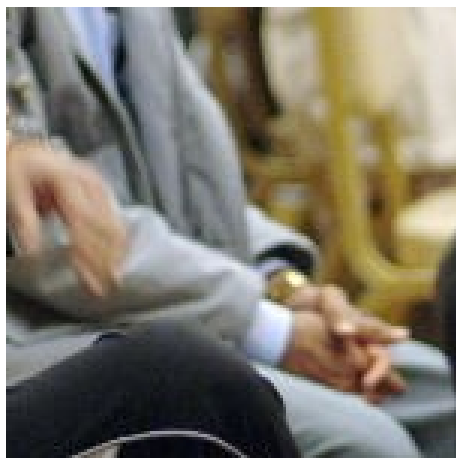
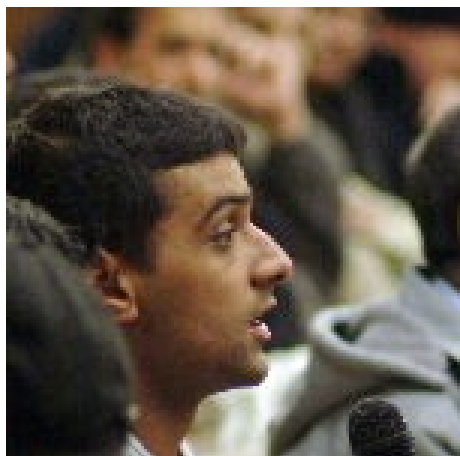
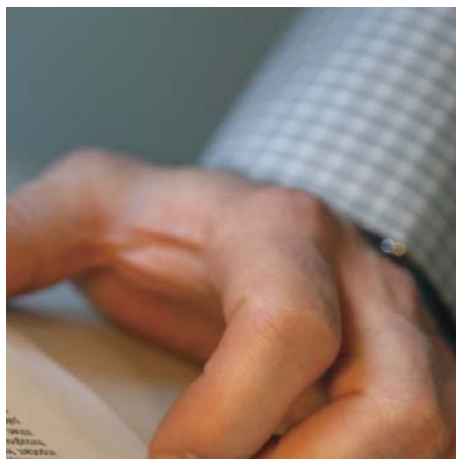
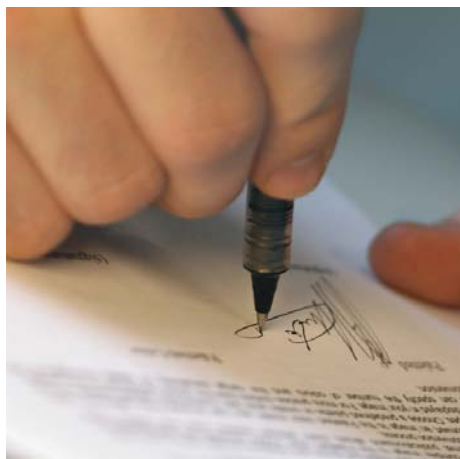


Preparing a Local Plan for Pendle



Core Strategy Summary of Representations

December 2014



For an alternative format of this
document phone 01282 661330



Pendle Local Plan Part 1: Core Strategy

Summary of Representations

This document provides a brief summary of each representation received by the Council to the public consultation on the Pre-Submission Core Strategy.

The full representations are included at Appendix 5 of the Consultation Statement (Regulation 22).

Pendle Local Plan Part 1: Core Strategy

838056 / 4 / DOC / - / 0 / 0

North Yorkshire County Council

Mr.

Carl

Bunnage

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

No specific comment.

807418 / 6 / DOC / - / - / -

Environment Agency

Mr

Dave

Hortin

Support for document - Duty to Co-operate, Legal Compliance and Soundness.

379222 / 7 / DOC / 0 / 0 / 0

The Coal Authority

Miss

Rachael

Bust

General comment giving context of the role of the Coal Authority and an overview coal mining issues in the borough.

817585 / 11 / DOC / - / - / S1, S3, S4

JWPC Ltd

Mr

John

Willcock

Beck Developments Ltd

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.

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.

The plan should address identified needs (and inherited deficits) robustly, and as quickly and effectively possible.

327529 / 17 / DOC / 0 / 0 / 0

Natural England

No specific comment.

866837 / 19 / DOC / 0 / 0 / 0

Mr

G R

Bolton

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

The land between Knotts Lane and Lenches Road should be considered as an area for conservation not development.

The consultation has been flawed due to the mislabelling of this site. People have been denied the right to put their views forward.

817556 / 29 / DOC / - / - / -

David Lock Associates

Ms

Kate

Skingley

Rolls Royce plc

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.

818207 / 40 / DOC / 0 / 0 / 0

United Utilities Property Services

Ms

Jenny

Hope

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.

867305 / 46 / DOC / 0 / 0 / 0

Persimmon Homes Lancashire

Mr

Chris

Gowlett

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

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.

755915 / 66 / DOC / 0 / 0 / 0

Home Builders Federation Ltd

Mr

Matthew

Good

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.

Pendle Local Plan Part 1: Core Strategy

755915 / 67 / DOC / DTC / 0 / 0

Home Builders Federation Ltd

Mr

Matthew

Good

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.

818046 / 74 / DOC / 0 / - / S4

Barton Willmore

Mr

Michael

Courcier

Junction Properties Ltd

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.

818046 / 75 / DOC / 0 / - / S1, S2, S3, S4

Barton Willmore

Mr

Michael

Courcier

Junction Properties Ltd

The overall housing requirement for 2011-2030 will not meet the objectively assessed housing needs of the area.

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.

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.

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.

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).

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.

The housing requirement in Policy LIV1 should be increased to at least 340 dwellings per annum.

There is no justification for staggering the housing requirement.

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.

National policy is clear that Local Plans should aim to meet OAN for housing - this must mean meeting them when they arise.

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.

The housing requirement in Policy LIV1 (total amount and phasing) is unsound against all four tests.

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.

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.

Many of the committed sites identified in the SHLAA are subject to significant market constraints which mean that they are not genuinely deliverable. 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.

818046 / 88 / DOC / 0 / 0 / 0

Barton Willmore

Mr

Michael

Courcier

Junction Properties Ltd

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.

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.

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.

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.

The SHLAA therefore over-estimates the supply of deliverable sites and the actual supply is significantly less.

Pendle Local Plan Part 1: Core Strategy

327387 / 89 / DOC / 0 / 0 / 0

Wildlife Trust for Lancashire,
Manchester and North
Merseyside

Mr

John

Lamb

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

Support for the preparation of a Habitat Regulations Assessment Screening Report for the Core Strategy.

327387 / 97 / DOC / 0 / LC / 0

Wildlife Trust for Lancashire,
Manchester and North
Merseyside

Mr

John

Lamb

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

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.

867836 / 109 / DOC / 0 / - / S1, S2

Ms

Angela

Arnold

There are currently 139 empty industrial units in Pendle. It is unclear why the Lomeshaye extension has become so important.

The farm is still classified as green belt land.

The site is also in floodplain and it does not seem sensibly to build tin tabernacles up the hillside above the river.

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.

Why does the plan have to be rushed? Why does the roundabout onto the A6068 have to be installed at the earliest opportunity?

It is unlikely that the area will return to full employment and industrial activity.

There is a wealth of wildlife which occupy this site.

327580 / 113 / DOC / 0 / 0 / 0

Lidgett & Beyond Group

Mr.

Owen G.

Oliver

Broad support for the Core Strategy. Support for Strategic Objectives 9 and 10.

Would like to prepare a Neighbourhood Plan with Colne Town Council, Laneshawbridge and Trawden Parish Councils.

Disputes some of the evidence in the SHLAA.

The Core Strategy does not reflect recent government announcements on the protection of the Green Belt.

DCLG announced that the Green Belt should be protected from development and brownfield development should be prioritised.

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.

Policy ENV1 should reflect the new guidance and consider how to protect and preserve the Green Belt more strongly.

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.

There should be a proactive approach to brownfield sites to meet the targets especially for affordable homes.

379387 / 117 / DOC / 0 / 0 / 0

Mr & Mrs A

Hoyle

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.

731431 / 125 / DOC / 0 / 0 / S4

English Heritage

Ms

Emily

Hrycan

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.

Pendle Local Plan Part 1: Core Strategy

327467 / 158 / DOC / 0 / 0 / 0

Barrowford Parish Council

Mr

Iain

Lord

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.

868081 / 170 / DOC / 0 / 0 / S1, S2, S3, S4 JWPC

Mr

Stuart

Booth

Beck Developments Ltd

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.

868120 / 181 / DOC / - / - / -

Turley Associates

Mr

Andrew

Bickerdike

Peel Holdings (Land & Property) Ltd

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

478805 / 191 / DOC / 0 / 0 / 0

Ms

Sheila

Smith

Multiple objections to the Core Strategy on the basis of:

- inadequate public consultation;
- irreversible damage to wildlife, destruction of national habitats and green fields;
- destruction of the countryside around towns and the adverse impact on footpaths;
- an unfair proportion of housing delivery in Colne;
- unreliable figures and statistical evidence;
- the introduction of an unpopular and unwanted bypass; and
- the loss of Colne's historical character and identity.

478805 / 192 / DOC / 0 / 0 / 0

Ms

Sheila

Smith

The Core Strategy is not based on adequate, or timely, engagement/public consultation.

478805 / 196 / DOC / 0 / LC / 0

Ms

Sheila

Smith

The Core Strategy is not legally compliant because it is

- not a product of neighbourhood planning;
- the housing figures are not viable, but simply comply with government requirements; and
- public consultation has been abysmal.

868199 / 197 / DOC / 0 / 0 / 0

Mrs

Angela

Ross

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.

Pendle Local Plan Part 1: Core Strategy

619588 / 201 / DOC / - / - / -

Friends of the Earth

Ms

Jane

Wood

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.

327812 / 211 / DOC / - / - / -

Mr

Clive

Narrainen

No comments made.

868476 / 216 / DOC / 0 / LC / S1, S2, S3, S4

Ms

Pam

Smith

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

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.

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.

868022 / 164 / CHP1 / 0 / 0 / S4

Dr and
Mrs

John and
Alison

Plackett

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.

868022 / 165 / CHP1 / 0 / 0 / 0

Dr and
Mrs

John and
Alison

Plackett

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

Support for Chapter 2.

327387 / 91 / CHP2 / DTC / 0 / 0

Wildlife Trust for Lancashire,
Manchester and North
Merseyside

Mr

John

Lamb

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.

868022 / 163 / CHP2 / 0 / 0 / 0

Dr and
Mrs

John and
Alison

Plackett

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

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.

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.

327387 / 92 / CHP3 / 0 / 0 / 0

Wildlife Trust for Lancashire,
Manchester and North
Merseyside

Mr

John

Lamb

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. There is also no mention of cross boundary wildlife sites or links to networks in adjoining authorities.

731431 / 126 / CHP3 / 0 / 0 / S4

English Heritage

Ms

Emily

Hrycan

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

The plan needs to be amended to ensure all aspects of the historic environment are covered not just built heritage.

327467 / 149 / CHP3 / 0 / 0 / 0

Barrowford Parish Council

Mr

Iain

Lord

Historical context: - Decline in former industries and severing of transport links (railway) has left the area in a state of decline and isolation.

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.

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.

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.

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.

Infrastructure: - Barrowford has reached saturation point with major infrastructure needs:

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.

- obstructions and restriction to minor roads leading from the A682 to more rural areas - these issues are insurmountable for large developments.

Schools: - Both primary schools are either at our near capacity and oversubscribed - no capacity for additional places resulting from development.

Health services: - limited provision and oversubscribed facilities.

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.

Sewage: - The main foul water drainage system is very old and was not built to deal with such large scale development.

619588 / 202 / CHP3 / - / - / 0

Friends of the Earth

Ms

Jane

Wood

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:

- deliver a range of housing appropriate to the needs of the borough
- create a strong and dynamic economy
- address our infrastructure requirements, creating sustainable urban and rural communities

Chapter 4: Our Spatial Vision: Pendle Tomorrow

864766 / 58 / CHP4 / - / - / -

SELRAP

Mr

David

Penney

Rail should be the transport priority so that the SCS goal to deepen our understanding and respect for the environment is achieved.

867824 / 112 / CHP4 / DTC / 0 / S1, S2

Mrs

Heather

Askew

The plan has not objectively assessed development requirements for Barrowford. Local residents have not been included in the discussion or planning.

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.

The infrastructure is inadequate - schools are oversubscribed and there is heavy traffic congestion.

731431 / 128 / CHP4 / 0 / 0 / S4

English Heritage

Ms

Emily

Hrycan

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

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.

868022 / 166 / CHP4 / 0 / 0 / S3, S4

Dr and
Mrs

John and
Alison

Plackett

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.

Protecting habitats in Rural Pendle alone is not justified, as priority habitats exist elsewhere in the borough.

868022 / 169 / CHP4 / 0 / 0 / 0

Dr and
Mrs

John and
Alison

Plackett

The Spatial Vision fails to offer sufficient recognition to the important role that 'biodiversity planning' can play in the regeneration of the area.

478805 / 195 / CHP4 / 0 / 0 / 0

Ms

Sheila

Smith

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

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

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

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.

327370 / 146 / CHP5 / - / - / S1, S2, S3, S4

National Trust

Mr

Alan

Hubbard

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.

868022 / 168 / CHP5 / 0 / 0 / S3, S4

Dr and
Mrs

John and
Alison

Plackett

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

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

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.

868120 / 182 / CHP7 / - / - / 0

Turley Associates

Mr

Andrew

Bickerdike

Peel Holdings (Land & Property) Ltd

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.

Policy SDP1: Presumption in Favour of Sustainable Development

817889 / 12 / SDP1 / 0 / 0 / 0	Turley Associates	Mr	George	Wilyman	Sainsbury's
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	
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

Support for Policy SDP2.

866837 / 20 / SDP2 / 0 / 0 / 0

Mr

G R

Bolton

Brownfield sites should be used first. Green Belt land should be dismissed.

867305 / 48 / SDP2 / 0 / 0 / 0

Persimmon Homes Lancashire

Mr

Chris

Gowlett

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.

755915 / 68 / SDP2 / 0 / 0 / S1, S4

Home Builders Federation Ltd

Mr

Matthew

Good

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.

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.

818046 / 76 / SDP2 / 0 / 0 / S1, S2, S3, S4

Barton Willmore

Mr

Michael

Courcier

Junction Properties Ltd

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.

817541 / 101 / SDP2 / 0 / 0 / 0

Dickman Associates Ltd

Ms

Jane

Dickman

Green Emmott Trust

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.

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.

New housing sites will need to provide a range of house types and tenures and Rural Villages should reflect this mix.

327580 / 115 / SDP2 / 0 / 0 / 0

Lidgett & Beyond Group

Mr.

Owen G.

Oliver

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.

There is a need for public funding to help deliver affordable housing.

The Council should proactively engage with development partners given that there is a general apathy of commercial developers to develop brownfield sites.

327467 / 150 / SDP2 / 0 / 0 / 0

Barrowford Parish Council

Mr

Iain

Lord

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.

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.

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.

Policy SDP2: Spatial Development Principles

327467 / 152 / SDP2 / 0 / 0 / 0

Barrowford Parish Council

Mr

Iain

Lord

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).

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.

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.

These concerns are not unfounded as developers have shown a keen interest in developing a number of sites on the edges of Barrowford. 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.

868120 / 183 / SDP2 / - / - / -

Turley Associates

Mr

Andrew

Bickerdike

Peel Holdings (Land & Property) Ltd

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.

Policy SDP3: Housing Distribution

755915 / 69 / SDP3 / 0 / 0 / S1, S2, S3 Home Builders Federation Ltd Mr Matthew Good

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.

818046 / 77 / SDP3 / 0 / 0 / S1, S2, S3, S4 Barton Willmore Mr Michael Courcier Junction Properties Ltd

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.

817541 / 102 / SDP3 / 0 / 0 / 0 Dickman Associates Ltd Ms Jane Dickman Green Emmott Trust

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.

327467 / 153 / SDP3 / 0 / 0 / 0 Barrowford Parish Council Mr Iain Lord

Barrowford is the smallest settlement in the M65 Corridor and is subject to the decisions of its larger neighbours on the borough council. 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.

868120 / 184 / SDP3 / - / - / - Turley Associates Mr Andrew Bickerdike Peel Holdings (Land & Property) Ltd

Support for Policy SDP3 - Housing Distribution

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

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

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.

327580 / 116 / SDP6 / 0 / 0 / 0 Lidgett & Beyond Group Mr Owen G. Oliver

The Core Strategy is pessimistic about being able to introduce CIL charges.

PAS suggest that 'heat mapping' can be used to indicate where land values can support a CIL charge for different development types.

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.

327467 / 155 / SDP6 / 0 / 0 / 0 Barrowford Parish Council Mr Iain Lord

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.

864766 / 61 / CHP8 / - / - / -	SELRAP	Mr	David	Penney
<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>				
868022 / 167 / CHP8 / 0 / 0 / S3		Dr and Mrs	John and Alison	Plackett
<p>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).</p>				

Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

379222 / 9 / ENV1 / - / - / -The Coal AuthorityMissRachaelBust

Support for Policy ENV1.

867305 / 49 / ENV1 / 0 / 0 / 0Persimmon Homes LancashireMrChrisGowlett

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.

818046 / 79 / ENV1 / 0 / 0 / S1, S2, S3, S4Barton WillmoreMrMichaelCourcierJunction Properties Ltd

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.

327387 / 93 / ENV1 / 0 / 0 / 0Wildlife Trust for Lancashire, Manchester and North MerseysideMrJohnLamb

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.
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.
Support for the inclusion of wording at 8.50 regarding the identification and designation of Local Green Spaces.

731431 / 130 / ENV1 / 0 / 0 / 0English HeritageMsEmilyHrycan

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.

731431 / 131 / ENV1 / 0 / 0 / S1, S4English HeritageMsEmilyHrycan

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, S4English HeritageMsEmilyHrycan

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.

731431 / 133 / ENV1 / 0 / 0 / S4English HeritageMsEmilyHrycan

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 / S4English HeritageMsEmilyHrycan

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.

868022 / 159 / ENV1 / 0 / 0 / S4Dr and MrsJohn and AlisonPlackett

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

868022 / 160 / ENV1 / 0 / 0 / S3, S4

Dr and MrsJohn and AlisonPlackett

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.

868022 / 162 / ENV1 / 0 / 0 / 0

Dr and MrsJohn and AlisonPlackett

The preparation of the Sustainable Community Strategy (and the Core Strategy) failed to achieve adequate engagement with biodiversity partner organisations.

619588 / 204 / ENV1 / - / - / -

Friends of the EarthMsJaneWood

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

Support for Policy ENV2. Developments should incorporate water efficiency measures into their designs.

867015 / 52 / ENV2 / DTC / - / S4

Canal & River Trust

Mr

Martyn

Coy

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.

818046 / 80 / ENV2 / 0 / 0 / S1, S2, S3, S4

Barton Willmore

Mr

Michael

Courcier

Junction Properties Ltd

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.

731431 / 135 / ENV2 / 0 / 0 / S1, S4

English Heritage

Ms

Emily

Hrycan

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

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.

Policy ENV3: Renewable and Low Carbon Energy Generation

731431 / 136 / ENV3 / 0 / 0 / S4	English Heritage	Ms	Emily	Hrycan
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
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

Support for Policy ENV4.

818401 / 23 / ENV4 / 0 / 0 / 0

Mr

Anthony J

Peacock

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.

Is it part of the strategy to press County/Government for the building of the Colne bypass?

817556 / 35 / ENV4 / - / - / -

David Lock Associates

Ms

Kate

Skingley

Rolls Royce plc

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

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.

818314 / 120 / ENV4 / 0 / 0 / 0

P

Daniel

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.

868113 / 179 / ENV4 / 0 / LC / S3, S4

Mr

M

Gordon

Considers the plan to be unsound because:

- it has been prepared largely by professionals who have achieved little engagement with the local community.

- the plans stated commitment to sustainable development is laudable, but not based on "any real grasp" of the concept.

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.

Policy ENV5: Pollution and Unstable Land

379222 / 10 / ENV5 / - / - / - The Coal Authority Miss Rachael Bust

Support for Policy ENV5.

867015 / 53 / ENV5 / - / - / - Canal & River Trust Mr Martyn Coy

Support for Policy ENV5

619588 / 207 / ENV5 / - / - / 0 Friends of the Earth Ms Jane Wood

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

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

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.

378754 / 99 / ENV7 / 0 / 0 / - Lancashire County Council Mr Marcus Hudson

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

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

817848 / 27 / CHP10 / 0 / 0 / 0

Ms

Susan

Sunderland

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.

474133 / 28 / CHP10 / 0 / 0 / 0

Mr

Martin

Stanworth

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.

867267 / 39 / CHP10 / 0 / 0 / 0

Mr

Carl

Hammond

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.

The development of this site will lead to major traffic problems in Barrowford which already suffers from severe congestion.

867850 / 108 / CHP10 / 0 / 0 / 0

Ms

Gayle

Dunkley

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.

867852 / 110 / CHP10 / 0 / 0 / 0

Mrs

Alex

Roberts

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.

847067 / 118 / CHP10 / DTC / LC / 0

Mr. & Mrs. Jeff & Jacquie Noon

Not informed of the rearranged council meeting. Prefer face to face consultations.

The strategy is too complex to understand.

There is no key with the site allocation map.

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.

Traffic problems are already a major concern and the area would not be able to cope with the impact of 700 new houses.

There are bats present in this area which need to be protected.

Unused sites in Nelson should be used instead.

818314 / 122 / CHP10 / 0 / 0 / 0

P

Daniel

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

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

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.

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.

This approach could provide a spring board for the deprived areas.

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.

868022 / 161 / CHP10 / 0 / 0 / 0

Dr and
Mrs

John and
Alison

Plackett

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.

868089 / 171 / CHP10 / 0 / 0 / 0

Ms

Susan

Fletcher

Opposes building on Green Belt (sic) land to the rear of St. Thomas's School, Wheatley Lane Road, Barrowford.

The development of Brownfield sites within Nelson should be prioritised in order to help stimulate regeneration.

868098 / 172 / CHP10 / 0 / 0 / 0

Mr and
Mrs

Christopher
and Ann

Webster

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.

868098 / 173 / CHP10 / 0 / 0 / 0

Mr and
Mrs

Christopher
and Ann

Webster

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.

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.

817934 / 178 / CHP10 / DTC / LC / S1, S2, S3, S4

Mr

Paul

Henderson

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

478805 / 193 / CHP10 / 0 / 0 / 0

Ms

Sheila

Smith

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.

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.

Policy LIV1: Housing Provision and Delivery

866837 / 21 / LIV1 / 0 / 0 / 0

Mr

G R

Bolton

There are 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

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

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 Sedgefield method should be used which is a growth friendly approach.

755915 / 70 / LIV1 / 0 / 0 / S1, S4

Home Builders Federation Ltd

Mr

Matthew

Good

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.

818046 / 81 / LIV1 / 0 / 0 / S1, S2, S3, S4

Barton Willmore

Mr

Michael

Courcier

Junction Properties Ltd

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.

The housing requirement should be expressed as a minimum and not a cap as proposed.

The requirement for applicants to provide a financial viability assessment should be deleted as it is an unnecessary burden.

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.

817541 / 103 / LIV1 / 0 / 0 / S2, S3, S4

Dickman Associates Ltd

Ms

Jane

Dickman

Green Emmott Trust

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.

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.

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.

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.

It is unclear whether a statement showing availability, suitability and achievability will be required for sites already tested through the SHLAA process.

Policy LIV1: Housing Provision and Delivery

327580 / 114 / LIV1 / 0 / 0 / 0

Lidgett & Beyond Group

Mr.

Owen G.

Oliver

The housing requirement in the Core Strategy should be amended to reflect the new household projections once they are released.

Questions the application of the 20% as the borough has only under-delivered due to housing market stagnation.

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.

Too much supply will keep house prices down and will threaten the viability of brownfield sites.

The AMR should make a high-level review of the housing requirement every year based on available population and household information.

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".

The Liverpool method should be used for dealing with any under-delivery so as not to set an onerous target.

The inclusion of sites with planning permission in the five year supply target is supported. Help should be given to moth-balled / incomplete developments.

857197 / 143 / LIV1 / 0 / 0 / 0

Burnley Borough Council

Ms.

Kate

Ingram

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.

327467 / 157 / LIV1 / 0 / 0 / 0

Barrowford Parish Council

Mr

Iain

Lord

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.

868099 / 175 / LIV1 / 0 / 0 / S3

Pendle Liberal Democrats

Mr

Jim

Kerrigan

The housing requirement numbers, which underlie the policies in the Core Strategy, are unrealistic and fundamentally flawed.

The housing requirement figure should be reduced and six sites (listed below) removed from the SHLAA:

- Land off Skipton Road, Barnoldswick
- Land behind Raikes Cottage, Barnoldswick
- Land off Gisburn Road (Lane Ends Farm and Foster Road, Barnoldswick
- Land at Wapping, Barnoldswick
- Land at Windermere Avenue (The Rough), Colne
- Land at Lidgett Triangle, Colne

327997 / 177 / LIV1 / 0 / 0 / S3

Vernon & Co

Mr

Peter

Vernon

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.

More land should be brought forward earlier in the plan period.

868113 / 180 / LIV1 / 0 / LC / S1, S4

Mr

M

Gordon

Considers the plan to be unsound because:

- it has been prepared largely by professionals who have achieved little engagement with the local community.
- the plans stated commitment to sustainable development is laudable, but not based on "any real grasp" of the concept.

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.

868120 / 185 / LIV1 / - / - / -

Turley Associates

Mr

Andrew

Bickerdike

Peel Holdings (Land & Property) Ltd

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.

Policy LIV1: Housing Provision and Delivery

868120 / 186 / LIV1 / - / - / S4

Turley Associates

Mr

Andrew

Bickerdike

Peel Holdings (Land & Property) Ltd

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.

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.

857212 / 212 / LIV1 / - / - / S2

Lancaster City Council

Mr.

Maurice

Brophy

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.

818030 / 214 / LIV1 / 0 / LC / S1, S3

PWA Planning

Mr

Paul

Walton

Mr Marcus Kinsman

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).

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.

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.

Policy LIV2: Strategic Housing Site: Trough Laithe

817934 / 22 / LIV2 / 0 / 0 / 0

Mr

Paul

Henderson

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

The number of houses proposed for the Strategic Housing Site will cause a capacity issue at local schools and cause further traffic problems.

818207 / 44 / LIV2 / 0 / 0 / 0

United Utilities Property Services

Ms

Jenny

Hope

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.

818046 / 82 / LIV2 / 0 / 0 / S1, S2, S3, S4 Barton Willmore

Mr

Michael

Courcier

Junction Properties Ltd

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.

The site at Trough Laithe is not in accordance with the spatial strategy set out in Policy SDP2. Barrowford is a second-tier settlement.

There is no minimum size set by national policy for allocations in Core Strategies. A range of sizes has been accepted.

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.

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.

817541 / 104 / LIV2 / 0 / 0 / 0

Dickman Associates Ltd

Ms

Jane

Dickman

Green Emmott Trust

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

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.

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.

Without such an assessment the plan cannot demonstrate that the site can be delivered without harm to the historic environment.

867961 / 142 / LIV2 / 0 / 0 / 0

Ms

Samantha

Ward

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.

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.

Policy LIV2: Strategic Housing Site: Trough Laithe

327467 / 154 / LIV2 / 0 / 0 / 0

Barrowford Parish Council

Mr

Iain

Lord

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.

818007 / 176 / LIV2 / DTC / LC / 0

Mr

Mark

Roberts

The Core Strategy is neither legally compliant nor sound for the following reasons:

- 1) The evidence on housing is weak or non existent.
- 2) Housing targets are too high.
- 3) The Trough Laithe site will not help to meet housing needs in Pendle due to its poor proximity to services and supporting infrastructure.
- 4) Delivery of the site is not achievable.
- 5) The sustainability appraisal in respect of the strategic allocation is inadequate.
- 6) There is no adequate assessment of the supporting infrastructure required to support the strategic housing allocation.
- 7) The development of Greenfield sites is unjustified when there are vast amounts of Brownfield land in Pendle and neighbouring Burnley.

868120 / 187 / LIV2 / - / - / 0

Turley Associates

Mr

Andrew

Bickerdike

Peel Holdings (Land & Property) Ltd

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.

868120 / 190 / LIV2 / - / - / 0

Turley Associates

Mr

Andrew

Bickerdike

Peel Holdings (Land & Property) Ltd

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.

818030 / 215 / LIV2 / 0 / LC / S2, S3

PWA Planning

Mr

Paul

Walton

Mr Marcus Kinsman

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

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

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.

857212 / 213 / LIV3 / - / - / S1 Lancaster City Council Mr. Maurice Brophy

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.

Policy LIV4: Affordable Housing

867305 / 51 / LIV4 / 0 / 0 / 0

Persimmon Homes Lancashire

Mr

Chris

Gowlett

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.

755915 / 71 / LIV4 / 0 / 0 / S2, S4

Home Builders Federation Ltd

Mr

Matthew

Good

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.

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. These mandatory costs will have a significant impact on viability.

There is no justification for the requirement to provide financial viability appraisals.

The tenure percentages should be for indicative purposes only.

The threshold of five units or more (in rural Pendle) is contrary to a recent Government consultation.

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.

818046 / 84 / LIV4 / 0 / 0 / S1, S2, S3, S4 Barton Willmore

Mr

Michael

Courcier

Junction Properties Ltd

The affordable housing target of 40% is unrealistic and would threaten the viability of development.

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.

The requirement for renegotiation of the affordable housing element if planning permission is not implemented should be deleted.

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.

817541 / 105 / LIV4 / 0 / 0 / S1, S2, S4

Dickman Associates Ltd

Ms

Jane

Dickman

Green Emmott Trust

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.

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

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.

868120 / 188 / LIV4 / - / - / S4

Turley Associates

Mr

Andrew

Bickerdike

Peel Holdings (Land & Property) Ltd

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.

Policy LIV5: Designing Better Places to Live

755915 / 72 / LIV5 / 0 / 0 / 0

Home Builders Federation Ltd

Mr

Matthew

Good

The Building for Life standards should not become a mandatory requirement.

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.

818046 / 85 / LIV5

/ 0 / 0 / 0

S1, S2, S3, S4

Barton Willmore

Mr

Michael

Courcier

Junction Properties Ltd

The policy does not encourage the provision of higher value/lower density family housing in the M65 Corridor in line with the SHMA.

327387 / 94 / LIV5 / 0 / 0 / 0

Wildlife Trust for Lancashire,
Manchester and North
Merseyside

Mr

John

Lamb

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

The cost of providing one or two bedroom detached properties will impact on viability. Furthermore these are likely to look incongruous in design terms.

731431 / 138 / LIV5 / 0 / 0 / S4

English Heritage

Ms

Emily

Hrycan

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

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

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

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.

478805 / 194 / CHP11 / 0 / 0 / 0

Ms

Sheila

Smith

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.

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.

Policy WRK1: Strengthening the Local Economy

817889 / 15 / WRK1 / 0 / 0 / 0	Turley Associates	Mr	George	Wilyman	Sainsbury's
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
Support for Policy WRK1.					

619588 / 209 / WRK1 / - / - / 0	Friends of the Earth	Ms	Jane	Wood	
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

Support for Policy WRK2.

857197 / 145 / WRK2 / 0 / 0 / 0

Burnley Borough Council

Ms.

Kate

Ingram

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.

868120 / 189 / WRK2 / - / - / 0

Turley Associates

Mr

Andrew

Bickerdike

Peel Holdings (Land & Property) Ltd

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.

Policy WRK3: Strategic Employment Site: Lomeshaye

866837 / 18 / WRK3 / 0 / 0 / 0

Mr

G R

Bolton

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.

818410 / 24 / WRK3 / 0 / 0 / 0

Mrs

Margaret

Lancaster

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.

817556 / 32 / WRK3 / - / - / -

David Lock Associates

Ms

Kate

Skingley

Rolls Royce plc

Support for the changes made to Policy WRK3.

818207 / 45 / WRK3 / 0 / 0 / 0

United Utilities Property Services

Ms

Jenny

Hope

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.

817576 / 111 / WRK3 / 0 / 0 / 0

Ms

Beverley

Bailey

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.

818314 / 119 / WRK3 / 0 / 0 / 0

P

Daniel

Lomeshaye extension:

Green Belt land should not be used for industrial development as there are no exceptional circumstances. This is piecemeal erosion of the Green Belt. How does an increase in traffic to the area surrounding the A6068 sit with "people and places matter". Air quality will be affected by an increase in traffic. This development will contribute to urban sprawl and the merging of towns. Brownfield sites in the canal corridor should be used instead of Green Belt as this will help to improve the area. How will this development protect the countryside (impact on AONB). Open spaces should be protected and AONBs be enhanced. Big units are not needed for small and medium sized businesses. Pendle needs more higher wage jobs. The permanence of the Green Belt is paramount. Life should be more than being a slave to profit.

817686 / 123 / WRK3 / 0 / 0 / 0

Mr

Alan

Boardwell

The Lomeshaye extension is an intrusion into unsuitable land. The traffic implications on the bypass are ill thought out and dangerous.

327370 / 147 / WRK3 / - / - / S1, S3

National Trust

Mr

Alan

Hubbard

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. 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. 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.

868099 / 174 / WRK3 / 0 / 0 / S4

Pendle Liberal Democrats

Mr

Jim

Kerrigan

The Core Strategy is not consistent with national policy in relation to the Green Belt.

Policy WRK3: Strategic Employment Site: Lomeshaye

327622 / 198 / WRK3 / 0 / 0 / 0

Mr. Colin Butterworth

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.

327504 / 199 / WRK3 / 0 / 0 / 0

Goldshaw Booth Parish Council Mrs. Sheila Grindrod

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

Support for Policy WRK4.

817889 / 16 / WRK4 / 0 / 0 / 0

Turley Associates

Mr

George

Wilyman

Sainsbury's

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

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.

619588 / 210 / WRK4 / - / - / 0

Friends of the Earth

Ms

Jane

Wood

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

Support for Policy WRK5.

818314 / 121 / WRK5 / 0 / 0 / 0

P

Daniel

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.

731431 / 140 / WRK5 / 0 / 0 / S4

English Heritage

Ms

Emily

Hrycan

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.

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 AssociatesMsKateSkingleyRolls Royce plc

Support for Chapter 12. However, every opportunity to build on the cultural and leisure offer in Pendle should be explored.

864766 / 64 / CHP12 / - / - / -SELRAPMrDavidPenney

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

Support for Policy SUP1.

755915 / 73 / SUP1 / 0 / 0 / 0 Home Builders Federation Ltd Mr Matthew Good

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.

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.

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.

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

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.

The definition of Open Space is not in accordance with the NPPF or the Core Strategy footnote 95.
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).

Appendix D: Bibliography

327387 / 95 / APPD / 0 / 0 / 0

Wildlife Trust for Lancashire,
Manchester and North
Merseyside

Mr

John

Lamb

Appendix D does not include the Lawton Review.

Deputy Chief Executive
Planning & Building Control
Pendle Council
Town Hall
Market Street
Nelson
Lancashire BB9 7LG

Tel: 01282 661330

Fax: 01282 661720

Email ldf@pendle.gov.uk

Website: www.pendle.gov.uk/corestrategy



If you would like this information
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۔

