



TRAWDEN FOREST NEIGHBOURHOOD PLAN

2018-2030

CONSULTATION STATEMENT

January 2018

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1 Consultation Process

Introduction

- 1.1 This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning (General) Regulations 2012 in respect of the Trawden Forest Neighbourhood Plan (TFNP).
- 1.2 The legal basis of this Consultation Statement is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should:
 - i. contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
 - ii. explain how they were consulted;
 - iii. summarise the main issues and concerns raised by the persons consulted; and
 - iv. describe how these issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan.
- 1.3 The policies contained in the TFNP are as a result of considerable interaction and consultation with the community within the parish of Trawden Forest. Work has been undertaken by the TFNP Steering Group over a period of approximately twenty months. The group was formed in June 2016 by the Trawden Forest Parish Council and consists of Parish Councillors and other local volunteers. It organised a survey in the Autumn of 2016, public events in the Summer of 2017 and drop-in sessions in Autumn 2017. Views and interactions from this process were summarised in the Key Issues (Section 2) of the TFNP, and formed the basis for the Vision Statement and Objectives in Section 3 of the TFNP. Subsequently nine Policies were proposed to achieve the community's vision and meet the Objectives. The Policies are set out in Sections 4 to 7 of the Plan.

Organisational structure of the TFNP

- 1.4 The structure put in place was a Steering Group working across the range of themes that formed the basis of the draft Neighbourhood Plan. This Steering Group met monthly. The minutes of meetings were made available on the Neighbourhood Plan pages of the Parish Council website:
<https://www.trawdenparishcouncil.org.uk/neighbourhood-plan>
- 1.5 In total there were 11 volunteers from the community in the Steering Group. Of this number five were members of the Trawden Forest Parish Council. In addition, most meetings were attended by a representative of Pendle Council Planning Department who provided invaluable advice and support.
- 1.6 The TFNP has been prepared after extensive community involvement and engagement. The TFNP Steering Group has reflected the views of the community, namely that there is a need for well-thought out, sensitive development in keeping with the size and character of the villages in the parish. The Policies aim to provide an appropriate amount of housing to meet local needs, protect significant local views, promote good quality design, protect built and natural heritage assets, protect open and green spaces, and protect local amenities.

- 1.7 As part of the Neighbourhood Plan process the Parish Council decided to undertake a Site Assessment exercise to identify preferred sites for development. In order to maintain consistency in this exercise, a core group of five members of the Steering Group was involved with all the Site Assessments.

Public events and consultation activities

- 1.8 The following consultation activities were undertaken. Examples of the various publicity and survey materials are shown in Appendix A and B.

June 27 th 2016	The intention of producing the TFNP was announced and introduced at a Village Meeting in the Community Centre.
September 2016	Questionnaire Survey of all households.
30 th June 2017	Forthcoming drop-in event at the Trawden Garden Festival was advertised in the Parish Newsletter
July 8 th /9 th 2017	A display of the housing site allocations and the proposed Policies was prominently sited and manned by Steering Group members throughout the two-day Trawden Garden Festival event. Over 250 people expressed an interest and over 95% of comments received were supportive.
27 th November 2017 to 8 th January 2018	Pre-submission Consultation (6-weeks) as described in Section 3. The consultation included a leaflet drop to all residents, emails and or letters to statutory and non-statutory consultees, and three drop-in sessions.

Consultation Event 8th and 9th July 2017



Stakeholder consultations

- 1.9 Throughout the process, the TFNP Group worked closely with Pendle Borough Council (PBC). The process included the preparation of a Sustainability Appraisal. This was developed using a template provided by PBC, with the resulting report being reviewed by PBC. The TFNP Site Assessment exercise used a subset of the criteria devised by PBC to perform their own site assessments in preparation of the Pendle Local Plan (Part 2). The initial assessments for the TFNP were undertaken with the help of PBC. Advice was provided by PBC on various other matters, including the green belt, open space designation, flood risk assessment and the development of a Local List of heritage assets. There was an ongoing dialogue with PBC during the preparation of the early drafts of the Neighbourhood Plan.
- 1.10 The TFNP Group submitted a screening request regarding the need for a Strategic Environmental Assessment (SEA) and Habitat Regulation Assessment (HRA) of the draft TFNP in October 2017. PBC provided its formal response in November 2017, stating that an SEA was not required. This was confirmed by the three statutory bodies (Natural England, Historic England and the Environment Agency) who responded to the consultation held in December 2017. A copy of the full Screening Report is included as part of the supporting evidence base.

Engaging with hard-to-reach groups

- 1.11 There were no specific groups that were felt to be under-represented throughout the process. The ethnic diversity of the parish (98.4% white as described at 1.3.17 of the TFNP) is such that there was no need for translated material.
- 1.12 The drop-in sessions were all held at the community centre in the heart of Trawden village, a location accessible to all residents. The two-day drop-in session in July 2017 occupied a prominent location during the annual Trawden Garden Festival to ensure that as many residents as possible could view the emerging neighbourhood plan, including the proposed site allocations and the outline policies.

2 Key Responses from Consultation

- 2.1 Initially, the Parish Council identified some of the key issues, such as the many objections to proposals for large, inappropriate developments in Greenfield locations. Also the frequent disputes and complaints arising from inadequate parking spaces in certain parts of the parish. The Steering Group was established and sought to address these issues, and also to discover what other issues the community felt required consideration.
- 2.2 In Summer 2016 the Steering Group designed a Questionnaire which was delivered to all of the approximately 1200 households in the parish. People were asked to say which (from a list of 30 issues) they considered important, and also to identify any other issues. Responses were received from 8% of households. The main findings were as follows:
- The importance of Wycoller Country Park was recognised by 89% of respondents, with the need to protect it being the highest scoring response. It was seen as a tourist attraction and also an important resource for local people.
 - Protecting the Recreation Ground (The 'Rec') and other play areas was important to 85% of respondents.
 - Nearly 87% of respondents were in favour of protecting local amenities such as the Community Centre.
 - 76% of respondents wanted to limit the size of new residential developments and to maintain the character of the villages in the parish. Also to maintain the green wedge between the settlements of Trawden and Cotton Tree (81%)
 - Off-road Parking improvement was considered important by 79% of respondents.
 - The protection of open spaces and the protection or improvement of Trawden Forest's heritage assets were considered important by, respectively, 77% and 80% of respondents.

3. Regulation 14 Pre-Submission Consultation

- 3.1 The Neighbourhood Plan Steering Group finalised the Draft TFNP in November 2017. The Regulation 14 Pre-Submission Consultation ran for a six-week period from 27th November 2017 to 8th January 2018.
- 3.2 A coordinated publicity campaign was undertaken which comprised:
- A notice and link to the plan was added to the Parish Council website (<http://www.trawdenparishcouncil.org.uk>)
 - Notifications were sent to statutory and non-statutory consultees via email (where possible) or hard copy letter if no email address was available (see below).
 - A 4-page publicity leaflet was delivered to almost 1200 households in the parish. This informed residents that copies of the TFNP were available to view on the Parish Council website and that printed copies of the 100-page TFNP booklet were available to view at several locations in the Parish (Trawden Parish Office, the Community Centre, Colne Public Library, Wycoller Café, Harambee Surgery, Trawden School, 42 Skipton Road, Old Joseph's Farmhouse and 145 Cotton Tree Lane). The leaflet also contained a Comments Form for completion and return. Copies of the TFNP Sustainability Appraisal, the SEA Screening Report and the Flood Risk Assessment were also provided on-line and at the designated locations.
 - Drop-in sessions were held in the Community Centre, manned by Steering Group members on three Saturday mornings during the 6-week consultation period (2nd and 9th December 2017 and 6th January 2018). A total of 13 people attended.

Distribution to Statutory and Non-Statutory Consultees

- 3.3 In accordance with requirements of the Neighbourhood Planning Regulations (Regulation 14), relevant statutory consultees were notified by letter and/or email. In addition, a range of parties that the Steering Group considered were likely to have an interest in the plan were also written to. All parties were advised to download a copy of the plan, but were advised that hard copies could be issued on request.
- 3.4 The full list of statutory and non-statutory consultees that were written to is as follows:

Consultee

Bradford Metropolitan District Council
Burnley Borough Council
Calderdale Metropolitan Borough Council
Lancashire County Council
Pendle Borough Council
Briercliffe-with-Extwistle Parish Council
Colne Town Council
Haworth, Cross Roads & Stanbury Parish Council
Keighley Town Council
Laneshaw Bridge Parish Council
Nelson Town Council
Wadsworth Parish Council

Environment Agency
 Highways England
 Historic England
 Homes and Communities Agency
 Natural England
 BT Openreach
 Centrica (British Gas)
 E.ON UK Renewables
 East Lancashire Clinical Commissioning Group
 East Lancashire Hospitals NHS Trust
 EE
 Electricity North West
 Hutchison 3G UK Ltd
 Lancashire Constabulary
 Lancashire Fire & Rescue Service
 Lancashire LEP
 Lancashire Local Nature Partnership
 National Grid
 Network Rail Infrastructure Ltd
 O2
 The Coal Authority
 Three
 United Utilities - Planning
 United Utilities
 Virgin Media
 Vodafone
 Wildlife Trust for Lancashire, Manchester and North
 Merseyside
 Yorkshire Water
 Trawden School
 St Marys Church
 Block Property Management
 Dunham Developments
 Community Centre Trustees
 CNC Support
 Marlyn Engineering
 CFE Lighting
 CRS
 Brookside Garage
 Penyard
 VWM

Responses

3.5 In total nine responses were received, from the following consultees:

- | | |
|---|--------------------|
| A | The Coal Authority |
| B | Natural England |
| C | National Grid |
| D | Lancashire Police |
| E | Network Rail |

F	Highways England
G	Historic England
H	Pendle Borough Council
I	The Wildlife Trust for Lancashire, Manchester and N Merseyside

- 3.6 The response from **Pendle Borough Council** contained 110 comments. This response appears as **Appendix C** and the Steering Group's responses to it appear in **Appendix D**.

The response from **The Wildlife Trust of Lancashire, Manchester and North Merseyside** appears as **Appendix E** and the Steering Group's response is in **Appendix F**.

The response from **Historic England** and the Steering Group's reply are in **Appendix G**.

- 3.7 The other 6 responses required no reply by the Steering Group.

Residents' Responses

- 3.8 A four-page leaflet was delivered to the approximately 1200 households in the parish. A total of 21 written replies were received. Of these 21, five were fully supportive of the whole plan. Several of the others were supportive, including being positive about specific policies. The remainder expressed concerns about specific issues (but some of these were also supportive of the plan in general). The issues raised can be grouped under the following eight headings:

Policy 6 - Heritage Assets	3 responses
General Planning Questions	1 response
Policy 4 – Parking Standards	1 response
Site Allocations – Land North of Dean St	1 response
Site Allocations – Adjacent to 37 Hollin Hall	9 responses
Settlement Boundary	2 responses
Protected Car Parks	3 responses
Road Safety	1 response

These issues and the TFNP Steering Group's consideration of them and response to them appear in **Appendix H**.

Another car park was added to the list for protection, and several further buildings have been added to the list for consideration as Local List entries. **Beyond that the above 8 issues did not result in a change to the plan.**

Appendix A Neighbourhood Plan Questionnaire (2016)

<p>Any other ideas to consider?</p> <p>-----</p> <p>-----</p> <p>-----</p> <p>-----</p> <p>-----</p> <p>-----</p> <p>-----</p> <p>-----</p>	<div data-bbox="300 497 491 869"></div> <p>As part of the Trawden Forest Neighbourhood Plan development, we are seeking information about the priorities of those living in the Parish</p> <h3>You live in Trawden Forest</h3> <p>Have your say.....</p>
<p>Thank you for your time and contribution</p> <p>Please return this questionnaire, by hand or by post, to any of the addresses below by 7th October:</p> <p>Trawden Forest Parish Council, Unit 2a Black Carr Mill, Skipton Road, Trawden, Colne Lancs BB8 8RA</p> <p>Trawden Forest Community Centre, Church Street, Trawden</p> <p>LBS Garden Centre Shop, Standroyd Mill, Cotton Tree Lane, Colne</p>	

Please take a moment to tick all those objectives below that are important to you.

Housing and Land Development

Preservation of a 'Green Wedge' between Trawden and Colne
By limiting infill development ☐

More housing for older residents ☐

More housing for younger residents ☐

Creating affordable homes ☐

Limiting the number of dwellings in any one development ☐

Only making new development on previously developed land ☐

Housing which is in-keeping with the villages in the Parish ☐

Prioritise housing for people with a strong local connection ☐

Developing off-road parking ☐

Preserving farmland ☐

Heritage and Tourism

Identify and protect/improve local heritage assets ☐

Support initiatives to generate local employment from tourism ☐

Protect and support Wycoller Country Park ☐

Encourage the creation of footpaths/cycleways ☐

Introduce 'Information point(s)' for visitors ☐

Landscape & Environment

Encourage and support community gardening projects
(eg Trawden in Bloom & Incredible Edible) ☐

Encourage electricity generation from renewable sources ☐

Building resilience to the effects of climate change
(eg flooding) ☐

Consideration of where Mobile Phone masts are sited ☐

Retain distinct identities of villages within the Parish ☐

Protect and enhance open spaces ☐

Protect the Green Belt ☐

Protect and support the Conservation Areas ☐

Lifestyle and Wellbeing

Protect playgrounds and recreational areas from development ☐

Create more recreation areas for young people ☐

Protect allotments from development and create new ones ☐

Improve Communications (High Speed Broadband and
mobiles) ☐

Support small businesses and local amenities serving the
Community (eg Community centre) ☐

Reduce reliance on cars by promoting car-sharing schemes
And improving bus services ☐

Appendix B Regulation 14 Publicity Material - B1 Text of email sent to statutory and non statutory bodies

Dear sir/madam

Trawden Forest Parish Council are currently consulting on a draft of their Neighbourhood Plan (Regulation 14 consultation). The consultation runs from Monday 27th November 2017 to 5pm on Monday 8th January 2018.

Please send any comments to tfneighbourhoodplan@trawdenparishcouncil.org.uk by the closing date.

The Draft Plan is attached and the Strategic Environmental Assessment and Sustainability Appraisal can be found at [www/trawdenparishcouncil.org.uk/neighbourhoodplan](http://www.trawdenparishcouncil.org.uk/neighbourhoodplan)

Kind regards

Adele Waddington

Parish Clerk and Responsible Financial Officer

Trawden Forest Parish Council

Tel : 07496 041676

Appendix B Regulation 14 Publicity Material - B2 Text of letter sent to those consultees who could not receive email

28th November 2017

Dear sir/madam

Trawden Forest Parish Council are currently consulting on a draft of their Neighbourhood Plan (Regulation 14 consultation). The consultation runs from Monday 27th November 2017 to 5pm on Monday 8th January 2018.

The Draft Plan, Strategic Environmental Assessment and Sustainability Appraisal can be found at www.trawdenparishcouncil.org.uk/neighbourhoodplan

Please send any comments to Neighbourhood Plan, Unit 2A Black Carr Mill, Skipton Road, Trawden, Colne, Lancs BB8 8QU or email them to tfneighbourhoodplan@trawdenparishcouncil.org.uk by the closing date.

Thank you

Kind regards

For Trawden Forest Parish Council

Adele Waddington

Parish Clerk and Responsible Financial Officer

Trawden Forest
Neighbourhood Plan (2018-2030)
Pre-submission Consultation



Trawden Forest
Parish Council

Autumn 2017

Trawden Forest Neighbourhood Plan (2018-2030)

The Neighbourhood Plan Steering Group has now produced a Draft Neighbourhood Plan using your opinions and comments from the returned questionnaires, from the drop-in sessions in July 2017, and from other interest groups consulted over the last 14 months. This is not a finished document. It is a draft for you to read and comment on.

- Are there things we have omitted?
- Are there sections that are not clear?
- Are there items you think may be wrong?
- You are also encouraged to tell us what you like about the plan.

The full draft plan contains policies on the following topics:

- Location of development sites.
- The types and sizes of development.
- Improving parking in the parish.
- Protecting Local amenities.
- Trawden Forest's Heritage Assets and Townscapes.
- Open Spaces and Tourism.

It is available to view:

1. On the Parish Council's website:
 - <https://www.trawdenparishcouncil.org.uk/neighbourhood-plan/>
2. A paper copy of the Draft Plan can be viewed at Trawden Forest Parish Council Office (Mon –Wed 9am-2pm), Colne Library, The Community Centre, Wycoller Cafe, Harambee Surgery, Trawden School or at one of the advertised consultation drop-in sessions in The Community Centre (see Key Dates below).

Trawden Forest Neighbourhood Plan - Pre-submission Consultation

This Neighbourhood Plan Pre-submission Consultation is in line with Regulation 14 of [The Neighbourhood Planning Regulations \(2012\)](#) and will run for a period of six weeks from 27th November 2017 through to 8th January 2018.

It offers a last opportunity to influence Trawden Forest's Neighbourhood Plan before it is submitted to Pendle Borough Council (PBC).

Your Comments

All comments received by 8th January 2018 will be considered by the Neighbourhood Plan Steering Group and may be utilised to amend this draft Neighbourhood Plan. A Consultation Statement, including a summary of all comments received and how these were considered, will be made available along with the amended Neighbourhood Plan at a future date.

Comments Form

Comments can be written on the back of this form, recorded on the Pre-submission Consultation Comments Form, which is available to download and print off by clicking on the link below, or collecting a comments form from one of the locations below:

- <https://www.trawdenparishcouncil.org.uk/neighbourhood-plan/>

You can also pick up a form from the Parish Council office, Wycoller Cafe, Colne Library, Harambee Surgery, Trawden School or at one of the advertised consultation drop-in sessions in the Community Centre (see Key Dates below).

Completed forms should be returned by 8th January 2018 at the latest via:

- E-mail: tfneighbourhoodplan@trawdenparishcouncil.org.uk
- Post: Parish Council Office, Unit 2A, Black Carr Mill, Skipton Road, Trawden, BB8 8QU
- Drop off: Parish Council Office, Wycoller Cafe, Trawden School, Colne Library, The Community Centre, Harambee Surgery, Old Joseph's Farmhouse Colne Road, 145 Cotton Tree Lane, 42 Skipton Road, Trawden

*Please note that we will not accept responses that are anonymous and comments may be made public, but **not** your personal details.*

Summary of Key Dates:

- 27th November 2017 to 8th January 2018 - Pre-submission Consultation.
- Saturday 2nd December, Saturday 9th December 2017, Saturday 6th January 2018– Drop-in sessions, 10:00 – 12:00, the Community Centre.
- **Monday 8th January 2018 – last date for receipt of comments.**

Trawden Forest Neighbourhood Plan Pre-Submission Consultation Comments Form

Please return by 8th January 2018 to one of the locations detailed on page 3

This six week pre-submission consultation on the Draft Neighbourhood Plan is the last time we will be asking people for comments before submitting the Plan to Pendle Borough Council for approval.

All responses received by the above date will be considered by the Trawden Forest Neighbourhood Plan Steering Group and may be utilised to amend the Draft Neighbourhood Plan. A Consultation Statement, including a summary of all comments received, and how these were considered, will be made available along with the amended Neighbourhood Plan. **Please note that we cannot accept responses that are anonymous and comments may be made public. This would not include your personal details.**

Name:	
Address:	
Postcode:	
Email:	
General Comments: Page No/Paragraph	Comments:
Policy No:	Comments:
Date:	

Please continue on an additional piece of paper if required.

Appendix C Comments to Pre-submission Consultation received from Pendle Council

Pendle Borough Council

Comments on Trawden Forest Neighbourhood Plan Reg. 14 Consultation Document

Page	Para	Policy	Comments / Suggested Amendments
1. Introduction & Background			
1.1 A History of Trawden Forest			
5	-	-	<ul style="list-style-type: none"> Recommend that the paragraphs in this section are numbered.
5	-	-	<ul style="list-style-type: none"> Appreciate that informal wording helps to make the document accessible, but would suggest replacing the phrase “verbally assaulted” with something a little less confrontational e.g. – <i>“Try telling a resident of Trawden that they live in a part of Colne and you will soon be made aware they most definitely do not. The parish of Trawden Forest is composed of three settlements – Trawden in the south, Cotton Tree with Winewall in the north and Wycoller in the east – each with its own distinctive character.</i>
5	-	-	<ul style="list-style-type: none"> Remove the apostrophe from “meres”.
5	-	-	<ul style="list-style-type: none"> Remove the apostrophe from “1850s”.
5	-	-	<ul style="list-style-type: none"> Some of the terminology used may be confusing to the casual reader (e.g. “enclosed” in paragraph 5) without a little further explanation.
1.2 How the Trawden Forest NP fits into the Planning System			
7	-	-	<ul style="list-style-type: none"> Recommend that this section opens the chapter.
7	-	-	<ul style="list-style-type: none"> Recommend not using NP in the title, especially as the abbreviation has not previously been referenced in the main text, which refers to Neighbourhood Development Plans.
7	1.2.1	-	<ul style="list-style-type: none"> To aid clarity, suggest amending the final sentence to read: <i>“The emerging Local Plan Part 2 will contain specific site allocations and detailed policies to help planning officers in Development Management to determine applications for planning permission.”</i>
7	1.2.2	-	<ul style="list-style-type: none"> The abbreviation TFNP is used without it having previously been introduced in parentheses after the full wording, which is normal practice.
7	1.2.3	-	<ul style="list-style-type: none"> Remove the full stop after “obligations” and start the wording in the brackets with (N.B. This requirement may disappear following ‘Brexit’, but” The full stop should appear outside the final bracket.
7	1.2.4	-	<ul style="list-style-type: none"> May be useful to reference that in the UK Sustainability Appraisal (SA) addresses the requirements for Strategic Environmental Assessment (SEA). Should state that the SA Report for the Pendle Local Plan is considered to address many of the policies in the Trawden Forest Neighbourhood Plan (TFNP).
7	1.2.5	-	<ul style="list-style-type: none"> Suggest the wording of the second sentence is changed to read: <i>“If the TFNP is supported by the majority of voters in a local referendum, the policies contained within it will ...”</i>
8	1.2.8	-	<ul style="list-style-type: none"> Planning Practice Guidance does not “inform” the National Planning Policy Framework” (NPPF) it “supports and adds further context to the NPPF”.
8	1.2.9	-	<ul style="list-style-type: none"> Recommend that this paragraph and the unnumbered paragraph that follows are deleted.

Page	Para	Policy	Comments / Suggested Amendments
8	1.2.11	-	<ul style="list-style-type: none"> Suggest that this paragraph is included under a new sub-heading “Trawden Forest Neighbourhood Plan” and follows paragraph 1.2.13 to give a better indication of the process to date – i.e. area application; area designation; plan preparation and public engagement; formal public consultation on draft plan. This section should say why a Neighbourhood Plan and the policies within it are needed – e.g. to better reflect local distinctiveness etc.
9	-	-	<ul style="list-style-type: none"> The paragraph introducing the diagram is unnumbered.
9	Fig 1	-	<ul style="list-style-type: none"> The diagram is potentially confusing. Whilst the ‘three-tier’ arrangement is OK, as currently shown it suggests a three-tier planning system. Following the demise of regional planning there are only two tiers to planning policy in England: <ol style="list-style-type: none"> National Policy: the NPPF The Development Plan: in Pendle this includes the Pendle Local Plan; the Bradley Area Action Plan (not relevant in this context); the Joint Lancashire Minerals & Waste Local Plan; and any Neighbourhood Plans that are ‘made’ – these are collectively referred to as Development Plan Documents (DPDs). The diagram needs to make clear that layers 2 and 3 are within the same tier.
1.3 Trawden Forest Today			
10	-	-	<ul style="list-style-type: none"> Suggest that the narrative of the document would be improved if this section followed on from section 1.1 (see above) and into Chapter 2.
15	1.3.35	-	<ul style="list-style-type: none"> The sentence should end with a full stop, unless it was intended to include a list of the eight businesses.
16	1.3.38		<ul style="list-style-type: none"> Full stop missing at the end of the paragraph.
16	1.3.39	-	<ul style="list-style-type: none"> The SSSI, whose boundary is coincidental with those for the SAC and SPA, accounts for 45% of the Parish, not 60% as stated.
16	1.3.40	-	<ul style="list-style-type: none"> The sites of Local Natural Importance (LNI) should be listed after the Biological Heritage Sites (BHS) to reflect their position in the hierarchy of sites SSSI, LNR, BHS/GHS, LNI. It may be worth noting that although there is no Local Nature Reserve (LNR) within the parish, there is one in Ball Grove Park, which is within walking distance of the Parish boundary at Cotton Tree.
16	1.3.41	-	<ul style="list-style-type: none"> Mention should be made that the value of this historic landscape is recognised through its designation as a Conservation Area.
16	1.3.42	-	<ul style="list-style-type: none"> Suggest merging paragraphs 1.3.42 and 1.3.43 and listing both the Scheduled Monuments and Listed Buildings in Appendix 2.
16	-	-	<ul style="list-style-type: none"> Suggest making reference to the importance of the landscape and identify the key landscape character types – Natural England and Lancashire County Council.
2. Key Issues for Trawden Forest			
2.1 Introduction			
-	-	-	<ul style="list-style-type: none"> No comments
2.2 Housing & Land Development			
17	2.2	-	<ul style="list-style-type: none"> The number should be in bold text for consistency.

Page	Para	Policy	Comments / Suggested Amendments
17	2.2.3	-	<ul style="list-style-type: none"> The number should be in bold text for consistency.
2.3 Protecting the Environment, Green Spaces, character and amenities of Trawden Forest			
			<ul style="list-style-type: none"> No comments
2.4 Summary			
			<ul style="list-style-type: none"> No comments
3. Vision, Objectives, measures and Policies			
3.1 The Vision			
20	3.1	-	<ul style="list-style-type: none"> The Vision would be strengthened by making a clearer reference to the “natural and historic environment” to better reflect that these assets are highly valued by the local community, as highlighted in the paragraph summarising feedback to the public consultation (para 2.4.1).
3.2 Objectives			
21	3.2.1	-	<ul style="list-style-type: none"> Delete “attempt to”.
21	3.2.1 (ii)	-	<ul style="list-style-type: none"> Suggest the third paragraph of this objective is reworded to read: “The level of residential development should at least meet the number set out in the Local Plan Part 2: Scoping Report and Methodology”.
3.3 Measures / Monitoring Indicators			
22	3.3.2 iii	-	<ul style="list-style-type: none"> Are these figures available? The Parish Council will need to monitor this going forward.
22	3.3.2 v	-	<ul style="list-style-type: none"> Are usage statistics for the playground readily available? Are the numbers employed in the tourist industry available for the parish?
3.4 The Policies			
23	3.4.2	-	<ul style="list-style-type: none"> Delete: “for the parish” Add the following wording to the end of the first sentence: “within the parish”. Delete: “including for example policies relating to protecting landscape character and biodiversity.” Add the word “these” after “applying” in the second sentence. Need to reference that, where appropriate, policies in the Joint Minerals and Waste Local Plan should also be taken into consideration.
24	-	-	<ul style="list-style-type: none"> The formatting could be better. Suggest the brief descriptions are aligned with the policy heading e.g. Policy 1 Location of Development Support appropriate developments only within the settlement boundary Policy 2 Housing Site Allocations Allocate sites Also a number of full stops are missing.
24	-	Policy 1	<ul style="list-style-type: none"> SEE COMMENTS UNDER POLICY 1 (BELOW) This wording is not in accordance with higher level policy – Policies SDP2 and LIV 1.

Page	Para	Policy	Comments / Suggested Amendments
24	-	Policy 2	<ul style="list-style-type: none"> The number of dwellings to be provided in Trawden is set out in the Local Plan Part 2: Scoping Report and Methodology (Pendle Council, October 2016)
24	-	Policy 3	<ul style="list-style-type: none"> How has the threshold of nine houses been derived?
24	-	Policy 6	<ul style="list-style-type: none"> Why are the settlements listed separately in brackets? Heritage assets also occur outside defined settlement boundaries. No mention is made of a Local List (Policy 6).
25	3.4.5	-	<ul style="list-style-type: none"> For consistency “9” should read “nine”.
25	3.4.6	-	<ul style="list-style-type: none"> It would be useful to show how the objectives and policies in the Neighbourhood Plan link to those in Local Plan Part 1.
3.5 Contributing to Sustainable Development			
			<ul style="list-style-type: none"> No comments
4. Housing and Land Development			
27	-	Policy 1	<ul style="list-style-type: none"> Policy SDP2 of the Core Strategy permits development outside of settlement boundaries for those exceptions identified in the NPPF, Core Strategy policies or other policies in the development plan. Policy 1 of the TFNP is therefore not in conformity with this policy. As currently written it only allows for development within a settlement boundary. Furthermore the justification text is inconsistent with the policy as it states that some development will be allowed if it is appropriate to a countryside location. The policy needs to be amended to ensure conformity with the Core Strategy and to allow appropriate development outside of the settlement boundary (e.g. tourism developments in Wycoller). Although sites have been allocated, this wording is not currently in accordance with higher level policy. Policy LIV 1 in the Local Plan allows for development outside the settlement boundary where this can be shown to be in a sustainable location. This position may change with the adoption of Local Plan Part 2, but this will not be in place when the Neighbourhood Plan is likely to be examined / made. “Brownfield” is one word.
27	-	Policy 1	<ul style="list-style-type: none"> In the final document highlighting paragraphs in the NPPF and policies in the Local Plan etc. as key linkages (rather than saying “conforms to”) may be more appropriate.
27	4.1.1	-	<ul style="list-style-type: none"> Need to be clear that the <u>two</u> “established settlements” are Trawden and Cotton Tree – i.e. they have designated settlement boundaries. All previous references have been to three settlements – Trawden, Cotton Tree (with Winewall) and Wycoller. Winewall and Wycoller are “washed over” by open countryside and (in the case of Winewall) Green Belt policy designations.
27	4.1.2	-	<ul style="list-style-type: none"> Suggest rewording the opening sentence to read: <i>“The purpose of the policy is to promote housing and other development proposals within the designated settlement boundaries for Trawden and Cotton Tree. Development in the open countryside must be in a sustainable location adjacent to a designated settlement boundary, or require a countryside location.”</i>
27	4.1.4	-	<ul style="list-style-type: none"> Would make a better opening paragraph, but if moved will require the opening of paragraph 4.1.1 to be reworded.

Page	Para	Policy	Comments / Suggested Amendments
28	-	Policy 2	<ul style="list-style-type: none"> Change wording at end of sentence to read: <i>"as set out in the Pendle Local Plan (Parts 1 and 2)."</i>
28	(iii)	Policy 2	<ul style="list-style-type: none"> Have the locally important views been identified and mapped?
28	(vi)	Policy 2	<ul style="list-style-type: none"> Add to the end of the sentence: <i>"and where appropriate the Character Appraisal for the Trawden Forest Conservation Area and Policy 7 in this plan."</i>
28	(vii)	Policy 2	<ul style="list-style-type: none"> Replace <i>"and"</i> with <i>"and/or"</i>.
28	(viii)	Policy 2	<ul style="list-style-type: none"> The wording at the start of the criteria does not flow on from the introduction to this list – i.e. <i>"should:"</i> Reword, or simply delete all words up to, but not including <i>"produce"</i>.
28	(ix)	Policy 2	<ul style="list-style-type: none"> The wording at the start of the criteria does not flow on from the introduction to this list – i.e. <i>"should:"</i> Reword or delete <i>"Do"</i>.
28	-	-	<ul style="list-style-type: none"> No mention is made of the need to provide affordable housing on allocated sites. <p>Consider including an additional criterion within the policy to address this.</p>
28	4.2.2	-	<ul style="list-style-type: none"> The reference should be to the <i>"Scoping Report and Methodology for ..."</i>
29	4.2.10	-	<ul style="list-style-type: none"> Delete the word <i>"all"</i>. Replace the word <i>"under"</i> with <i>"following"</i>.
31	4.2.11 (para 2)	-	<ul style="list-style-type: none"> Start a new sentence after <i>"...higher ground."</i>
31	4.2.12 (para 1)	-	<ul style="list-style-type: none"> The company employed is called <i>"The Flood Risk Consultancy"</i>.
33	-	Policy 3	<ul style="list-style-type: none"> The criteria repeat those in Policy 2. Would a more appropriate solution be to incorporate these criteria into a separate design policy and include a cross reference in Policies 2 and 3?
33	4.3.4 & 4.3.5	-	<ul style="list-style-type: none"> Reference is made to affordable housing, but there is no corresponding criterion within the policy itself. <p>Consider including an additional criterion within the policy to address this (see comment against Policy 2 above).</p>
34	4.3.7	-	<ul style="list-style-type: none"> How are developers expected to identify <i>"interested local people"</i>? Should the requirement be to consult with local residents and speak with the Council's Conservation Officer and local interest groups such as the Civic Trust?
35	BP1	Policy 4	<ul style="list-style-type: none"> How do the car parking standards in Appendix 8 relate to those in the existing/emerging Local Plan? <p>If they are the same, as paragraph 4.4.3 seems to imply, this reference should be to the Local Plan and Appendix 8 should be removed – as it may become out of date when Local Plan Part 2 is adopted.</p> <p>If the proposed parking standards are different, the justification should make this clear and reference the evidence used to establish the TFNP standards.</p> <p>If the car parking standards in Appendix 8 are only 'suggestions', as the wording at the head of the column implies, this needs to be clearly reflected in the policy wording (Bullet Point 1).</p>
35	BP2	Policy 4	<ul style="list-style-type: none"> What is a <i>"locally sensitive area"</i>? Have these been defined?

Page	Para	Policy	Comments / Suggested Amendments
35	BP4	Policy 4	<ul style="list-style-type: none"> It may be worth stating: <ul style="list-style-type: none"> The type of 'facility' required – e.g. 13 amp plug or better That access to the power supply should be provided either within the garage or be accessible for a car parked on the driveway. This should also be reflected in the justification text (para 4.4.5)
35	BP5	Policy 4	<ul style="list-style-type: none"> How does this equate with Bullet Point 3.
36	4.4.5	-	<ul style="list-style-type: none"> Reword opening sentence to read: <i>"Electric vehicles are likely to ..."</i>
36	4.4.6	-	<ul style="list-style-type: none"> Delete the word <i>"initial"</i>.
5. Heritage and Tourism			
37	-	Policy 5	<ul style="list-style-type: none"> Accepting that the phrase "development proposals" includes the re-use of existing buildings, could the policy emphasise that re-use is preferred ahead of new build?
37	5.1.1	-	<ul style="list-style-type: none"> Replace the text <i>"preserved old"</i> with <i>"historic"</i>.
37	5.1.2	-	<ul style="list-style-type: none"> The final sentence should be the opening sentence of paragraph 5.1.1. Delete Appendix 12 as this is not planning related.
38	5.1.7	-	<ul style="list-style-type: none"> The word <i>"emerging"</i> will need to be deleted once the list has been finalised.
38	5.1.8	-	<ul style="list-style-type: none"> "Bridleways" is a single word.
38	-	Policy 6	<ul style="list-style-type: none"> The final bullet point repeats the NPPF and Local Plan. Suggest that in Trawden Today (Section 1.3) reference is made to the important contribution that non-designated heritage assets make to the locally distinctive character of the parish and the preparation of a Local List to recognise this.
39	5.2.3		<ul style="list-style-type: none"> Suggest rewording as follows to provide greater focus on the Local List and avoid confusion between designated and non-designated heritage assets: When the Trawden Forest Local List is complete, heritage assets in the parish will comprise of the entries on the Local List; the four Scheduled Monuments; the 35 Listed Buildings and the three Conservation Areas. The Scheduled Monuments and Listed Buildings (Appendix 2) and the Conservation Areas are protected under Policy ENV1 of the Pendle Local Plan. The principal focus of the TFNP policy is on the protection of non-designated heritage assets on the Local List.
40	5.2.7	-	<ul style="list-style-type: none"> The reference to "double protection" should be removed as this is not technically correct.
6. Landscape and Environment			
41	-	Policy 7	<ul style="list-style-type: none"> The justification describes these areas in some detail and paragraph 6.1.6 notes the evidence used. However, the descriptions for each area need to reflect how the evidence has been used to define their particular boundaries.
42	6.1.3	-	<ul style="list-style-type: none"> There is no need to emphasise the word "particular" in bold text.
42	6.1.5	-	<ul style="list-style-type: none"> The two paragraphs below should either be indented or numbered.
42	6.1.6	-	<ul style="list-style-type: none"> May be worth emphasising that the four designated areas are distinct and help to reflect how the village has developed over time.
43	6.1.7	-	<ul style="list-style-type: none"> For ease of reference, the preference is to number individual paragraphs that follow rather than the headings. This also applies to 6.1.8, 6.1.9 and

Page	Para	Policy	Comments / Suggested Amendments
			6.1.10, which follow.
45	6.1.9	-	<ul style="list-style-type: none"> The pictures should be captioned.
46	6.1.10	-	<ul style="list-style-type: none"> The picture should be captioned.
7. Lifestyle and Wellbeing			
47	-	Policy 8	<ul style="list-style-type: none"> The final sentence beginning “Specifically, any proposal ...” is confused. Suggest it is rewritten as follows, which avoids the use of the term “exceptional circumstances” which have not been defined. <i>“Specifically, any proposal for change of use, which would adversely affect or result in the loss of a Locally Valued Resource (as defined in the list below) will not be permitted unless it has been clearly demonstrated to be the most locally acceptable solution, taking into account all relevant factors including”:</i>
47	7.1.1	-	<ul style="list-style-type: none"> It is not possible to identify a facility for policy protection before it actually exists (e.g. Community Shop / Post Office). If still included in the list of Locally Valued Resources, replace the abbreviation “P.O.” with the full text “Post Office”.
47	Footnote	-	<ul style="list-style-type: none"> The term “Asset of Community Value” should be capitalised. Replace “asked” with the term “formally requested”.
48	7.1.2	-	<ul style="list-style-type: none"> Trawden, when compared to villages of similar size (e.g. Fence and Foulridge) has an under-representation in retail service provision. This may in part be due to the lack of passing trade, but should be acknowledged as this will help to emphasise the importance of the new Community Shop/Post Office.
49	-	Policy 9	<ul style="list-style-type: none"> Paragraph 77 of the NPPF advises that the Local Green Space designation will not be appropriate for most green areas or open space. Mention long established clubs by name, especially where they run junior programmes (e.g. Trawden Celtic) Do Trawden Athletic Club make use of ‘The Rec’?
50	7.2.2	-	<ul style="list-style-type: none"> If the Recreation Ground is included in this list, it should be removed as its designation within the TFNP as Local Green Space would result in double counting.
50	7.2.4 to 7.2.7	-	<ul style="list-style-type: none"> The justification text needs to make reference to the criteria outlined in the NPPF, to help justify their selection.
8. The Next Steps			
-	8.2	-	<ul style="list-style-type: none"> In future documents (e.g. the consultation statement), it would be beneficial to be specific about the dates when consultation events took place.
-	8.4	-	<ul style="list-style-type: none"> It should be noted that the independent examiner is jointly selected by the Parish Council and Pendle Council.
-	8.5	-	<ul style="list-style-type: none"> Needs to be reworded, a suggestion is set-out below: <i>“Should the examiner recommend that the Neighbourhood Plan can proceed to public referendum (either with or without changes), those people living within the designated neighbourhood area, who are included on the Electoral Register, will be invited to vote. The examiner may extend the referendum area beyond the parish boundary if he/she considers it appropriate.”</i> <i>“If a simple majority of those voting (e.g. 50% of turnout +1) are in favour of the plan it will be formally ‘made’ (adopted) and become part of the</i>

Page	Para	Policy	Comments / Suggested Amendments
			<i>development plan for the Parish."</i>
Appendices			
			General Comments <ul style="list-style-type: none"> The use of hyperlinks, which take the user to a specific webpage where they can find out more about a particular reference (e.g. the NPPF) is highly beneficial in online versions of the document. There is random capitalisation of certain phrases throughout the document – e.g. "<i>Suggested Number of Spaces</i>" and "<i>Minimum Number</i>" in para 4.4.3. Capitalisation should be reserved for official names and titles and examples such as this should be removed.

Appendix D Trawden Forest Neighbourhood Plan - Responses to Pendle Council's Comments on Regulation 14 Consultation Document

Pendle Council made 110 comments (see Appendix C) about the Pre-Submission Consultation Version of the TFNP. These comments have been reviewed and 81 of the comments have been accepted and the plan changed as suggested by Pendle. The remaining 29 comments appear below. Representatives of the Steering Group considered these comments and also discussed them with Pendle Council at a meeting on 18th January 2018. It was decided that 14 of the comments required no change to the plan (see reasons below). The remaining 15 comments required further work, and resulted in changes to the TFNP (as described below).

TFNP ref no.	Page	Para or Policy	Comment/Suggested Amendments	Response	Plan Changed?
PC01	5		Recommend that the paragraphs in this section are numbered.	The Steering Group considered that it was not necessary to add paragraph numbers. It is unlikely that it will be necessary to refer to any part of this section in the planning process, and it would detract from 'readability'.	No
PC02	8	1.2.9	Recommend that this paragraph and the unnumbered paragraph that follows are deleted.	The inclusion of an example of how the TFNP adheres to the NPPG was considered to be appropriate.	No
PC03	9	fig 1	The diagram is potentially confusing. Whilst the 'three-tier' arrangement is OK, as currently shown it suggests a three-tier planning system. Following the demise of regional planning there are only two tiers to planning policy in England: 1. National Policy: the NPPF 2. The Development Plan: in Pendle this includes the Pendle Local Plan; the Bradley Area Action Plan (not relevant in this context); the Joint Lancashire Minerals & Waste Local Plan; and any Neighbourhood Plans that are 'made' – these are collectively referred to as Development Plan Documents (DPDs). The diagram needs to make clear that layers 2 and 3 are within the same tier.	The TFNP has been amended to highlight the two-tier planning system.	Yes
PC04	16	1.3.42	Suggest merging paragraphs 1.3.42 and 1.3.43 and listing both the Scheduled Monuments and Listed Buildings in Appendix 2.	Appendix 2 now contains all 39 listed buildings. The six Grade II* buildings are marked.	Yes
PC05	16		Suggest making reference to the importance of the landscape and identify the key landscape character types – Natural England and Lancashire County Council.	A paragraph has been inserted to describe the character of the landscape.	Yes
PC06	22	3.3.2 (iii)	Are these figures available? The Parish Council will need to monitor this going forward.	The Parish Council plans to undertake a parking survey later, prior to the plan taking effect. This statement has been written into the TFNP as a footnote and a brief idea of the methodology also included.	Yes
PC07	22	3.3.2 (v)	Are usage statistics for the playground readily available?	The playgrounds are not monitored, but it should be possible to estimate usage of the Rec.	No

PC08	22	3.3.2 (v)	Are the numbers employed in the tourist industry available for the parish?	Probably not. We should drop this measure.	Yes
PC09	24		<p>The formatting could be better. Suggest the brief descriptions are aligned with the policy heading e.g.</p> <p>Policy 1 Location of Development Support appropriate developments only within the settlement boundary</p> <p>Policy 2 Housing Site Allocations</p>	We really struggled with Microsoft Word to get the existing presentation. We prefer to leave as is.	No
PC10	24	Policy 1	This wording is not in accordance with higher level policy – Policies SDP2 and LIV 1.	The word 'only' has been removed, and Policy 1 reworded.	Yes
PC11	24	Policy 2	The number of dwellings to be provided in Trawden is set out in the Local Plan Part 2: Scoping Report and Methodology (Pendle Council, October 2016)	The detail of whereabouts the number appears in the Local Plan is fully described at 4.2.1 to 4.2.3	No
PC12	24	Policy 3	How has the threshold of nine houses been derived?	The text at 4.3.2 offers some justification. A review of the empty spaces within the settlement boundaries did not discover any sites larger than this, except for the possible redevelopment of larger buildings which are excluded from this limit.	No
PC13	25	3.4.6	It would be useful to show how the objectives and policies in the Neighbourhood Plan link to those in Local Plan Part 1.	We considered that this would lose the clarity of diagram. The linkages to the Local Plan appear after each Policy.	No
PC14	27	Policy 1	<p>Policy SDP2 of the Core Strategy permits development outside of settlement boundaries for those exceptions identified in the NPPF, Core Strategy policies or other policies in the development plan. Policy 1 of the TFNP is therefore not in conformity with this policy. As currently written it only allows for development within a settlement boundary.</p> <p>Furthermore the justification text is inconsistent with the policy as it states that some development will be allowed if it is appropriate to a countryside location. The policy needs to be amended to ensure conformity with the Core Strategy and to allow appropriate development outside of the settlement boundary (e.g. tourism developments in Wycoller).</p>	To conform to SDP2 and LIV 1 (see PC15 below), an extra paragraph has been added to the text of Policy 1, describing exceptions (Tourism and agriculture).	Yes
PC15	27	Policy 1	Although sites have been allocated, this wording is not currently in accordance with higher level policy. Policy LIV 1 in the Local Plan allows for development outside the settlement boundary where this can be shown to be in a sustainable location. This position may change with the adoption of Local Plan Part 2, but this will not be in place when the Neighbourhood Plan is likely to be examined / made.	See PC 14.	Yes

PC16	27	4.1.4	Would make a better opening paragraph, but if moved will require the opening of paragraph 4.1.1 to be reworded.	Decided to leave the paragraph sequence unchanged, subject to any changes arising from discussions about PC14 and PC15 above.	No
PC17	28	Pol 2(iii)	Have the locally important views been identified and mapped?	The 'locally important views' are described in detail in Policy 7. This reference inserted into the wording of Policy 2. It is considered that this approach is preferable to the mapping of particular viewpoints.	Yes
PC18	28		No mention is made of the need to provide affordable housing on allocated sites. Consider including an additional criterion within the policy to address this.	Additional instruction (xi) added as suggested.	Yes
PC19	33	Policy 3	The criteria repeat those in Policy 2. Would a more appropriate solution be to incorporate these criteria into a separate design policy and include a cross reference in Policies 2 and 3?	We discussed this during the development of the plan and decided to avoid a separate design policy.	No
PC20	33	4.3.4/5	Reference is made to affordable housing, but there is no corresponding criterion within the policy itself. Consider including an additional criterion within the policy to address this (see comment against Policy 2 above).	Additional instruction (xi) added as suggested.	Yes
PC21	35	Pol 4(bp1)	How do the car parking standards in Appendix 8 relate to those in the existing/emerging Local Plan? If they are the same, as paragraph 4.4.3 seems to imply, this reference should be to the Local Plan and Appendix 8 should be removed – as it may become out of date when Local Plan Part 2 is adopted. If the proposed parking standards are different, the justification should make this clear and reference the evidence used to establish the TFNP standards. If the car parking standards in Appendix 8 are only 'suggestions', as the wording at the head of the column implies, this needs to be clearly reflected in the policy wording (Bullet Point 1).	The Policy has been amended as recommended by PBC (in email dated 19.1.18). The Appendix 8 has been renamed as Parking Spaces (Guidelines) and the minimum size changed to 3m x 7m.	Yes
PC22	35	Pol 4(bp5)	How does this equate with Bullet Point 3.	Bullet point 3 refers to all parking spaces, whereas bullet point 5 refers only to designated protected car parks.	No
PC23	37	5.1.2	Delete Appendix 12 as this is not planning related.	Although it is not a 'planning' map, it is included because it shows the Country Park boundary, whereas the proposals map shows the boundary for the Wycoller policy only.	No
PC24	38	Policy 6	The final bullet point repeats the NPPF and Local Plan.	Yes but it refers to non-designated heritage assets on the Local List. Does it do any harm to repeat ENV1?	No
PC25	40	5.2.7	The reference to "double protection" should	Paragraph reworded to remove the	Yes

			be removed as this is not technically correct.	reference to 'double protection'	
PC26	41	Policy 7	The justification describes these areas in some detail and paragraph 6.1.6 notes the evidence used. However, the descriptions for each area need to reflect how the evidence has been used to define their particular boundaries	The boundaries were mapped using local knowledge of the various views (as documented within the policy), the different housing periods etc. The Lane Top, Well Head and New Row boundary was clearly defined taking into account the views from the north and northwest. Similarly the views from the east helped define the Hill Top and Foulds Road boundary. The Lane House and Hollin Hall area is well defined by the linear nature of the townscape. There was discussion about the eastern boundary of the Church Street, Clogg Head and Old Chelsea area and it was decided to use the tram tracks to define this. A paragraph was added at 6.1.10 referring to this boundary.	Yes
PC27	43	6.1.7	For ease of reference, the preference is to number individual paragraphs that follow rather than the headings. This also applies to 6.1.8, 6.1.9 and 6.1.10, which follow.	For readability we prefer to not split further into more paragraphs.	No
PC28	50	7.2.2	If the Recreation Ground is included in this list, it should be removed as its designation within the TFNP as Local Green Space would result in double counting.	It had already been removed from the list in the draft Plan?	No
PC29	Appendices		The use of hyperlinks, which take the user to a specific webpage where they can find out more about a particular reference (e.g. the NPPF) is highly beneficial in online versions of the document.	A few hyperlinks have been included (e.g. the NPPF, TFNP Sustainability Appraisal, Flood Risk Assessment).	Yes

Appendix E Comments to Pre-submission Consultation received from The Wildlife Trust for Lancashire, Manchester and North Merseyside

The Wildlife Trust for Lancashire, Manchester and North Merseyside

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Lancashire,
Manchester &
N Merseyside

2nd January 2018

Adele Waddington
Parish Clerk and Responsible Financial Officer
Trawden Forest Parish Council
Unit 2A Black Carr Mill
Skipton Road
Trawden
Colne
Lancashire
BB8 8QU

Dear Ms Waddington

Re: Trawden Forest Neighbourhood Plan (2018-2030) Pre-submission Consultation
Version – comments from the Lancashire Wildlife Trust

Thank you for informing the Lancashire Wildlife Trust ("LWT or The Trust") about the application from Trawden Parish Council to prepare a Neighbourhood Plan, and inviting comments on the proposal by the 8th January 2018. I am writing on behalf of The Trust as follows:

- A) Comments on the consultation document, and
 - B) Additional comments that relate to wildlife sites (statutory and non-statutory), notable habitats, notable species, ecological networks and net gains in nature in the Neighbourhood Plan area.
- A) Comments on the consultation document (the numbered comments below follow those used in the Trawden Forest Neighbourhood Plan (2018-2030) - Pre-submission Consultation Version)

2.3.1 General Protection of the environment and character of Trawden Forest featured highly in the responses to the feedback questionnaire sent out to residents. There were several aspects to this:

LWT Comment: None of these aspects relate to biodiversity or ecology or wildlife generally. However, these matters are covered below.

3.1 The Vision

LWT Comment: There is no mention of the natural environment etc. in the vision.



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3.2 Objectives

3.2.1 The following five Objectives for the Trawden Forest Neighbourhood Plan have been proposed by the Steering Group following consideration of the results of the various public consultations. The Objectives attempt to address the Key Issues identified in the previous section.

LWT Comment: There are no ecological / biodiversity objectives other than a mention of protecting open spaces, which doesn't go far enough to satisfy the NPPF.

3.4 The Policies

3.4.2 When the TFNP is made and becomes part of the statutory development plan for the parish, these policies will be used by officers of Pendle Council in the determination of planning applications. Importantly, the policies will sit alongside the policies of the Local Plan Part 1: Core Strategy and emerging Local Plan Part 2, including for example policies relating to protecting landscape character and biodiversity. For that reason, the TFNP policies do not seek to repeat the Local Plan policies, but merely look to refine or add further interpretation for applying to the TFNP area. The TFNP should therefore be read in conjunction with the Local Plan Parts 1 and 2, and with the saved policies in the Replacement Pendle Local Plan (2001-2016), until such time that they are replaced.

LWT Comment: Biodiversity etc. should be covered / protected in the proposed local plan but there has been no attempt in the Trawden Forest Neighbourhood Plan to add to those policies or be more specific in terms of opportunities to enhance biodiversity / ecological networks etc.

4. Housing and Land Development

Policy 2 Housing Site Allocations

LWT Comment: Appendix 6D sets out criteria used to support Policy 2 and 3. However, it is not clear why it has been done this way. It would be better for the Policy itself to include these criteria, or at least they should be specifically referred to in the Policy.

Policy 3 Housing Windfall Sites

LWT Comment: Should there not be similar criteria to support windfall sites in Policy 3 as there are for housing site allocations in Policy 2?

Policy 5 Wycolter Country Park

LWT Comment: Wycolter Country Park is important in terms of biodiversity, ecological networks and wildlife sites, yet there is no mention in this policy.



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Policy 9 Protecting Designated Open Spaces & Local Green Spaces

LWT Comment: Areas within the open spaces shown on the map (9A) are important for biodiversity, and as ecological corridors and wildlife sites, but there is no mention of this in Policy 9.

Appendix 6D Criteria Used to Support Policy 2

This appendix lists the criteria used in assessing the candidate sites. It is a subset of the list designed by Pendle and proposed in their emerging Local Plan 2.

LWT comment: See comment on Policy 2. These criteria should be incorporated more positively in the wording of Policy 2.

B) Additional comments

Sites:

The boundary of the Neighbourhood Plan Area includes Lad Law and part of Boulsworth Hill, which is part of the statutorily designated and protected South Pennine Moors - a nationally-important Site of Special Scientific Interest (SSSI), and an internationally-important Special Area of Conservation (SAC) and Special Protection Area (SPA). That part of the Moors that lies within Trawden Forest is, in the absence of any other International designation, the most important area of land and entity in the Parish and in the Borough of Pendle. Over 60% of the area of the parish lies within the South Pennine Moors, which will be one of the largest proportions of any parish in Lancashire to be nationally and internationally important.

In addition to the South Pennine Moors, the boundary of the Neighbourhood Plan Area includes the following nine non-statutory County Wildlife Sites covering just over 82 hectares:

1. Wycoller Beck (BHS* reference: 94SW03, 16.6 hectares centred on SD927398). The site meets the BHS selection guidelines for fen (Fe1) and grassland (Gr3).
2. Bank House Flushes (BHS* reference: 93NW05, 4.5 hectares centred on SD937386). The site meets the BHS selection guidelines for fen (Fe1) and grassland (Gr3).
3. Turnholes Flushes & Grassland (BHS* reference: 93NW06, 4.2 hectares centred on SD938382). The site meets the BHS selection guidelines for fen (Fe1) and grassland (Gr2 and Gr3).
4. Turnholes Clough (BHS* reference: 93NW07, 3 hectares centred on SD939384). The site meets the BHS selection guidelines for woodland (Wd2).

The Wildlife Trusts for Lancashire, Manchester and North Merseyside

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5. The Crank, Wycoller (BHS* reference: 93NW04, 0.5 hectares centred on SD933387). The site meets the BHS selection guidelines for fen (Fe1).
6. Coldwell Reservoirs (BHS* reference: 93NW02, 29.4 hectares centred on SD904362). The site meets the BHS selection guidelines for birds (Bi2 and Bi8) and fen (Fe2).
7. Colne Water Pastures (BHS* reference: 94SW05, 4.6 hectares centred on SD913403). The site meets the BHS selection guidelines for grassland (Gr3).
8. Antley Gate Bog (BHS* reference: 93NW08, 6.3 hectares centred on SD916364). The site meets the BHS selection guidelines for bog (Bo3a), fen (Fe2) and flowering plants and ferns (Ff3), the latter for its population of Marsh Lousewort.
9. Gilford Clough (BHS* reference: 93NW03, 13 hectares centred on SD921369). The site meets the BHS selection guidelines for grassland (Gr3), habitat mosaic (Hm3) and woodland (Wd1).

*BHS = Biological Heritage Site, the County Wildlife Sites system in Lancashire, established and maintained by the BHS Partnership, which comprises Lancashire County Council, Lancashire Wildlife Trust and Natural England.

In addition there are two District Wildlife Sites (called Sites of Local Natural Importance – SLNI in Pendle):

1. Flake Hill Moor, and
2. Antley Gate.

There are also three “Special Wildflower Roadside Verges” in the parish, i.e. two near Frigham’s Cottage and one near Oak House Farm. See Lancashire County Council’s Highways Department for further details on their botanical interest and the special management that they receive through the roadside verge management contract.

Whilst it does not fall within the parish, Upper Ball Grove Lodge Local Nature Reserve lies immediately north of the parish boundary, situated in between Cottontree and Laneshaw Bridge.

The NERC Act (2006) places a duty on all statutory authorities, including County, Borough, Parish and Town Councils, to have due regard to biodiversity in the exercising of all of their functions. This means that Pendle Borough Council and Trawden Parish Council have a ‘Biodiversity Duty’ to conserve and enhance sites of importance for biodiversity through the preparation and implementation of the Neighbourhood Plan.



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Habitats:

The Neighbourhood Plan Area supports a variety of habitat types including semi-natural broadleaved woodland, plantation woodland (broadleaved, coniferous and mixed), parkland with scattered trees, dense and scattered scrub, hedgerows with and without trees, acid grassland, neutral grassland, marshy grassland, poor semi-improved grassland, amenity grassland, blanket bog, swamp and fen, Bracken, standing water (ponds and reservoirs) and running water (brooks/streams and rivers). Below the hillwall, the Plan Area is predominately agriculturally-improved grassland.

Some of the habitat types in the Plan Area will meet the definition of Habitats of Principal Importance in England, as listed in Section 41 of the Natural Environment and Rural Communities Act (NERC) 2006, which may include some/all of the following:

- Blanket bog
- Hedgerows
- Inland rock outcrop and scree habitats
- Lowland dry acidic grassland
- Lowland fens
- Lowland meadow
- Lowland mixed deciduous woodland
- Ponds
- Rivers
- Upland flushes, fens and swamps
- Upland heathland
- Upland oakwood
- Wet woodland
- Wood-pasture and parkland

The Biodiversity Duty referred to under the heading 'Sites' also applies to 'Habitats'.

Species:

The Plan Area also supports a variety of species including amphibians, birds, bryophytes (mosses and liverworts), flowering plants and ferns, invertebrates, mammals and reptiles.

The Lancashire Environment Record Network (LERN) should be consulted to determine which Lancashire Key Species have been recorded in the Neighbourhood Plan area, including those that are Species of Principal Importance in England, as listed in Section 41 of the NERC Act (2006).

The Biodiversity Duty referred to under the heading 'Sites' also applies to 'Species'.

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Ecological networks:

The National Planning Policy Framework (NPPF) was published in March 2012 and paragraph/requirement 117 states that *"To minimise Impacts on biodiversity and geodiversity, planning policies should:*

- *plan for biodiversity at a landscape-scale across local authority boundaries;*
- *Identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;*
- *promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;" etc.*

Paragraph/requirement 165 of the NPPF states that planning decisions *"should include an assessment of existing and potential components of ecological networks"*. The Lancashire Local Nature Partnership (funded by Natural England) commissioned LERN and The Trust to produce ecological network habitat maps for the county. LERN has produced ecological network habitat maps for grassland and woodland, which are available at the District, Parish, Ward and other levels. A wetland ecological network is still in preparation.

There are both grassland and woodland corridors within the Trawden Forest Neighbourhood Plan Area.

The Neighbourhood Plan should take account of the ecological networks in Trawden Forest, discuss the conservation of the components and/or identify opportunities for restoration and enhancement of the ecological networks and their functionality within and adjacent to the boundary of the Neighbourhood Plan area, see diagrammatic example overleaf.

Note: Pendle Borough Council may NOT have an agreement with LERN for the provision of environmental information to support its activities. If it did then this agreement would include the provision of information to inform the development of Neighbourhood Plans. Trawden Parish Council should contact Pendle Borough Council's Planning Department to determine whether or not they can access this service for free through the Borough Council's Service Level Agreement (SLA) with LERN. If Pendle Borough Council does not have a SLA with LERN then it will probably have to pay to access the information.

Net gains in nature:

Through paragraph/requirement 9 and 109, the NPPF requires the planning process to deliver net gains in nature. This could be achieved in a number of ways, for example:



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- When planning applications are approved, Pendle Borough Council can require the applicant to submit a Site Management Plan and a fully costed action plan lasting a minimum of five years, or for the duration of temporary developments such as wind farms. The applicant can be required to dedicate a commuted sum, e.g. through a Section 106 agreement, in order to deliver the Site Management Plan.
- Biodiversity Offsetting. Biodiversity offsets are conservation activities that are designed to give biodiversity benefits to compensate for losses - ensuring that when a development damages nature (and this damage cannot be avoided) new, bigger or better nature sites will be created. They are different from other types of ecological compensation as they need to show measurable outcomes that are sustained over time. In 2013 the government published guidance on how offsetting might be introduced in England (see <https://www.gov.uk/guidance/biodiversity-offsetting>).
- Through the Community Infrastructure Levy (CIL).

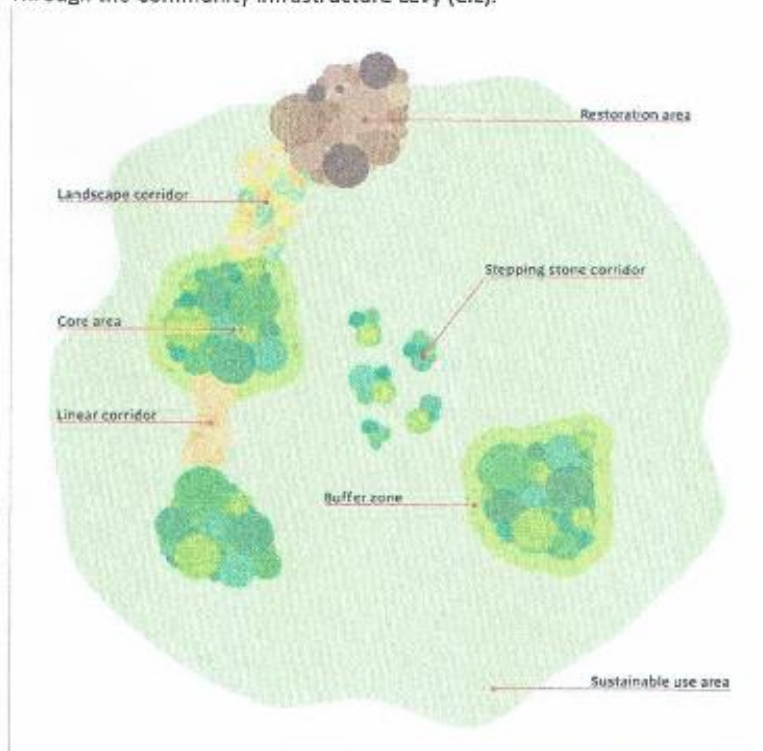


Figure from the 'Lawton Review' (2010) Making Space for Nature: a review of England's wildlife sites and ecological network. Report to Defra.

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The Trust understands that the Neighbourhood Plan will need to conform to the policies in the Pendle Local Plan, and hopes that the Neighbourhood Plan will add further detail and be more proactive, for example, looking at and including, not only how features can be conserved, but also ways in which they can be enhanced as is required by the National Planning Policy Framework.

I trust that these comments from the Wildlife Trust will be taken fully into account.

I would be grateful if you would keep me informed as to the outcome of this plan process.

Yours sincerely,

A handwritten signature in black ink, appearing to read "John Lamb".

John Lamb B.Sc. (Hons.), M.Sc., MCIEEM
Senior Conservation Officer (Lancashire)

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Appendix F Responses to comments from The Wildlife Trust for Lancashire, Manchester and North Merseyside

TFNP Para	LWT Comment	TFNP Response	Plan Changed?
2.3.1	None of these aspects relate to biodiversity or ecology or wildlife generally.	When the parish's residents were consulted, biodiversity etc. were not raised as issues.	No
3.1	There is no mention of the natural environment etc. in the vision.	The vision has been changed (at the request of Pendle Council) to also refer to the natural environment.	Yes
3.2.1	There are no ecological / biodiversity objectives other than a mention of protecting open spaces, which doesn't go far enough to satisfy the NPPF.	These policies are covered by higher level policy in the Pendle Local Plan.	No
3.4.2	Biodiversity etc. should be covered / protected in the proposed local plan but there has been no attempt in the Trawden Forest Neighbourhood Plan to add to those policies or be more specific in terms of opportunities to enhance biodiversity / ecological networks etc.	See 2.3.1 above.	No
Policy 2	Appendix 6D sets out criteria used to support Policy 2 and 3. However, it is not clear why it has been done this way. It would be better for the Policy itself to include these criteria, or at least they should be specifically referred to in the Policy.	The content of this policy and the criteria used are based on the methodology used by Pendle Council, and the policy was drafted with advice from Pendle Council. The wording has been accepted by them. The use of the criteria is explained and justified in the text accompanying the policy. The criteria do not need to be included in the policy.	No
Policy 3	Should there not be similar criteria to support windfall sites in Policy 3 as there are for housing site allocations in Policy 2?	Planning applications for Windfall Sites will be considered by Pendle Council as and when they are submitted by developers. It is difficult to see how a scoring system could be used on individual sites. It is assumed that developments will be assessed for sustainability, and against the requirements of the policies in the Local Plan and the TFNP. The criteria need not be included in Policy 3.	No
Policy 5	Wycolter Country Park is important in terms of biodiversity, ecological networks and wildlife sites, yet there is no mention in this policy.	References to biodiversity and natural heritage have been added to the policy wording, and two paragraphs have been inserted in the supporting text, describing the special wildlife sites in the designated area. A further paragraph has been included, referring to a new project to plant broad leaf woodland at Parson Lee Farm.	Yes

Policy 9	Areas within the open spaces shown on the map (9A) are important for biodiversity, and as ecological corridors and wildlife sites, but there is no mention of this in Policy 9.	Policy 9 has been amended to include reference to the importance of biodiversity. Reference is already made in the justification text (7.2.1) to the aspects quoted in the WTLNM comment.	Yes
Appx 6D	See comment on Policy 2. These criteria should be incorporated more positively in the wording of Policy 2.	See response in Policy 2 above.	No
Page 4, NERC Act (2006)	The NERC Act (2006) places a duty on all statutory authorities, including County, Borough, Parish and Town Councils, to have due regard to biodiversity in the exercising of all of their functions. This means that Pendle Borough Council and Trawden Forest Parish Council have a 'Biodiversity Duty' to conserve and enhance sites of importance for biodiversity through the preparation and implementation of the Neighbourhood Plan.	The TFNP has no Policy specific to the natural environment, but the site selection process under Policy 2 used criteria several of which refer to biodiversity and the natural environment. The TFNP does not aim to cover every aspect of planning. The steering group considered that, because these issues were not raised in the survey, they would be left for Pendle Council to cover in their Local Plan.	No

Appendix G Historic England Consultation Comments and Responses

Ref	Organisation / Representor	Comments	TFNP Response
HE01	Historic England	Your neighbourhood plan falls within the boundary of 3 Conservation Areas, the boundary also contains 4 scheduled monuments, 6 buildings or structures listed in Grade II* and 33 listed in Grade II. We recommend that you confirm the precise number and grade of nationally designated heritage assets in Appendix 2 of your plan.	The Plan has been corrected to show 39 listed buildings, of which 6 are in Grade II*.
HE02	Historic England	We also recommend that you provide a table of non-designated heritage assets as part of your evidence base.	This will not be completed until after the TFNP is 'made'. The Policy (6) has been written referring to an emerging list.
HE03	Historic England	A "local list" is for the Local Planning Authority and not something you can include in your neighbourhood plan.	The plan has been amended to make clear that the LPA owns the list. But work by Trawden Forest is being based on Pendle's list of criteria for Local List selection and candidates will be submitted to Pendle Council for consideration.
HE04	Historic England	If you have not already done so, we would recommend that you speak to the staff who hold the Lancashire Historic Environment Record and give advice on archaeological matters.	This advice will be taken up by the group working on the list for submission to Pendle Council.
HE05	Historic England	We recommend the inclusion of a glossary of relevant terminology contained in the NPPF and details about the additional legislative and policy protections that heritage assets enjoy.	The Steering Group decided that a glossary was not necessary. The Pendle Local Plan contains the necessary glossary and details of protections.

Appendix H Responses to Residents' Comments on the Pre-submission Version

The 21 returned Comments Sheets were numbered 1 to 21. Where a response contained comments on more than one issue these were numbered A, B, C.... (for example response 14 contained two comments: 14A and 14B).

The issues raised were grouped under the following eight headings:

Policy 6 - Heritage Assets	3 responses
General Planning Questions	1 response
Policy 4 – Parking Standards	1 response
Site Allocations – Land North of Dean St	1 response
Site Allocations – Adjacent to 37 Hollin Hall	9 responses
Settlement Boundary	2 responses
Protected Car Parks	3 responses
Road Safety	1 response

The comments on each issue are summarised, and the Steering Group's responses follow each one:

Policy 6 - Heritage Assets (1C, 14A, 19)

One response (1C) recommended the inclusion of 2 mill chimneys in the Local List.

Another response (14A) suggested the 2 sets of Tram Tracks should be in the Local list.

Another response (19) enquired whether Holme Street should be included in an ATC because of the old shop buildings?

SG responses: The two chimneys are already under consideration for inclusion.

Clarification is required from Pendle as to whether the Tram tracks are an appropriate entry.

It was agreed that it would be more appropriate to consider individual buildings (former shops) in Holme Street as Local List entries rather than redrawing the ATC boundary at the bottom of Winewall.

General Planning Questions (21)

The comment is asking about the applicability of Compulsory Purchase Orders and HCA (Homes & Communities Agency) funding.

SG response: CPO and HCA funding are not applicable to the allocated sites.

Policy 4 - Parking Standards (1A)

The single response questions why the Parking Standards don't suggest more spaces for 3 and 4 bedroom apartments (in line with terraced housing).

SG response: The group decided that the comment was valid, although the number of 3 bed or more apartments in Trawden is likely to be small. Because apartments are unlikely to have any roadside spaces, the number of parking spaces recommended should be at least as many as those for terraced properties. Appendix 8 changed accordingly.

Site Allocations – Land North of Dean Street (15)

The response opposes the site: school parking/access problems, further development spreading up the fields, “dark corridor”, previously rejected site (?), all the TFNP allocated sites in one area.

SG responses: The problems with access were reflected in the ‘scoring’ during the site allocation process, and until a plan is put forward by the developer it is not possible to assess the extent of any potential problems.

As for the question of development spreading further up the fields behind the site, the steering group expects to curb such development under Policies 1, 3 and 7 of the TFNP.

The SG rejected the description of a “dark corridor” because the plan as a whole should help to open up this stretch of road when Black Carr mill is developed.

It is true that the three larger sites allocated are all in one area, but this was inevitable if the plan is to keep development in the valley bottom and adjacent to the main road of the village. If Concept Staging and the LCC former Winewall Mill site had been available it would have been possible to spread developments along the B road, but they were not possible.

Site Allocations – Adjacent to 37 Hollin Hall (2,3,4,9,10A,11,12,13,14B)

Three responses (2,3,4) supported the provision of additional parking on this site. The other 6 responses opposed the allocation of the site:

Response (9): Extra traffic, obstruct view, loss of green space, disruption during building work, house prices, increase pollution/noise, already a car park at HH, flooding, further applications once the plan approved causing spread .

Response(10A): In 2003 a recommendation for no more development beyond Cock Hill Club was ignored by Pendle, 9 roadside spaces not fully utilised, developer not a resident, conflicts of interest.

Response (11): Loss of green space, the village is already ‘full’.

Response(12): Extra traffic, loss of green space, structural problems, loss of view, noise and pollution, threat to exclude HH residents from Floats Mill car park, change of plan to more than 2 dwellings, disturbance during building phase.

Response(13): Mixing “ultra-local issue” with Trawden-wide issue; doubting HH residents would walk 150-200 yards to new car park: questioning the scoring on the site assessment; parking available on roadside adjacent to proposed development; many HH houses have off-road parking already; a parking survey implies that there is sufficient parking already.

Response(14B): Loss of green wedge between 37 HH and Floats Mill.

SG Responses: The six responses opposing this development, when combined, raised the following 12 different issues:

- (a) Extra traffic
- (b) Loss of green space
- (c) Loss of view
- (d) Disruption/disturbance during development
- (e) Previous history of the site
- (f) Additional Parking not required
- (g) Conflicts of Interest
- (h) Questions the scoring of the Site Assessment Exercise
- (i) Spread of the Development
- (j) Threat to exclude Hollin Hall Residents from Old Mill Car Park
- (k) Flooding and Structural Problems
- (l) Change of the plan once supported by the TFNP

The SG considered these views and its responses are as follows:

- (a) Extra Traffic: While accepting that additional traffic is a problem, a net two new houses is not a significant increase. There may be some additional traffic arising from vehicles using the 16-bay car park, but it is assumed that most of this traffic is already present, being displaced from the Mill Car Park or from the roadside parking along the boundary wall of the site. There will be some car owners using the new car park who previously parked on the roadside at Hollin Hall but many of them will currently drive to the junction opposite the site in order to turn round. The SG considered that overall the increase is not likely to be significant. It was noted that the TFNP is not supporting the proposed site at Ryecroft which would have added 24 new homes further down this road; that would cause a significant increase if it was allowed to go ahead.
- (b) Loss of Green Space: The SG accepts that the development, being a Greenfield one, will result in Loss of Green Space, but this was taken into account in the site assessment and sustainability appraisal, and the benefits of the site were judged to outweigh the loss of green space.
- (c) Loss of View: The SG noted that this is not a reason for refusing a development.
- (d) Disruption/disturbance during development: Similarly, this is not a reason for refusing a development. Disruption during development is a normal part of the development process and would only be for a limited period of time.
- (e) Previous history of the site: It was noted that a similar scheme had been refused in 1994. That was prior to the Floats Mill development and the parking issues would not have been anywhere near as significant 24 years ago as they are today. So that refusal is not a reason for the TFNP to not support the development.
- (f) Additional Parking not Required: A 'parking survey' provided in a response to the consultation claims to show that the nine roadside spaces along the boundary wall of the site are rarely, if ever, all occupied. Against this it was pointed out that parking issues in Hollin Hall are frequently reported to the Parish Council, and there are reports of neighbour disputes over parking, and even deliberate vandalism to Hollin Hall's residents' vehicles when they use the Old Mill car park. Residents at the 'pinch point' in Hollin Hall may not currently use the roadside parking along the boundary wall but would be more likely to use an off-road space in the 16-bay car park, regardless of whether it is dedicated to them or generally available. It was also noted that the use of the 9 roadside spaces is not ideal and those opposite the mill can lead to an undesirably narrow access to properties further down the road. There was some minority disagreement about the current need, but the SG was unanimous in believing that there would definitely be a need for extra parking before 2030.
- (g) Conflicts of Interest: It was stressed that the Parish Council operates to a code of conduct which insists that any conflicts of interest are declared, and this code applies equally to the SG. Other than one SG member declaring an interest in this development not going ahead, no other SG member made any declaration, and any suggestion of favouring the developer was dismissed as completely untrue. The SG has been completely transparent in its work.
- (h) Questioning the scoring of the site assessment exercise: One response contained an unofficial re-scoring of this site and claimed it had been awarded 9 points too many. The SG pointed out that it was inappropriate to produce an

individual scoring by someone not involved in the whole scoring exercise back in March/April 2017. It was important that a core group of the same 5 people, supplemented by various other SG members at different meetings, performed all eleven site assessments within a relatively short period of time in order to maintain consistency. They acted objectively and used the criteria in a consistent way across all the sites. A few of the criteria used are not 'black and white' and require a degree of interpretation, but this interpretation was applied consistently. As the TFNP points out (at point 3 in Appendix 6C), this site was scored purely as a residential site, but if the benefit of the 16 additional parking spaces had been 'scored' then the site would have resulted in a higher ranking. Furthermore, Pendle Council regularly reminds the SG that the scoring system is not the sole reason for supporting or rejecting sites. Consideration of other factors can be taken into account. The site assessment exercise worked well and the SG believes that it came up with the most sustainable sites when all factors were considered.

- (i) Spread of development: The idea that development of this site could lead to further development in adjacent Greenfield sites was rejected. Policies 1 and 3 of the TFNP are intended to prevent such spread.
- (j) Threat to exclude Hollin Hall Residents from Old Mill Car Park: This threat was not taken seriously. It is unlikely that the landlord would be prepared or even permitted to make such a change. The Old Mill car park is included in the TFNP as a protected car park.
- (k) Flooding and Structural Problems: The SG believes that the structural problems referred to were near the river and have no bearing on a development many metres away from that site and on the opposite side of the road. The SG accepted that there can sometimes be significant surface water flooding in that field, but that this would be mitigated by measures to be incorporated at the planning stage. An appropriate drainage scheme would need to be submitted with the planning application.
- (l) Change to plan once the TFNP 'made': This aspect was not actually raised during the consultation period, but emerged during the SG's consideration of this issue. Pendle Council were consulted and they confirmed that the developer would be able to change the basis of the application, for example to more than 2 dwellings, once the TFNP had supported the site for development. Also that it would not be possible to include the site in the TFNP on a conditional basis, thereby restricting it to 2 dwellings.
The SG accepted that this was a concern, but decided to retain the site in the Plan because the developer is ready to go ahead and it was felt unlikely that the planning application, when submitted, would differ significantly from the outline plan in the Call for Sites version. The Parish Council members of the Steering Group were confident that if the application did differ significantly (eg more than 2 dwellings or removal of the additional parking spaces), that the Parish Council would lodge a strong objection to the application and would lobby Pendle Council to refuse the application.

Settlement Boundary (10B, 14C)

Response(10B): Questioning on whose authority the SB has been redrawn.

Response(14): objects to redrawing of SB to encompass the 37HH development.

SG Response: The question of redrawing the Settlement Boundaries was discussed in detail during development of the plan. The steering group was advised that the

settlement boundaries could be redrawn to include the site allocations. Pendle Council also redrew the boundaries to tidy up any sections where they did not correctly align with the existing garden boundaries etc.

Protected Car Parks (1B, 16,17)

Response(1): Suggests adding car park on Colne Rd (at end of Proctor Croft) to list.

Responses(16) and (17): Requesting their 4 (of 5) private spaces be removed from the list. (Top of Back Lane).

SG responses: It was agreed that the car park on Colne Road should be added.

The requests to remove 4 of the 5 spaces at Back Lane were rejected – the Parish Council was advised by Pendle Council that it has the authority to designate sites for certain uses (i.e. a car park) and protect them from development; this can be without the owner's consent.

Road Safety (20)

The response raises the 20mph zone issue again. Proposes an additional Policy (20mph zone, cycle/walking route from Trawden to Park High school, promoting public transport)

SG response: The steering group, while approving of the resident's aims, considered that they are outside the scope of the neighbourhood plan.

The question of a 20 mph zone has been raised on several occasions and has been (is being?) considered by the Highways Department at LCC. But the proposal for a 20mph zone is not a planning issue and therefore not considered to be appropriate content for the neighbourhood plan.

Even such safety measures as a school crossing near Dean Street are problematic because of the absence of a footpath on one side of the road.

Cycle routes and walking routes would need to be developed by LCC and/or Pendle Council, but the geography of the village makes such developments difficult to implement.

While the group is sympathetic to the idea of promoting public transport, it considered this to be outside the scope of the TFNP.