



To: Mr David Proctor MRTPI

22nd May 2018

Response to Issues with the TFNP Site Allocations

Thank you for reviewing our Neighbourhood Plan. Your comments were forwarded to us by Pendle Council. We apologise for the delay in responding. This is due to members of the Steering Group being absent on holiday.

We have attempted to address below the issues raised in your letter of 29th April 2018.

Obviously we are anxious to resolve these issues as soon as possible.

With regard to supplying further information, in addition to the descriptions below in this document, we aim to submit the following:

- 1) Site-specific Flood Risk Assessments (SSFRA) for the two sites.
- 2) A detailed assessment score sheet for each of the 11 sites.
- 3) Sales particulars for Site 009 (Land N of Dean St)
- 4) A record of the group members who participated in the assessments, and the 'core' group who participated in ALL assessments.
- 5) Outline plan for site 011 (Adjacent to 37 Hollin Hall)

We have relied on advice and information provided by Pendle Council in preparing the Plan. We have highlighted below where items requested by the Examiner can be provided by Pendle Council.

Flood Risk Assessment

We have approached our Flood Risk consultant and requested the site-specific flood risk assessments which we now understand the NPPF insists upon before sites may be allocated.

The consultant has quoted a period of 2-3 weeks to complete the work, once we give the go ahead. Her initial reaction was that consultation with the Environment Agency would be required and would add further weeks to the timetable. But having reviewed the data which the Environment Agency (EA) has already supplied, she believes the shorter timetable is possible.

We will consult Lancashire County Council (LCC) and EA on the findings of the SSFRA as appropriate.

Easement, Site Capacity and Allocations

As for the quantum of residential development being planned, we would expect that, even if the SSFRA points to fewer houses on sites 012 and/or 015, site allocations in the Plan will still exceed the minimum housing delivery target of 39. The plan as submitted exceeded this minimum requirement by 11 dwellings.

We acknowledge that once the SSFRA has been prepared there may be a need to amend the Plan and possibly carry out additional public consultation.

Site Assessment and Scoring

The assessment process started in March 2017 and considered sites already known to be available, from their presence in the SHLAA or from local contacts with the Parish Council.

Jonathan Dicken and John Halton of Pendle Council's Planning Department used the assessment criteria set out in the Pendle Local Plan Part 2: Scoping Report & Methodology, which was subject to a six-week public consultation in 2017, to consider one of the Trawden Forest sites (Site 005: E of Ryecroft). This example was used at the steering group meeting on March 1st to train those present in how to apply the criteria on a consistent basis. Subsequently, members of the Steering Group assessed 5 further sites on two days in March.

The Steering Group then waited for the closure of the Call for Sites by Pendle Council, following which a further 5 sites were assessed on May 9th. A review meeting was held on the following day, May 10th, with the aim of maintaining consistency.

In addition, the 'core' members of the steering group (see attachment) made site visits, both collectively and individually, to familiarise themselves with each of the locations.

In total eleven sites were assessed:

March 1 st	Site 005 Land E of Ryecroft *
March 15 th	Site 009 Land N of Dean Street
	Site 015 Black Carr Mill
	Site 013 Concept Staging **
March 21 st	Site 003 Back Side
	Site 004 S of Green Meadow
May 9 th	Site 011 Adjacent to 37 Hollin Hall
	Site 012 Across River from Black Carr
	Site 014 Hall House Farm
	Site 016 Joe Meadow and Little Wood
	Site 018 Land Adj to Goat House, Rock Lane
	Unit 2A Black Carr Mill, Skipton Road, Trawden, Colne, Lancs, BB8 8QU
	Email : a.waddington@trawdenparishcouncil.org.uk

May 10th Review/reassessments for consistency and following receipt of further information.

* The first assessment (Site 005) was initiated by Pendle Council and was used as a training exercise at the steering group meeting on March 1st.

** Site 013 was assessed and scored highly, but was later withdrawn by the land owner.

Where further information came to light (e.g. a map of local coal workings), and to ensure consistency with later assessments, scores were adjusted as the group gained more experience.

The 11 individual scoring matrices, including justifications, will be provided.

Statutory Consultees

All relevant Statutory Consultees were consulted at the pre-submission (Regulation 14) and Submission (Regulation 15) stages. No technical comments have been received from these consultees, beyond those documented in the Consultation Statement.

Sources of the Sites Considered by the Steering Group

The original list of 18 sites appears in Appendix 6B of the TFNP. Of these the 14 sites with a P-reference either featured in Pendle Council's SHLAA or were put forward in the Call for Sites for the emerging Local Plan. Stanroyd Mill, which has a reference of CE080, was also supplied by Pendle Council. Pendle Council should be able to supply the evidence from the SHLAA, or the Site Nomination Form completed by the landowners or their agents. With respect to site CE080, that although it lies within the Trawden Forest Parish area, it actually lies within the Colne Settlement Boundary.

The remaining three unreferenced 'sites' are:

Private Allotments (010), which were excluded from the exercise, having been designated as Open Spaces.

Black Carr Mill (015) is now at the planning application stage and again Pendle Council should have the details, although the flood risk assessment has not yet been undertaken by the developer. Hence the need for the TFNP to provide a Site-specific Flood Risk Assessment.

Rear Black Carr (012) did not appear in the Call for Sites but the Parish Council has been informed of the landowner's intention to develop the site. The owner is Mr Anthony Kay of Apartment 3, Pine Tree Court, Keighley Road, Trawden BB8 3RW. Once again the TFNP has undertaken to provide a SSFRA to allow the site to be included as one of its allocations.

You ask in particular for the details for Site 011 (Land Adjacent to 37 Hollin Hall). The landowner (Colin Blackburn) wrote to the Parish Council in October 2016 suggesting that the TFNP gave him an opportunity to present a scheme for two bungalows and a 16 bay parking area. The site was later

put forward in 2017 in response to Pendle's Call for Sites. An outline plan for this site, submitted to Pendle Council, showing the two bungalows and a 16-bay parking area, will be provided.

Of the five sites which the TFNP allocates, four are known to have owners keen to develop the sites themselves. The fifth site (site 009 Land N of Dean St) is up for sale (details at <http://www.rightmove.co.uk/commercial-property-for-sale/property-63645404.html>). Although in these particulars it states potentially 15 houses, the call for sites submission indicated 20 houses.

Other Documentation

The Steering Group meetings were minuted and these are available if required. However, minutes were not taken at the site assessment meetings.

At the March sessions, following extensive discussions, scores were entered on to spreadsheets and circulated to members after the meetings for verification and confirmation by those who had attended.

At the May 9th session a further 5 sites were assessed. A large sheet displaying all the criteria, the names of all 11 sites displayed and scores for the first 6 was used to help score the remaining 5 sites in a consistent manner.

Once the exercise was completed, the electronic score sheet (spreadsheet) was updated with the detailed scores for all 11 sites, and a summary version created to appear in the published TFNP.

The detailed sheets for all 11 sites will be supplied.

Technical Information

The technical information used in the site assessments was in the main supplied by Pendle Council. They assisted the Steering Group with all the mapping, the information on designated areas (e.g. SSSI etc.). Landfill sites, Minerals & waste, flood zones, former coal workings etc. This information together with the local knowledge of the Steering Group members and site visits formed the basis for the group's assessments.

Objections to the Site adjacent to 37 Hollin Hall

Although not something specifically requested by you, the Parish Council wishes to make clear that the allocation of this site has been discussed in detail at three Parish Council meetings, the latest being on May 8th 2018. On each occasion there was unanimous support for the proposal to allocate this site.

The Regulation 16 Consultation gave rise to three objections, two of which were from the occupants of the adjacent property (37 Hollin Hall). Mr Colin Munro, one of the objectors, joined the Steering Group after the site assessments had been completed. The majority of the group continued to support the proposed allocation, but Mr Munro has continued to raise objections, and accused members of the parish council of favouring this site for several unfounded reasons.

The other members of the Steering Group continue to favour the site because it has benefits for the residents of Hollin Hall generally. It is also supported by Policy 4 (Parking) of the TFNP. There are serious parking problems in the vicinity and the site as proposed would help to alleviate these problems which Pendle Council and Lancashire County Council Highways have been aware of for some time.

The assessment scoring exercise placed this site only just within the points total for inclusion in the TFNP. But as is explained in Appendix 6C, the system used was based on Pendle Council's own set of criteria for the Local Plan Part 2, which does not include a specific criteria related to reducing parking issues. If it had, then the site would have scored much higher.

Pendle Council, have made clear throughout this process that the scoring helps to inform the site allocation process and that other local factors may influence the final decision. Without a weighted scoring system, total scores are merely a rough guide. The Steering Group was reassured by the findings of the Sustainability Appraisal, which found that all 5 allocated sites recorded positive or neutral scores, whereas the five rejected sites recorded negative scores. Pendle Council's planners have reviewed this Sustainability Appraisal in detail and endorsed our results.

Timetable

SSFRA for sites 012 and 015.

The Flood Risk Consultant has been tasked with this work. The target date for completion is 22nd June 2018. However we suggest that an additional week is included to allow for slippage. Therefore we aim to submit this to you by 29th June 2018.

Site Allocation Scoring and other material.

As explained above we have problems with Steering Group members being absent on holiday. But we aim to assemble and submit the information that you requested by Friday 15th June 2018 at the latest.

Thank you

Kind regards
For Trawden Forest Parish Council

A Waddington

Adele Waddington
Parish Clerk and Responsible Financial Officer