barrowford as an area of major development purely on the basis of its close proximity to a motorway junction makes a mockery of that vision - it is only car drivers that benefit from the proximity to the motorway network! As a resident of Barrowford I can assure you that you are reliant on the car to get further than Nelson.

I also ask that Pendle Council gives careful consideration to the detrimental impact on the local environment. The proposed site is of green fields, a habitat for a wealth of wildlife including deer and birds of prey. The grassland and scrub also provides a much needed soak away to rainwater running off the hills beyond, Barrowford has suffered from extensive flooding in the past and a huge housing development on this scale will only exacerbate the situation. We are fortunate in Pendle to be surrounded by glorious countryside and Pendle Council has an important role as custodian of the landscape that makes Pendle a wonderful place to live. Whilst I appreciate the needs of a growing population, Pendle has sufficient brown sites to develop before we have to look towards destroying the countryside we all love so much. Your document states that " We want to be recognised locally, regionally and nationally as a great area to live, learn, work, play and visit." - well wake up Pendle...it is our countryside, our walkways, our wildlife our areas of green fields that our children play in that gives us that....destroy the countryside and you destroy Pendle.

Turning to more practical concerns, there is no way that Barrowford has the infrastructure to cope with a sudden and massive increase in population. 200 residential homes will bring at least 400 adults and lets estimate at 100 children. That will be 400 extra cars on already crowed roads. The village cannot cope with the extra traffic and Wheatley Lane Road certainly cannot - particularly at peak times when the village is currently gridlocked. Has anyone considered where the extra 100+ children will be schooled? The local primary school is already oversubscribed and we have no secondary school at all.

You do not have to travel far in Pendle to see brown-field site areas crying out for redevelopment - and what exactly is the plan for the empty houses standing in ruins in Nelson? The larger towns of Nelson, Colne and Barnoldswick are in a much better position to sustain increased housing than smaller villages. However, it seems that Pendle's strategy is less the work of Councillors working on behalf of the electorate and more their pandering to the needs of greedy developers who may be able make a bigger profit selling a house with a 'Barrowford' postcode.

I trust that the concerns and objections of tax-paying & voting Barrowford residents will be taken seriously.

Suggested Change

Comment

Summary

Distinct lack of public consultation. We get a leaflet drop about bin collections but not one for something as important as this. Only aware of the consultation through a friend's social media post.

The strategy is flawed and gives not attention to direct impact on residents.

Object to Barrowford being an area of major development and particularly development behind St Thomas' Primary School.

This area of land (Trough Laithe) will be developed for 200 dwellings but stage 2 will triple this. The area will see 50 dwellings per year over 15 years - i.e. over 750 dwellings.

Barrowford is a small village and cannot cope with the traffic impact of this development. Although close to Junction 13 access is not easy at peak times. There is a contradiction in the strategy between being close to junction 13 (for motorists) and a desire to reduce car use.

There will be a detrimental impact on the local environment. These sites are habitats for a wealth of wildlife and are needed as soakaways to reduce flood risk - which will increase with this amount of development.

Policy LIV2: Strategic Housing Site: Trough Laithe

Pendle Council should be custodians of the landscape. There are sufficient brownfield sites to develop before destroying the countryside.  
Barrowford infrastructure cannot cope with an increase in population. Increased traffic, oversubscribed school, no secondary school.  
What is the strategy for all the empty homes in Nelson? The bigger towns are better placed to sustain this increase in housing.  
The strategy is pandering to greedy developers who will make a bigger profit selling a house with a Barrowford postcode.

327467 / 154 / LIV2 / 0 / 0 / 0

Barrowford Parish Council

Mr

Iain

Lord

Duty to Co-operate

Legal Compliance

Soundness

1. That the acceptance of the large Strategic Housing Site at Trough Laithe by the people of Barrowford will probably exceed the total growth in population of Barrowford over the previous hundred years.

2. That the housing development of Trough Laithe, with the site not being reliant on the A682, would be supported by the Parish Council. This support would only be forthcoming on the proviso that no access is created to Wheatley Lane Road which may impact on the A682 within the village and that infrastructure concerns other than transport are considered and addressed.

Suggested Change

Comment

Supporting documents provided.

Summary

The population growth of Barrowford as a result of the development of Trough Laithe is likely to exceed the total growth over the previous hundred years.  
Barrowford Parish Council will only support the development of the Strategic Housing site at Trough Laithe where the site is not reliant on the A682 and that no access is created off Wheatley Lane Road which may impact on the A682. Furthermore all other infrastructure concerns should be considered and addressed.

Policy LIV2: Strategic Housing Site: Trough Laithe

818007 / 176 / LIV2 / DTC / LC / 0	Mr	Mark	Roberts
Duty to Co-operate	See comment above. There are adequate BF sites within Burnley that could deliver significant housing supply over the plan period, particularly having regard to the fact Burnley shows low population growth.		
Legal Compliance	<p>The evidence base for the Core Strategy, specifically the strategic housing allocation at Trough Laithe is inadequate. There is no demonstrable need for the allocation of significant Greenfield sites based on population growth forecasts, which are low for Pendle across the proposed plan period. There is no justification for the release of the safeguarded greenfield land, and the approach is not in accordance with the Government policy.</p> <p>The Core Strategy is not legally compliant for the following reasons:</p> <p>1) The evidence on housing need within Pendle is weak or non existent - this site and the location is not suitable to meet the housing requirement within Pendle due to its poor proximity to services and supporting infrastructure.</p> <p>2) Delivery of the site is not achievable - The impact on existing infrastructure has clearly not been considered and assessed or taken into account.</p> <p>3) Housing targets are too high, and concentrated within a location that will not benefit wider areas of the Borough which display a chronic shortage of housing and lack of development. The sustainability appraisal is therefore inadequate for a proposed strategic allocation on this scale.</p>		
Soundness	<p>There is no adequate assessment of the supporting infrastructure required to support such a significant allocation within Barrowford.</p> <p>The proposed Core Strategy discounts many brownfield sites and merely seeks to achieve the 'easy option' based on a developers requirement to promote land in their ownership for residential development. Such a significant allocation of Greenfield land is totally unjustified when the vast amounts of Brownfield land within other large settlements in the borough are taken into account. Pendle Borough Council's approach to the allocation of Trough Laithe has been wholly led by the land owner/developer. Ultimately this will prevent regeneration of other parts of the borough (and adjoining Borough's with established infrastructure) in need of development and regeneration.</p> <p>The Council do not demonstrate how they expect to regenerate other brownfield areas of the Borough once a significant Greenfield allocation is secured at Trough Laithe. Given the lack of consideration regarding the negative impact on already inadequate existing infrastructure the proposed development is not deliverable. There is no supporting evidence that this strategic allocation is deliverable without significant detrimental impact due to its unsustainable location and lack of supporting infrastructure.</p> <p>The Council has failed to take account of other deliverable brownfield sites within sustainable locations, that would deliver wider regeneration objectives. It has also fundamentally failed to consider working with adjoining authorities in order to deliver a spatial approach to planning.</p>		
Suggested Change	I fully expect that the LPA will ignore any suggestions to revise the strategic housing allocation at Trough Laithe, as they have done in previous consultations. The policy should seek to continue to safeguard the land (as per my previous comments), until there is a justifiable and sufficient evidence base that all other brownfield options have been fully exploited and delivered.		
Comment	All previous comments made to other consultation stages should be taken into account.		
Summary	<p>The Core Strategy is neither legally compliant nor sound for the following reasons:</p> <p>1) The evidence on housing is weak or non existent.</p> <p>2) Housing targets are too high.</p> <p>3) The Trough Laithe site will not help to meet housing needs in Pendle due to its poor proximity to services and supporting infrastructure.</p> <p>4) Delivery of the site is not achievable.</p> <p>5) The sustainability appraisal in respect of the strategic allocation is inadequate.</p> <p>6) There is no adequate assessment of the supporting infrastructure required to support the strategic housing allocation.</p> <p>7) The development of Greenfield sites is unjustified when there are vast amounts of Brownfield land in Pendle and neighbouring Burnley.</p>		



Policy LIV2: Strategic Housing Site: Trough Laithe

868120 / 187 / LIV2 / - / - / 0	Turley Associates	Mr	Andrew	Bickerdike	Peel Holdings (Land & Property) Ltd
Duty to Co-operate					
Legal Compliance					
Soundness	<div>Policy LIV2: Strategic Housing Site: Trough Laithe Farm</div> <div>3.23 Peel supports the proposed Strategic Housing Site allocation at Trough Laithe Farm, and agrees that the development of the site will play a critical role in the achievement of the Core Strategy’s vision and key objectives.</div> <div>3.24 The site occupies a strategically important location within the M65 Corridor. It is the only major site in this spatial area capable of delivering a critical mass of higher quality and higher value family housing, as needed to redress the imbalanced nature of the housing market within the M65 Corridor, and attracting and retaining higher income households critical to the future economic growth prospects of the Borough. Its allocation is justified by reference to robust evidence of a qualitative need for housing of this type particularly within the priority growth area. It represents and is consistent with the plan’s overall approach of seeking to marry opportunity with need by encouraging growth within areas of greatest regeneration requirement and economic growth potential.</div> <div>3.25 Peel has presented a detailed Development Framework to the Council explaining how the site can come forward over the Core Strategy plan period, delivering around 500 new properties within a green landscaped setting sitting alongside Riverside Business Park; a major employment allocation within the existing Pendle Local Plan benefiting from outline planning permission and which will be developed to provide a range of high quality employment space and ancillary uses. This co-location of high quality housing and new employment space represents a sustainable approach to growth.</div> <div>3.26 Together Trough Laithe Farm and Riverside Business Park will play a strategically important role in the growth of the M65 Corridor and the wider Borough. Trough Laithe Farm is deliverable in the short term and given the pressing need for new housing in the Borough, the shortfall in historic provision and in the absence of a 5 year supply of deliverable housing land, its allocation in the Core Strategy is wholly justified. This will enable the site to be brought forward early in the plan period.</div> <div>3.27 The site represents a rare opportunity for Pendle to attract major national house builder investment into the area and to make a positive and significant contribution to the Borough’s wider economic growth. Its allocation represents a positive and sustainable approach to growth and is wholly consistent with The Framework.</div> <div>3.28 Notwithstanding this, to provide clarity and certainty with regard to the implementation of the policy, it is recommended that the policy makes reference to the expectation that the site will provide approximately 500 dwellings over the plan period. The site’s capacity has been tested through the submitted Development Framework and so this figure should be included within the policy wording.</div>				
Suggested Change	<div>3.29 To achieve soundness Policy LIV2 should therefore be amended to confirm that the Strategic Housing Site will deliver approximately 500 residential units in total.</div>				
Comment					
Summary	<div>Support for Policy LIV2 - Strategic Housing Site: Trough Laithe, but recommends that to provide clarity and certainty that it makes reference to the expectation that the site will provide approximately 500 dwellings over the plan period.</div>				

Policy LIV2: Strategic Housing Site: Trough Laithe

868120 / 190 / LIV2 / - / - / 0	Turley Associates	Mr	Andrew	Bickerdike	Peel Holdings (Land & Property) Ltd
Duty to Co-operate					
Legal Compliance					
Soundness	<div><div>4. Comments on Sustainability Appraisal</div><div><div>4.1 Peel is generally supportive of the Sustainability Appraisal (SA) and the methodology used in assessing individual policies. However, it is disappointed that the section of the SA relating to the Trough Laithe strategic housing site (i.e. Policy LIV2) has not been updated since the version that accompanied the Further Options Report (see page vii) (February 2014).</div><div>4.2 Peel raised a number of comments on the appraisal of Policy LIV2 during the previous consultation, particularly in relation to a number of positive impacts which will arise as a result of the policy but are not currently identified within the SA. These points remain valid, and the SA should be amended to reflect these.</div><div>4.3 As set out within Peel’s representations to the Further Options Report, the following aspects should be considered within the SA in respect of Policy LIV2:</div><div>Strategic Objective E1: To encourage business which is appropriately located to maximise the benefits on local, national and global markets</div><div>Strategic Objective E2: To secure economic inclusion and develop and maintain a healthy labour market</div><div>4.4 The development of Trough Laithe Farm will provide high quality, aspirational family housing, and helping to attract and retain economically active residents within the Borough. It will also support the delivery of Riverside Business Park which will provide high quality business space within the M65 Corridor and which there is a general under supply of in Pendle. The development will make Pendle a more attractive location for business investment, helping to create jobs and secure economic growth. Policy LIV2 will, therefore, have a positive impact against the following criteria:</div><div>Increase the number of growth businesses</div><div>Reduce unemployment levels</div><div>Improve the physical accessibility of jobs through the location of sites and transport links close to areas of high unemployment</div><div>Provide better paid and higher quality jobs.</div><div>Strategic Objective E3: To develop strategic transport, communication and economic infrastructure</div><div>Strategic Objective P2: To address the need to limit and adapt to climate change</div><div>4.5 The co-location of residential development at Trough Laithe Farm and business space development at Riverside Business Park will promote sustainable transport choices.</div><div>Policy LIV2 will, therefore, have a positive impact against the following criteria:</div><div>Reduce road traffic congestion and improve safety for road users</div><div>Reduce or minimise greenhouse gas emissions</div><div>Sustainability Objective P4: To reduce contamination, regenerate degraded environments, maintain soil resources and minimise development on Greenfield sites</div><div>4.6 Trough Laithe Farm is classed as poor quality, agricultural land (Grade 4). As such, its release for development will protect and prevent the need for the release of higher quality agricultural land in Pendle. Policy LIV2 will, therefore, have a positive impact against the following criteria:</div><div><div>• Protect good quality soil resources.</div></div></div></div>				
Suggested Change					
Comment					
Summary	<div>Disappointed that the section of the Sustainability Appraisal Report relating to Policy LIV2 (Strategic Housing Site: Trough Laithe) has not been updated to reflect comments made in response to the Further Options Report (February 2014), which highlighted a number of positive impacts arising from the development in respect of Strategic Objectives E1, E2, E3, P2 and P4.</div>				

Policy LIV2: Strategic Housing Site: Trough Laithe

818030 / 215 / LIV2 / 0 / LC / S2, S3 PWA Planning Mr Paul Walton Mr Marcus Kinsman

Duty to Co-operate

Legal Compliance

Soundness

SUBMISSIONS IN RESPECT OF POLICY LIV2

PWA Planning are retained on behalf of the owners of land north of Wheatley Lane Road, Barrowford to make representations to the Pendle Core Strategy Pre Submission Report.

What are your concerns about this section of the document?

It is not considered appropriate to identify a strategic housing site within the Core Strategy. Taken in isolation the allocation of the Trough Laithe site does not perform as a strategic site, rather it simply functions as a large potential housing site which might help to make up some of the housing needs to ensure that the plan’s housing strategy can come close to meeting the needs. Without the development (and where necessary the identification) of other large areas of greenfield land in the Site Allocations document, it is clear that the Core Strategy cannot deliver the housing required. Either the Core Strategy should be abandoned in favour of a full Local Plan with specific housing land allocations to at least meet the first 10 years housing needs, or the Trough Laithe site should be removed and considered as part of the Pendle Local Plan Part 2 : Site Allocations and Development Policies. Without further land allocation or the issue of planning permissions, it is clear that in isolation the strategic housing site cannot meet the assessed needs and is therefore of little strategic importance. It is therefore unsound to pre-empt the site allocations to include a specific site allocation in the Core Strategy which does not perform as a strategic site (representing only around 10% of the housing needs in the plan period)

Suggested Change

Policy LIV2 should be removed from the Core Strategy with consequential amendments made to the remainder of the document. The Council should then rely upon the next stage of the plan process, i.e. the Site Allocations document, to ensure adequate land is allocated, together with other consented schemes, to meet the housing needs identified in LIV1. To do otherwise may result in a failure to identify more sustainable options for meeting housing needs across the Borough

Comment

Summary

Policy LIV2 - Strategic Housing Site: Trough Laithe should be removed from the Core Strategy. It is unsound to pre-empt the site allocations process by including a specific site allocation for housing in the Core Strategy, which does not perform a strategic role.

Policy LIV3: Housing Needs

818046 / 83 / LIV3 / 0 / 0 / S1, S2, S3, S4	Barton Willmore	Mr	Michael	Courcier	Junction Properties Ltd
Duty to Co-operate					
Legal Compliance					
Soundness	<div>Policy LIV3: Specific Housing Needs</div> <div>A1.31 Policy LIV3 should specifically address the strategic imperative identified by the SHMA to rebalance the housing stock and increase the numbers of higher value/lower density housing (otherwise known as aspirational housing) within the housing stock. In this regard, the SHMA says that Pendle should be:  “Planning for a mix of housing which encourages the retention of residents of an economically active age or encourages younger economically active people to move into the two local authority areas. This would have a significant impact on the labour market and for the economic growth for (Pendle) going forward. The provision of better quality detached and semi-detached homes in both Boroughs may reduce the current imbalance from stigmatised two-up, two-down terraced properties and help encourage the retention of families (or conversely, attract families) on higher incomes to move into the area, thus improving overall job growth prospects.”</div> <div>A1.33 For these reasons, the policy fails the soundness tests of being positively prepared, justified, effective and consistent with national policy.</div>				
Suggested Change	<div>A1.32 This SHMA recommendation is not fully reflected in the Core Strategy. JPL therefore considers that Policy LIV3 should be amended so that the first part becomes:-</div> <div>In order to help rebalance the borough’s housing stock, the Council will encourage proposals in appropriate locations which incorporate lower density/higher value housing. It will also encourage provision that helps to meet the following specific needs:</div>				
Comment					
Summary	Policy LIV3 should address the need to rebalance the housing stock and increase the number of higher value/lower density housing (aspirational housing). The policy should be reworded to encourage proposals to incorporate lower density/higher value housing.				

857197 / 144 / LIV3 / 0 / 0 / 0	Burnley Borough Council	Ms.	Kate	Ingram
Duty to Co-operate				
Legal Compliance				
Soundness	<div>Gypsy, Traveller, Travelling Showpeople communities</div> <div>We note in the Pre-Submission Report your statement that there is no specific, identified local need for the provision of sites as a result of the 2012 Burnley and Pendle Gypsy and Traveller Accommodation Assessment (GTAA) and the conclusions drawn from Development Management and enforcement statistics. Paragraph 11.2 of the GTAA refers to the issue of suppressed need from those living in bricks and mortar accommodation in Pendle. With this in mind, we advise that you satisfy yourself that the criteria based policy approach proposed is the best mechanism for addressing this issue.</div>			
Suggested Change				
Comment	<div>I am writing in response to the letter dated 9th October 2014 from John Halton inviting comments on the Pre-submission Report. As a neighbouring authority, with existing joint working arrangements on a number of planning matters we welcome the opportunity to comment.</div> <div>In line with the Duty to Co-operate, in relation to cross-boundary strategic matters and as a specific consultee, we would make the following comments.</div>			
Summary	It is noted that the Pre-submission report states that there is no specific identified local need for the provision of sites for the Gypsy, Travellers and Travelling Showpeople communities. However, paragraph 11.2 of the GTAA refers to the suppressed need from those living in bricks and mortar accommodation in Pendle. Consideration should be given as to whether the criteria based approach in the policy is the best mechanism for addressing this need.			

# Policy LIV3: Housing Needs

857212 / 213 / LIV3 / - / - / S1	Lancaster City Council	Mr.	Maurice	Brophy
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	<p>The joint production of the Gypsy and Traveller Accommodation Assessment (GTAA) (2012) with Burnley Council again helps to satisfy the duty to cooperate. In paragraph 10.87 it is stated that the there is no need for accommodation in the Pendle area with the need having reduced since the Lancashire GTAA was published in 2007, this is accompanied by a lack of planning applications for sites in the previous decade. Policy LIV3 therefore states the Gypsy, Traveller and Travelling Showpeople communities’ housing needs are low and will be dealt with on a case by case basis following the guidance set out in DCLG’s Designing Gypsy and Traveller Sites - Good Practice Guide (2008).</p> <p>After briefly reading the Burnley and Pendle GTAA there is some concern that Pendle’s approach to their Gypsy, Traveller and Travelling Showpeople communities’ does not allow for choice as to whether they live according to their traditions or become part of the ‘bricks and mortar’ community. Table 3.4 of the GTAA states that there are no sites, authorised or otherwise, in the district and an estimated 79 individuals living in bricks and mortar. The GTAA states that Pendle had no illegal encampments during the survey period of 1st January to 31st December 2011, however, interviews with officers contradict this suggesting there had been a short-lived unauthorised encampment towards the end of 2011 (para 5.24). In the same paragraph it is stated that Pendle Council do not keep a log of unauthorised encampments. Lancaster City Council recognises that the Gypsy and Traveller communities’ are relatively small within the Pendle area but there is a concern that their needs may not be met within the proposed Core Strategy.</p>			
Summary	<p>The approach to the accommodation requirements for the Gypsy, Traveller and Travelling Showpeople communities’ does not allow for choice as to whether they live according to their traditions or become part of the ‘bricks and mortar’ community.</p>			

Policy LIV4: Affordable Housing

867305 / 51 / LIV4 / 0 / 0 / 0	Persimmon Homes Lancashire	Mr	Chris	Gowlett
Duty to Co-operate				
Legal Compliance				
Soundness	The policy of LIV4 regarding the provision of affordable housing is generally acceptable. Although a borough-wide target of 40% over the lifetime of the plan is ambitious and the viability of this should be tested, the flexible approach in table LIV4a and the ability to provide a contribution in lieu of units is supported by us, especially in weaker market areas. However, the use of discount to open market value as a more prevalent tenure option should be necessary, rather than an over reliance on rented.			
Suggested Change				
Comment				
Summary	Generally support for the approach to affordable housing provision. However, the use of a 'open market discount' product should be considered as an alternative tenure option, rather than relying on a rented product.			

Policy LIV4: Affordable Housing

755915 / 71 / LIV4 / 0 / 0 / S2, S4	Home Builders Federation Ltd	Mr	Matthew	Good
Duty to Co-operate				
Legal Compliance				
Soundness	<div><div>Policy LIV 4: Affordable Housing</div><div><p>The policy is considered unsound as the targets are not justified by the viability evidence and the thresholds within rural Pendle are contrary to those indicated by Government.</p><p>Targets</p><p>33. The need for affordable housing within Pendle is not disputed. The HBF supports the variable requirements proposed across the plan area to take account of the variable levels of economic viability experienced within Pendle. Whilst the 2013 Housing Needs Study and SHMA suggests a 40% requirement this is shown to be unviable within the December 2013 Development Viability Study (DVS). This study (paragraph 6.16) clearly states that a 40% requirement would be unachievable in the current market. Support is also provided for a zero affordable housing requirement within the M65 corridor where viability is already compromised. It is, however, considered that the upper limit of the proposed affordable housing requirement within the rural area (up to 30%) is too high and is likely to create viability issues. The DVS indicates a maximum affordable housing requirement of 20% within this area (Table, paragraph 6.16). It is therefore unclear how the Council justifies a higher requirement. Whilst it is recognised that the council is willing to negotiate within a range the upper limits should be viable in the majority of cases.</p><p>34. Indeed the HBF is concerned that a 20% affordable housing requirement may, in itself, be too high as the DVS does not include the costs of Section 106 or Section 278 agreements (paragraph 4.76), nor does it take account of the costs of the government’s push towards zero carbon. These additional mandatory costs will have a significant impact upon development viability in Pendle.</p><p>35. The policy wording also suggests that financial viability appraisals will be required for all proposals and the amount of affordable housing either increased or decreased dependent upon the appraisal. There is no justification for such a requirement for all proposals. If a proposal is policy compliant there should be no need to submit a viability appraisal. This will simply slow the development process and create extra burdens for the developer and Council alike.</p><p>36. The quoted percentages of tenures and types of affordable housing identified in the policy should be clearly identified as being for indicative purposes only. Flexibility will be required in the percentage of each tenure delivered based not only upon current needs but also location and development viability.</p><p>Threshold</p><p>37. The policy identifies a site threshold of five units for the delivery of affordable housing within rural Pendle. This is contrary to the recent Government consultation Planning performance and planning contributions (March 2014). This consultation considers the introduction of a 10 unit threshold for affordable housing contributions. The aim of the threshold is to seek to address the disproportionate burden placed on small scale developers which prevents the delivery of small scale housing sites. Further announcements were made on this issue within the Queens Speech providing a clear indication that the Government intends to introduce a 10 unit threshold. The five unit threshold in rural Pendle is therefore contrary to the Government’s stated direction of travel.</p></div></div>			
Suggested Change	<div><div>Recommendation</div><div><p>38. It is recommended that the Council take account of the additional costs associated with development including likely Section 106/278 agreements and the governments push towards zero carbon. The additional considerations should be used to set a viable affordable housing requirement, which given current evidence is unlikely to exceed 20% anywhere in the district. A threshold of 10 units within rural Pendle is also suggested.</p></div></div>			
Comment				
Summary	<div><p>The upper limit of the affordable housing requirement in rural areas is too high and likely to create viability issues. It is unclear how the 30% upper limit is justified.</p><p>Concern that an upper limit of 20% may also be too high as the evidence does not include costs of Section 106 or Section 278 agreements, nor does it take account of the costs of providing zero carbon developments.</p><p>These mandatory costs will have a significant impact on viability.</p><p>There is no justification for the requirement to provide financial viability appraisals.</p><p>The tenure percentages should be for indicative purposes only.</p><p>The threshold of five units or more (in rural Pendle) is contrary to a recent Government consultation.</p><p>Consideration should be given to the additional costs associated with development. A viable affordable housing target should then be set, which is unlikely to be above 20%. A threshold of 10 units in rural Pendle is also suggested.</p></div>			



Policy LIV4: Affordable Housing

818046 / 84 / LIV4 / 0 / 0 / S1, S2, S3, S4

Barton Willmore

Mr

Michael

Courcier

Junction Properties Ltd

Duty to Co-operate

Legal Compliance

Soundness	<div>Policy LIV4: Affordable Housing</div> <div>A1.34 JPL considers that Policy LIV4 as currently drafted is not in accordance with national policy.</div> <div>A1.35 The NPPF (paragraph 173) requires that affordable housing targets and other standards and requirements should not impose a scale of obligations and burdens that their ability to be developed viably is threatened. It is clear from the Council’s viability study that a 40% affordable target is unrealistic.</div> <div>A1.36 JPL considers that that the policy should specify that the targets set out in Table LIV4a should be the basis for negotiations with applicants. In line with national policy, if these targets are met, there should be no need for the submission of a viability assessment.</div> <div>A1.39 The requirement should be deleted for renegotiation of the affordable housing element if planning permissions are not implemented in two years. It is unduly onerous and there is no similar requirement in national policy.</div> <div>A1.40 To facilitate increased viability, the tenure split for affordable housing should be 50% affordable rent and 50% intermediate tenure. The present split has not been properly justified in terms of need or impact on viability or rebalancing the housing stock.</div> <div>A1.41 For these reasons, the policy fails the soundness tests of being positively prepared, justified, effective and consistent with national policy.</div>
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Suggested Change

Comment

Summary	<div>The affordable housing target of 40% is unrealistic and would threaten the viability of development.</div> <div>The targets set out in the table should be the basis for negotiation and where they are met a financial viability assessment should not be required.</div> <div>The requirement for renegotiation of the affordable housing element if planning permission is not implemented should be deleted.</div> <div>The tenure requirement should be 50% affordable rent and 50% intermediate tenure. The current split is not justified in terms of viability of stock rebalancing.</div>
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Policy LIV4: Affordable Housing

817541 / 105 / LIV4 / 0 / 0 / S1, S2, S4	Dickman Associates Ltd	Ms	Jane	Dickman	Green Emmott Trust
Duty to Co-operate					
Legal Compliance					
Soundness	<p>Policy LIV4 – again a policy which has undergone amendment since the previous version but still fails to address the fundamental issues and objections identified. Table LIV4a now sets out the percentages for affordable housing on sites of different sizes in the 4 main area types for the borough. A new area ‘M65 Corridor North’ has been added presumably based on the comment in the Pendle Strategic Housing Land Allocation document (Sept 2014) notes that viability is greatest in the areas north of the M65 and Laneshawbridge so emphasis should be put on being able to deliver housing in these more affluent parts of the borough early in the plan period.</p> <p>Yet however many dwellings are to be built in the M65 corridor north the affordable requirement is still 0%. The SHMA says 40% affordable is required but also the Development Viability Study (DVS) (Dec 2013) acknowledges this is not achievable in the current market. The supporting documents note that house prices in Pendle particularly in the urban areas are about half that of the regional and national price of similar properties which would suggest they are affordable yet the LPA argue that as these are in poor condition they are not affordable.</p> <p>As we have already commented Policy SDP3 sets out the percentages of housing by area but does not split the M65 corridor in the same way Policy LIV4 now does. It should. Currently based on the percentages in Table SDP3a the M65 corridor accounts for 70% of the housing distribution this needs to be further analysed and split so that the area to the north also has affordable percentages allocated to it given this is identified as one of the affluent areas and one of the areas of greatest viability. This also raises a further question as to why the Strategic Site in Policy LIV2 seemingly can only include 20% affordable. At nearly 500 dwellings and a greenfield site if this were elsewhere in Pennine Lancashire then 30% affordable is the norm.</p> <p>The percentage of affordable suggested by Table LIV4a places an undue burden on Rural Pendle which accounts for only 12% of the housing growth over the plan period. The DVS indicates 20% should be the maximum affordable in the rural areas. However the DVS in reaching this percentage does not take account of any costs of any S106 or S278 agreements which will further erode the likelihood of even achieving 20%. Table LIV4a also puts the highest percentages on the smaller sites in the rural areas which will significantly undermine any viability of otherwise sustainable sites which goes completely against NPPF para 173, which states:</p> <p>‘Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.’</p> <p>Not consistent with NPPF</p> <p>There must be a flexible approach and allow for a mix of tenures depending upon the merits of each site its location, constraints and development viability.</p> <p>The retesting of the viability of a site with planning consent if it has not been implemented within 2 years conflicts with S91 of the 1990 Act. Landowners and developers need certainty to enable delivery.</p> <p>The introduction of the new section on on-site/off-site provision to Policy LIV4 is noted but point 2 is unduly onerous as it would in the case of (i) possibly require the applicant to purchase other land at market price but then only get affordable dwellings on it -this is not how the market works, or will the LA just give a parcel of their land for the developer to build affordable houses on? On point 2(ii) there would need to be a timescale and assurance that the financial contribution was used in a set time otherwise it would have to be returned with interest. Also it should not delay the provision of the main development. It must be remembered that current policy is encouraging housing development and delivery so nothing should be an impediment to that in regard to off-site contributions. This needs to be clarified and incorporated in the policy.</p> <p>All affordable housing should remain so in perpetuity and eligibility criteria of households should be regularly reviewed.</p> <p>In the section under ‘Rural needs’ in Policy LIV4 it refers back to Table LIV4a and Policy SPD3 upon which we have already pointed out numerous inconsistencies. These are further compounded in this section. The likelihood of affordable housing being delivered without any market housing to fund it is generally nil. So this section of Policy LIV4 needs to draw a difference between sustainable sites including those already acknowledged by the 2013 SHLAA as suitable for development in identified settlements i.e. Rural Service Centres and Rural Villages on the one hand, and other smaller settlements/hamlets.</p> <p>This policy still fails on all counts to be sound. Unsound, not justified, inconsistent with NPPF not positively prepared.</p>				
Suggested Change					
Comment					
Summary	Given the viability of the M65 Corridor north and Laneshawbridge emphasis should be put on delivering housing in these areas in the early part of the plan period.				

Policy LIV4: Affordable Housing

The supporting documents suggest house prices in the urban areas are half the regional and national prices which would suggest that these properties are affordable. Policy SDP3 should split up the M65 Corridor like it is in Policy LIV4. The M65 Corridor housing distribution of 70% should be split so that the north area has affordable percentages allocated to it as this is one of the areas of greatest viability.

Concern regarding the 20% affordable housing allocation on the Strategic Housing site where other large greenfield sites in Pennine Lancashire are require to provide 30%.

The affordable housing percentages in Table LIV4a place an undue burden on Rural Pendle as the area only accounts for 12% of housing growth. The DVS indicates a maximum of 20% affordable housing in this area but this does not take account of S106/S278 agreements which will impact on viability. The highest percentages are placed on the smallest sites undermining viability which goes against the NPPF.

The tenures to be provided must be flexible.

The retesting of viability goes against S91 of the 1990 Act.

The on-site/off-site provision - point 2 i) would require the purchase of additional land but the developer would only get affordable housing on it or would require the LA to give a parcel of land for free. Point 2 ii) a time limit for the use of funds would be required and if not used should be returned with interest. It should not delay the provision of the main development. The policy needs to be clarified that the off-site provision will not impede development.

Affordable housing should be provided in perpetuity and the eligibility criteria of households should be reviewed.

The section on "Rural needs" needs to indicate the difference between sustainable sites in Rural Service Centres/Rural Villages and other smaller settlements/hamlets.

327467 / 156 / LIV4 / 0 / 0 / 0	Barrowford Parish Council	Mr	Iain	Lord
Duty to Co-operate				
Legal Compliance				
Soundness	4. That every effort is made to increase the viability of sites within Nelson and Brierfield, including looking at the feasibility of our suggestions regarding affordable houses and actively seeking financial backing to bring these visions to fruition.			
Suggested Change				
Comment	Supporting documents provided.			
Summary	Every effort should be made to increase the viability of sites in Nelson and Brierfield. Consideration should be given to Barrowford Parish Council's suggestion regarding affordable housing.			

Policy LIV4: Affordable Housing

868120 / 188 / LIV4 / - / - / S4	Turley Associates	Mr	Andrew	Bickerdike	Peel Holdings (Land & Property) Ltd
Duty to Co-operate					
Legal Compliance					
Soundness	<div>Policy LIV4: Affordable Housing</div> <div>3.30 The third paragraph of Policy LIV4 requires the viability of a housing scheme to be retested where development does not commence within two years of planning permission being granted.</div> <div>3.31 The default life of a planning permission is three years<sup>8</sup>, though some permissions may be granted for a longer period of time where appropriate. If a development does not lawfully commence within the specified timeframe the permission would lapse. At this juncture, the merits of a scheme, and detailed considerations such as the level of affordable housing to be provided, would need to be reconsidered through a new planning application. It is for this reason that planning permissions have a limited lifespan.</div> <div>3.32 This provision of Policy LIV4 would essentially add another layer of appraisal and cost to the planning application process, and effectively act to unnecessarily constrain development. The prospect of affordable housing provisions being reviewed before a permission lapses will introduce uncertainty and potentially restrict prospects of securing funding for new development. This measure also goes firmly against recent efforts by the Government to reduce the burden of S106 Agreements for affordable housing provision, in recognition of the impact this continues to have on the delivery of housing.</div> <div>3.33 The provision is clearly contrary to national planning policy and the Government’s general stance on affordable housing provision. It is not justified and will render the policy, and plan as a whole, ineffective. It is also not supported by local evidence which indicates a clear need for this approach.</div>				
Suggested Change	<div>3.34 To achieve soundness this requirement should be removed from the policy.</div>				
Comment					
Summary	<div>Recommends the removal of the requirement that the viability of a housing scheme be retested on sites where development does not commence within two years of the planning permission being granted, as it represents an additional cost that would unnecessarily constrain development.</div>				

Policy LIV5: Designing Better Places to Live

755915 / 72 / LIV5 / 0 / 0 / 0	Home Builders Federation Ltd	Mr	Matthew	Good
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	<div>Policy LIV 5: Designing Better Places to Live</div> <div>39. It is noted that the policy encourages the use of Building for Life standards. The HBF supports this standard and many developers accord to its requirements. It is, however, important that it does not become a mandatory requirement for all developments, as to do such would remove flexibility and be directly contrary to the Governments push to reduce the standards placed upon housing development.</div> <div>40. Tables LIV 5a and 5b provide property types and sizes. It is recommended that these tables are retained as indicative only. To ensure the viability of schemes developers will need to vary the type and size of properties dependent upon location, site characteristics and prevailing market conditions.</div>			
Summary	<div>The Building for Life standards should not become a mandatory requirement.</div> <div>The types and sizes of housing stated in the policy should be indicative only. Developers will need to vary their schemes depending on the site location, characteristics and market conditions.</div>			

818046 / 85 / LIV5 / 0 / 0 / S1, S2, S3, S4	Barton Willmore	Mr	Michael	Courcier	Junction Properties Ltd
Duty to Co-operate					
Legal Compliance					
Soundness	<div>Policy LIV5: Designing Better Places</div> <div>A1.42 Policy LIV5 does not provide sufficient encouragement for proposals for higher value/lower density family housing in the M65 Corridor. The SHMA makes clear that this should be a key objective for planning policy in Pendle.</div> <div>A1.43 For this reason, the policy fails the soundness tests of being positively prepared, justified, effective and consistent with national policy.</div>				
Suggested Change					
Comment					
Summary	<div>The policy does not encourage the provision of higher value/lower density family housing in the M65 Corridor in line with the SHMA.</div>				

Policy LIV5: Designing Better Places to Live

327387 / 94 / LIV5 / 0 / 0 / 0	Wildlife Trust for Lancashire, Manchester and North Merseyside	Mr	John	Lamb	
Duty to Co-operate					
Legal Compliance					
Soundness					
Suggested Change					
Comment	10.142 The Wildlife Trust welcomes the proposal to produce a Pendle Green Infrastructure Strategy and recommends that it identifies shortfalls in the governments Accessible Natural Greenspace Standards (ANGSt), which includes the provision of at least one hectare of Local Nature Reserve (LNR) for every thousand people in the Borough. Access to the larger areas of natural greenspace needs to take account of greenspace in adjacent boroughs, hence this is a cross boundary issue.				
Summary	Support for the preparation of a Green Infrastructure Strategy. This should address issues of access to Green Space and take account of greenspace in adjacent areas - i.e. as a cross boundary issue.				

817541 / 106 / LIV5 / 0 / 0 / S4	Dickman Associates Ltd	Ms	Jane	Dickman	Green Emmott Trust
Duty to Co-operate					
Legal Compliance					
Soundness	Policy LIV5 –Adding to our previous comments on this policy the LPA note that it is possible to build 1 and 2 bed detached properties, which is true but it is the cost of so doing that goes to the issue of viability that they have missed, as well as the fact they would look incongruous in design terms thus unlikely to meet the standards of design. Not consistent with NPPF.				
Suggested Change					
Comment					
Summary	The cost of providing one or two bedroom detached properties will impact on viability. Furthermore these are likely to look incongruous in design terms.				

# Policy LIV5: Designing Better Places to Live

731431 / 138 / LIV5 / 0 / 0 / S4 English Heritage Ms Emily Hrycan

Duty to Co-operate

Legal Compliance

Soundness

The NPPF requires that Plan Policies should contain a positive strategy for the conservation and enhancement of the historic environment. In particular it should contain strategic policies for the conservation and enhancement of the historic environment. The policy appears to determine the appropriate density for locations outside conservation areas and even states that higher densities are appropriate in certain conservation areas. The policy does little to ensure that conservation and enhancement of the historic environment. The Council has a statutory duty under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its conservation areas. Therefore, before the development of a site for new housing, there will need to be some evaluation of the impact the development of the site might have upon those elements that contribute to the significance of the heritage assets including their setting. This includes determining the level of density appropriate for the site on a case by case basis.

Suggested Change

The policy should be amended to ensure that densities are determined on a case by case basis with regard to its context and the historic environment. The proposed densities put forward adjacent to and within conservation areas are not considered appropriate. The policy should be amended to ensure that the historic environment in Pendle is conserved and enhanced in a manner appropriate to its significance.

Comment

Summary

The policy does little to ensure the conservation and enhancement of the historic environment. Before a site can be developed for housing an evaluation of the impact the development may have on those elements that contribute to the significance of heritage assets including their setting needs to be carried out. This will include determining the appropriate density for the site on a case by case basis. The proposed densities within and adjacent to conservation areas as detailed in the policy are not considered appropriate.



# Chapter 11: Working: Creating a Dynamic and Competitive Economy

817556 / 34 / CHP11 / - / - / -	David Lock Associates	Ms	Kate	Skingley	Rolls Royce plc
Duty to Co-operate					
Legal Compliance					
Soundness					
Suggested Change					
Comment	Section 11 of the Local Plan which relates to Employment, continues to recognise the desire to provide..."working environments that function efficiently, enhance the local environment and provide employment in a place people want to work". Rolls-Royce recognises that this is key in ensuring a cycle of reinvestment in Pendle. Rolls-Royce however, continue to stress the importance of a pragmatic approach to this, ensuring realism is applied to new development in the Borough. This will ensure existing, and future employers are supported and encouraged to grow in an effective, and sustainable way.				
Summary	Support for Chapter 11. However, a pragmatic approach to the cycle of reinvestment will be needed to ensure existing and future businesses are supported and encouraged to grow.				

864766 / 62 / CHP11 / - / - / -	SELRAP	Mr	David	Penney
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	Under Policy WRK 2: Employment Land Supply (Pages 158/160), as already noted above (S7 and Policy SDP 6), any land identified for employment use or any other development should not prejudice the reopening of the double track railway along the existing route.			
Summary	The development of land for employment or any other use should not prejudice the reopening of the railway.			

864766 / 63 / CHP11 / - / - / -	SELRAP	Mr	David	Penney
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	Under Policy WRK 5: Tourism, Leisure and Culture (Page 176), the reinstatement of the railway would increase the potential for tourism into Pendle and access to Leisure and Cultural Venues within the Borough, as well as giving people more choice of links to other Social Centres in adjacent areas.			
Summary	The reinstatement of the railway could increase tourism and access to leisure and cultural venues. It would also provide a choice of links to social centres in adjacent areas.			

# Chapter 11: Working: Creating a Dynamic and Competitive Economy

478805 / 194 / CHP11 / 0 / 0 / 0

Ms                      Sheila                      Smith

Duty to Co-operate

Legal Compliance

Soundness

Employment
<p>It is true that Pendle needs better quality jobs, but these would not necessarily result from the building of massive industrial estates. Large industrial estates cause major problems with infrastructure, particularly with traffic. The location of a large site at Heir’s House Lane, Colne, at Foulridge Wharf or at Colne Lane, Barrowford would mean that a bypass would be inevitable. A bypass would be extremely unpopular with the many people around Pendle who strongly oppose the bypass. There has already been plenty of evidence of the great extent of this opposition. People do not want to have a major road, with its accompanying industrial buildings, blighting the beautiful countryside form Colne to Foulridge. We are very afraid that it would set a precedent for building in this region, and would send traffic problems further down the road. We do not believe that it would alleviate the congestion in Colne.</p> <p>Large industrial estates, whilst creating employment for the North West, would not guarantee work for the people of Pendle. There are many industries which are thriving in Pendle, which are not covered in your report. Service industries such as tourism, caring, creative industries, accounting and restaurants do not need to operate from huge industrial complexes. They do not need to be situated near the motorway because they do not use heavy goods vehicles. They can easily be housed in existing buildings, or brownfield land could be made available in small pockets of the towns. Such land exists in plenty. Self-employment is not discussed, yet rates are increasing. Many people work from home, or need only small premises. Your report states that a large number of businesses are still housed in former textile mills and, because of that, a high number of workers walk to work. It must be preferable for people to live at a short distance from their workplace: they would save on travel expenses and the roads would be less congested.</p> <p>The tourist industry would suffer badly if major developments sprang up over Pendle. Colne would be hit particularly hard. It makes no sense to build over the very features that make Colne such an attractive destination to tourists. It is lacking in fore-sight to propose these developments at a time when tourism in Pendle is becoming so important to its economy. Your pre-submission report notes that ‘Tourism provides an increasingly important contribution to the local economy.’ The 2.5 million tourists who visited the area in 2012 spent £96.68 million: a large increase compared with the previous year. The total number of jobs supported by tourism increased from 1397 in2011 to 1452 in 2012. The report continues: ‘It is the understated beauty of the countryside surrounding the borough’s towns and villages for which the area is best known.’</p>

Suggested Change

Comment

Summary

<p>The creation of large industrial areas at Heirs House Lane, Colne and Colne Road, Barrowford would make the construction of a bypass from the M65 motorway, west of Colne, to join with the A56 north of Foulridge inevitable, blight the landscape, adversely affect tourism and cause further traffic problems.</p> <p>Homeworking and smaller business premises within the urban areas, which are accessible on foot, offer the chance to expand employment in sectors such as tourism, financial and creative industries, whilst reducing the need to travel.</p>
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Policy WRK1: Strengthening the Local Economy

817889 / 15 / WRK1 / 0 / 0 / 0	Turley Associates	Mr	George	Wilyman	Sainsbury's
Duty to Co-operate					
Legal Compliance					
Soundness	Policy WRK1 (Strengthening the Local Economy) Sainsbury's supports the aims of Policy WRK1, which seeks to identify broad locations to meet the identified need for employment land over the plan period and the support for retail development as an appropriate wider employment generating use to strengthen the local economy.				
Suggested Change	Incorporate an element of flexibility into the policy to ensure that the required development can be brought forward in a timely manner.				
Comment	On behalf of our client, Sainsbury's Supermarkets Ltd, we have reviewed the Pendle Borough Council Core Strategy Pre-Submission Report and would like to take this opportunity to comment on the document. Introduction: Overall, Sainsbury's considers the Pre-Submission Report to be sound, if a number of amendments are included and reflected in the next stages of the Core Strategy adoption. For clarity, our comments and recommended changes are detailed as bullet points below the relevant policies. I trust that these comments will be taken into account in your consideration of the Pre-Submission Publication version of the Pendle Core Strategy.				
Summary	Incorporate an element of flexibility into the policy to ensure that the required development can be brought forward in a timely manner.				

817556 / 33 / WRK1 / - / - / -	David Lock Associates	Ms	Kate	Skingley	Rolls Royce plc
Duty to Co-operate					
Legal Compliance					
Soundness					
Suggested Change					
Comment	The recognition of the existing manufacturing industries in Pendle as a catalyst for significant growth is also welcomed, as is the recognition at Para 11.23 that the advanced manufacturing industries make a major contribution not just in Pendle but throughout Pennine Lancashire. The NPPF is clear at paragraph 20 that..."to help achieve economic growth, local planning authorities should Plan proactively to meet the development needs of business and support an economy fit for the 21st century".				
Summary	Support for Policy WRK1.				

619588 / 209 / WRK1 / - / - / 0	Friends of the Earth	Ms	Jane	Wood	
Duty to Co-operate					
Legal Compliance					
Soundness	(11.22 p149) It is vital to support as the TUC and UNITE has done the creation of green sustainable jobs and people trained in the borough with the necessary skills for them. If you are truly being forward thinking as a council there should be more emphasis on this in the strategy.				
Suggested Change					
Comment					
Summary	Policy WRK1 - Strengthening the Local Economy should place greater emphasis on the creation of 'green sustainable jobs' and the need to provide local people with the necessary skills to occupy those jobs.				

Policy WRK2: Employment Land Supply

817556 / 31 / WRK2 / - / - / -	David Lock Associates	Ms	Kate	Skingley	Rolls Royce plc
Duty to Co-operate					
Legal Compliance					
Soundness					
Suggested Change					
Comment	Employment: Rolls-Royce are pleased that the Core Strategy continues to recognise the importance of their site at Barnoldswick, supports its growth and recognises the need for future investment. Rolls-Royce note the proposed increase in Employment Land to be allocated in Pendle to 68ha of land and the clear recognition that employment is a key driver for economic growth. Rolls-Royce are therefore pleased to note in Policy WRK2 that the Employment Land Review will be monitored annually and the employment land portfolio reviewed every three years to ensure that it provides an appropriate range of sustainable sites attractive to the market.				
Summary	Support for Policy WRK2.				

857197 / 145 / WRK2 / 0 / 0 / 0	Burnley Borough Council	Ms.	Kate	Ingram
Duty to Co-operate				
Legal Compliance				
Soundness	Employment Land Supply  We note the results of your Employment Land Review and the identification of a Strategic Employment site which is to be released from the Green Belt following an assessment of selected sites in advance of a full Green Belt Review. As you will know, Green Belt boundaries should only be altered in exceptional circumstances and at that time, authorities should consider the Green Belt boundaries having regard to their purposes and intended permanence. With this in mind, we advise that you satisfy yourself that you are content that the approach taken and the release of this site is justified and accords with the National Planning Policy Framework and National Planning Policy Guidance. We would welcome the opportunity to work closely with you on further work concerning the review/partial review of the Lancashire Green Belt and its boundaries within the two boroughs.			
Suggested Change				
Comment	I am writing in response to the letter dated 9th October 2014 from John Halton inviting comments on the Pre-submission Report. As a neighbouring authority, with existing joint working arrangements on a number of planning matters we welcome the opportunity to comment.  In line with the Duty to Co-operate, in relation to cross-boundary strategic matters and as a specific consultee, we would make the following comments.			
Summary	The release of a site from the Green Belt to be used for employment purposes is noted. Consideration should be given to as to whether the approach taken to justify the release of this site accords with the NPPF and NPPG. Burnley Borough Council would welcome the opportunity to work closely with Pendle on further work concerning the review/partial review of the Lancashire Green Belt and its boundaries.			

Policy WRK2: Employment Land Supply

868120 / 189 / WRK2 / - / - / 0	Turley Associates	Mr	Andrew	Bickerdike	Peel Holdings (Land & Property) Ltd
Duty to Co-operate					
Legal Compliance					
Soundness	<div>Policy WRK2: Employment Land Supply</div> <div>3.35 Peel supports the majority of Policy WRK2, particularly the reference to the key role of the Protected Employment Areas in the context of the M65 Corridor and its future growth.</div> <div>3.36 However, it is considered that specific reference should be made to Riverside Business Park as, alongside the strategic site at Lomeshaye, the business park will be a key driver of economic growth within the M65 Corridor. Inclusion of this reference will ensure that Policy WRK2 is effective in providing sufficient employment land to meet the economic growth objectives of the Core Strategy.</div>				
Suggested Change	<div>3.37 To achieve soundness the following point should be added to the priorities for the M65 Corridor:</div> <div>“Deliver the comprehensive development of Riverside Business Park for high quality employment uses.”</div>				
Comment					
Summary	<div>Policy WRK2: Employment Land Supply should also include a reference to the important role of the Riverside Business Park as a key driver for economic growth in the M65 Corridor, alongside the strategic employment site at Lomeshaye.</div>				

Policy WRK3: Strategic Employment Site: Lomeshaye

866837 / 18 / WRK3 / 0 / 0 / 0

Mr G R Bolton

Duty to Co-operate

Legal Compliance

Soundness

1) The expansion of the Lomeshaye Industrial Estate should not, under any circumstances, expand up to and onto the Padiham bypass road. The entrance/exit on to the Motorway should be expanded to accommodate extra traffic.

To exit on to the Bypass would devastate the local surroundings especially the villages on it and the road could not accommodate the extra volume of traffic.

2) As some of the other points in the report depend on the construction and extension of the M65 through Colne to Skipton and as I am against this extension in principle, then I think that the third ranked site will never happen.

3) The Greenhead Lane site should never have been suggested. It is an area of outstanding natural beauty and should be allowed to remain so. This is borne out by the fact that a recent application for a wind turbine site was rejected and the same reasons apply to this site.

Suggested Change

Comment

Summary

Access to the Lomeshaye Strategic Site should not be off the bypass (A6068). The motorway should be expanded to accommodate extra traffic.

The site off Barrowford Road, Colne should not come forward.

The site off Greenhead Lane should not have been suggested.

Policy WRK3: Strategic Employment Site: Lomeshaye

818410 / 24 / WRK3 / 0 / 0 / 0

Mrs Margaret Lancaster

Duty to Co-operate

Legal Compliance

Soundness

In February this year I objected to the plan to expand the Lomeshaye Industrial Estate up to the Bypass A6068 being included in the Pendle Core Strategy Plan. I understand this has now been put forward to be included once again in the Pendle Core Strategy (Pre-Submission report) and I wish to object on the following grounds as contained in my letter of the 19th February, 2014 (see below).

May I say how disappointing it is to see this being put forward again after the large number of objections which were submitted previously.

PLAN TO EXPAND THE LOMESHAYE INDUSTRIAL ESTATE UP TO THE BYPASS A6068

1. The land is Green Belt which can only be changed in exceptional circumstances which is far from clear in this case.

2. I understand that the figures used to calculate so much extra employment land are flawed and that if other available sites had not been eliminated the figures would be transformed.

3. The bypass is a busy and dangerous road with a history of many accidents over the years and to add any substantial increase in traffic from the Lomeshaye Estate would exacerbate the situation, plus traffic from a planned very large housing estate just before the Nelson & Colne College would make the situation worse.

4. Pendle Borough is at present considering ‘rebranding itself’ as a tourist area and to extend the present Lomeshaye site, which is low lying and reasonably unobtrusive, up a steep slope to the bypass would in no way enhance Pendle as a tourist area.

5. The aim of increasing business rates received by Pendle may not happen as there is now a threat that the Government and not Pendle will receive all or part as recompense for giving a grant for the initial infrastructure.

6. In the Borough 2012 survey of businesses there was a reply of only 29% of which 70% said they were happy with their premises. Therefore, only a very small number were not satisfied and it can be assumed that those who didn’t bother to reply were happy.

7. The government encourages neighbouring boroughs to work together and as Burnley has large new estates Pendle should work together with them.

8. The current Lomeshaye estate has large warehousing taking up a vast amount of land but actually employs few people, this will most probably happen again and if the aim is to create a large number of jobs this will not be achieved.

Please would you give the above points your earnest consideration.

Suggested Change

Comment

Summary

The Strategic Employment Site is Green Belt land which can only be changed in exceptional circumstances - this is not the case here.  
The employment land calculations are flawed. If other available sites had not been eliminated the amount needed would be different.  
The current traffic problems on the bypass would be made worse by the increase in traffic generated from both Strategic Sites.  
The expansion of the Lomeshaye site will not enhance Pendle as a tourist area.  
The Government may take all or part of the increase in business rates to recompense the grant given for the initial infrastructure.  
The evidence from the Business survey show only 29% of businesses replied and the majority of them were happy with their premises.  
Pendle should work with Burnley as they have new estates.  
If the new Lomeshaye industrial estate is used for warehousing this will not create a large number of jobs.

Policy WRK3: Strategic Employment Site: Lomeshaye

817556 / 32 / WRK3 / - / - / -	David Lock Associates	Ms	Kate	Skingley	Rolls Royce plc
Duty to Co-operate					
Legal Compliance					
Soundness					
Suggested Change					
Comment	Rolls-Royce's made previous comments in relation to the Strategic Allocation at Lomeshaye and raised concerns about the interrelationship between proposed and existing employment land. Rolls-Royce are pleased to note that the Council have now included the sentence at para 11.63 that..."The strategic employment site will have a complementary and sustainable relationship with other employment sites in the borough, ensuring that their valuable contribution to future growth, diversification and expansion is not compromised." Rolls-Royce feel strongly that the protection of existing and thriving employers in the borough will be key in ensuring the effectiveness of the Plan, as such this inclusion is welcomed and helps to make the Plan effective.				
Summary	Support for the changes made to Policy WRK3.				

818207 / 45 / WRK3 / 0 / 0 / 0	United Utilities Property Services	Ms	Jenny	Hope
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	Policy WRK 3: Strategic Employment Site: Lomeshaye: Policy WRK 3 states that the development of a strategic employment site at Lomeshaye to deliver B1, B2 and B8 uses will be supported subject to meeting a number of criteria. United Utilities supports the inclusion of criteria b) within the Pre-Submission Core Strategy, which requires that: "Early engagement between the applicant and infrastructure providers is carried out to address any capacity issues and ensure the relevant infrastructure (e.g. utilities, broadband etc) is provided (Policy SDP6)" . As per our comments regarding Policy LIV 2, given the size and strategic nature of this site it may be necessary to co-ordinate infrastructure improvements with the delivery of the development once more details become available. In addition, it may be necessary to ensure that the delivery of development is guided by strategies for infrastructure which ensure coordination between phases of development over lengthy time periods and by numerous developers. On both of the strategic sites, we would be interested to better understand whether there is fragmented ownership. If ownership is fragmented, we would strongly recommend that the council establishes, prior to publication, how the landowners intend to work together to ensure the coordinated delivery of infrastructure in the most sustainable fashion. We believe coordinated delivery of infrastructure on strategic sites can only be secured on sites in fragmented ownership where there is a clear legal agreement between land owners. This legal agreement will ensure the coordinated site-wide delivery of infrastructure in the most appropriate way alongside an associated site-wide mechanism for drawing down land value proportionately between landowners on all development parcels, whilst also making proportionate contributions to key infrastructure as the delivery of the site takes place.			
Summary	Support for the criteria in Policy WRK3 relating to early engagement between the applicant and infrastructure provider to ensure the relevant infrastructure and capacity is available. However, there is a need for infrastructure providers to have a better understanding of the following aspects of the development of the strategic site to gain a full appreciation of the impact: details of connection points, timing of delivery, surface water management and drainage, site ownership.			



Policy WRK3: Strategic Employment Site: Lomeshaye

817576 / 111 / WRK3 / 0 / 0 / 0

Ms                      Beverley                      Bailey

- Duty to Co-operate
- Legal Compliance
- Soundness
- Suggested Change
- Comment

Once again I am disputing the proposed extension of Lomeshaye Industrial Estate.

There is no justification for building on greenbelt land and once you annihilated it, it will never be returned to us. The wildlife will suffer - there are deer, badgers and some rare birds in this area. It is this stunning landscape that attracts many people to the area - whether it is for walking, photography, horse riding - and is one of the reasons many people pay a premium to settle in this area.

You claim there will be creation of 2000 jobs. I very much doubt this. I also doubt that the units would ever be occupied, as we can already see that there are many vacant units on the M65 corridor and at the old Padiham power station site.

It has recently been announced by the government that there will be a downturn in the economy in coming years, and therefore It seems counterintuitive to be creating more units that will very likely remain vacant.

In the unlikely event that the speculated 2000 jobs will ever be fulfilled, there is not adequate infrastructure to support this massive influx of people. the bypass is already a busy and dangerous route and is very difficult at peak times,

My local conservative MP assured me during the last local elections that this proposal was flawed and would never be built, I voted for her based on this promise, so I am hoping that this letter is really unnecessary.

Please let me know when the council are meeting to discuss this as I want to attend the meeting.

Please acknowledge receipt of this personal objection to your core strategy.

Summary

Object to the extension of Lomeshaye. There is no justification for building on Green Belt land. There is a wealth of wildlife on this site which will be affected. The landscape attracts many people to the area. Unrealistic job creation figures (2000). Unlikely that the units would ever be occupied. Already many vacant unit in the M65 Corridor. The government announced there will be a downturn in the economy so it is counterintuitive to create more units. The infrastructure to support the levels of employment is not adequate. The Bypass is busy and dangerous.

Policy WRK3: Strategic Employment Site: Lomeshaye

818314 / 119 / WRK3 / 0 / 0 / 0	P	Daniel
Duty to Co-operate		
Legal Compliance		
Soundness	<div><p>My comments on the Core Strategy are based on the “sound” principle which is a value judgement, on which people differ rather than a legal one which no doubt the Council has covered.</p><p>1) The proposed extension of industrial units towards the bypass A6068</p><p>The use of green belt land for industrial development should only be used in exceptional circumstances and this development does not merit being classed as exceptional. This is piecemeal erosion of the green belt that could act as a precedent for future acquisition of greenbelt land.</p><p>Section 4.1 states “People and places matter” – how does this sit with an increase in traffic that a new roundabout and access will bring to the surrounding area of the A6068.</p><p>Section 3.95 air quality will be affected by an increase in traffic to the area. Breathing spaces between towns should be protected.</p><p>Section 3.86 preservation of the openness of the countryside to prevent merging of the towns and villages. This development will bring industrial units within view of the village and will contribute to urban sprawl.</p><p>Section 5.2 re-use of Brownfield sites. The corridor along the canal has vast opportunities to be used for Brownfield site development before using up green belt land, and this will enhance “the look” of the whole area.</p><p>Section 7.4 protection of the countryside as Green Belt land. How will this development protect the countryside. It brings development in view of an Area of Outstanding Natural Beauty which begins on the outskirts of Fence.</p><p>Open spaces should be protected and AONB’s should be enhanced and if possible increased.</p><p>Small and medium sized businesses do not need big buildings and warehouse units. These units usually provide low wage jobs and skills and Pendle needs more higher wage jobs and opportunities to attract high salary/wage people to the area.</p><p>The permanence of green belt protection is paramount and giving it up under pressure from builders close to the authority will not make Pendle a better place to live. Life should be more than being a slave to profit and once built on, it is gone forever.</p></div>	
Suggested Change		
Comment		
Summary	<div><p>Lomeshaye extension:</p><p>Green Belt land should not be used for industrial development as there are no exceptional circumstances. This is piecemeal erosion of the Green Belt.</p><p>How does an increase in traffic to the area surrounding the A6068 sit with "people and places matter".</p><p>Air quality will be affected by an increase in traffic.</p><p>This development will contribute to urban sprawl and the merging of towns.</p><p>Brownfield sites in the canal corridor should be used instead of Green Belt as this will help to improve the area.</p><p>How will this development protect the countryside (impact on AONB). Open spaces should be protected and AONBs be enhanced.</p><p>Big units are not needed for small and medium sized businesses. Pendle needs more higher wage jobs.</p><p>The permanence of the Green Belt is paramount. Life should be more than being a slave to profit.</p></div>	

Policy WRK3: Strategic Employment Site: Lomeshaye

817686 / 123 / WRK3 / 0 / 0 / 0	Mr	Alan	Boardwell
Duty to Co-operate			
Legal Compliance			
Soundness	<div>I am still of the opinion that the Lomeshaye extension is an intrusion into land unsuitable for the purpose.</div> <div>Any traffic implications involving the bypass are ill thought and dangerous.</div>		
Suggested Change			
Comment			
Summary	<div>The Lomeshaye extension is an intrusion into unsuitable land.</div> <div>The traffic implications on the bypass are ill thought out and dangerous.</div>		

327370 / 147 / WRK3 / - / - / S1, S3	National Trust	Mr	Alan	Hubbard
Duty to Co-operate				
Legal Compliance				
Soundness	<div>Inadequate consideration as to how strategic development is brought forward in a manner that will minimise and mitigate impacts upon environmental assets.</div> <div>Without appropriate phasing and planting proposals the proposed development of this site would impact unnecessarily and detrimentally upon the Green Belt and the sites surroundings.</div> <div>National Trust does not propose to comment upon the principle of allocating this substantial area of green belt land as an employment development site – it notes the case made in the context of Pendle and its employment needs and through the detailed review of potential sites. No doubt these matters will be carefully tested by the appointed Inspector and others through the Examination process.</div> <div>However, the Trust does note that if the site is allocated for development as proposed that there are several strategic and many detailed matters that will need to be addressed in bringing the site forward for development. Critical ones for the Trust, having regard to its interests in the wider area at Gawthorpe, would include the phasing of development and related hard &amp; soft infrastructure, provision of structural landscaping, and the height, external materials and external lighting in respect of the proposed built development.</div> <div>In this context the criteria at a) and b) beg a number of questions, especially about timing related to the phasing of the development. Criterion c) raises a similar issue [arguably advance planting works in relation to boundaries and strategic routes would be appropriate].</div> <div>It is requested that if development does take place that it is in accordance with a Masterplan/ Development Brief [or a site specific SPD] that has been the subject of public consultation and ensures that both the wider context of the site and its own features are recognised, respected and reinforced as part of the development. Alongside this the document should also address the matter of phasing/timing of different elements as part of the considered development of the site to ensure that not only ‘roads and sewers’ but also, for example, green infrastructure, renewable energy technologies and public transport provision, are secured in a timely manner.</div>			
Suggested Change	<div>Amend criterion c) to read: “high quality landscaping, including structural planting in particular to the boundaries with the green belt, is developed, incorporating and enhancing natural environmental features and respecting the wider landscape character, where as appropriate.”</div> <div>Add a new paragraph after criterion c) as follows:</div> <div>“The above matters and the phasing of the different elements of the development of the overall site will be the subject of a Masterplanning (or similar) process, that will include public consultation, in order to ensure that an appropriate high quality development is secured which includes public transport provision and the enhancement of the natural and built environment.”</div>			
Comment				
Summary	<div>Inadequate consideration of how the development of this site can be brought forward in a way that will minimise and mitigate the impact on environmental assets.</div> <div>Concerns relating to the phasing and planting proposals for this site. In particular the impact on Gawthorpe and the timing of the provision of hard and soft infrastructure, structural landscaping and the height, external materials and lighting to be used in the development of this site.</div> <div>A Masterplan/Development Brief or SPD should be prepared for the development of this site. This document should be subject to public consultation and ensure that the wider context of the site and its own features are recognised, respected and reinforced as part of the development. This document should include timings for all infrastructure including green infrastructure, renewable energy and public transport.</div>			

Policy WRK3: Strategic Employment Site: Lomeshaye

Duty to Co-operate	
Legal Compliance	
Soundness	<div><p>GREEN BELT</p><p>The Core Strategy is not consistent with national policy in relation to the Green Belt, in relation to the proposal to take Green Belt land for industrial land for the proposed Lomeshaye Industrial Estate extension in the vicinity of Fence/Wheatley Lane.</p><p>The National Policy Planning Framework (NPPF) states (paragraph 79) (OUR EMPHASIS):</p><p>79. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; ESSENTIAL CHARACTERISTICS OF GREEN BELTS ARE THEIR OPENNESS AND THEIR PERMANENCE.</p><p>83. Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. ONCE ESTABLISHED, GREEN BELT BOUNDARIES SHOULD ONLY BE ALTERED IN EXCEPTIONAL CIRCUMSTANCES, through the preparation or review of the Local Plan.</p><p>We agree that if Green Belt boundaries are to be changed, the new Local Plan is the process by which it should happen. We suggest however that there are no “exceptional circumstances” to warrant this change, and that a change at this stage drives a coach and horses through the idea that “the essential characteristics of Green Belts are...their permanence.”</p><p>The proposal to take this Green Belt land is based on a flawed or at the very least debatable assessment of the future need for industrial land, and a failure to consider adequately other options. It does not amount to “exceptional circumstances” . We do not think that merely by designating the land a “strategic site” amounts to exceptional circumstances in the absence of other compelling evidence.</p><p>We also suggest that extending the Lomeshaye Industrial estate on to the area which is referred to as the “upper plateau” in the Council’s review of employment land is an undesirable incursion into open countryside. This is a prominent feature and can be seen from a wide area around, notably across the valley, and the proposals therefore seriously compromise the setting of the Green Belt as it would remain after this land is removed from it (including the remainder of the “upper plateau” area.</p><p>The NPPF also states:</p><p>84. When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.</p><p>We submit that the proposed extension into Green Belt adjacent to the village of Fence/Wheatley Lane is not a “sustainable pattern of development”, that it would link this freestanding village directly with the large town of Nelson, and that the other options have not been fully considered.</p></div>
Suggested Change	
Comment	
Summary	<div>The Core Strategy is not consistent with national policy in relation to the Green Belt.</div>

Policy WRK3: Strategic Employment Site: Lomeshaye

327622 / 198 / WRK3 / 0 / 0 / 0

Mr. Colin Butterworth

Duty to Co-operate

Legal Compliance

Soundness

Please would you kindly take this letter as a protest against the proposals to build on greenbelt land which would lead to absolute chaos with traffic, entering whichever entrance is chosen. The existing traffic causes major problems from entering Lomeshaye onto the M65 to the gridlock at tea times through Barrowford. An extra 2000 vehicles, they call it creation of 2000 jobs, would be devastating to the area. We welcome 2000 jobs being created in Pendle just in a different location.

We are still a tourist attraction in Pendle and this would be blighted with the sight of huge warehouses being built right up to Fence, obliterating our magnificent view of Pendle Hill from the M65, and seen from the properties in Fence. People who live in Fence have worked long and hard to live in a village location with the views bought and paid for. I am sure there will be less intrusive sights to locate these massive buildings on. Most are built and then left empty for years such as the Riverside location behind Nelson and Colne College.

This view is held by the majority of residents in Fence and we would welcome our voices being heard on this matter. You say that you will ensure local residents are happy with the proposals and I hope that is true.

Concerned resident of Fence

PS We are told that the majority of jobs created would be filled by out of town commuters and not locally filled. Either way 2000 new jobs mean 2000 extra vehicles in place where there are extensive traffic problems already. The By-Pass is already an accident black spot without the extra vehicles.

Suggested Change

Comment

Summary

Whilst welcoming the proposal to create 2,000 new jobs in Pendle, object to the allocation of land to the west of the existing Lomeshaye Industrial Estate for a strategic employment site (Policy WRK3), on the grounds that it would:

- cause significant traffic issues;
- represent a blight on the landscape; and
- occupy a Green Belt location.

Policy WRK3: Strategic Employment Site: Lomeshaye

Duty to Co-operate

Legal Compliance

Soundness

Please would you kindly take this letter as a protest against the proposals to build on greenbelt land which would lead to absolute chaos with traffic, entering whichever entrance is chosen. The existing traffic causes major problems from entering Lomeshaye onto the M65 to the gridlock at tea times through Barrowford. An extra 2000 vehicles, they call it creation of 2000 jobs, would be devastating to the area. We welcome 2000 jobs being created in Pendle just in a different location.

We are still a tourist attraction in Pendle and this would be blighted with the sight of huge warehouses being built right up to Fence, obliterating our magnificent view of Pendle Hill from the M65, and seen from the properties in Fence. People who live in Fence have worked long and hard to live in a village location with the views bought and paid for. I am sure there will be less intrusive sights to locate these massive buildings on. Most are built and then left empty for years such as the Riverside location behind Nelson and Colne College.

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Suggested Change

Comment

Summary

Whilst welcoming the proposal to create 2,000 new jobs in Pendle, object to the allocation of land to the west of the existing Lomeshaye Industrial Estate for a strategic employment site (Policy WRK3), on the grounds that it would:

- cause significant traffic issues;
- represent a blight on the landscape; and
- occupy a Green Belt location.

Policy WRK4: Retailing and Town Centres

856633 / 1 / WRK4 / 0 / - / -	The Theatres Trust	Mr	Ross	Anthony
Duty to Co-operate	N/A			
Legal Compliance				
Soundness	The Theatres Trust supports Policy WRK 4 as it will encourage the provision of arts, culture and entertainment facilities in town centres, adding to their vitality and the evening economy.			
Suggested Change				
Comment	Re Q1 and 2 - My comments only regard soundness with Para 70 of the NPPF.			
Summary	Support for Policy WRK4.			

817889 / 16 / WRK4 / 0 / 0 / 0	Turley Associates	Mr	George	Wilyman	Sainsbury's
Duty to Co-operate					
Legal Compliance					
Soundness	Policy WRK 4 (Retailing and Town Centres) Sainsbury's supports the aims of Policy WRK4, which seeks to direct retail development within Town Centres of Nelson, and Colne. Sainsbury's further supports the Councils aim to promote uses which help to create active street frontages and a vibrant public realm, such as shops, cafés, restaurants, cultural and leisure uses.				
Suggested Change	It is considered the wording to resist out/edge of centre development is unduly restrictive. Such development is accepted in the NPPF where the sequential and impact tests are satisfied.				
Comment	On behalf of our client, Sainsbury's Supermarkets Ltd, we have reviewed the Pendle Borough Council Core Strategy Pre-Submission Report and would like to take this opportunity to comment on the document. Introduction: Overall, Sainsbury's considers the Pre-Submission Report to be sound, if a number of amendments are included and reflected in the next stages of the Core Strategy adoption. For clarity, our comments and recommended changes are detailed as bullet points below the relevant policies. I trust that these comments will be taken into account in your consideration of the Pre-Submission Publication version of the Pendle Core Strategy.				
Summary	It is considered the wording to resist out/edge of centre development is unduly restrictive. Such development is accepted in the NPPF where the sequential and impact tests are satisfied.				

731431 / 139 / WRK4 / 0 / 0 / S4	English Heritage	Ms	Emily	Hrycan
Duty to Co-operate				
Legal Compliance				
Soundness	The NPPF requires that Plan Policies should contain a positive strategy for the conservation and enhancement of the historic environment. In particular it should contain strategic policies for the conservation and enhancement of the historic environment. The policy fails to ensure that development within town centres or local shopping centres will have a positive contribution to the historic environment and where possible conserve and enhance heritage assets including their setting.			
Suggested Change	The policy should be amended to ensure that new development will conserve and enhance heritage assets including their setting and make a positive contribution to the historic environment in the Borough of Pendle.			
Comment				
Summary	The policy fails to ensure that development within town centres or local shopping centres will have a positive contribution to the historic environment and where possible conserve and enhance heritage assets including their setting.			

# Policy WRK4: Retailing and Town Centres

619588 / 210 / WRK4 / - / - / 0	Friends of the Earth	Ms	Jane	Wood
Duty to Co-operate				
Legal Compliance				
Soundness	(p166) Town centres and keeping them ‘healthy’ are another issue. Allowing planning permission for large supermarkets does not help ‘town’ centres i.e. Booths in Barrowford!. Pendle Borough Council should continue to do everything it can to support shopping at smaller local shops and imaginative use of these town centres in particular Nelson.			
Suggested Change				
Comment				
Summary	Policy WRK 4 - Retailing and Town Centres should promote the continued viability of town and local shopping centres by supporting smaller local shops and the imaginative use of premises, whilst resisting larger edge-of-centre and out-of-centre supermarkets.			



Policy WRK5: Tourism, Leisure and Culture

867015 / 54 / WRK5 / - / - / -	Canal & River Trust	Mr	Martyn	Coy
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	We support Policy WRK 5 that fully acknowledges the Leeds & Liverpool Canal as a provider of tourism, leisure and culture and also that the canal offers further opportunities to develop these sectors in the future to benefit the local community and encourage visitors from outside the Borough to visit and boost the local economy. Please note that leisure activities including boating are thriving along the canal. New marinas have been developed which have helped support the rural economy in accordance with section 3 'Supporting a prosperous rural economy' of the National Planning Policy Framework. Boating also requires essential supporting facilities such as boatyards and these uses will be supported within the proposed Policy.			
Summary	Support for Policy WRK5.			

818314 / 121 / WRK5 / 0 / 0 / 0	P	Daniel
Duty to Co-operate		
Legal Compliance		
Soundness	My comments on the Core Strategy are based on the “sound” principle which is a value judgement, on which people differ rather than a legal one which no doubt the Council has covered.  1) Tourism  This is an area becoming more important and can bring people, business and kudos to the area.  Industrial units and industrial sprawl reduce the attractiveness of the area. A cycle trail between Colne/Skipton with cafes, cycle hire, information points would enhance tourism, reduce car travel, improve air quality and bring new people to the area. How is the splendour of Pendle Hill and surrounding AONB being enhanced and used as a positive image to not only visit but come and live in the area. How are the parks and recreational facilities being developed and improved The site of the Lomeshaye estate is a blott on the area.	
Suggested Change		
Comment		
Summary	Industrial units and sprawl will reduce the attractiveness of the area and have a negative impact on tourism. A cycle trail between Colne and Skipton with facilities en route should be provided to increase tourism, reduce car travel and improve air quality. How is Pendle Hill and the AONB being enhanced and used to attract people to visit and live in the area. How are the parks and recreational facilities being developed and improved. Lomeshaye estate is a blot on the area.	

Policy WRK5: Tourism, Leisure and Culture

731431 / 140 / WRK5 / 0 / 0 / S4	English Heritage	Ms	Emily	Hrycan
Duty to Co-operate				
Legal Compliance				
Soundness	The NPPF requires that Plan Policies should contain a positive strategy for the conservation and enhancement of the historic environment. In particular it should contain strategic policies for the conservation and enhancement of the historic environment. The policy only refers to tourism that promotes the Borough’s “built heritage” (bullet 1) but not the historic environment as a whole. Bullet 5 also does not make it clear whether proposals need to have regard to the historic environment, as the terminology used is “environment”. Further clarity is needed.			
Suggested Change	The policy should be amended to ensure that tourism that relates to the whole the historic environment is supported, so Bullet 2 should be amended to read: “ Promote sustainable tourism associated with walking, cycling, waterways and the appreciation of the area’s natural and (built heritage) historic environment ”. Bullet 5 should be amended to include reference to the term “ historic ” when defining the environmental impacts. (Brackets indicate deleted text).			
Comment				
Summary	The policy should be amended so that tourism that relates to the whole of the historic environment is supported. Bullet point 2 should be amended to include reference to the "historic environment" rather than "built heritage". Bullet point 5 should also refer to "historic" when defining environmental impacts.			

Policy WRK6: Designing Better Places to Work

817556 / 36 / WRK6 / - / - / -	David Lock Associates	Ms	Kate	Skingley	Rolls Royce plc
Duty to Co-operate					
Legal Compliance					
Soundness					
Suggested Change					
Comment	Design and Sustainability: Rolls-Royce continues to support the statement at paragraph 11.132 of the Plan that..."quality in design extends beyond the adaptation and construction of better buildings. We want the centre of our towns and other key employment areas to be attractive and welcoming places". Rolls-Royce work hard to ensure that they build the highest quality buildings possible and therefore recognise the importance of this within the Plan. Rolls-Royce suggested that some flexibility be demonstrated in Policy ENV 2 and Policy WRK 6 to recognise the economic and viability implications of energy efficiently initiatives. However, the Council considers that there is sufficient flexibility in these policies to not compromise the viability and effectiveness of existing businesses. Whilst Rolls-Royce respect this position, they ask the Inspector to carefully examine the implications of the policy to ensure it is effective and compliant with the advice in NPPF (para 174) to not overly burden development proposals and prevent them from coming forward.				
Summary	Support for quality buildings. However, Policies WRK6 and ENV2 should be carefully considered in terms of their likely impact on the viability of a scheme.				

## Chapter 12: Supporting: Creating Health and Confident Communities

817556 / 38 / CHP12 / - / - / -	David Lock Associates	Ms	Kate	Skingley	Rolls Royce plc
Duty to Co-operate					
Legal Compliance					
Soundness					
Suggested Change					
Comment	Education, Community Facilities and Culture: As per Rolls-Royce's previous comments, Rolls-Royce feel strongly that education, community facilities and cultural enterprises are vital components in the spatial planning of Pendle and should not be underestimated. Rolls-Royce consider the provision of key community facilities as crucial for the creation of a vibrant and healthy community. As such, Rolls-Royce feel the Council should continue to explore every opportunity to build on the cultural and leisure offer in Pendle, particularly in light of the planned increase in housing and employment growth proposed in the Plan. Rolls-Royce continue to support the Plan's vision that recognises the importance of education and training in creating a more knowledgeable and skilled workforce, which will attract new business opportunity in the area and retain existing employers as they evolve and diversify.				
Summary	Support for Chapter 12. However, every opportunity to build on the cultural and leisure offer in Pendle should be explored.				

864766 / 64 / CHP12 / - / - / -	SELRAP	Mr	David	Penney
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	Under Policy SUP 2: Health and Well-Being (Page 193), the Core Strategy advocates: "Support and develop healthy ways to travel". This reflects the aim of Policy ENV4: Promoting Sustainable Travel. Rail travel is more environmentally friendly and better for public health than other forms of polluting transport. Therefore the Council should urge that the existing East Lancashire Railway from Preston to Colne be upgraded and the Colne-Skipton Railway be reopened to provide a regional rail link to City Regions across the North as soon as possible. Under Policy SUP 3: Education and Training (Pages 196/7), in order for Citizens of Pendle to take advantage of Education, Training (and Employment) opportunities not just in Pendle but elsewhere in East Lancashire, Manchester and North/West Yorkshire, rail connectivity is vital for people to gain access to such facilities. It is clear that the rail passengers numbers are increasing even on the deficient East Lancashire Railway. There is no doubt from projected rail usage that the reopened railway line between Colne and Skipton would be well patronised. If the line was reopened it would also bring the added advantage of inward investment and the promotion of social and economic regeneration and growth. This has been the case in the Aire Valley between Skipton and Leeds/Bradford when the railway was saved and upgraded in the 1980s. So, Pendle should make the reopening and upgrading of the railway a major priority as part of the Local Plan.			
Summary	Rail travel is more environmentally friendly and better for public health than other forms of polluting transport. The Council should urge the upgrading of the railway from Preston to Colne and the reopening of the railway from Colne to Skipton as soon as possible. Rail connectivity is vital for people to gain access to education and training facilities. Pendle should make the reopening of the railway a major priority as part of the Local Plan. It can help to increase inward investment and promote social and economic regeneration. Passenger numbers are increasing and the reopening of the line to Skipton would be well used. A similar project on the Aire Valley line in the 1980s has shown this to work.			

Policy SUP1: Community Facilities

856633 / 2 / SUP1 / - / - / -	The Theatres Trust	Mr	Ross	Anthony
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	The Theatres Trust continues to support Policy SUP 1 Community Facilities as this policy provides clear guidance for protection and promotion of existing and new community and cultural facilities. We are especially pleased to see cultural facilities listed in the description of the term "community facilities". This Policy clearly reflects the guidance provided in para 70 of the NPPF.			
Summary	Support for Policy SUP1.			

755915 / 73 / SUP1 / 0 / 0 / 0	Home Builders Federation Ltd	Mr	Matthew	Good
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	Policy SUP 1: Community Facilities  41. The policy requires new developments to contribute towards the provision of any community needs generated by the development, where viable. The policy therefore appears to indicate that contributions towards community facilities will be pooled. The Council will be aware that the use of section 106 agreements are being scaled back with the pooling of contributions severely limited. The HBF is unaware of the Council’s intentions regarding the introduction of the Community Infrastructure Levy (CIL), it is however clear that the government intends that this will be the only mechanism for collecting cumulative contributions towards infrastructure.			
Summary	The policy appears to indicate that contributions towards community facilities will be pooled. The use of Section 106 agreements are being scaled back. CIL will be the only mechanism for the collection of cumulative contributions for infrastructure.			

Policy SUP2: Health and Well-being

867015 / 55 / SUP2 / - / - / -	Canal & River Trust	Mr	Martyn	Coy
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	We support the principles of the Policy. However, as the Leeds & Liverpool Canal and its towpath offer great leisure and recreational opportunities that create health and well-being benefits to all its diverse users, we recommend that the Trust is included as a delivery agency. Thereby, we can help work with the Local Authority and other agencies to ensure that strategies are put in place in order that our network is fully utilised by the local community so that they benefit from the health and well-being benefits offered by the canal. Such an approach would be consistent with section 8 'promoting healthy communities' of the National Planning Policy Framework.			
Summary	General support for Policy SUP2. However, the Canal & River Trust should be included as a delivery agency so they can work with the Local Authority on projects relating to the Leeds & Liverpool canal.			

Policy SUP4: Designing Better Public Places

731431 / 141 / SUP4 / 0 / 0 / S4	English Heritage	Ms	Emily	Hrycan
Duty to Co-operate				
Legal Compliance				
Soundness	The NPPF requires that Plan Policies should contain a positive strategy for the conservation and enhancement of the historic environment. In particular it should contain strategic policies for the conservation and enhancement of the historic environment. The policy does not recognise that the design of public buildings and the public realm and the contribution they make to the whole of the historic environment including local identity and character. It only requires proposals to “ respond sympathetically ” (public buildings) or “ enhance the setting ” (public realm). The policy only refers to “built heritage” which does not particularly accord with the requirements of the NPPF.			
Suggested Change	The Policy should be amended to ensure that proposals for public buildings and improvements to the public realm will conserve and enhance the whole of the historic environment including heritage assets and their setting.			
Comment				
Summary	The policy does not recognise the contribution that the design of public buildings and the public realm can have on the whole historic environment including local identity and character. The policy should ensure that proposals will conserve and enhance the whole of the historic environment - heritage assets and their setting.			

# Appendix A: Infrastructure Delivery

867015 / 56 / APPA / 0 / 0 / 0	Canal & River Trust	Mr	Martyn	Coy
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	We note that the Infrastructure Delivery Schedule makes no reference to funding improvements to the pedestrian and cycling network. We attended a workshop event for the preparation of the Core Strategy in 2013 and highlighted the role the canal and it's towpath have in providing sustainable transport options. The towpath provides a car free route allowing local people the opportunity to walk to school or work and provides commuter opportunities for people working outside the Borough. Such usage helps the health and well-being of the towpath users and reduces congestion and pollution on local roads. Therefore, encouraging the use of the towpath for walking and cycling meets many of the criteria and requirements of the National Planning Policy Framework from promoting sustainable transport (section 4) to promoting healthy communities (section 8). As such, we would welcome the opportunity to further meet with you to discuss this issue and how to better promote the funding of the towpath network within the context of the Infrastructure Delivery Schedule.			
Summary	The Canal & River Trust would like to further discuss the issue of how to fund work to the canal towpath to improve it as a sustainable transport option.			



Appendix B: Replacement Pendle Local Plan (2001-2016) Policies

818046 / 86 / APPB / 0 / 0 / S1, S2, S3, S4	Barton Willmore	Mr	Michael	Courcier	Junction Properties Ltd
Duty to Co-operate					
Legal Compliance					
Soundness	<div>Appendix B: Replacement Local Plan Policies</div> <div>A1.44 Adopted Local Plan Policy 12 is not consistent with the NPPF as it is not a criteria-based landscape policy. Appendix B should specify its deletion from the development plan. Its retention would impede the effective delivery of housing in the period before the adoption of the allocations dpd.</div> <div>A1.45 For these reasons, the policy fails the soundness tests of being positively prepared, justified, effective and consistent with national policy.</div>				
Suggested Change					
Comment					
Summary	<div>Appendix B should specify that Policy 12 of the existing Local Plan should be deleted as it is not consistent with national policy and will impede housing delivery before the adoption of the Site Allocations DPD.</div>				

Appendix C: Glossary

818046 / 87 / APPC / 0 / 0 / S1, S2, S3, S4	Barton Willmore	Mr	Michael	Courcier	Junction Properties Ltd
Duty to Co-operate					
Legal Compliance					
Soundness	<div>Appendix C: Glossary</div> <div>A1.46 The definition of open space in Appendix C is not in accordance with national or guidance. It is also not in accordance with Footnote 95 of the Core Strategy itself.</div> <div>This is because it includes not only areas which offer opportunities for sport and recreation (in line with the NPPF) but also areas which act as a “valuable visual amenity or haven for wildlife.” The Appendix thereby confuses the type of protection appropriate to open space (as set out in NPPF paragraph 74) with that to be accorded to Local Green Spaces (NPPF paragraph 77) and wildlife sites (NPPF paragraphs 113 and 118).</div> <div>A1.47 For these reasons, Appendix C fails the soundness tests of being positively prepared, justified, effective and consistent with national policy.</div>				
Suggested Change					
Comment					
Summary	<div>The definition of Open Space is not in accordance with the NPPF or the Core Strategy footnote 95.</div> <div>The definition includes areas which act as "valuable visual amenity or haven for wildlife" this definition confuses the type of protection appropriate to open space (as set out in the NPPF).</div>				

Appendix D: Bibliography

327387 / 95 / APPD / 0 / 0 / 0	Wildlife Trust for Lancashire, Manchester and North Merseyside	Mr	John	Lamb
Duty to Co-operate				
Legal Compliance				
Soundness				
Suggested Change				
Comment	Appendix D Bibliography and References does not appear to refer to The Lawton Review.			
Summary	Appendix D does not include the Lawton Review.			



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in a way which is better for you,  
please telephone us.**

یہ معلومات کسی ایسی شکل میں چاہتے ہیں، جو کہ  
لئے زیادہ مفید ہو تو برائے مہربانی ہمیں ٹیلیفون کریں۔

