

**Summary of representations received by Pendle Borough Council in response to the Regulation 16 public consultation for the Colne Neighbourhood Development Plan pursuant to paragraph 9 of Schedule 4B to the Town and Country Planning Act 1990.**

## **1.0 Background**

- 1.1 Colne Town Council (CTC) submitted the final draft of the Colne Neighbourhood Development Plan (CNDP) and supporting documents to Pendle Council on Monday 8 August 2022.
- 1.2 In accordance with [Regulation 16 of the Neighbourhood Planning \(General\) Regulations 2012](#) as amended, Pendle Borough Council (PBC) carried out a six week period of public consultation from Friday 2 September 2022 to Monday 17 October 2022 to allow interested parties to comment on the submission version of the CNDP.
- 1.3 A total of 107 valid representations were received before the end of the consultation period. All representations have been submitted to the independent Examiner pursuant to [paragraph 9 of Schedule 4B to the Town and Country Planning Act 1990](#).

## **2.0 Introduction**

- 2.1 This document provides a summary of the key issues raised in the representations that were submitted in response to the public consultation.
- 2.2 Section 3 provides a summary of the key issues raised by the consultees during the consultation. Appendix 1 presents the individual representations received, in full.

## **3.0 Summary of issues raised**

- 3.1 The comments submitted by consultees were wide-ranging. The majority of representations were in support of the neighbourhood plan, as submitted.
- 3.2 This section summarises the key issues that were raised. They are presented in document order, immediately followed by comments on the accompanying Policies Map and supporting documents.

### **Basic Conditions**

- 3.3 A neighbourhood plan must meet the [Basic Conditions](#) if it is to proceed to referendum. The following comments relate to this matter:
  - The plan as written does not meet the Basic Conditions, but can be made to do so with minor modifications.

## General

3.4 A number of comments addressed the submission version of the CNDP as a whole. The key points that were made are:

- There is significant, if not universal, support for the plan objectives.
- The Greenfield Conservation Area has not been referenced in the plan, or considered in appropriate site assessments.
- Some of the indicators identified are not capable of being monitored.

## Neighbourhood Plan Policies

3.5 A number of representations address issues relating to individual policies within the plan. The key points are:

### Policy CNDP1 - Colne Market Town

- Policy needs to be clear that proposals will not necessarily be subject to all of the policy requirements.
- It is unclear how applicants and decision makers should respond to the requirements of the policy.
- Policy needs to make explicit reference to the emerging Masterplan for Colne Town Centre.
- Some policy requirements do not accord with the NPPF or meet the CIL tests.

### Policy CNDP2 - Shopfronts

- Policy excludes modern high quality design.

### Policy CNDP3 - Design in Colne and the Colne Design Code

- Policy fails to acknowledge that modern high quality designs may be appropriate.

### Policy CNDP4 - Development Affecting Non-Designated Heritage Assets

- The policy represents a higher test than the NPPF.

### Policy CNDP5 - Urban Character Areas

- The character areas are not referenced in the accompanying design code.

### Policy CNDP6 - Future Housing Growth

- The policy is consistent with the spatial strategy for the borough and accords with strategic planning policies.
- Sites CNDP6/1, CNDP6/5, CNDP6/6 in the South Valley have reverted back to Greenfield and should not be classified as Brownfield sites.
- Site CNDP6/8 is designated as amenity green space (AG174) in the Pendle Open Space Audit 2019. The requirements of Pendle Local Plan Policy ENV1 have not been met to justify its loss.
- Insufficient infrastructure improvements are proposed to justify more housing.

### Policy CNDP7 - Protecting Local Green Space

- The assessment of LGS sites is flawed.
- Land at Lenches Road (Pendle Council, Site Ref. P152) should also be designated as Local Green Space.

### **Policy CNDP8 - Protection and Enhancement of Community Facilities**

- No significant concerns raised.

### **Policy CNDP9 - Protection of Local Shops and Public Houses**

- No significant concerns raised.

### **Policy CNDP10 - Protection of Sport and Recreation Facilities**

- No significant concerns raised.

### **Policy CNDP11 - Protection of Allotments**

- No significant concerns raised.

### **Policy CNDP12 - Transport**

- Some elements of the policy text are not consistent with the NPPF.

### **Policy CNDP13 - Conserving and Enhancing Valued Landscape Features**

- The policy cannot impose restrictions on development outside the designated neighbourhood area.

### **Policy CNDP14 - Rural Identity and Character**

- The language used should better reflect that used in the NPPF.

### **Policies Map**

- No significant concerns raised.

### **Supporting Documents**

- The Greenfield Conservation Area has not been considered in appropriate site assessments.

### **Other**

- Concern that the Regulation 14 public consultation took place during the COVID-19 lockdown (26<sup>th</sup> October 2020 – 8<sup>th</sup> January 2021) and was not adequately publicised.

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Ref	Individual, Organisation and Client	Verbatim Comment
CNDP-REP-001	Alan Bedford	<p>I am a resident in Colne and am writing to show support for the Colne Neighbourhood Plan.</p> <p>I agree fully that this plan will protect Colne and allow Colne to control the development of housing sites. Meaning that brownfield land is reused and regenerated within the settlement boundary. Therefore, protecting green spaces which are precious to Colne and make it a more desirable place to reside in.</p> <p>Please consider this plan carefully as the future of Colne depends heavily on it.</p>
CNDP-REP-002	Dr Alison Birkinshaw (1)	<p>I am writing to support the draft Colne Neighbourhood Plan since I believe that it meets the Basic Conditions required by Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (as inserted by the Localism Act 2011).</p> <p>I believe that the Plan takes a reasonable approach to influencing future development in Colne. More than this, it is designed to protect key areas of the local countryside and safeguard them against development. Colne has many green spaces that local people use on a daily basis and these are valued for the positive impact they have on mental and physical health. There are also some crucial curlew nesting grounds which must be safeguarded to ensure this red listed bird has a chance of survival. The area known as The Rough is one such valued green space which should and must be protected against development.</p> <p>Please log this email as showing support for the draft local plan.</p>
CNDP-REP-003	Dr Alison Birkenshaw (2)	<p>I am writing in total support of the draft Colne Neighbourhood Plan which is under consideration currently.</p> <p>I believe that it is important that local people have a say in the development plans for their area and that the democratic process is allowed to operate in a way that is in with the thinking of local people. Too often, it seems, the views and wishes of local people are subordinated to the landowner or others with influence, despite the fact that decisions made, contrary to the views of local people, will impact negatively on the lives of many others.</p> <p>This neighbourhood plan has been developed over many years and on the back of much community involvement. It clearly has regard to national policies and advice contained in guidance issued by the Secretary of State:</p> <ul style="list-style-type: none"> <li>• the making of the plan contributes to the achievement of sustainable development,</li> <li>• the making of the plan is in general conformity with the strategic policies contained in the development plan for the area of the authority,</li> <li>• the making of the plan does not breach, and is otherwise compatible with, EU obligations.</li> </ul> <p>But more than this, it reflects the views of local people who have campaigned to safeguard our green spaces for decades. It protects our local wildlife, including the red listed curlew and other rare birds. It facilitates</p>

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		<p>healthy living and will improve the mental health of those who live in Colne, and it has been produced as part of a democratic process. Should this neighbourhood plan not be allowed to progress to final approval then this will undermine the fundamental principle on which these plans are propounded, namely allowing local people to have an influence on the plans for their local area.</p>
CNDP-REP-004	Andrew Birtwistle	<p>I am writing to wholeheartedly add my support for the Colne Neighbourhood Plan.</p> <p>After 7 years of painstaking development I am convinced that it provides the right way forward for planning in the Colne area.</p>
CNDP-REP-005	Andrew Tillotson	<p>We would like to register our support for the Colne Neighbourhood Plan. It lays out a good strategy for the future sustainable development of Colne whilst still seeking to protect our important and valued green spaces. It should have a positive impact on our area and therefore has our full support.</p>
CNDP-REP-006	Andrew Wraith	<p>I am writing to express my support of the above draft plan meeting the basic conditions required by paragraph 8(1)a of schedule 4b to the town &amp; country planning act 1990.</p> <p>I have recently retired to the area in order to enjoy the outstanding green spaces of the area, especially the Rough, the Lidgett Triangle, Ball Grove &amp; Foulridge to just name a few .</p> <p>After having lived in an area where poor town planning had lead to suburban sprawl ruining areas of once beautiful countryside. I have come to enjoy The Colne area greatly with it's many heritage assets also.</p> <p>The plan also points out the support of developing brown field sites for housing. In my opinion if brown field land is available green field land shouldn't even be considered with no excuses or exceptions.</p> <p>One of the occasions where the planners got things right where I used to live was a former ICI work s. If housing can be successfully be built on there it can be done anywhere.</p> <p>I believe that a plan done at local level here at Colne, with the best interests of it's local residents can only be a good thing.</p>
CNDP-REP-007	Anne Smith	<p>We would like to offer our full support to the Colne Plan and we are fully confident that this plan will benefit the whole of Colne by allowing sustainable housing development whilst protecting our precious green spaces and outstanding views that makes Colne the beautiful town in which we choose to live and raise our families.</p>
CNDP-REP-008	Anthony Ennis and Julie Langham	<p>We offer our whole hearted support to the Colne Neighbourhood Development Plan Submission through Regulation 16, offered for comments and approval at the Pendle Borough Council meeting held on Monday 10<sup>th</sup> October 2022 to the Policy and Resources Committee.</p>

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		<p>At this Regulation 16 stage , we understand that the consultation is <u>not</u> about the detailed development sites or green spaces, but we must demonstrate that we meet the Basic Conditions and these are:</p> <ul style="list-style-type: none"> <li>• the plan has regard to national policies and advice contained in guidance issued by the Secretary of State,</li> <li>• the making of the plan contributes to the achievement of sustainable development,</li> <li>• the making of the plan is in general conformity with the strategic policies contained in the development plan for the area of the authority,</li> <li>• the making of the plan does not breach, and is otherwise compatible with, EU obligations.</li> </ul>
CNDP-REP-009	Bretty678 (full name not supplied)	P152 land at Lenches Rd is added as a protected green space in Colne Neighbourhood Plan. It's part of who we are and deserves to be protected
CNDP-REP-010	Dr Caroline Spencer-Palmer	<p>Due to a string of domestic health problems I have not had the time I would have liked to thoroughly read &amp; research the latest draft of the Colne Neighbourhood Plan. (CNP)</p> <p>However, I note with dismay that the Lenches area is not on the list of designated protected green spaces, which is a surprise, given that the recent</p> <p>However, I note with dismay that the Lenches area is not on the list of designated protected green spaces, which is a surprise, given that the recent planning application by Gleasons attracted over 400 objections to building on the land. It is an area that is clearly boundaried by Lenches Road, Knotts lane &amp; Short &amp; Daisy Streets, is not a large tract of land, is accessible to &amp; indeed well-used by local people, &amp; is demonstrably special, as it has a rich wealth &amp; variety of habitats, &amp; indeed several trees with protection orders enacted. The residents of Waterside certainly value the area as special, &amp; I see that the last photograph on the draft plan itself, is a view of Colne taken from the Lenches field, so presumably you, do too. I have been campaigning for the protection of the Lenches since 1998, so please therefore now include its protection in the final CNP.</p> <p>I also note that areas of green space immediately to the south of Patten St, &amp; in Waterside ie CNDP6/6, CNDP6/5&amp; CNDP6/1, are also suggested as brownfield sites that should be considered for housing development. However, the areas in question have reverted to natural grassland &amp; woodland, &amp; are therefore no longer classified as brownfield. They are also pleasant green areas that abound with insect &amp; bird life, confer benefit on the residents, &amp; mitigate for the lack of gardens in the area, which is within the 5% most deprived wards in the country.</p>

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		<p>Otherwise I think that having a neighbourhood plan is a sensible idea &amp; laud the efforts of Councillors &amp; Officers in putting this document together.</p>
CNDP-REP-011	Christine Hartley	<p>I am writing to you to voice my support for the passing of the Colne Neighbourhood Plan, which I believe to be a good thing for Colne.</p> <p>If I'm honest I don't fully understand the full complexities of the document, evolved over years with thousands of hours of dedicated work.</p> <p>This kind of thing is not my personal speciality.</p> <p>But I can promise you one thing: from everything I have seen and read I firmly believe that this Plan is good for Colne and surroundings.</p> <p>It appears to favour housing development on Brownfield sites, which is what every sensible person wants. We are not just talking about ourselves, but about our children, and our children's children. I moved to the Lidgett area of Colne 18 years ago (from Burnley), almost entirely because of the beauty of the town and countryside around it, particularly the fields around us, and I have thought it disgraceful that green fields are being used, and considered, for housing development, when significant brownfield areas are lying unbuilt on.</p> <p>There are also some lovely green spaces within the town which I feel should be nurtured and cherished. The thought of modern housing on the green tree-studded space by Heifer Lane roundabout, as an example, is quite shocking.</p> <p>I also believe that the Plan contributes to sustainable development, and meets all the basic conditions necessary, with regard to national and EU policy and guidelines, for this class of document.</p> <p>For these reasons I am in full support of the Colne Neighbourhood Plan. Please don't allow it to fall flat on its face at this critical Regulation 16 stage.</p>
CNDP-REP-012	Christine Hird	<p>We fully support the Colne Neighbourhood Plan and support its progression. This plan has been correctly done and developed over 7 years and we feel that it is good for the whole of Colne.</p>
CNDP-REP-013	Claire Kelly	<p>I am emailing to request that P152 - the land at Lenches Road in Colne is added as a protected green space in the Colne Neighbourhood Plan.</p> <p>I feel that what little greenspaces we have in Waterside - Lenches at the very least ought to be protected. There are many valid reasons which you will see within the many objections received when plans were submitted for it to be built on.</p> <p>I do hope that this can be protected.</p>

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CNDP-REP-014	Clive Riley	<p>With regards to the upcoming debate reference the placement and quantity of houses to be built within Pendle, local opinions such as those brought forward by the Colne Neighbourhood Plan must be the backbone for future development.</p> <p>No longer should we be at the mercy of outside financial interests. We need cast iron commitment that green spaces have to be available for future generations to enjoy our walks, scenery, wildlife and quality of fresh air.</p> <p>How can we have more houses without adequate infrastructure?</p> <p>More houses without investment in roads, rail, schools, doctors, dentists is lunacy.</p> <p>We don't even have a bus in Colne, Barnoldswick, Earby and the various villages to get people to a hospital appointment.</p> <p>Fix the problems first before more developments</p>
CNDP-REP-015	Cllr Elizabeth Hurley	<p>I am writing in support of the Colne Neighbourhood Plan.</p> <p>It has regard to all the relevant national policies and advice, provides an excellent framework for protecting and preserving the heritage assets (designated and non-designated) of the town and gives special consideration to conservation areas.</p> <p>Above all, it contributes to the achievement of sustainable development by identifying brownfields to provide housing and infrastructure in a programme of regeneration in areas where access to transport and services would mean less dependency on car travel</p> <p>I am aware that there are those that claim some of the brownfield sites in the South Valley in Waterside should now be regarded as open green spaces since post demolition neglect has led to them becoming overgrown.</p> <p>As a councillor for Waterside I have attempted to clear these areas (which are awash with dog faeces) of tipped items, drugs paraphernalia and litter. Only to find that within weeks, they have become grot spots yet again. This is particularly the case for the land in front of Patten Street.</p> <p>It is precisely these areas of the South Valley which would benefit most from regeneration, and I therefore wholeheartedly support the plan and the vision it has both for Waterside, and all of Colne.</p>
CNDP-REP-016	Daniel Wilkinson	<p>As a resident of Colne my entire life, I would like to extend my support for the Colne Neighbourhood Plan through Regulation 16 and on towards examination by a Planning Inspector.</p>



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		<p>I feel the plan is extremely important to the town and has Colne residents' best interests at heart. I believe Colne should be able to Designate its own housing sites and use brownfield wherever possible. The protection of the surrounding countryside, green spaces and habits for increasingly endangered wildlife from development has never been more vital.</p> <p>The town has a rich history which needs protection and I believe the Colne Neighbourhood Plan will be a very positive step forward for Colne and will benefit the town as a whole.</p>
CNDP-REP-017	Dave Penney	<p>This communication is to let you know that the Pendle Green Party and members of the Pendle Climate Action Group, who also belong to the Climate Emergency Working Group, strongly support the proposed plans as they emphasize the importance of:</p> <ul style="list-style-type: none"> <li>• Protecting our Greenfields and Green Spaces from Housing and Industrial Developments which would damage Biodiversity and increase Climate Change and damage the health and well being of communities;</li> <li>• Brownfields should be used instead to provide the housing and infrastructure needed to help in a Programme of Regeneration in areas where access to transport and local services would mean less dependency on car travel;</li> <li>• These measures would enable the Council to engage in the County's Active Travel Strategy.</li> </ul> <p>In order for the Plan to succeed I believe Planning Regulations and Guidance in the National Planning Policy Framework need to change in order to stop any building on Green Spaces where Brownfields are available.</p> <p>To this end, I have written to the Pendle MP urging him to lobby the Government to change the Regulations and Guidance accordingly in the following email:</p> <hr/> <p>Dear Andrew</p> <p><b>NEED TO CHANGE PLANNING LAW TO PROTECT GREEN FIELDS</b></p> <p>It is good to know that you support Pendle Council's refusal to give planning permission to Developers to build on Greenfields. However, there still remains a danger that Developers will get their way under current Housing Planning Legislation.</p> <p>This danger is seen in Pendle Planning Department's current Housing Policies as expressed in their Framework 51 Newsletter under "Call for Sites". This includes the following conditions:</p>

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		<p>"Our preference is to allocate sites on land that has been previously developed (Brownfield land);</p> <p>But we will also consider the need to allocate sites on land that has not been developed before (Greenfield land);</p> <p>The sites identified do not need to be in your ownership."</p> <p>This has led to Planners recommending that housing developments on Greenfields should go ahead while Councillors under pressure from Objectors decide against giving permission.</p> <p>This seems to leave the door open to Developers who do not have to own land to submit plans to build on Greenfields. This has led the Developers to "Land Banking", storing up greenfield sites to stop rival bidders and plan future developments. This practice seems to conflict with the Council's claim made by all political parties (Cons, Labour, Lib Dems, Greens) that they are against any housing or industrial developments on Greenfields.</p> <p>The Council is put in an invidious position with the Developers going to Appeal and being awarded Planning Permission by the Planning Inspectorate or in some cases by Secretary of State for Housing with the Council Taxpayers footing the bill for the Appeal. For far too long Planners and Developers have ruled the roost!</p> <p>The Council Planners say they have to follow National Planning Policy Framework (NPPF) Guidelines on Housing Developments which still allow for development of housing on Greenfields "in exceptional Circumstances". Developers have used this loophole to argue their case by saying vaguely that is not viable or feasible for them to build on Brownfield sites - in other words they would make more profits from building on Greenfields than on Brownfields.</p> <p>You are now in an ideal position, as Parliamentary Under Secretary of State at the Department for Levelling Up, Housing and Communities, for your Department to submit necessary changes to the Housing Regulations and Guidance in the NPPF.</p> <p>Can I suggest that this loophole in the NPPF be closed by changing to the Law to be specific by what is meant by "in exceptional Circumstances"? Changes could read as follows:</p> <ul style="list-style-type: none"> <li>• "No housing will be allowed on Greenfields if Brownfields are available", and;</li> <li>• <b>"Developers cannot propose sites for development that they do not own"</b></li> </ul> <p>Such changes would benefit Pendle as it has plenty of urban Brownfield sites. They help in the Regeneration and Levelling Up of deprived urban areas, protect Greenfields, reduce the carbon</p>

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		<p>footprint, enhance Biodiversity and allow public access to healthy breathing green spaces like the newly agreed LNR at Gib Hill.</p> <p>I would be grateful if you could persuade the Government to make these changes to the NPPF.</p> <p>While the Government is reviewing the NPPF Regulations and Guidance, would it be possible <b>to ensure that Developers adhere to the highest level of eco housing standards including insulation, energy saving measures, installing renewables in place of gas, which will help to reduce the carbon footprint?</b></p> <p>These changes are more important than ever as the Government has just announced <b>38 new Investment Zones</b>, one of them being Lancashire.</p> <p>These will have an <b>adverse impact on Nature and Biodiversity</b>, especially as the Policy includes plans for a relaxation of planning rules to allow business development, which ministers said would be "consent-driven", leading to an industrialization of Greenfields and Green Spaces. Some Environmental and Wildlife Protection Groups, like the CPRE and RSPB, have said these <b>schemes will create destruction not investment zones</b>. (BBC News, 28<sup>th</sup> September 2022) Investment zones with "liberalised" planning laws to accelerate development could be designated within national parks and in the most environmentally protected areas of the UK, government documents reveal.</p> <p><u><a href="#">Details of the government's new zones to increase housebuilding and commercial development</a></u> reveal councils can apply for zones in <b>national parks, areas of outstanding natural beauty, (AONBs) sites of special scientific interest, (SSSIs) and green belt land</b>, according to a Guardian Report. (3<sup>rd</sup> October, 2022) So much for protecting Greenfields from housing and industrial development when only Brownfields should be used in these Investment Zones to reduce the impact of climate change. Social Wellbeing and the Health of the Environment will be sacrificed in favour of Economic Growth at any cost if this is allowed to happen. It may also make it easier for the Government to impose Fracking in rural areas.</p> <p>I am sending this email to Planning Policy as part of the Consultation, indicating our support for the Colne Neighbourhood Plan.</p>
CNDP-REP-018	Dave Welburn (1)	<p>I am writing in relation to the public consultation on the final draft of the Colne Neighbourhood Plan.</p> <p>This is now a very comprehensive and well prepared document thanks to the substantial efforts of all involved and should form a solid basis for managing future planning applications.</p> <p>I believe the policies within the draft plan support and meet the basic conditions i.e.</p>

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		<ul style="list-style-type: none"> <li>• the plan has considered the national policies and advice contained in guidance issued by the Secretary of State,</li> <li>• the production of the plan contributes to the achievement of sustainable development, and the plan is in general conformity with the strategic policies contained in the development plan for the area of the authority.</li> </ul> <p>In particular, I would like to highlight the following:</p> <ul style="list-style-type: none"> <li>• Conforming to all of the CNDP Policies (1 to 14) will ensure that future developments do not drastically change the market town appeal of Colne but will let it grow in a sustainable way.</li> <li>• Policy CNDP1 will help to support the economic development of Colne.</li> <li>• Policies such as CNDP8, CNDP9 and CNDP11 will help to provide the community facilities a vibrant town needs.</li> <li>• Policies CNDP7, CNDP10 and CNDP11 will help protect the very valuable green spaces which provide much needed pockets of greenery in an urban area, for wildlife, relaxation, sport, exercise and healthy food production. In particular, protecting the former Nelson &amp; Colne College sports/ playing fields on Barrowford Road is welcome, as following the necessary maintenance this valuable facility has been used extensively by local teams for training and matches which is good for community spirit and peoples' wellbeing.</li> <li>• Policy CNDP6 identifies a range of suitable sites to help meet identified housing growth. Identifying such areas allows development to be focussed on specific areas of the town, which in turn prevents the building on valuable green belt and prevents the urban sprawl which alters the character of the town.</li> <li>• This is a very good final draft document which I hope will get full approval very soon.</li> </ul>
CNDP-REP-019	Dave Welburn (2)	<p>I have submitted a separate email in support of the CNDP but I have the following points about the document.</p> <p>In Section 6.3.1 it states "The PLPCS identifies the need for 3,963 new homes in the M65 Corridor, 2011-30". However, in Table 2 the figure becomes 3,366, a drop of 597 houses, without any explanation. Which is the correct figure?</p> <p>In Section 6.3.25 there is a typo in the spelling of advantage (adavantage).</p> <p>In Section 6.4.5 SEO 2 there are additional spaces between providing and fuel (and providing fuel,). I know this seems a bit picky but I hope the document can be amended before sending to the Inspector.</p>

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CNDP-REP-020	David and Jennifer Bell	<p>As lifelong residents of Pendle and residents of Colne for over 45 years we wish to register our support for the Colne Neighbourhood Plan. We particularly want to single out our support for the Plan's retention of our local green spaces, specifically the Lidgett Triangle, the Upper Rough, Ball Grove, the Foulridge Reservoir walking area, the Heifer Lane roundabout, St. Stephen's walking area and Snell Grove.</p> <p>As has been highlighted by the recent Covid pandemic, access to local green spaces on foot is such a vital resource for maintenance of health, both mental and physical. In addition this contributes to making Colne a desirable place to live, as we have witnessed first hand from conversations with people from outside our immediate area who have been surprised by the wealth of accessible and beautiful countryside on our doorstep together with our urban green spaces. It is something that we as residents have perhaps too easily taken for granted and we need to ensure the preservation of these spaces for future generations to enjoy.</p>
CNDP-REP-021	David Faulkner	<p>I am writing to ask that you remove three potential areas from the proposed Colne Neighbourhood Plan. These areas are based in the Waterside ward and are marked as CND 6/1, CND 6/5 and CND 6/6. Development of any and all of these areas would significantly change the face of the Waterside ward and cause a severe impact on the schools, health facilities and the roads within the ward.</p> <p>CND 6/6, the wooded area that runs alongside Patten St/Exchange St is an area of land that has never been built on, you can see this if you view several maps of the area over the last 150+ years and I'm unsure why anyone would think that it should be allowed now. This area also is beneficial for the residents of Patten St who currently use this land, rightly or wrongly, as an extension to houses and an area in which their children use and learn.</p> <p>CND 6/5 and CND 6/1 are also wooded areas that are popular with both children and adults. I use these areas with my children and when I'm walking our dog and he too finds them fascinating as well. I have read that these areas were regenerated prior to the 1930s, meaning they once were used for housing or other facilities but the right decision was made to green the area for the betterment of the Waterside residents allowing them to have easy access to a green area right on their own doorstep. This is very much beneficial today considering that the area remains one of the most deprived in the country, as well as many of the houses in the area lack gardens due to their compact design, it allows children areas to learn, play, enjoy, have fun in and make memories rather running around newly built estates causing havoc and getting in trouble . Having been regenerated for nearly 100 years makes these areas green field as designated by your own department. I have heard that a councillor recently made comments on these areas that one person's regeneration area can be an eyesore to another. My family and I, as well as many other residents would much prefer this 'eyesore' than that of new houses transforming the view and land use of the area.</p> <p>Please kindly put my views forwards regarding these designated sites.</p>

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CNDP-REP-022	David Horsfield	<p>I am writing in regard to the four public consultations, public meetings, regular updates and collective scrutiny of all documents, in my opinion all of the above has been done correctly.</p> <p>In relation to the plan itself I am in full support of the initial framework and believe that this is in the best interests and future of Bonnie Colne.</p>
CNDP-REP-023	Emma Crickmore	<p>I write to lend my support to the Colne Neighbourhood Plan. I believe it takes a reasonable approach to influencing the future development in Colne.</p> <p>My understanding is that it has been developed over 7 years, has had detailed planning to demonstrate its viability and compliance with basic conditions, and has involved the public through its many consultations.</p> <p>In particular, it is important to me that through this process, we will be better able to control our future in identifying housing sites to reuse and regenerate brownfield land within the settlement boundary, protect our much-valued local green spaces (eg, the Upper Rough, Lidgett Triangle, Ball Grove), non-designated heritage assets and important long-range views.</p>
CNDP-REP-024	Emma Hartley	<p>I would like to make the following comments on the Colne Neighbourhood plan</p> <p>1) The reg 14 consultation took place during Lockdown 26th October 2020 – 8th Jan 2021. Only 74 members of the public commented. Some residents only realised once the consultation had finished that it was possible to ask for land to be protected as local green space. 145 residents wrote to the town hall requesting that a particular piece of land at Lenches Rd was protected. Several residents spoke at meetings but we were told it was too late and nothing could be added. Despite this the plan has changed dramatically with 7 additional green spaces added and 13 housing allocations removed. Therefore it seems like the plan at reg 16 has altered dramatically since reg 14. Would it not be wise to re consult with all the changes?</p> <p>2) Many of the numbers and references for green space allocations and site allocations don't correspond with each other it is extremely confusing trying to work out which sites are allocated for development and which are to be protected. One of the sites on the masterplan is incorrectly labelled meaning that a completely different site is referenced on the map. There was no reference numbers on the original policies map meaning it was impossible to work out what was being proposed. We were told that some of the site allocations were mapping errors which would be corrected. Some of these errors were still in place at reg 16 making it very difficult to understand what is being proposed.</p> <p>3) South Valley in Colne has been allocated hardly any protected green space whilst 4 of its building allocations are areas designated as open spaces in Pendle's open space audit 2004/2008 and 2019. These sites are in an area in the top 10% for deprivation in the UK according to the IMD. Residents live in terraced</p>

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		<p>homes with no gardens, car ownership is low and they rely on these green spaces for mental and physical wellbeing. No alternative provision has been made. The sites are</p> <p>CNDP6/1 land East of Waterside Rd designated as Natural Green Space (NG118) and amenity green space (AG139) this is in conflict with ENV1 of the Pendle local plan</p> <p>CNDP6/5 Dam side this site is designated as Natural Green Space (NG118) and amenity green space (AG139) this is in conflict with ENV1 of the Pendle local plan</p> <p>CNDP6/6 Shaw St. This site is incorrectly labelled as CNDP6/7 on the masterplan meaning residents have no idea that this site has been targeted for housing. It is designated as a play area (PA014/015) and woodland (WD374) in the Pendle open space audit 2019. The requirements of policy ENV1 have not been fulfilled to justify the loss of this site.</p> <p>CNDP 6/8 Primet Bridge This site is designated as amenity green space (AG174) in the Pendle open space audit 2019. The requirements of ENV 1 have not been met to justify its loss.</p> <p>As a local resident I find it shocking that these valuable open spaces have been designated for housing in such a deprived area and feel there is a moral and social responsibility to remove them as building allocations.</p> <p>I have also observed that whilst some areas seem to be benefitting from a virtual green belt South Valley which has no green belt provision has been given extremely limited protected green space which seems to be discrimination against the very poorest in society which does not seem to meet the basic conditions of a neighbourhood plan</p> <p>Many of the areas proposed as protected green space are already protected through existing policies and legislation as green belt, nature reserves, public parks, amenity greenspace and public rights of way which seem to be a waste of Local green space designation when some areas have been given hardly any green space protection. You can see from the policies map just how uneven the distribution is. I would be happy to meet the examiner to discuss my concerns.</p>
CNDP-REP-025	Ernest Thorley	<p>This has been a very large undertaking and is now a very impressive and thorough document. The efforts and diligence of those responsible is much appreciated. The policies within the plan support and meet the basic conditions.</p> <p>In particular, I would like to highlight the following:</p> <p>1. <u>Economic Objectives</u></p> <p>Building development sites are often a contentious issue, but CNDP6 identifies a range of suitable sites to help meet identified growth. This should allow developers the opportunity to focus on such areas, speeding</p>

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		<p>up the house building process. It is also encouraging to see CNDPI which should support a wide variety of economic development.</p> <p>2. <u>Social Objectives</u></p> <p>CNDP6 is again a key issue re development sites, to ensure that the very important social objective is not compromised. I am very pleased to see CNDP7 protection of open spaces in place, as it is a key issue in an urban area. This is also the case for CNDP10, protecting sports and recreational facilities. For example, by protecting the Barrowford Road Playing Fields and ensuring the undertaking of the necessary maintenance, an exponential increase in usage has already been achieved, which is good for people’s wellbeing.</p> <p>In summary, an excellent final draft document both in content and presentation which I hope will get full approval very quickly.</p>
CNDP-REP-026	Fiona Milnes	<p>A quick look at the plan shown for consultation shows huge swathes of land which are protected spaces on the North Valley side of Colne and exceedingly little on the South Valley side.</p> <p>When I moved to Colne many decades ago I moved to the outskirts of town with the protected land to the rear of the houses with the fields being designated as Green Belt land. This protected land was trashed when housing permission was given for the poorest quality housing to be erected on the green fields, whilst within the town area there were numerous brown belt land spaces available. Many of these houses have had to redo basic work, like roofing, pointing of walls, etc. Social housing erected at the base of the hill next to the railway line and on top of former wetlands, being at the base of the valley, unsurprisingly suffer from damp. Cars speed up Knotts Lane to the new estate access road and the recent 20mph signs that were put up have been ignored just as much as the former 30mph signs.</p> <p>Over time, I have watched the South Valley properties being sold on to, mainly prospecting landlords who live, by and large, within London and the prosperous South East. This has had a tendency to push up property prices and make local properties unavailable to younger generations who wish to get on the property owning ladder. Instead we have had an influx of people unconnected to the area, who have no stake in the property they live in, nor the neighbourhood, and subsequently take no pride or care of the property. Litter and items of rubbish are constantly on the streets and up to people's front doors, there's been a rental house on a lower block where the front window has been boarded up for months. Rubbish bins are left where the bin men have put them for weeks on end. Other items of rubbish are discarded behind the houses. It's easy to feel one's living in an increasingly slummy area!</p>



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		<p>Permission given for a new take away at the bottom of Knotts Lane, with no provision whatsoever for customer parking, has lead to cars parking on the double yellow lines making the blind corner opposite the shop exceedingly dangerous.</p> <p>So when I look at your latest neighbourhood plan, which fails to show all recent erected housing areas, with its paucity of green protected land, I can not feel optimistic about future neighbourhood plans for this area! I had thought that the £25K spent on providing weed trees &amp; a rubbish sculpture for the Millennium Green was at least spent on an area that is protected as a green space, but it seems not. And the land where the effort of raising funding and of local volunteers to plant trees on The Hagg and the old rubbish tip also appears to not have protected green space status. I'm wondering why our green spaces have not been proposed to be protected on your latest Neighbourhood Plan, and would appreciate why this is so and also why there is such a lack of balance of green protected land to the South Valley of Colne compared to the North Valley side.</p> <p>I congratulate you on turning down a housing application for The Lenches land, but again it appears this is not considered on the proposed neighbourhood plan for a protected green space. As many locals use it surely a more considered plan would propose to flatten out an area on this land near the Lenches Road, so people have a safe, and non-ankle-twisting surface, to play ball on, fly a kite on, set up a cricket game, take kids for a picnic, etc. etc. In short, enhance the provision of this green space. It needed cost much to achieve at all.</p> <p>In short, I and many residents, wish to raise the quality and provision within this area instead of suffering from past decisions made, that no matter how well-intentioned, do not seem to have been thought through, so that potential problems likely to occur along the way could be dealt with beforehand or abandoned. Hindsight is okay but how much better to properly think things through from all angles with knowledgeable projection into the future, leaving vested interests aside and make decisions wisely, than for locals to suffer from these unsurprising problems later.</p> <p>I speak for many when I implore you to work on bettering and enhancing this area rather than think building by private contractors is the only way to go. If you are short of ideas and vision please do not hesitate to contact me.</p>
CNDP-REP-027	Galen Hayes	I understand Colne Neighbourhood Plan is now out for consultation and in that regard I would like to request that P152 Land at Lenches Road is added as a protected green space.
CNDP-REP-028	Gary Towler	<p>I write to voice my full support for the plan.</p> <p>Clearly lots of hard work and thought have gone into it's production and it makes good sense to me.</p> <p>Let's get behind it.</p>

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Ref	Individual, Organisation and Client	Verbatim Comment
CNDP-REP-029	Gill Lee	<p>I wish to add my support to the proposed Neighbourhood Plan for Colne. Although I am only a recent resident I appreciate the reason for wanting to retain the "Market Town" feel as there is a richness of sturdy older buildings that give this vibe in the town and it would be a shame to add modern buildings to what is essentially a town with character.</p> <p>I also agree that the building on current brown field sites is important rather than building on green field areas around the town. The open countryside directly around our town is so accessible to young and old alike and is within easy walking distance wherever we live.</p> <p>The continuation of promoting Fairs and Festivals and Concerts is highly important to keep us on the map!</p> <p>I believe this proposal has been some years in the making and feel it is important to have a plan now with local support which is to the benefit of all its residents.</p>
CNDP-REP-030	Graham Wardle	<p>Please accept this email as my request that, P152 land at Lenches Rd is added as a protected green space in Colne Neighbourhood Plan.</p>
CNDP-REP-031	Helen Clegg	<p>I wish to register my support for the Colne Neighbourhood Plan</p> <p>I see it as an extremely appropriate, relevant &amp; valuable document, to be used as a high priority reference tool for the planning decision-makers. It is highly personalised for our local area &amp; will help to protect the important green spaces &amp; valued heritage both for the present residents &amp; generations to come.</p>
CNDP-REP-032	Historic England	<p>Thank you for consulting Historic England on the above consultation. We are the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Digital Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.</p> <p>Historic England note the amendments made to the draft Colne Neighbourhood Development Plan, have no comment to make at this stage, but would like to be kept informed of future progress. Nevertheless, in respect of SEA, we would like to clarify that our response regarding the SEA screening opinion remains as detailed in our letter to Mr Wellock of Kirkwell's dated 5 February 2021, that we consider that the need for SEA of the draft plan cannot be screened out.</p> <p>Thank you once again for providing Historic England with the opportunity to comment.</p>

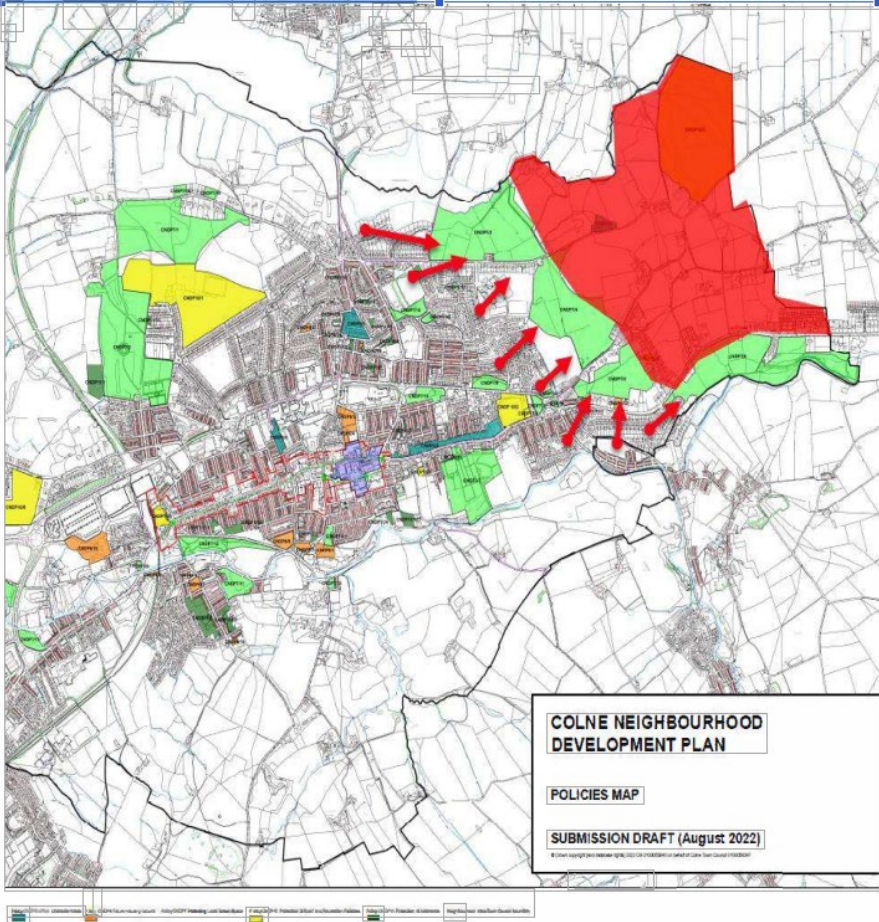
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Ref	Individual, Organisation and Client	Verbatim Comment
CNDP-REP-033	Homes England	<p>As a prescribed body, we would firstly like to thank you for the opportunity to comment on the above consultation.</p> <p>Homes England is the government's housing accelerator. We have the appetite, influence, expertise, and resources to drive positive market change. By releasing more land to developers who want to make a difference, we're making possible the new homes England needs, helping to improve neighbourhoods and grow communities.</p> <p>Homes England does not wish to make any representations on the above consultation. We will however continue to engage with you as appropriate.</p>
CNDP-REP-034	Ian Davids	<p>I am writing to you to comment on the Colne Neighbourhood Plan Consultation Reg 16. Apologies for the slightly late email I have realised it has not sent earlier due to the size of the images so I have had to compress them.</p> <p>I started to write a detail report but due to the length and the considerable amount of time it was taking I have decided to revise\ summarise the entire comments. The basic summary I have been left feeling when looking at this plan is considerable confusion and lack of understanding due to the poor practices implemented throughout the documents.</p> <p>I have a good understanding of working documents and how you must ensure the documents overall clarity for the readers. To which this does not some bullet points of such examples below:</p> <ul style="list-style-type: none"> <li>• multiple sites referenced via a mass of different ID reference names to which you are left spending half the time trying to decipher which site is which. Best example of this is within the document Colne_Neighbourhood_Development_Plan_Site_Assessments_Report_03.08.22_1.pdf page 10 under section <b>[6.10 This produces a final allocation for the Regulation 14 Draft CNDP of the following sites:]</b>. The site CNDP6/27 - Bunkers Hill, 1.87ha., 56 units is referenced yet there is no way to find the assessment for this site under CNDP6/27 you have to look for CTCD when doing a search within the digital document. The you progress to the document <b>[Colne_NDP_Policies_Map_02.08.22_REVISED.pdf]</b> where I think its detailed as CNDP6/15!!!</li> <li>• a lot of maps which many of the public have commented on during previous consultations required changing to reflect what the plans are trying to detail have been ignored and carried on through multiple revisions.</li> </ul> <p>This just leaves people utterly lost and I don't think anyone within the public is truly understanding any of this. I have spent considerable time trying to piece it all together with the aid of digital documents and still not succeeded. A set of documents which has vast array of inaccuracies within itself and convoluted details</p>

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		<p>should not be going to Reg 16. This is such a critical document for the Town and is a highly important legal document.</p> <p>I strongly agree with a lot of the comments stated from the Planning Department comments of Reg 16 draft within the document</p> <p><b>[Item_08_Colne_NP_Appendix_Comments_on_Reg_16_Draft_September_2022_Final_Draft.pdf].</b></p> <p>Another point I'd like to make after seeing the document [Colne_NDP_Policies_Map_02.08.22_REVISED.pdf] is how transparent and appalling this over all plan feels. It should not be tailored to one communities needs to which this Neighbourhood plan feels. You can greatly see the community this plan strongly serves with the ill use of Local Green spaces which has left the plan greatly deviating from the NPPF. As seen in the governmental link <a href="https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space">https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space</a>. The section stated below:</p> <p style="text-align: center;"><b>How big can a Local Green Space be?</b></p> <p style="text-align: center;">There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, <a href="#">paragraph 100</a> of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name.</p> <p style="text-align: center;">Paragraph: 015 Reference ID: 37-015-20140306</p> <p style="text-align: center;">Revision date: 06 03 2014</p> <p>As clearly shown highlighted above a local green space "should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name."</p> <p>The map below shows a vast saturation of designated Local Green Space which is blatantly designed to offer a singular community greater protection than others.</p>

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		 <p>his map also does not take into account the additional layers of protection which have been mapped in the below image this map is a little out of date but shows the upto date layers of protection assigned in the north east area of Colne. With the way the plan is laid out it doesn't truly show the gravity due to its complexity and misleading approach however another member of the community has kindly put they own time into demonstrate this:</p>





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Ref	Individual, Organisation and Client	Verbatim Comment
		<p>We have lost 70% of wildlife in the last few decades alone. We will not just kill off the wildlife we will destroy ourselves if we destroy our precious and unique countryside. Your children and their children need you to stop the destruction of Pendles unique countryside.</p>
CNDP-REP-036	Jaqueline Blackburn 2	<p>I totally OBJECT to all and any building on Lenches and any green sites in Pendle. We have lost 70% of wildlife in the last few decades. We must NOT lose anymore.</p>
CNDP-REP-037	Janet & Paul Snowden	<p>We wish to show our support for progressing the Colne Neighbourhood Plan through Regulation 16 and on towards examination by a planning inspector.</p> <p>This plan has been developed over 7 years with L&amp;B representatives playing a part throughout. The key point is that the plan is good for the whole of Colne. On a personal level we live on Castle Road Colne and our huge concerns have already been submitted to L&amp;B org. Please see attachment.</p> <p>Attachment: <a href="#">Colne Neighbourhood Area Proposal</a></p>
CNDP-REP-038	Janet Fitzpatrick	<p>I am writing in to record my full support of the Colne Neighbourhood Plan.</p> <p>Looking at it we have a very fair &amp; sustainable plan for the future of our community/town. It is very apparent that local residents' views have been listened to &amp; taken into account when making the decisions. I feel the plan is good for the whole of Colne and the plan will protect our valuable Green Spaces &amp; our abundance of local Heritage, which together are so important for our future generations.</p> <p>It takes into account the national policy &amp; fills the criteria for the Basic Conditions for all Neighbourhood Plans.</p>
CNDP-REP-039	Janine Snowden	<p>I would like to comment on the emerging neighbourhood plan, which in my own opinion as a member of the public and resident of Colne is a very necessary and important piece of legislation.</p> <p>I fully support the development of the emerging plan and have followed with interest the complexities of forging such a document with all its detail and structure. It's such a fundamentally important piece of litigation that Colne needs, in order to have any sort of control over its house building and design quality.</p> <p>I am specifically interested in the protection of our green spaces and countryside. I am impressed with the potential brown site development allocations, within the Colne settlement boundary and I am more than satisfied with the green space allocation. This document will help protect our countryside outside the settlement boundary which for me is extremely important. The potential for building and regeneration in our town in a controlled and measured way is both important and exciting, and with a Colne Neighbourhood Plan in place we can potentially deliver our own building strategies and design codes, preventing urban sprawl into open countryside.</p>

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Ref	Individual, Organisation and Client	Verbatim Comment
		<p>As far as I can see as a normal member of the public, the emerging plan has been given the utmost consideration in a professional and regulated way. I understand it is very difficult to please everyone all of the time but I do believe this legal blue print for our towns development will please most of the people most of the time.</p> <p>In conclusion I would like to say that I support fully and in its entirety the emerging Colne Neighbourhood Plan. I am satisfied with the public consultations and the opportunity to have a say on its design and purpose. I am grateful for years of hard work and dedication that has gone into its development and I look forward to a future where we can control the building strategy of Colne, a very worthy town indeed.</p>
CNDP-REP-040	Janice Baker	<p>I would like to register my support for progressing the Colne Neighbourhood Plan through regulation 16.</p> <p>This document has been seven years in the making and offers the best protection for the green spaces of Colne whilst contributing to the achievement of sustainable development. The plan follows the principle of national policies and guidance given by Secretary of State. It also compliments the strategic policies contained within the development plan for the area and is compatible with EU obligations.</p> <p>All in all, the plan is good for the whole of Colne.</p>
CNDP-REP-041	Jason Heavey	<p>I am writing to confirm my whole-hearted support for the Colne Neighbourhood Plan.</p> <p>It will offer protection for green spaces in our town while also including some allocation for housing. Most impressive is that most of the allocations are on brownfield land.</p> <p>It also, of course, offers protection to Colne's heritage assets.</p> <p>The work that has gone into this has been outstanding.</p> <p>I would like to add that this is, most likely, a one and only chance as Local Plans are highly likely to be scrapped by the government.</p> <p>Getting this plan adopted at speed is absolutely vital.]</p>
CNDP-REP-042	Jerry Stanford	<p>I write in response to the call for comment on the above plan as laid in Regulation 16.</p> <p>I believe that the Plan has made a reasonable and considered approach to meeting the required Basic Conditions and that with minor adjustments will completely do so. This has been a joint effort over the last 6 years involving local Colne Councillors with co-opted residents and with support from businesses; it has been out to an extensive informal review and all comments have been robustly considered and where appropriate have been actioned.</p> <p>It makes a reasonable attempt to meet the Basic Conditions in that:</p>



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Ref	Individual, Organisation and Client	Verbatim Comment
		<p>It has regard to National Policy,            It makes significant contribution to achievement of sustainable development,            It generally conforms to the strategic policies currently extant in the development plan for the area,            And is compatible with EU obligations in so far as they are pertinent.            I therefore would offer my support to the Plan in meeting Regulation 16 and trust that the forthcoming Policy &amp; Resources Committee will see its way forward to similarly recognise that the residents of Colne have compiled a document to the requisite standard.</p>
CNDP-REP-043	Joe Cooney	<p>I want to take this opportunity to show my support for the Colne Neighbourhood Plan developed by Colne Town Council. Having read the plan I believe all the policies included in the Neighbourhood Plan meet the basic requirements as set out in paragraph 8 of Scheduled 4b of Town and Country Planning Act 1990.</p> <p>The Steering Committee and Colne Town Council have ensured the draft neighbourhood plan complies with the National Planning Policy Framework to enable Colne to provide sustainable development up to 2030.</p> <p>The plan includes the allocation of viable housing sites within the settlement boundary of colne, whilst continuing to protect the valuable green spaces spread across the whole of Colne.</p> <p>The plan also protects the traditional long range views of the town and the town centre which are both stand out features of Colne.</p> <p>Over the life of the development of the plan I know first-hand the Town Council has undertake comprehensive consultations with both residents and key stakeholders. The final draft of the plan that has been submitted is good for the whole of Colne, it will provide the much needed framework for the town to continue to thrive and ensure that the residents of Colne have a say in the future development and protection of the lovely town we all like to call home.</p> <p>I hope the Planning Inspector undertakes their work with diligence and with fervour to ensure the plan progresses to the referendum stage as soon as possible.</p>
CNDP-REP-044	John Birchenough	<p>I wish to register my strong support for the Colne Neighbourhood Plan and after careful consideration believe that it meets all the conditions required for meeting Regulation 16 requirements. It has regard for national policy, it generally conforms to strategic policies in the local area development plan, is compatible to EU obligations and certainly contributes to the achievement of sustainable development.</p> <p>It has been evolving for over six years with widely advertised public consultation exercises and opportunities for involvement and to comment. These include open "road shows." public meetings, 'zoom' meetings,</p>

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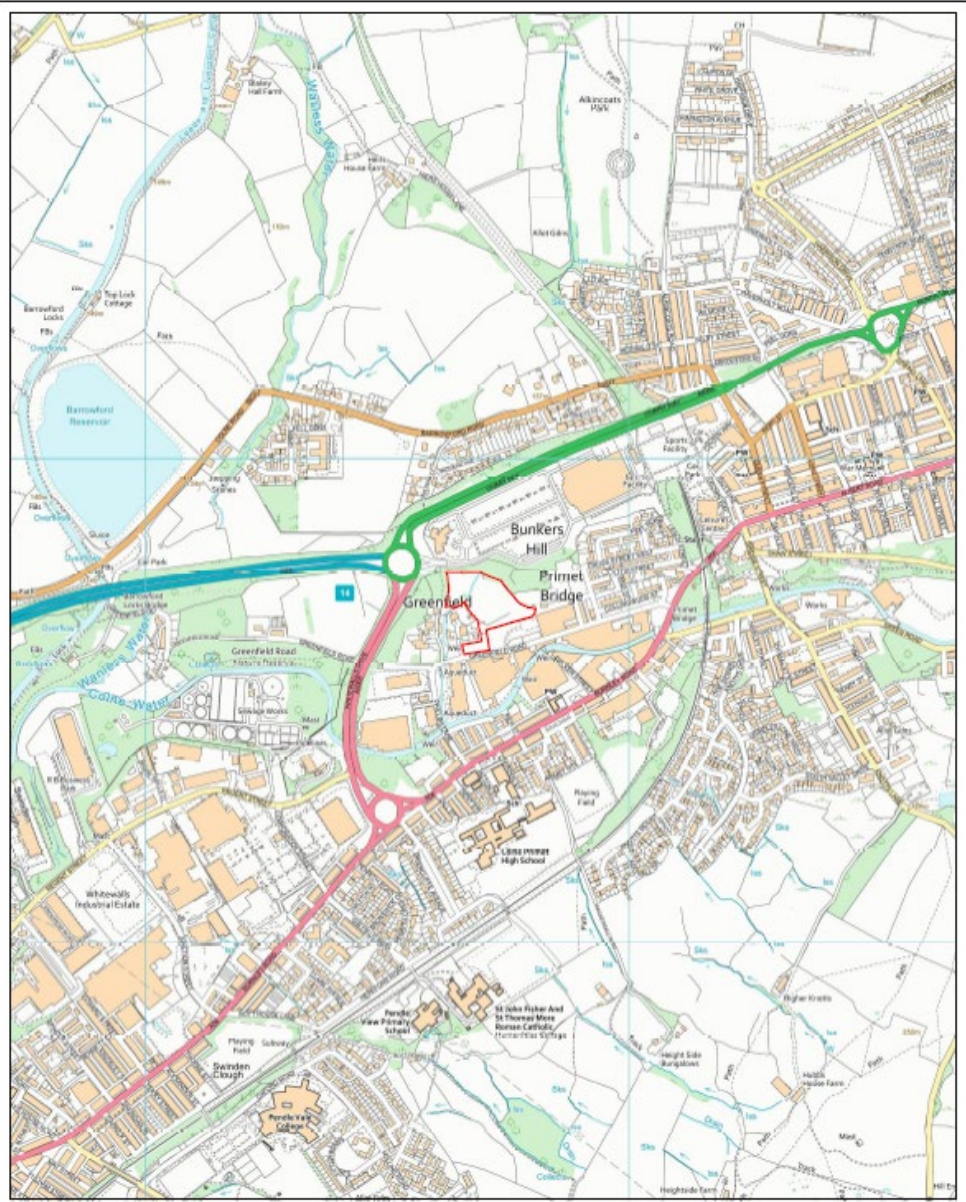
Ref	Individual, Organisation and Client	Verbatim Comment
		<p>opportunities to write/email comments with feedback from all of these being considered by this plan as it now stands .</p> <p>It has a wide and detailed evidence base which identifies potential housing sites and has given some detailed Master Plans for some of these showing them to be deliverable and viable. There is a focus on regeneration of Brownfield Sites and keeping development within the settlement boundary. It contains a comprehensive Design Code which gives guidance to design aspects for future developments which should help sympathetic and cohesive schemes and provide consistency across them .</p> <p>It is a positive plan for the whole of Colne and should be progressed.</p>
CNDP-REP-045	John Hartley	<p>Having been through the CNP, I am delighted that the opinions and judgement of local residents are about to have a greater influence on the development of the town, whilst protecting green spaces and heritage assets. I agree with the assessments made for identifying these and with the design aspects and strategies for future growth.</p> <p>The Plan has my complete support and I thank the team responsible for creating such an important document.</p> <p>Please ensure that the Plan is fully adopted as submitted and in a prompt manner.</p>
CNDP-REP-046	John Kendall	<p>I am writing in support of the Colne Neighbourhood Plan, as this plan supports and identifies the development of brown field's sites for housing, as opposed to greenfield sites. There has been <b>all</b> too much development of greenfield sites for housing in this area over the years.</p>
CNDP-REP-047	Judi Blackburn	<p>I would like to show my support for the proposed Colne Plan. Including the following points</p> <ul style="list-style-type: none"> <li>• Designate housing sites on almost entirely brownfield sites within the settlement boundary and regenerate areas that require investment</li> <li>• Implement a Colne Design Code to ensure a sense of place is maintained</li> <li>• Designate Local Green Spaces</li> <li>• Protect the Countryside</li> <li>• Protect long-range views to and from key landmarks</li> <li>• Protect non-designated heritage assets (i.e. not listed)</li> <li>• Protect Community Assets</li> </ul>

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		It is so important that we respect what we have and try to preserve to the best of our ability for future generations
CNDP-REP-048	Judith Nelson	I write to support the policies and proposals included in the Colne Neighbourhood Plan. It promotes sustainable development, striking the right balance between development and the conservation of the built, historic and natural environment. Additionally I support the policies safeguarding the countryside and open spaces and particularly the definition and delineation of Local Green Spaces.
CNDP-REP-049	Julia Ingham	The draft neighbourhood plan for Colne has demonstrated that Colne wants to protect our valued Green space sites like the Upper Rough and BallGrove yet can also identify more suitable (if possible Brownfield sites) and viable potential housing sites for future growth . These green spaces amongst others are vitally important to everyone and meet the interpretation of the neighbourhood plan. The Regeneration is important within our local boundary to prevent suburban sprawl which appears to be happening in many towns for example Clitheroe. Colne people are aware of our valued green spaces with connecting footpaths and non designated heritage assets, which are important to many and the plan would support sustainable development throughout Colne. The plan conforms with national policy and strategic policies for the local area as well as not breaching any EU historical obligations. The plan gives Colne more of an input into local planning by people who know and care about our green spaces rather than absent developers who want to stack as many houses as possible on green land and don't care about long range views. Public consultations and meetings have been held for people to state their views and the plan takes development into account for the good of the whole town not just a small area.
CNDP-REP-050	K Holt (Mrs)	I fully support the Colne Neighbourhood Plan in its aim to prevent indiscriminate use of greenfield and beautiful, natural sites for unnecessary housing development. Clean up and develop brownfield sites!
CNDP-REP-051	Keith Marsh	We support in full the Colne neighbourhood plan and that it has, in our view, been fully consulted on and meets all the basic conditions.
CNDP-REP-052	Kevin Hey	<p>I am writing to express my very strong support for the draft Neighbourhood Plan for Colne. I believe that the plan more than meets the statutory Basic Conditions.</p> <p>My support for the Plan is based on the rigorous process supporting it, the extensive consultation with local people and most importantly the policies and in particular the development sites and green spaces.</p> <p>As someone with disability the issue of green space is very important to me. I walk regularly across some of the key green spaces of the town, including those in east Colne such as Upper Rough and Higher Ball Grove. If</p>

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		<p>I have to go into central Colne I walk (and return) via Snell Grove, and the green space in the Grove while modest is always refreshing and uplifting. I consider all of these spaces to be vital to my health.</p> <p>I wish, therefore, for my strong support to be duly recorded, and that the evidence of my submission will in due course be given to the Planning Inspector.</p>
CNDP-REP-053	Lancashire County Council (Estates	<p>In response to the consultation on the Colne Neighbourhood Plan Lancashire County Council would like add its support regarding the Plan.</p> <p>Whilst acknowledging the consultation is not in relation to amendments the County is in support of the housing allocation – particularly in relation to site CNDP6/15 (Future Housing Growth) in the Policies plan and the same as referenced as CNDP/27 in the Colne Masterplan – and would like to draw to your attention the site adjoining ref CNDP6/15 etc. The County Council has the adjoining site as per the attached plan which it is understood sits within an area designated for New Housing Locations within the Local Plan and in our opinion would serve to complement and enhance the offer/prospects in relation to CNDP/27.</p> <p>I have attached a copy of the site plan for your attention /information, coupled with an extract from the Masterplan showing CNDP/27, and will be sending further correspondence regarding the site under separate cover.</p>



**Lancashire**  
County Council



**COLNE**  
Land at Greenfield Road

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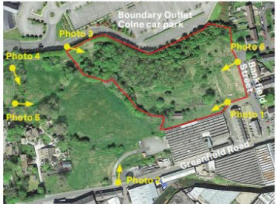


Grid Ref:	SD8730	Plan Ref:	v1.1a
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		<p><b>4. Site CNDP/27 Masterplan</b></p> <p><b>This section provides an analysis of the site and the evolution of the masterplan for site CNDP/27.</b></p> <p><b>4.1 Site visit</b></p> <p>Site CNDP/27 is a greenfield land that lies to the northwest of Colne town centre and covers approximately 1.87ha. The site's boundaries are defined by managed hedgerows along the northern edges, next to the Boundary Outlet Colne car park. Another clear boundary is Bankfield Street to the east, which provides potential access to the site. A large light industrial building, the Bronte Carpets, defines the site's southern boundary, while the western site boundary is visually unclear from overgrown shrubs and trees on slopes. A site visit was carried out on 15th December 2021, which provided the designer with spatial and visual experiences around the site.</p>      
CNDP-REP-054	Laura Hopkinson	<p>I'm writing to show my wholehearted support for Colne Neighbourhood Plan in its abition to prevent any further plans for building on Colne's idellic countryside, crammng in unnecessary housing development and it's bid to clean up and develop brownfield sites into more beautiful living spaces.</p>
CNDP-REP-055	Lea Fothergill	<p>I write to confirm my wholehearted support for the developed Colne Plan.</p> <p>I support the approach which has involved local communities and groups and which has resulted in a serviceable and thorough plan which is good for Colne and it's people.</p> <p>I particularly applaud the fact that housing sites will be on almost entirely brownfield sites, that our countryside and green spaces are protected and that our heritage assets, key views and landmarks are also protected alongside community assets. 1 urge total approval of the plan to secure and protect the future of Colne and its communities.</p>
CNDP-REP-056	Leigh Tait	<p>As a resident of Colne for over twenty years, I would like to lend my support for the Colne Neighbourhood Plan through Regulation 16 and on towards examination by a Planning Inspector.</p> <p>I think that this plan is extremely important and is an absolute necessity for all of Colne and its residents.</p>

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		<p>I firmly believe that Colne should be able to designate its own housing sites and use brownfield over Greenfield and conversation areas at all times. The protection of the surrounding countryside, green spaces and habits for increasingly endangered wildlife from development is vital.</p> <p>Colne's rich history and its beautiful surrounding countryside needs protection and I believe the Colne Neighbourhood Plan will be a very positive step forward for Colne and will benefit the whole town.</p>
CNDP-REP-057	Lenches Residents Group	<p>We are a group of residents who live in Waterside in Colne and would like to make a few comments on the CN DP. Firstly we feel that we have been completely ignored. When looking at the policies map it seems fairly apparent that providing protected green spaces for the residents of one of the UKs poorest wards according to the IMD has been given zero priority. Insult is added to injury by the fact that 4 of our open spaces ( identified by Pendles open space audit in Feb 2019) are now being designated as building land in the plan. CNDP6/1 CNDP6/5 CNDP6/6 ( incorrectly labelled on the masterplan as CNDP6/7) CNDP6/8</p> <p>We have only just come to this realisation (admittedly belatedly) as there were so many inaccuracies and labelling errors on the maps and documents we have only just realised that the vision for Waterside is to pave over our amenity green spaces with housing developments whilst refusing to even assess the land we have tried desperately to have added as a green space (Lenches)</p> <p>We have attended meetings, written to the town hall and planning department begging for Lenches to be protected to no avail yet can see from the policies map and PBC planning department comments that other areas have been afforded huge swathes of green space protection on land that in most cases is already protected by various other policies and legislations. Whether this plan meets the basic conditions or not it seems designed to protect certain areas at the expense of others, not a genuine neighbourhood plan. Whenever we have had the temerity to speak up we have been accused on social media and in person by councillors of being conspiracy theorists, scuppering/ derailing the plan and more recently of being in affiliation with the planning department! During a recent meeting (available on youtube) it was suggested that the planning departments report proposing changes to bring the plan in line with policies in the NPPF was some kind of revenge attack by PBC!</p> <p>As a residents group we fully endorse the concept of a neighbourhood plan for Colne but the current situation with blame and false allegations being levelled in all directions is not the harmonious environment required to do what is best for Colne until 2030. We feel that the neighbourhood plan team need to collaborate with the experienced officers in planning department and examine all the documentation to ensure accuracy and make any changes necessary to bring it in line with the policies in the NPPF by removing housing allocations on Watersides open spaces and levelling up the green space designations before it is seen by an examiner</p>

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CNDP-REP-058	Lenches Road Residents Association	<p>We are a residents group from Lenches Rd in Colne and would like to request that land at Lenches P152 is added to CNDP as a protected green space</p> <p>We feel that it meets the 3 criteria</p> <ul style="list-style-type: none"> <li>• Demonstrably special</li> <li>• Reasonably accessible to the community it serves</li> <li>• Not an open tract of land</li> </ul> <p>We have been requesting that it is included or at least assessed since February 2021 but the CNDP group have unfortunately refused to even assess its suitability. We have compared it to other land that has been included and feel it is very similar.</p> <p>145 people wrote to Colne Town Council asking for it to be included and 196 people mentioned that it was worthy of protection during the consultation for Pendle Borough council plan part 2. Waterside in South Valley (a deprived area) has been given minimal protected green space whilst other areas have had a virtual green belt thrown round them. We feel that this deprived area is the victim of social injustice and that the plan has not been fairly assessed or executed.</p> <p>We would welcome the opportunity to meet the examiner and put our case for inclusion.</p>
CNDP-REP-059	Lidgett & Beyond	<p><b>1. Introduction</b></p> <p>1.1 This response has been prepared by the Lidgett &amp; Beyond (“L&amp;B”) Charity as part of the Regulation 16 public consultation for Colne Town Council’s (“ColneTC”) Neighbourhood Development Plan (“CNDP”). Planning Practice Guidance (Paragraph: 065 Reference ID: 41-065-20140306) sets out that only a draft neighbourhood plan or order that meets each of a set of basic conditions can be put to a referendum and be made. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.</p> <p>1.2 L&amp;B was set up in 2010 as a community group, re-igniting and re-energising the legacy of previous local groups, and registered to become a charity in 2015. L&amp;B’s members and supporters are drawn from young and old and from a wide range of families from all backgrounds. L&amp;B’s overall membership is approx 750, making it the largest formally established community group in the area. L&amp;B acts for both local people and our many visitors to promote sustainable development for the benefit of the public by the preservation and the protection of the environment and the prudent use of resources alongside the promotion of sustainable means of achieving economic growth and regeneration. L&amp;B aims to protect, enhance and improve access to the Lidgett and Bents area of East Colne in Lancashire and to our green spaces, as well as having respect for</p>



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		<p>our heritage and our landscape. Our charitable purposes also aim to promote the ecology and environment of the area and to advance the education of the public in subjects relating to sustainable development and the protection, enhancement and rehabilitation of the environment, heritage assets and biological diversity and to promote study and research in such subjects.</p> <p><b>2. Comments</b></p> <p>2.1 L&amp;B has played a significant part in developing the CNDP and it is absolutely true to say that local people are closer to their communities, are more aware of opportunities for sustainable development, and are more informed of what is valuable about their town. For example, rather than merely rolling forward the out-of-date Pendle BC SHLAA, which includes local beauty spots and green fields outside Colne's settlement boundary, we used our local knowledge and contacts to help to proactively identify 147 sustainable units across 15 sites, of which 98.6% are on brownfield land. There might have been even more units if the Environment Agency's objection to one site on the grounds of a remote desktop flooding review could be addressed, but that will come once a potential developer progresses a planning application. Our smaller sites would help the town grow, with regeneration of areas of neglect and under-investment and without putting a strain on our existing infrastructure and irreversibly gobbling up green acres. This is the beauty of Neighbourhood Planning in action!</p> <p>2.2 Summarising L&amp;B's principal areas of interest in the CNDP and its outcomes:</p> <ul style="list-style-type: none"> <li>• the development of a realistic portfolio of houses of the right type and the right price being built in the right places, namely on principally brownfield sites within the settlement boundary;</li> <li>• protecting and preserving Colne's environmental, ecological and heritage assets; and</li> <li>• enhancing the vibrancy, hope and ambition of Colne, so that people are happy to live here and wish to visit and move here.</li> </ul> <p>2.3 The range of evidence prepared for the CNDP looks incredibly broad, extensive and detailed. It provides support for:</p> <ul style="list-style-type: none"> <li>• the availability, viability and delivery of housing sites, with additional input from AECOM and the Town Council's own marketing guide;</li> <li>• the robustness of selections of local green spaces by applying the tests set out in the NPPF;</li> <li>• the same for the non-designated heritage assets and character areas by applying the guidance from Historic England;</li> <li>• the value of preserving key significant views when any development takes place; and</li> </ul>

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		<ul style="list-style-type: none"> <li>the retention of a sense of place and personality for Colne and its various wards through the development of a Design Code, which will work alongside Pendle’s various Supplementary Planning Documents and the Colne BID’s guidance for shop fronts in the town centre conservation area.</li> </ul> <p>2.4 Looking at housing sites and specifications, L&amp;B strongly supports the CNDP wanting to see a balanced housing market which includes starter homes/flats for first-time buyers, especially if they are properly affordable, and a range of bungalows and supported living for the older generation. Every housebuilder in recent years seems overly focussed on 3- or 4-bed detached box houses on curly-road estates with street scenes dominated by too many cars and yet no spaces for any visitors.</p> <p>This must stop and the types of developments must broaden to accommodate all potential buyers/renters if Pendle is to create a “virtuous housing cycle”.</p> <p>2.5 Looking at targets, given the wide range of housing delivery success in the Borough, with Colne having more than delivered on its share of the overall target, it is vital in the future that Colne is in control of its own development plans with an appropriate housing target and selection of deliverable sites. Once the CNDP is made, Colne will supply such a portfolio of sites which are supported for development and have been fully researched and consulted upon. Looking ultra-local to our area of East Colne, we have recently had to suffer the development of a box-house estate on the Lower Rough with little regard to local style or heritage, with the developer being forced to acknowledge our Conservation Area and being forced to improve design and choice of materials for a selection of houses, leading to a disjointed and jarring development. We look forward to both the Upper Rough and the Lidgett Triangle being designated as Local Green Spaces so they do not suffer the same fate – their case for designation, along with all the others across Colne, is strongly supported by the evidence.</p> <p>2.6 We note that the selection of brownfield sites for development scores more highly in Pendle’s proposed Sustainability Appraisal and this is a good sign for when the new Pendle Local Plan is developed. To conclude and to reiterate on housing, what is needed in Colne, and in Pendle overall, are the right types of homes for first time buyers, low-paid workers, aspirational people, and the ageing population. The biggest challenge in Colne, in Pendle, and across the North is the issue of viable development to create affordable houses for each of those housebuyer budgets. We must all play our part in encouraging and incentivising developers to deliver on our Borough’s needs.</p> <p><b>Conclusion</b></p> <p>L&amp;B strongly supports the CNDP and asserts that the Basic Conditions have been met for the Plan, its Policies and its significant evidence base. The CNDP highlights and values Colne’s positive features – its built, environmental and cultural heritage, its manufacturing and commercial heritage, its sense of pride, flexibility</p>

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		<p>and adaptability, and, above all, its people. With that in mind, Colne could be labelled as a “place of personalities” and our CNDP should deliver opportunities, ambition and connections.</p>
CNDP-REP-060	Linda Turner	<p>I am writing in support of the draft Colne Neighbourhood Plan which provides an excellent blueprint for the future development of Colne as a thriving town. The proposals are realistic, backed by a substantial evidence base, which more than meet the criteria of the basic conditions for a neighbourhood plan.</p> <p>The proposals for Colne town centre are well-thought out and will enhance the character of our market town ensuring that the vitality and viability of Colne will be safeguarded for future generations.</p> <p>The proposals to provide green spaces in particular at Foulridge Reservoir, the Lidgett Triangle, the Upper Rough, Ball Grove, Heifer Lane Roundabout, Snell Grove and St Stephen's walking area are greatly welcomed. These areas are much loved and valued by residents of Colne, walkers and visitors to the area. In preserving these areas habitats would be conserved and distinctive settlements maintained. The local community has identified these areas as important to themselves and the sites have been assessed within the constraints of the NPF. Many of these sites are highly visible when entering and leaving the area and from various vantage points in the district. These areas have been assessed against Colne's Significant Views Assessment.</p> <p>The sites included for future housing growth have been identified to provide feasible and sustainable housing. The majority of these sites are on brownfield sites so any new developments would not detract from Colne's unique character.</p> <p>In conclusion I would like to thank the Working Group and Advisory Committee for their hard work, commitment and dedication in producing this excellent neighbourhood plan .This plan will ensure that Colne will thrive for many generations to come and the quality of life for the residents of Colne will be greatly improved and enhanced.</p>
CNDP-REP-061	Lorraine McFadyen	<p>I am emailing once again ...to request that the above P152 Lenches Road is added as a protected green space.....I am sure that is crystal clear by now to all involved how important this is not only to people living nearby but others a little walk away that use this green space on a regular basis....</p> <p>I do feel that it is imperative that I keep reminding the powers that be how crucial All Green spaces are to the vast majority of local people ....once its gone its gone for ever</p>
CNDP-REP-062	Louise Hopkinson	<p>I writing to show my support for the Colne Neighbourhood Plan, which appears to take a balanced view on influencing the future development in Colne.</p> <p>It appears to take into account the national policy, while listening to local residents and they're wishes on the future development of Colne.</p>

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		<p>I am an adamant supporter of protecting our Green Spaces &amp; local Heritage.</p> <p>I feel it has been well thought out to ensure that it definitely fulfills the Basic Conditions for Neighbourhood Plans.</p>
CNDP-REP-063	Lynda Whittaker & Graham Hargreaves	<p>As residents of castle road we would like to wholeheartedly agree with all the proposed valid points as laid out in the consultation Colne neighbourhood plan through regulation 16.</p> <p>The keeping of green spaces is of vital importance for the conservation of wild life and for people to enjoy and appreciate nature as well as protecting views long and short distance from these areas .</p> <p>We believe it is more realistic and makes complete sense to first utilise and regenerate brown spaces ensuring we keep to a design code and protect Colne from becoming a sprawling suburb whereby it would inevitably lose its identity as a small unique thriving working town surrounded by beautiful countryside for everyone to enjoy.</p>
CNDP-REP-064	Maddox Planning (for Little Cloud Limited)	<p><b>) Introduction</b></p> <p>1.1 This written statement is prepared in accordance with Schedule 4B to the Town and Country Planning Act 1990 (as amended). It is a response to the statutory six weeks Regulation 16 consultation on the Colne Neighbourhood Development Plan (NDP) over the period to 17 October 2022, ahead of its submission to the Secretary of State for examination.</p> <p><b>Little Cloud Limited</b></p> <p>1.2 Maddox Planning has prepared this written statement for Little Cloud Limited (Little Cloud). Little Cloud has control of significant land assets at Windermere Avenue, Colne. Its land assets form part of wider area identified in the draft Colne NDP as protected local greenspace <b>(proposed protected site CNDP7/4 (LGS4) - Upper Rough (10.55 ha.)</b></p> <p><b>Policy and guidance informed response</b></p> <p>1.3 The responses in this written statement have regard to legislation and particularly the Town and Country Planning Act 1990 (as amended), the provisions of the existing development plan, the Framework, relevant sections of the Planning Practice Guidance (PPG) and good practice drawn from elsewhere.</p> <p><b>Structure</b></p> <p>1.4 A response is provided first on the stated key issues, vision, zones and objectives of the Colne NDP (section 3.0). This is followed by a response on specific policies (section 4.0) and commentary on whether the Regulation 16 draft is consistent with the basic conditions (section 5.0) that need to be met for a neighbourhood plan to be put to referendum.</p>

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		<p><b>Attachments</b></p> <p>1.5 Attached at <b>Appendix 1</b> is the report to Pendle Borough Council Policy and Resources Committee of 17 December 2020 regarding the Regulation 14 draft of the Colne NDP. Attached at <b>Appendix 2</b> are examples of local green space policies that neighbourhood plan examiners have considered accord with the basic conditions.</p> <p><b>Related matters</b></p> <p>1.6 Accrue Capital, development partner to Little Cloud, ran an extensive public consultation exercise during the summer of 2022 regarding a landscape and design led proposal for housing development at the Windermere Avenue site over which Little Cloud has control. Its design team is in the process of revising the proposed development in response to comments received and a planning application is to be submitted later this year.</p> <p><b>Disclaimer</b></p> <p>1.7 Little Cloud reserves the right to amend, add to or withdraw its duly made representations.</p> <p><b>2.0 Legislation, policy and other material considerations</b></p> <p><b>Acts of Parliament</b></p> <p>2.1 The Localism Act, 2011 gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. Local communities can set planning policies through a neighbourhood plan<sup>1</sup> that forms part of the development plan used in determining planning applications.</p> <p>2.2 Schedule 4B to the Town and Country Planning Act 1990 (as amended) sets out the basic conditions that a neighbourhood plan must meet. A qualifying body is entitled to submit a proposal to a local planning authority for the making of a neighbourhood plan. Neighbourhood plans must meet these basic conditions and other legal requirements before they can come into force. These are tested through an independent examination before the neighbourhood plan may proceed to referendum. A local planning authority must satisfy itself that a draft neighbourhood plan submitted to it for independent examination complies with all the relevant statutory requirements. It is said to meet the basic conditions if:</p> <p style="padding-left: 40px;">a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order;</p>

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		<p>b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order;</p> <p>c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;</p> <p>d) the making of the order contributes to the achievement of sustainable development;</p> <p>e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);</p> <p>f) the making of the order does not breach, and is otherwise compatible with, EU obligations; and</p> <p>g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.</p> <p><b>The Framework</b></p> <p>2.3 Paragraph 13 sets out that neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies and should shape and direct development that is outside of direction of these strategic policies.</p> <p>2.4 Paragraph 29 continues that neighbourhood planning gives communities the power to develop a shared vision for their area. Such plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. <b>The Framework is clear that neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies<sup>2</sup>.</b></p> <p>2.5 Paragraphs 66 and 67 deal specifically with housing requirements and are clear that strategic development plan policies should set out a housing requirement for designated neighbourhood areas, which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Paragraph 67 states that this should be indicative if it is not possible to provide an absolute requirement. Paragraph 70 states that neighbourhood planning groups should consider opportunities for allocating small and medium-sized sites suitable for housing in their area.</p> <p>---</p> <p>Footnotes</p>

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		<p>1. A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law this is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act 2004.</p> <p>2. Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area</p> <p>2.6 Framework paragraphs 101 to 103 provide prescriptive guidance on the designation of Local Green Space through local and neighbourhood plans. Paragraph 101 sets out that: <i>‘Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period’.</i></p> <p>2.7 Paragraph 102 continues that, a Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquility or richness of its wildlife; and local in character and <b>is not an extensive tract of land</b> (our emphasis). Paragraph 103 sets out that policies for managing developments within Local Green Space should be consistent with those for Green Belts.</p> <p><b>The Practice Guidance</b></p> <p>2.8 The Practice Guidance sets out that a neighbourhood plan should support the delivery of strategic policies set out in the local plan or spatial development strategy and should shape and direct development that is outside of those strategic policies<sup>3</sup>. A neighbourhood plan should contain policies for the development and use of land<sup>3</sup>. This is because the neighbourhood plan becomes part of the statutory development plan, which should set an environment in which sustainable development is pursued in a positive way consistent with the presumption in favour of sustainable development (paragraph 11 of the Framework).</p> <p>2.9 Neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it<sup>4</sup>. If a local planning authority is also intending to allocate sites in the same neighbourhood area, the local planning authority should avoid duplicating planning processes that will apply to the neighbourhood area. It should work constructively with a qualifying body to enable a neighbourhood plan to make timely progress. A local planning authority should share evidence with</p>

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		<p>those preparing the neighbourhood plan, such that every effort can be made to meet identified local need through the neighbourhood planning process<sup>5</sup>.</p> <p><b>Relevant made neighbourhood plans</b></p> <p>2.10 Examples of made neighbourhood plans, with particular regard to appropriate local green space policy, are included at <b>Appendix 2</b> and referenced in Section 4.0 and Section 5.0 of this submission.</p> <p><b>Other material considerations</b></p> <p>2.11 Other material considerations are addressed as relevant in Section 3.0, Section 4.0 and Section 5.0</p> <p>---</p> <p>Footnotes</p> <p>3. Paragraph: 004 Reference ID: 41-004-20190509 – revision date: 09 05 2019</p> <p>4. Paragraph: 103 Reference ID: 41-103-20190509 – revision date: 09 05 2019</p> <p>5. Paragraph: 043 Reference ID: 41-043-20140306 - revision date: 06 03 2014</p> <p><b>3.0 Key issues, vision, zones and objectives</b></p> <p><b>Housing</b></p> <p>3.1 Colne NDP paragraph 2.3 identifies as the first of its key issues: <i>‘To improve housing quality and identify land to meet the housing growth target set in the Pendle Local Plan Part 1: Core Strategy’</i>.</p> <p>3.2 The SWOT analysis at paragraph 2.1 should identify the potential for new homes as an opportunity. This will align with stated community objectives of supporting future housing growth, and creating a great place to live through the provision of the right type of new homes in the right locations.</p> <p>3.3 Paragraph 4.4 identifies the high proportion of terraced properties in the Colne housing stock; 61.3% compared with 19.4% semi-detached and 6.9% detached. This provides a clear justification for seeking to diversify the housing stock, through the delivery of new homes. The Colne NDP should include encouraging housing stock diversification as a key objective.</p> <p><b>Other</b></p> <p>3.4 The other themes of the key issues, zones and objectives are broadly supported.</p> <p><b>4.0 Response on draft policies</b></p>



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		<p><b>Policy CNDP3 – Design in Colne and the Design Code</b></p> <p>4.1 The language of objective 2 should reflect paragraphs 190 and 197 et al. of the Framework, which states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment. This includes the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation.</p> <p>4.2 Paragraph 197 is clear that in determining planning applications, local planning authorities should take account of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and the desirability of new development making a positive contribution to local character and distinctiveness. The precise language regarding magnitude of harm, referencing substantial harm, total loss or less than substantial harm should be reflected in the drafting of all development plan policy including the Colne NDP.</p> <p>4.3 Whilst it is right that development plan policies seek to guard against poor design, the language of policy CNDP3 and its supporting text should reflect the language of the Framework in terms of fostering well-designed, beautiful and safe places (paragraph 8) and well-designed and beautiful homes to meet the needs of different groups in the community (paragraph 73). Paragraph 124 of the Framework refers to the importance of securing well-designed, attractive and healthy places.</p> <p>4.4 Framework paragraph 134 is clear that development which is not well designed should be refused, but conversely significant weight should be attached to development which reflects local design policies and outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area. Policy CNDP3 should explicitly reflect Framework support for development which is consistent with local design policy and seeks to raise the standard of design more generally.</p> <p><b>Policy CNDP4 – Development Affecting Non-Designated Heritage Assets</b></p> <p>4.5 The drafting of policy CNDP4 does not fully reflect the wording of Framework paragraph 203. Whilst paragraph 203 is clear that the significance of a non-designated heritage asset should be taken into account in determining a planning application, it goes on to say that a balanced judgement will be required to consider the scale of any harm or loss of the significance of the heritage asset. The text of policy CNDP4 should make explicit reference to the need for a balanced judgement.</p> <p><b>Policy CNDP6 – Future Housing Growth</b></p>

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		<p>4.6 Policy CNDP6 – Future Housing Growth identifies 15 housing sites with the potential to deliver 147 new homes at density of 30 dwellings per hectare. The policy is not clear to what extent the sites identified are reflective of entries in the latest (January 2022) Five Year Housing Land Supply Statement completed by the Pendle Borough Council.</p> <p>4.7 Paragraphs 6.3.1 to 6.3.3 which provide the supporting text to policy CNDP6 are largely based upon the now superseded Pendle Borough requirement for 298dpa.</p> <p>4.8 Up to December 2021, the Council was bound by this 298dpa requirement in reporting delivery against requirements, and was consistently and repeatedly unable to demonstrate a five year supply of deliverable housing sites. As of 17 December 2021, the Local Plan Part 1 Core Strategy is more than five years old, meaning that the Framework requirement that housing requirement be calculated having regard to local housing need figures applies; following the current iteration of the Government standard methodology.</p> <p>4.9 The current Pendle annual requirement is 142 dwellings per annum (plus a 5% buffer which increases this to 149 dwellings per annum).</p> <p>4.10 4.10 Policy CNDP6 and its supporting text needs to be updated to reflect the revised borough wide housing requirement and pay due regard to the most up to date Five Year Housing Land Supply Statement.</p> <p>4.11 4.11 The housing policy does not currently provide a sound basis for interpreting housing requirements and supply within the neighbourhood plan area.</p> <p><b>Policy CNDP7 – Protecting Local Green Space</b></p> <p>4.12 A number of the entries within the CNDP7 policy text should be removed as their inclusion is in contradiction with the guidance contained with the Framework. Paragraph 6.3.11 of the Regulation 16 draft neighbourhood plan makes direct reference to paragraph 102 of the Framework which states that:</p> <p><i>The Local Green Space designation should only be used where the green space is:</i></p> <ul style="list-style-type: none"> <li><i>a) in reasonably close proximity to the community it serves;</i></li> <li><i>b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</i></li> <li><i>c) local in character and is not an extensive tract of land. (our emphasis)</i></li> </ul>

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		<p>4.13 Paragraph 101 of the Framework explains that designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.</p> <p>4.14 There can be no question that CNDP7/4 (LGS4) - Upper Rough (10.55 ha.) is an <b>extensive tract of land</b> and should be omitted from the schedule. Its inclusion in the draft policy is in direct conflict with Framework paragraph 102 (part c).</p> <p>4.15 The July 2022 report of the Examiner regarding the draft Kelbrook and Sough Neighbourhood Plan is included at <b>Appendix 3</b>. This deals with appropriate green infrastructure language within proposed policy ENV 1. It states that the policy should be reworded to say: ‘Improvements to the green infrastructure of the Parish will be supported. As appropriate to their scale, nature and location, development proposals should respond positively to the Pendle Green Infrastructure Strategy and Kelbrook and Sough Character Assessment’.</p> <p>4.16 The supporting text continues: ‘The Pendle Council Green Infrastructure Strategy and Kelbrook and Sough Character Assessment should be considered when determining planning applications and interpreting any relevant Local Plan Policy with respect to green infrastructure. In particular, the Character Assessment’s sections on Landscape and Topography, Biodiversity and Green and Natural Features, General Patterns of Built Form and Open Space, Main Uses and Mix of Uses and Views and Vistas and Enclosure provide detailed information on existing elements of green infrastructure in the parish’.</p> <p>4.17 Examples of made neighbourhood plans, with accepted appropriate local green space policy are included at <b>Appendix 2</b>. These demonstrate that other than formalised areas of recreation, such as parks and gardens, local green space designations are restricted to areas of significantly less area than the 10.55ha Upper Rough.</p> <p style="text-align: center;"><b>Policy CNDP13 – Conserving and Enhancing Valued Landscape Features</b></p> <p>4.18 The language of policy CNDP13 should better reflect the Framework in the way that it addresses the built environment and landscape setting.</p> <p>4.19 Framework paragraph 130 states that: Planning policies and decisions should ensure that developments: c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change</p>

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		<p>4.20 Paragraph 130 is seeking to be permissive of appropriate innovation and change, provided that development is sympathetic to local landscape character and history, including landscape setting.</p> <p>4.21 Policy CNDP13 should not require that development conserves and enhances local landscapes. The policy should be reflective of Framework paragraph 130 and use language which provides support for development that is sympathetic to local character and history. Whilst paragraph 174 of the Framework states that planning policies and decisions should contribute to and enhance the natural and local environment, its guidance on development is more nuanced. Policy CNDP13 should refer to seeking to protect and enhance valued landscapes, recognising the intrinsic character and beauty of the countryside and the move towards mandatory requirement for biodiversity net gain.</p> <p>4.22 Policy CNDP13 makes reference to the draft Colne Significant Views Assessment of May 2021. Such reference should be from the point of view of development respecting and being sympathetic towards these views rather than more rigidly requiring them to be conserved. It is unclear what is meant by rigidly referring to the conservation of views, as views can be maintained whilst allowing appropriate development to come forward. The policy should state that development should be sympathetic to the significant views identified in the Colne Significant Views Assessment, but this should not be at the expense of allowing for appropriate development coming forward.</p> <p><b>Policy CNDP14 – Rural Identity and Character</b></p> <p>4.23 The language of policy CNDP14 should better reflect the Framework. It is not justified to say that development outside of settlement frameworks should ‘...retain and enhance the rural identity and character of the neighbourhood area’. Paragraph 130 of the Framework refers to development being sympathetic to local character and history, including the surrounding built environment and landscape setting and it is this requirement that should set the overarching tone of policy CNDP14 rather than its current language of requiring development to retain and enhance rural identity and character.</p> <p>4.24 The policy criteria of CNDP14 should be amended to reflect the Framework. Criterion a) goes too far in requiring development outside of settlement frameworks to be smaller settlements, clusters of rural buildings and isolated farmsteads. This overlooks the fact that urban extensions of existing settlements can be justified, outside of an existing settlement framework boundary. Framework paragraph 120 deals with making effective use of land and sets out that planning policies and decisions should encourage multiple benefits from both urban and rural land. It states that policies and decisions should promote the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.</p>

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		<p>4.25 Criterion d) of policy CNDP14 is similarly too restrictive in dictating that building form and style and layout of development should be consistent with the forms predominantly found within the rural area. The policy goes beyond the Framework and PPG is stating that suburban and urban forms, styles and layouts will not be considered to meet the criterion; and it is not clear what is meant by an urban form, style or layout. A variety of forms of development can be shown to be appropriate outside of existing settlement boundaries, and this might include more urban forms of development, provided that they are sympathetic to local character and architectural styles. To rule out more intensive forms of development completely is contrary to an approach of making the best use of land and would likely render Pendle Borough unable to meet its requirement for new housing and employment floorspace. This would be at the expense of improved living conditions and supporting economic investment and development.</p> <p>4.26 Criterion f) should have regard to the need for surface materials to be part of and provide assistance with sustainable drainage systems.</p> <p>4.27 Criterion g) should adopt language from the Framework regarding the need to promote sustainable transport and reducing the need to travel. There does not need to be specific reference to garaging, garden landscaping or associated urban and suburban features as control over development can be exercised by the more general reference to development needing to be sympathetic to local character and history, including the surrounding built environment and landscape setting.</p> <p><b>5.0 Basic conditions</b></p> <p>5.1 The Regulation 16 draft Colne NDP does not meet the basic conditions in a number of ways.</p> <p>5.2 The draft NDP is not consistent with the National Planning Policy Framework, including in respect of its approach to local greenspace.</p> <p>5.3 As set out in the report to the 17 December 2020 Pendle Borough Council Policy and Resources committee (included at <b>Appendix 1</b> – our emphasis):</p> <p style="padding-left: 40px;"><i>Policy CNDP 07 – Protecting Local Green Spaces</i></p> <p style="padding-left: 40px;"><i>The CNDP proposes to designate a number of areas as Local Green Space (NPPF paras 99 &amp; 100). This is within the scope of an NDP, but must be undertaken in accordance with national policy (NPPF) and planning practice guidance (PPG). These require sites to: - be in reasonably close proximity to the community it serves; - be demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational</i></p>

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		<p><i>value (including as a playing field), tranquillity or richness of its wildlife; and - local in character and is not an extensive tract of land.</i></p> <p><b><u>Proposed designations LGS1, 2, 3, 4, 5, 6, 7, and 8 are large extensive tracks of land and do not comply with the criteria for designation in the NPPF. The CNDP does not meet the basic conditions in terms of the designation of these large areas which the NPPF specifically does not want to be protected in this way.</u></b></p> <p><b>6.0 Examination public hearing</b></p> <p>6.1 The PPG is clear that neighbourhood plans should be examined fairly and transparently.</p> <p>6.2 The 1990 Act<sup>6</sup> sets a general rule that the examination of issues by an examiner will usually take the form of the consideration of written representations. However, the PPG states that: <i>‘Where the independent examiner considers it necessary to ensure adequate examination of an issue or to give a person a fair chance to put a case, they must hold a hearing to listen to oral representations about a particular issue’<sup>7</sup>.</i></p> <p>6.3 The PPG continues by setting out that the subject of a hearing is determined by the independent examiner based on initial views of the draft plan and any other supporting documents submitted.</p> <p>6.4 In accordance with the guidance given in the PPG<sup>7</sup> and having regard to our reasoning why the Colne NDP has failed to meet the basic conditions, we ask that the Examiner convenes an oral hearing session. This will allow for a full discussion over the reasons why the draft Colne NDP fails to meet the basic conditions, including regarding its approach in seeking to protect large tracts of land as local greenspace; as is proposed in policy <i>CNDP7 – Protecting Local Greenspace</i>. There can be no doubt that this misapplication of Framework guidance represents a failure to meet the basic conditions.</p> <p>6.5 An oral hearing will allow for a full examination of the issues raised in our Regulation 16 submissions and provide Little Cloud with an opportunity to put forward its case against the approach adopted in the draft Colne NDP. Little Cloud sees a clear need for oral hearing sessions to consider the appropriateness of substantial tracts of land being identified as protected local green space.</p> <p>---</p> <p>Footnotes</p>

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		<p>6. <a href="#">paragraph 9(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended)</a></p> <p>7. paragraph: 056 Reference ID: 41-056-20180222 (revision date 22 02 2018)</p> <p>Appendix 1 <a href="#">Pendle Committee Report (item 6)</a></p> <p>Appendix 2 Adopted green space policies in made neighbourhood plans</p> <ol style="list-style-type: none"> <li>1. Formby and Altcar, Neighbourhood Plan adopted 12 November 2019. Policy ESD1 states that the sites listed, are designated local green spaces where development will be managed in a manner which is consistent with Green Belt policy. The plan articulates that those accessible open spaces should be protected to ensure health and wellbeing, serve the local community, used for recreational purposes and to help reduce pressure on sites of SSSIs and RAMSAR status. The 28 sites identified in the plan as green spaces range in size from 0.2 to 10.5 ha but are almost exclusively public parks or recreation grounds, with the exception of two allotments and Beechwood Drive Woods (0.4 ha) and Deansgate Lane North/Lingdales/Longton Drive (0.2 ha).</li> <li>2. The Ashbourne Neighbourhood Plan adopted July 2021. Policy COM2 – Public Open Space sets out that those public open spaces will be protected for their value as green spaces and places for recreation. Development within these open spaces will only be supported when it relates to and complements the current use of the site and does not have an adverse impact upon the quality of the open space or its recreational value. The five sites identified in Ashbourne vary in size from 4.3 to 14.1 ha. Three of the sites are in the form of a park/recreation ground/playing field. Two areas of meadow are identified and are of sizes 4.3 ha and 5.5 ha.</li> <li>3. The Barrowford Neighbourhood Plan adopted 9 October 2019. Policy BNDP 07 – Local Green Spaces describes that new development will only be allowed within designated Local Green Spaces which does not impact on its openness or reduce its character, environmental or recreational value. However, in cases where circumstances can be demonstrated in accordance with Green Policy in NPPF (2021), development may be allowed which otherwise may be unaccepted. The 10 sites listed under this policy cover areas ranging from 0.16 to 6.8 ha. Other than parks, playing fields and allotments none of the identified sites is larger than 1.3 ha.</li> </ol>

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		<p>4. The Trawden Forest Neighbourhood Plan, adopted in Autumn 2018. Under Policy 9: Protecting Designated Open Spaces and Local Green Spaces, each area is said to contribute to local amenity, character, and green infrastructure. Some of the sites are important for biodiversity, and as ecological corridors providing species habitats. Development is only permitted if an alternative space can be provided to compensate for loss of public amenity, it is determined that damage can be mitigated, or an existing space is improved. Thirty open spaces are identified in total, derived from a Pendle open space audit. They are described as small areas of open space and woodland within the settlements of Trawden Forest which are valued for their local amenity value and for informal or formal recreational purposes. Other than Wycoller Beck, which runs through Wycoller Country Park, and Colne Water Pastures the sites are all less than 2.5 ha.</p> <p>5. The Gargrave Neighbourhood Plan adopted July 2019. Policy G9: Local Green Spaces states that development will not be permitted within these local spaces unless use does not diminish its character as a local green space, or it is demonstrated under special circumstances in which to make an exception. Within this neighbourhood plan eight sites are identified, ranging in area from 0.1 to 3.6 ha.</p> <p>Appendix 3 <a href="#">Kelbrook and Sough Neighbourhood Plan Examiners Report</a></p>
CNDP-REP-065	Malcolm Redford	<p>I am shocked that the Lenches area is not on the list of designated protected green spaces. I feel this way given that the recent planning application by Gleasons attracted over 400 objections to building on the land. It is an area that is clearly boundaried by Lenches Road, Knotts lane &amp; Short &amp; Daisy Streets, is not a large tract of land, is accessible to &amp; indeed well-used by local people, &amp; is demonstrably special, as it has a rich wealth &amp; variety of habitats, &amp; indeed several trees with protection orders enacted. The residents of Waterside certainly value the area as special, &amp; I see that the last photograph on the draft plan itself, is a view of Colne taken from the Lenches field, so presumably you, do too., so please therefore now include its protection in the final CNP.</p> <p>I also note that areas of green space immediately to the south of Patten St, &amp; in Waterside ie CNDP6/6, CNDP6/5&amp; CNDP6/1, are also suggested as brownfield sites that should be considered for housing development. However, the areas in question have reverted to natural grassland &amp; woodland, &amp; are therefore no longer classified as brownfield. They are also pleasant green areas that abound with insect &amp; birdlife, confer benefit on the residents, &amp; mitigate for the lack of gardens in the area, which is within the 5% most deprived wards in the country.</p>



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		<p>Also, as a cyclist and walker, now troubled with partial sight, I see this area as an opportunity to develop natural, but more obvious rights of way to enable others like myself to enjoy the wonders of the local landscape in safety.</p> <p>Otherwise I think that having a neighbourhood plan is a sensible idea &amp; laud the efforts of councillors &amp; Officers in putting this document together.</p>
CNDP-REP-066	Malcolm Rochford	<p>I wish to register my support for the Colne Neighbourhood Plan.</p> <p>I feel that it would be extremely beneficial, for the whole of the Colne Area, to have a specifically personalised planning policy, which has been formulated with local residents input, through regular consultation, whilst having regard for national policy.</p> <p>The Plan appears to take a reasonable balanced approach to influencing future development in Colne.</p> <p>I am particularly supportive of the sections on protecting our Green Spaces &amp; local Heritage.</p> <p>I believe that it has had extremely close scrutiny to ensure that it definitely fulfills the Basic Conditions for Neighbourhood Plans.</p>
CNDP-REP-067	Marilyn Fielden	<p>We wish to register our support for the proposed Colne Neighbourhood Plan. The plan outlines a clear strategy to meet the areas future housing needs whilst not leading to disproportionate urban development. The plan clearly aims to preserve important greenspaces and views both from within the town and from without the town over the town. We think this aims to preserve the essential nature and beauty of the town as a small mill town and of the surrounding areas. We think this is essential to preserving the quality of life in the area making Colne a desirable place to live.</p>
CNDP-REP-068	Mark Birtwistle	<p>We support the neighbourhood plan wholeheartedly as it has been consulted on and in line with all the basic conditions.</p>
CNDP-REP-069	Mark Chung	<p>I am writing to give my support to the draft Colne Neighbour Plan.</p> <p>I believe it meets the basic conditions as required by Paragraph 8(1)(a) of Schedule 4B to the Town and Country Planning Act 1990.</p> <p>The public of Colne have been fully consulted since 2018 and the Plan has been developed using Coiner's feedback.</p> <p>I fully support all the green spaces proposed in the plan, including The Upper Rough, Gib Hill and Lidgett, and also the sites identified for housing.</p>

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CNDP-REP-070	Mark Cutler	<p>As a local resident and member of Lidgett &amp; Beyond I write to give my whole hearted support to the COLNE NEIGHBOURHOOD PLAN.</p> <p>Any local housing developments should be decided locally.</p> <p>The Colne Neighbourhood Plan gives the residents of Colne the chance to select its own development sites and just as importantly to protect our valued green spaces. This surely makes common sense.</p> <p>Future housing developments should be on brownfield sites wherever possible, enough greenfield space has been developed already.</p> <p>Two green areas which are of particular concern to me are the Lidgett Triangle and the Upper Rough. Both these areas need to remain as is. Lovely green fields and wildlife havens.</p> <p>Finally, The Colne Neighbourhood Plan has to be the way forward, giving local people a say in what happens locally here in Bonny Colne.</p>
CNDP-REP-071	Dr Mark Turner	<p>I am writing in full support of the draft Colne Neighbourhood Plan which provides an excellent template for the future development of Colne as a sustainable and community centered town. The proposals are just what is required and well thought out, with a strong evidence base, which more than meet the criteria of the basic conditions for a neighbourhood plan.</p> <p>The proposals for Colne town centre are realistic and will enhance the character of our historic market town ensuring that the vitality and viability of Colne will be safeguarded for future generations.</p> <p>The proposals to provide green spaces in particular at Foulridge Reservoir, the Lidgett Triangle, the Upper Rough, Ball Grove, Heifer Lane Roundabout, Snell Grove and St Stephen's walking areas are greatly welcomed. These areas are much loved and well used by residents of Colne, walkers and visitors to the area. In preserving these areas habitats would be conserved and distinctive settlements maintained. The local community has identified these areas as important to themselves and the sites have been assessed within the constraints of the NPFF. Many of these sites are highly visible when entering and leaving the area and from various vantage points in the district. These areas have been assessed against Colne's Significant Views Assessment.</p> <p>The sites included for future housing growth have been identified to provide feasible and sustainable housing. The majority of these sites are on brownfield sites so any new developments would not detract from Colne's unique character.</p> <p>In conclusion I would like to thank the Working Group and Advisory Committee for their hard work, commitment and dedication in producing this excellent neighbourhood plan .This plan will ensure that Colne</p>

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		will thrive for many generations to come and the quality of life for the residents of Colne will be greatly improved and enhanced.
CNDP-REP-072	May Calvert	Supporting L & B neighbourhood plans to use 99 per cent of brownfield land.
CNDP-REP-073	Michael Hartley	<p>I am writing to express my support for the Colne Neighbourhood Plan.</p> <p>From my examining it I feel that it is an appropriate document for the protection of our town, both in the near and distant future. It aims to prioritise housing development on brownfield sites, with which I am sure almost every citizen of Colne would agree. It would protect our beautiful countryside, for which this area is rightly renowned, for generations to come.</p> <p>It also appears to meet the basic conditions required for Neighbourhood Plans, with regard to national policy, sustainable development, and other relevant guidelines.</p> <p>People have worked hard over many years on the creation of this particular plan, in many cases for no personal gain, and with no 'axe to grind'; but with a sincere and admirable desire to protect our unique and attractive town and its environs.</p> <p>It would be a crying shame if this commitment were to be wasted at this regulation 16 stage .</p>
CNDP-REP-074	Michael Holehouse	<p>I am emailing to confirm my support for the draft 'Colne neighbourhood plan' which I believe meets the basic conditions.</p> <p>I urge Pendle Council to adopt this plan, to help protect the valuable green spaces around Colne for future generations.</p>
CNDP-REP-075	Michael Wormwell	<p>I am emailing to give my full support to the recently submitted Colne Neighbourhood Plan. It is vital for the area that we keep as many of our green spaces as possible and easily accessible for both locals and visitors.</p> <p>This is particularly important for the areas at the edge of the town such as Upper Rough which, if allowed to be developed, would be pushing the green spaces further and further away from those who currently enjoy them most, and are essential for the health and wellbeing of the people of Colne and the surrounding areas.</p>
CNDP-REP-076	Michelle Cooney	<p>I am writing to show my support for the Colne neighbourhood plan. I believe it meets the basic conditions required in law.</p> <p>The plan is important to me because it protects the green spaces throughout the town and it provides housing sites in viable and sustainable locations.</p>

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CNDP-REP-077	Dr Mike Pusey	<p>Please find below my comments on the CNDP Reg 16 draft Plan, which was read at the Policy and Resources Committee Meeting on Monday 10th October. I was very disturbed to find that the Committee voted to approve the document despite the fact that it is materially flawed and contains serious errors and omissions. In my opinion, the report has serious shortcomings which require addressing and the report should be amended before publication.</p> <p><b><u>Comments on Regulation 16 draft CNDP (Colne Neighbourhood Development Plan, reg 16 Draft Plan August 2022</u></b></p> <p>I have reviewed the draft in great depth and given it serious consideration. Overall my findings are that the plan is a well-prepared and clear document which sets out the basis on which it has been drafted and explaining all the various elements and planning principles which have gone into it. These include the vitally important principle of “Protecting and Enhancing Our Natural and Historic Environments”. Indeed one of the key stated aims was “to protect, conserve and enhance the historic environment and character of Colne including Listed buildings, Conservation Areas and non-designate historic buildings. I feel that the report has gone a long way towards this, however there are some glaring errors and serious omissions.</p> <p><b>Green Spaces</b></p> <p>The overwhelming opinion of the residents of Colne and Pendle in general is to prevent building on our green spaces, whether they be public or private, and for the setting of the town and the character of the area be preserved. The presumption must be brown field over green field site-development. This underlying principle does not seem to have been followed; the Council are not listening to the people.</p> <p><b>Building Targets</b></p> <p>The report mentions the latest Government published building figures using the Standard Method (SM) which currently show a minimum annual requirement for Pendle Borough of “142 dwellings per annum, which is significantly lower than the 298 dwellings per annum in the PLPCS and the 240 dpa in the abandoned LP2. Table 3 shows Meeting the Housing Requirement in Colne (figures as of January 2022). A. Overall housing requirement 2011-2030 (reduced from 1,003 due to the re-occupation of long-term empty homes) 952 To be achieved by: B. Completions (January 2022) 286 C. Commitments (January 2022) 341 D. Allocated sites (Policy CNDP6) 147 B+C+D 782.etc”</p> <p>However, this does not stack up with the results of the Housing Delivery Test where the 2021 analysis shows that Pendle has delivered 227% of target; therefore further housing is NOT justifiable according to these criteria.</p>

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		<p>This is further underlined by the volume of empty properties in the area. This large number of empty houses in the area must be used to address housing needs before new building is permitted. The number of houses vacant in Pendle stood at 1428 in 2021 i.e 3.5% of the housing stock.</p> <p>These important criteria for judging the need for housing developments have been overlooked or ignored and I suggest the report should be revisited to address these concerns.</p> <p><b>Conservation Areas, Heritage and Listed Buildings</b></p> <p>Conservation areas are not designated for trivial reasons. Our Conservation areas must be protected from development so that the heritage and unique nature of the town is preserved. I refer you to Colne Neighbourhood Plan Site Masterplans.</p> <p>This refers to the National Planning Policy Framework which highlights the environmental objective of seeking to contribute to protect and enhance the natural, built and historic environment. Part 15 describes conserving and enhancing the natural environment. The DPD Policy ENV1 elaborates on Protecting and Enhancing Our Natural and Historic Environments.</p> <p>The CNP emphasises that the CNPD will become part of the statutory development plan for Pendle. Sitting alongside the Pendle Local Plan Strategy and the Pendle Local Plan.</p> <p>The draft CNDP Report alludes to this, however it has COMPLETELY OVERLOOKED one of the most significant conservation areas in the town; the Greenfield Conservation Area and the historic Greenfield hamlet which lies within it. The report also omits a very important heritage listed building; the oldest inhabited house in the area; Greenfield Hall; built in 1550. This building has links to the Bannister and Townley families stretching back to the 1400s, and the houses around it are careful conversions of the various buildings that were part of the Greenfield Hall estate stretching back into the town’s historic past.</p> <p>There is also a total failure to recognise the Greenfield Conservation area as a local green space important to a huge variety of wildlife and which acts as a critical wildlife corridor.</p> <p>I would suggest that the fact this land is heavily contaminated with waste from the old tannery and has been used as landfill for household waste underlying rubble and waste from the building of North Valley Road should be highlighted. In addition there are a number of underground streams/aquifers as well as culverts and it is subject to the sudden appearance of sinkholes. There is also contamination with Japanese knotweed.</p> <p>Under CNDP/27 of the CNP Site Masterplan it states in 4.2 High Level Constraints “any future development (of the Greenfield Conservation Area) should respect the local historic character. The Masterplan indicates some limited development of the Eastern part of the site and the need to maintain the Western part for wildlife. However, once again, no mention is made of the protection given by Conservation Area status to this</p>

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		<p>area. I would suggest that proper consideration of wildlife and environmental concerns are paramount when considering planning issues.</p> <p>Although I would object to any development within the Greenfield Conservation Area, I would comment that the modest development proposed by H&amp;H Homes would have minimal impact on the area and if pursued carefully would be acceptable to all.</p> <p><b>Flood Risks</b></p> <p>Whilst the report makes mention of preventing building on land at risk of flooding, it makes no mention of taking cognisance of building development in areas which would increase the risk of flooding in other areas due to runoff.</p> <p>As an example, I once again refer you to the Greenfield Conservation area where the Pendle Strategic Flood Risk Assessment highlights properties in the Greenfield Hamlet being in Flood Zone 2 and 3 . Any significant building development on the Conservation Area would doubtless increase this risk significantly.</p> <p>I believe that the comments I have made above highlight serious shortcomings in the Colne Neighbourhood Development Plan, reg 16 Draft Plan August 2022 which MUST be addressed and the report amended before it can be published.</p>
CNDP-REP-078	Pam Slater	I'm writing to ask that P152, land at Lenches Rd, is added as a protected green space in Colne Neighbourhood Plan. It would be wonderful to have this area protected now, for future generations.
CNDP-REP-079	Pat Wardle	Please accept this email as my request that P152 land at Lenches Rd is added as a protected green space in Colne Neighbourhood Plan.
CNDP-REP-080	Paul Barlow	<p>I am a very concerned resident of Greenfield Hamlet. (Greenfield House)</p> <p>I Strongly believe the the draft plan should not be accepted as it is because</p> <ul style="list-style-type: none"> <li>• It fails to include the Greenfields Conservation Area.</li> <li>• Fails to recognise the historic and heritage nature of Geeenfield House-Hall and the Greenfield Hamlet.</li> <li>• It over-estimates the housing needs of the near future and fails to recognise that the local infrastructure cannot cope with more housing.</li> <li>• It fails to recognise the vital role our green spaces on preserving the nature and character of the town setting and the wildlife dependent on it"</li> </ul>

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		The Green spaces of Pendle should be protected, This green space has been protected (we thought so anyway). Please please do Not allow this small oasis of protected nature to be developed.																																																																				
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## Appendix 1: Colne Neighbourhood Development Plan – Summary of Representations

Ref	Individual, Organisation and Client	Verbatim Comment			
		30	-	-	<ul style="list-style-type: none"> <li>The Town Centre boundary shown on Map 4 (Appendix 1) should be amended to reflect that shown on the Policies Map, if the proposed extension to the Town Centre boundary (Policy CNDP1) is agreed.</li> </ul>
		30	-	Policy text	<ul style="list-style-type: none"> <li>The policy should reference the NPPF as a material consideration for town centre uses.</li> </ul>
		30	-	Policy text	<ul style="list-style-type: none"> <li>The policy should clarify that not all proposals within Colne Town Centre will be subject to all of the requirements set out in the policy.</li> <li>It is recommended that the opening sentence should be revised to read as follows: <i>'... identity, new town centre uses ... will be supported where they are consistent with other parts of the development plan, the NPPF, and the policy requirements below as relevant.'</i></li> </ul>
		30	A & B	Policy text	<ul style="list-style-type: none"> <li>Ideally the numbering convention in Parts A and B, and throughout the document, should be consistent.</li> </ul>
		30	A	Policy text	<ul style="list-style-type: none"> <li>It is unclear how applicants and decision makers should respond to the requirements of the policy.</li> <li>There is currently no comprehensive scheme for the redevelopment of Colne Town Centre. It is therefore unclear how proposals can meet, or be assessed against, parts (a) to (e) of the policy. It is also unclear how any interim proposals for small-scale development would be assessed to have prejudiced a comprehensive redevelopment.</li> </ul>
		30	A	Policy text	<ul style="list-style-type: none"> <li>Pendle Council is currently working with the local community to produce a Masterplan for Colne Town Centre. This Masterplan should provide the basis for the policy, providing a meaningful and proportionate way to secure positive change within the town centre.</li> <li>It is recommended that the Policy text should be revised to read as follows: <i>'Development proposals within the defined town centre should have regard to the Colne Town Centre Masterplan. Proposals that are in conformity with the Masterplan will be supported. In particular proposals should:'</i></li> </ul>



## Appendix 1: Colne Neighbourhood Development Plan – Summary of Representations

Ref	Individual, Organisation and Client	Verbatim Comment			
		30	A	Policy text	<ul style="list-style-type: none"> <li>The phrase “upper floor development of other uses, such as residential ...” is imprecise.</li> <li>It is recommended that the Policy text should be revised to read as follows: <i>‘above ground floor level, appropriate town centre uses, including residential will be supported.’</i></li> </ul>
		30	A (c)	Policy text	<ul style="list-style-type: none"> <li>This requirements of this element of the policy are unclear. A clear direction on how to implement the policy is needed.</li> <li>The policy should clearly set out what is meant by the term ‘negatively impact’. Does this mean total loss? Degradation of quality? Removal or restriction of access? Adversely affecting its appearance? Loss of functionality?</li> <li>It would be disproportionate to refuse a scheme without consideration of the degree of harm that has been caused; the potential for mitigation measures to be put in place; and the wider benefits of the scheme.</li> <li>The policy needs to confirm precisely what ‘key areas/uses’ are to be protected by the policy and what value these add to the town centre and the local community. The list cannot be open-ended as this would leave considerable uncertainty for both applicants and decision makers.</li> <li>Evidence needs to be provided to show why the Market Hall, which is currently failing in terms of both occupation and patronage, has been singled out as an asset for protection.</li> </ul>
		30	A (e)	Policy text	<ul style="list-style-type: none"> <li>Suggest that this criterion is deleted.</li> <li>If it is retained, to accord with the adopted parking standards, the criterion should make reference to the need for an assessment of the additional parking pressures that will be generated and that provision will be based on evidence of need.</li> </ul>
		30	A (f)	Policy text	<ul style="list-style-type: none"> <li>This is a validation requirement of the Council.</li> <li>There is no need to agree the scope of a Heritage Impact Assessment with Pendle Council (the local planning authority). The parameters for producing heritage evidence are set out in the NPPF. There is no need for the policy to repeat this here.</li> <li>Policy requirement A (f) should be deleted.</li> </ul>

## Appendix 1: Colne Neighbourhood Development Plan – Summary of Representations

Ref	Individual, Organisation and Client	Verbatim Comment			
		30	A	Policy text	<ul style="list-style-type: none"> <li>The requirements applied within the policy, towards proposals which do not constitute comprehensive redevelopment, are too onerous.</li> <li>The policy should relate to the emerging Colne Town Centre Masterplan and suggested changes to the policy wording would address this concern and enable the final paragraph in Part A of the policy to be deleted.</li> </ul>
		31	B	Policy text	<ul style="list-style-type: none"> <li>The requirements of Part B (specifically criteria 1, 3, 5, 6, and 7) are disproportionate and do not meet the CIL tests.</li> <li>This element of the policy is not implementable through the decision-making process.</li> <li>Part B should be deleted from the policy, in its current form.</li> </ul>
		31	B (1)	Policy text	<ul style="list-style-type: none"> <li>Criterion 1 would not pass a statutory test. It is not possible to require improvements to the public realm for every development. As it stands the policy would be unlawful.</li> </ul>
		31	B (2)	Policy text	<ul style="list-style-type: none"> <li>Criterion 2 is premature, with regulations supporting the implementation of Biodiversity Net Gain still to be defined. Many of the requirements in Part B are aspirational and would be better if secured through the emerging Colne Town Centre Masterplan.</li> <li>Change of use applications will not deliver BNG.</li> <li>Some types of development will be exempt from BNG requirements.</li> </ul>
		31	B (3)	Policy text	<ul style="list-style-type: none"> <li>This is aspirational rather than necessary.</li> </ul>
		31	B (4) to (7)	Policy text	<ul style="list-style-type: none"> <li>Outwith guidance in NPPF or CIL Regulations.</li> </ul>
		31	B (5)	Policy text	<ul style="list-style-type: none"> <li>Engagement with Lancashire County Council (Highways), in the preparation of the Local Plan, raised concerns about the placement of charging points in the highway. These do not appear to be reflected in this policy requirement. We cannot see if the comments of the highways authority have been sought on this issue.</li> <li>As the town centre is regarded as an accessible location many development proposals within the town centre boundary will not require parking provision.</li> </ul>

## Appendix 1: Colne Neighbourhood Development Plan – Summary of Representations

Ref	Individual, Organisation and Client	Verbatim Comment			
		31	C	Policy text	<ul style="list-style-type: none"> <li>The restriction on hot food takeaways needs to be justified and align with higher order policy in the Local Plan. Policies need to be linked to evidence and there does not seem to be evidence to support this.</li> </ul>
		31	C	Policy text	<ul style="list-style-type: none"> <li>The word “Prime” should read “Primary”.</li> </ul>
		32	6.1.3	Justification	<ul style="list-style-type: none"> <li>This goes beyond what is required by the policy.</li> </ul>
		32	6.1.6	Justification	<ul style="list-style-type: none"> <li>Delete the reference to Appendix 1, if its deletion is supported (see comments against page 75 below).</li> </ul>
<b>CNDP2 – Shopfronts</b>					
		34	-	Policy text	<ul style="list-style-type: none"> <li>Precludes modern high quality design which is likely to be suitable within parts of the Town Centre. As currently worded the policy is only relevant to specific frontages within the town centre. For some town centre properties, its requirements will not be appropriate and its implementation would result in the refusal of otherwise suitable development.</li> </ul>
		34	(b)	Policy text	<ul style="list-style-type: none"> <li>Should ideally link back to the traditional design of the frontage.</li> </ul>
		34	(c)	Policy text	<ul style="list-style-type: none"> <li>Only illuminated signage requires planning permission and as such some of the policy proposals are not within the scope of the local planning authority.</li> </ul>
<b>CNDP3 – Design in Colne and the Colne Design Guide</b>					
		36	-	-	<ul style="list-style-type: none"> <li>The policy fails to acknowledge that a historic or traditional appearance is not always the most appropriate solution.</li> </ul>
		36	-	Policy text	<ul style="list-style-type: none"> <li>It is recommended that the following Policy text is deleted: <i><del>‘To support all those involved in the design process (applicants, decision makers, communities).’</del></i></li> </ul>
		39	6.2.5	Justification	<ul style="list-style-type: none"> <li>Only part of the Coding Matrix from the Colne Design Code is included. The full Matrix should be included – single page, landscape format, with an appropriate title above.</li> </ul>

## Appendix 1: Colne Neighbourhood Development Plan – Summary of Representations

Ref	Individual, Organisation and Client	Verbatim Comment			
<b>CNDP4 – Development Affecting Non-designated Heritage Assets</b>					
40	-	Policy text	<ul style="list-style-type: none"> <li>As written this represents a higher test than the NPPF. The wording in paragraph 203 of the NPPF requires a “<i>balanced judgement</i>” to be made. No evidence is provided to justify the proposed approach. As a result the policy should be revised to reflect the NPPF.</li> </ul>		
40	-	Policy text	<ul style="list-style-type: none"> <li>Non-designated heritage assets should be identified by the address of the property and not by reference to the current occupier as this is likely to change over time (e.g. #26 Clifford Smith and Buchanan, #88 Yorkshire Bank (now Funky Gifts).</li> <li>As the plan will be used by people who may not be familiar with the area, it is recommended that the format should be as follows: <i>(1) Reference number (2) Name of building, or description of the asset (3) Building number and street name, or brief description of the location</i></li> </ul>		
<b>CNDP5 – Urban Character Areas</b>					
43	(1)	Policy text	<ul style="list-style-type: none"> <li>This policy introduces ‘Character Areas’, which are not identified in the Colne Design Code.</li> </ul>		
43	(2)	Policy text	<ul style="list-style-type: none"> <li>As appropriate, these requirements should be incorporated into the Colne Design Code after checking for, and addressing, any conflicting guidance.</li> </ul>		
<b>CNDP6 – Future Housing Growth</b>					
45	-	-	<ul style="list-style-type: none"> <li>This policy is <b>not</b> considered to meet the Basic Conditions as written, but is capable of doing so with appropriate modifications.</li> </ul>		
45	-	-	<ul style="list-style-type: none"> <li>Pendle Council is satisfied that the CNDP, when read as a whole, is consistent with strategic planning policy on housing land provision and meets the aspirations of the spatial strategy.</li> </ul>		
45	-	-	<ul style="list-style-type: none"> <li>The allocation of specific housing sites is not consistent with other policies in the development plan. In the absence of any evidence justifying a departure from adopted policy, these sites should be removed from the CNDP.</li> </ul>		

## Appendix 1: Colne Neighbourhood Development Plan – Summary of Representations

Ref	Individual, Organisation and Client	Verbatim Comment			
		45	-	Policy text	<ul style="list-style-type: none"> <li>The policy notes that the site capacities are notional.</li> <li>Using the gross site area, rather than the net developable area, and applying a blanket density figure of 30 dph, overestimates the delivery potential of the sites allocated in the plan, as several have constraints– e.g. challenging topography, flood risk etc.</li> </ul>
		-	-	Site Assessment Report	<ul style="list-style-type: none"> <li>Comments were made at Regulation 14 relating to availability of sites, viability, ownership and designation for open space. Those comments flow through to this Regulation 16 stage.</li> </ul>
		45		CNDP6/15	<p>Land west of Bankfield Street (Bunkers Hill) – Greenfield</p> <ul style="list-style-type: none"> <li>Site CE127 (part of the site) already benefits from planning permission for housing, which has been partially implemented (13/12/063P – 30, 2/3 bed homes). It is included in the existing commitments for Colne and these dwellings should be excluded from the total capacity of the proposed allocations. This would reduce the contribution this site makes to the overall housing land supply from 56 dwellings to 34 dwellings.</li> <li>The submitted Heritage Impact Assessment (2022) prepared by Kirkwells fails to consider the likely effects on the wider historic environment, which includes the Greenfield Conservation Area to the west, Primet Bridge Conservation Area to the south, and three listed buildings –Wayside Barn (Grade II) and Greenfield House Farm and Greenfield House (Grade II) to the west and Primet Foundry (Grade II) to the south east. The overall impact is therefore unknown, raising questions about the suitability of the site for development and its overall capacity. The HIA should be updated to address this matter.</li> </ul>
		47	6.3.2	Justification	<ul style="list-style-type: none"> <li>In December 2021, Pendle Council resolved to abandon preparation of the Local Plan Part 2 and to prepare a new Local Plan for the borough.</li> <li>The reference to the Local Plan Part 2 housing requirement figure of 240 dwellings per year, and the resulting implications for Colne, are irrelevant and should be removed, as a new evidence base will underpin the spatial strategy in the new Local Plan.</li> </ul>
		47	6.3.3	Justification	<ul style="list-style-type: none"> <li>The figure generated by the Standard Method is material to housing land supply in Pendle. In accordance with the NPPF, it forms the basis of the 5 year housing land supply calculation.</li> </ul>

## Appendix 1: Colne Neighbourhood Development Plan – Summary of Representations

Ref	Individual, Organisation and Client	Verbatim Comment			
					<ul style="list-style-type: none"> <li>• However, the reference to the Standard Method figure for Pendle being much reduced, when compared with the adopted housing requirement, is not relevant in this context.</li> <li>• The CNDP should acknowledge that it is for the new Local Plan to define a housing requirement figure for Pendle.</li> <li>• As the new Local Plan is at a very early stage in the plan-making process, to conclude that the future housing needs of Colne will be significantly reduced is premature.</li> </ul>
		48	-	Table	<ul style="list-style-type: none"> <li>• Table 2 provides an illustration of residual housing need in Colne, but presents a picture that is out-of-date.</li> <li>• The table appended to this representation confirms the position at the end of the 2021/22 monitoring year. To be in conformity with adopted policy it employs the methodology employed in the Pendle Core Strategy (2015) and is based on the housing requirement of 298 dpa, set out in Policy LIV1 of that document.</li> <li>• This updated table shows that in recent years housing delivery in Colne has been particularly strong, and that significant progress has been made towards meeting the apportioned housing need for the town. It confirms a residual need of 192 dwellings in Colne. This represents 12% of the residual need for the borough.</li> <li>• The CNDP, as submitted, identifies housing allocations that will provide an estimated 177 dwellings. As set out above the Council has concerns regarding the suitability and deliverability of a number of these sites. Nevertheless it is likely that some of the allocated sites will come forward and the policies of the CNDP will allow further opportunities for housing to be delivered within the neighbourhood area. As a result, the Council is satisfied that the CNDP is in general conformity with the spatial strategy and the strategic planning policy on housing land supply.</li> </ul>
<b>CNDP7 – Protecting Local Green Spaces</b>					
		51	-	-	<ul style="list-style-type: none"> <li>• Comments were made on the appropriateness of allocations at Regulation 14. In accordance with the criteria in Paragraph 100 of the National Planning Policy Framework the inspector should confirm that all of the sites are of demonstrably high value to the community and that they are not extensive tracts of land.</li> </ul>

## Appendix 1: Colne Neighbourhood Development Plan – Summary of Representations

Ref	Individual, Organisation and Client	Verbatim Comment			
					<ul style="list-style-type: none"> <li>The assessments of parcels is incorrect. The test set out in the conclusions section is that land is not an open, extensive tract of land. The test in the NPPF does not include assessing if the land is open.</li> </ul>
<b>CNDP8 – Protection and Enhancement of Community Facilities</b>					
		54	-	Policy text	<ul style="list-style-type: none"> <li>“Non-community based uses” need to be defined and justified.</li> </ul>
		54		Policy text	<ul style="list-style-type: none"> <li>Part 2 of the policy should make clear that a facility should be marketed for community use, following its closure, for a period of at least a 12 months.</li> </ul>
<b>CNDP9 – Protection of Local Shops and Public Houses</b>					
		55	-	Policy text	<ul style="list-style-type: none"> <li>There is a 1 kilometre distance requirement for Class F2(a) uses.</li> <li>The policy would be more effective if it made reference to “any units within a designated local shopping frontage in the Pendle Local Plan” as the distance threshold and restriction to F2(a) uses would not apply.</li> </ul>
		55	(C)	Policy text	<ul style="list-style-type: none"> <li>Part C introduces the possibility that landowners could allow premises to fall into disrepair in order to secure a different use for a protected facility. Part C is unnecessary and counter-productive and should be removed from the policy.</li> </ul>
<b>CNDP10 – Protection of Local Shops and Public Houses</b>					
		56	-	-	<ul style="list-style-type: none"> <li>The policy does offers little in the way of additional protection to that afforded by Policy ENV1 in the Pendle Local Plan. Multiple designations are unecessary.</li> </ul>
		56	-	Policy text	<ul style="list-style-type: none"> <li>The use of reference numbers, which differ from those in the Council’s Open Space Audit, is unhelpful for those looking to apply planning policy.</li> </ul>
<b>CNDP11 – Protection of Allotments</b>					
		58	-	-	<ul style="list-style-type: none"> <li>Policy does not offer additional protection to that afforded by Policy ENV1 in the Pendle Local Plan. Is a further allotment designation in the CNDP necessary?</li> </ul>



## Appendix 1: Colne Neighbourhood Development Plan – Summary of Representations

Ref	Individual, Organisation and Client	Verbatim Comment			
		58		Policy text	<ul style="list-style-type: none"> <li>The use of reference numbers, which differ from those in the Council's Open Space Audit, is unhelpful, but their inclusion in parentheses is welcomed and will assist in day-to-day use of the CNDP.</li> </ul>
<b>CNDP12 – Transport</b>					
		-	-		<ul style="list-style-type: none"> <li>This policy is <b>not</b> considered to meet the Basic Conditions as written, but is capable of doing so with appropriate modifications.</li> </ul>
		60	-	Policy text	<ul style="list-style-type: none"> <li>Criterion (b) is contrary to national planning policy both in its wording and approach for proposals affecting the natural and historic environment.</li> <li>The NPPF is clear that the status of the asset affected together with the degree of harm caused is significant in how the decision maker must treat the proposal. Furthermore, it is not necessarily the case that proposals which destroy a natural or historic asset would be refused depending on the extent of the public benefits of approving the development.</li> </ul>
<b>CNDP13 – Conserving and Enhancing Valued Landscape Features</b>					
		-	-		<ul style="list-style-type: none"> <li>This policy is <b>not</b> considered to meet the Basic Conditions as written, but is capable of doing so with appropriate modifications.</li> </ul>
		63	-	Policy (c)	<ul style="list-style-type: none"> <li>Policy relates to landscape however part (c) is an ecology matter. To cover the habitats as outlined in (c) it is suggested (b) is amended to address 'landscape features, such as woodlands, trees, hedgerows, moorland grasses, wetland features and watercourses'</li> </ul>
		63	-	Policy (d)	<ul style="list-style-type: none"> <li>It is unclear what is meant by the phrase 'open landscape areas make in conserving and maintaining the area's distinctive settlements'.</li> <li>Colne is the only settlement within the designated area.</li> <li>Part (d) of the policy should be altered to read: <i>"The contribution that the open landscape makes to the setting and character of Colne."</i></li> </ul>
		63	-	Policy text	<ul style="list-style-type: none"> <li>Significant views – The policy cannot impose policy restrictions on locations that are situated outside the designated neighbourhood area.</li> </ul>

## Appendix 1: Colne Neighbourhood Development Plan – Summary of Representations

Ref	Individual, Organisation and Client	Verbatim Comment			
		63	-	Policy text	<ul style="list-style-type: none"> <li>The protection sought for 'significant views' through the policy is disproportionate and inconsistent with the NPPF.</li> <li>To address this conflict and provide a policy which will help to safeguard important views from within the designated neighbourhood area, the Council proposes that the following wording is adopted: <ul style="list-style-type: none"> <li><i>'The following viewpoints are identified as important in the Colne Significant Views Assessment (2021):</i></li> <li><i>[LIST]</i></li> <li><i>Proposals which are likely to affect an important view will be required to prepare a Landscape Appraisal.</i></li> <li><i>The Landscape Appraisal must be prepared in accordance with the latest guidelines of the Chartered Institute of Landscape Architects. The Landscape Appraisal will identify the important views that are affected, address their significance and assess any impacts that are may be caused by the development proposal, after the consideration of any mitigation measures that have been incorporated into the final design to help avoid, reduce or offset these effects.</i></li> <li><i>Proposals found to have an adverse impact on an important view may be refused, taking into account the significance of the view, the level of harm caused and benefits of the proposal'</i></li> </ul> </li> </ul>
<b>CNDP14 – Rural Identity and Character</b>					
		68	-	-	<ul style="list-style-type: none"> <li>This policy is <b>not</b> considered to meet the Basic Conditions as written, but is capable of doing so with appropriate modifications.</li> </ul>
		68	(c)	Policy text	<ul style="list-style-type: none"> <li>The wording is not consistent with the NPPF.</li> <li>The use of "traditional" or "local" materials may no longer be appropriate, or possible.</li> <li>To offer greater flexibility in sourcing appropriate materials, it is recommended that the Policy text should be revised to read as follows: <ul style="list-style-type: none"> <li><i>'Use high quality materials which are consistent with local vernacular'</i></li> </ul> </li> </ul>
<b>5. How to comment</b>					

## Appendix 1: Colne Neighbourhood Development Plan – Summary of Representations

Ref	Individual, Organisation and Client	Verbatim Comment			
		-	-	-	<ul style="list-style-type: none"> <li>This section should be removed from the final version of the CNDP.</li> </ul>
<b>Maps</b>					
		72-74	-	-	<ul style="list-style-type: none"> <li>This section only includes maps for three of the four conservation areas within the designated neighbourhood area.</li> <li>A map of the Greenfield Conservation Area should be included as Map 5 for completeness. This is particularly important for transparency, as proposed housing allocation CNDP6/15 Bunkers Hill is partially within this conservation area.</li> </ul> <p><a href="https://www.pendle.gov.uk/downloads/file/5313/greenfield_conservation_area_map">https://www.pendle.gov.uk/downloads/file/5313/greenfield_conservation_area_map</a></p>
		-	-	Policies Map	<ul style="list-style-type: none"> <li>The Policies Map does not include important policy designations from the Local Plan (e.g. settlement boundary, Green Belt, open space), thereby giving the reader an incomplete picture of the spatial implications of planning policy within the designated neighbourhood area.</li> </ul>
		-	-	Policies Map	<ul style="list-style-type: none"> <li>The contrast between the designations shown in different shades of green is too subtle and difficult to discern.</li> <li>Several policy designations are superimposed over existing Local Plan designations.</li> <li>In view of the above it is recommended that the use of contrasting colours and 'transparent' shading (e.g. lines, dots and hashes) are used to greater effect on the final version, to ensure that the Policies Map is clear and easy to use.</li> </ul>
<b>Miscellaneous</b>					
		45, 51 & 56	-	Policy text	<ul style="list-style-type: none"> <li>The renumbering of sites between the different iterations of the plan, although understandable, does not aid transparency in the plan making process.</li> </ul>
		-	-	Policy text	<ul style="list-style-type: none"> <li>The NPPF requires plans and policies to be positively prepared.</li> <li>The wording of several policies refers to what isn't acceptable (development control), rather than the governments preferred</li> </ul>

## Appendix 1: Colne Neighbourhood Development Plan – Summary of Representations

Ref	Individual, Organisation and Client	Verbatim Comment			
					<p>approach which is to say what will be supported (development management).</p>
		-	-	Monitoring Indicators	<ul style="list-style-type: none"> <li>Some of the monitoring indicators, although well-intentioned, are not capable of being monitored.</li> </ul>
		-	-	Justification	<ul style="list-style-type: none"> <li>The justifications for many of the policies in the CNDP make little or no reference to relevant strategies that will be supported through implementation of the policy, or the evidence base underpinning it.</li> <li>The Justification should help to emphasise how the policy will help to maintain local distinctiveness.</li> </ul>
		-	-	General comments	<ul style="list-style-type: none"> <li>The use of red text is not considered to be accessible. Ideally a colour with better contrast should be selected to help those with a visual impairment.</li> <li>The advice below, taken from Pendle Council’s guidelines for tendering, sets out the accessibility requirements for web documents. It is mandatory for all local authority websites to meet <a href="#">accessibility legislation</a> for their design and content. Any new documents to be added to our website must also meet these criteria. In broad terms, all local authorities must, as a minimum, meet Level AA of the Web Content Accessibility Guidelines 2.1: <a href="https://www.w3.org/TR/WCAG21/">https://www.w3.org/TR/WCAG21/</a></li> </ul> <p>Contractors must provide their final report in a format that meets these requirements. Guidance on how to make documents as accessible as possible is provided below.</p> <p><b>Microsoft Word</b></p> <p>If you are creating your original documents in Microsoft Word, the following link provides useful guidance on making your documents accessible:</p> <p><a href="https://support.office.com/en-gb/article/make-your-word-documents-accessible-to-people-with-disabilities-d9bf3683-87ac-47ea-b91a-78dcacb3c66d">https://support.office.com/en-gb/article/make-your-word-documents-accessible-to-people-with-disabilities-d9bf3683-87ac-47ea-b91a-78dcacb3c66d</a></p> <p><b>Portable Document Format (PDF)</b></p> <p>All PDF documents will be run through the Adobe Accessibility Checker. This identifies where a document is likely to fail the accessibility criteria.</p>

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Ref	Individual, Organisation and Client	Verbatim Comment
		<p>The link below provides information on how to create and verify accessible PDF documents using Acrobat Pro:</p> <p><a href="https://helpx.adobe.com/acrobat/using/create-verify-pdf-accessibility.html">https://helpx.adobe.com/acrobat/using/create-verify-pdf-accessibility.html</a></p> <p><b>Further guidance</b></p> <p>Additional information on the Government’s accessibility legislation can be found here:</p> <p><a href="https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps">https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps</a></p>
CNDP-REP-082	Peter Stansfield	<p>As requested by the Lidgett and Beyond leaflet posted through my door today, I would like to respond, as requested., to support the Colne Neighbourhood Plan planning document.</p> <p>I feel that what we have here in Colne and the surrounding area is unspoilt countryside and not too large a population to swamp the area. The M65 encouraged many Mancunians to use us as a dormitory town working in Manchester 5 days per week, not having time to participate in local activities, distorting the housing market and putting unnecessary strain on our local infrastructure.</p> <p>Any further development of our area as far as I can see would only dilute still further our county of Lancashire and make us still more of a faceless sprawl of Greater Manchester, with no advantage to local residents.</p> <p>Let us prevent further destruction of our countryside and make Colne and its surrounds the place that most people aspire to reside. Our children will not thank us for more urban sprawl.</p>
CNDP-REP-083	R Hepworth-Harvey	<p>My family and I wish to show our support for progressing the Colne Neighbourhood Plan through Regulation 16 and on towards examination by your Planning Inspector. We support the following as outlined by the plan:</p> <ul style="list-style-type: none"> <li>• Designate housing sites on almost entirely brownfield sites within the settlement boundary and regenerate areas that require investment. This is extremely important for our green spaces and extremely important for regeneration of dilapidated sites across Pendle.</li> <li>• Implement a Colne Design Code to ensure a sense of place is maintained, and profiteering is not the rationale for housing development</li> <li>• Designate Local Green Spaces which cannot be altered in the future by profiteering (such as the spaces around Lidgett etc.</li> <li>• Protect the Countryside, which, once it is developed, will never be regained. This is the character of Lancashire!</li> </ul>

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Ref	Individual, Organisation and Client	Verbatim Comment
		<ul style="list-style-type: none"> <li>• Protect long-range views to and from key landmarks</li> <li>• Protect non-designated heritage assets (i.e. not listed)</li> <li>• Protect Community Assets</li> </ul> <p>At this Regulation 16 stage, the consultation meets the Basic Conditions and these are:</p> <ul style="list-style-type: none"> <li>• the plan has regard to national policies and advice contained in guidance issued by the Secretary of State,</li> <li>• the making of the plan contributes to the achievement of sustainable development,</li> <li>• the making of the plan is in general conformity with the strategic policies contained in the development plan for the area of the authority,</li> <li>• the making of the plan does not breach, and is otherwise compatible with, EU obligations.</li> </ul>
CNDP-REP-084	Rebecca Ferry	<p>I am writing to express my support for the Colne Neighbourhood Plan.</p> <p>I wholeheartedly believe it is the way forward for the future of Colne, as it will enable us to protect our valued green spaces and long ranging views.</p> <p>The plan has been developed over seven years and has involved consultations, public meetings, and thorough scrutiny of all relevant documents.</p> <p>The plan has regard for national policies and advice contained in guidance issued by the Secretary of State.</p> <p>I urge you to support the Colne Neighbourhood Plan.</p>
CNDP-REP-085	Robert Hindle	<p>I am writing to you in support of the above plan. I am a long time resident of Pendle. My view is that it's essential that Pendle Council approves any further housing development on Brown views sites within the Borough. Our local <b>MP</b> some years ago secured government funding for development of Brown field sites in the area, but for unclear reasons the council appeared unsympathetic to this funding. Destroying our green countryside because <b>it</b> may be marginally cheaper to build on Greenfield sites or more profitable should not be an option, particularly when there are ample brown field sites available and affordable housing could be built on these sites.</p> <p>Clearly an enormous amount of detailed work has been put into this plan with the interest of people who live in the area uppermost. It should not be discounted by the vested interests of a few large building companies exerting pressure on our planning dept.</p>

## Appendix 1: Colne Neighbourhood Development Plan – Summary of Representations

Ref	Individual, Organisation and Client	Verbatim Comment
CNDP-REP-086	Roger Whitehead	<p>I am writing to request that the land at Lenches Road reference P152 is added as a protected green space in Colne Neighbourhood Plan. I understand that plans for development of this land have currently been withdrawn but would like to ensure that the land is protected from development in the future.</p>
CNDP-REP-087	Roy & Judith Sutcliffe	<p>I have reviewed the Draft Neighbourhood Plan and found it to be a well thought out and sympathetic document with regards to the preservation and development of Col ne. The fact that the plan concentrates new housing on brownfield land is very welcome as there the town is surrounded by wonderful countryside much of it consisting of naturally farmed meadowland which is a boon to Britain's sadly diminishing wildlife which is being systematically wiped out in many parts of the country due to factory farming and overuse of pesticides. To build on that land would be despicable.</p> <p>The intention to preserve Colne's historical heritage by preservation where possible and sympathetic building where it isn't is also welcome as is trying to promote and preserve Colne's sporting and cultural heritage.</p> <p>I should like to congratulate those who have designed this plan and hope it can become a policy that preserves and improves Colne for future generations.</p>
CNDP-REP-088	Roy Davies	<p>Kindly note that my partner and I live in Standroyd Drive, Colne and fully support the Local Neighbourhood plan for our area. The proposal to develop housing sites on over 99% brownfield sites is sensible and we fully support it. We would fiercely oppose any proposal to develop housing sites or any other development on Green Belt land. We would consider such proposals unnecessary and a further erosion of our natural environment when it is already under considerable risk.</p> <p>We would appreciate it if our comments are taken on board before any decisions are taken.</p>
CNDP-REP-089	Roy Jenkins	<p>Good</p> <p>Day all Colne residents And Govt party members involved in this unjust land grabbing in my area of Colne Were I have spent all my life living as a residents</p> <p>I worked in Colne all my life seen changes we resident had enforced of us by party Cllr That only look after their party leader in LONDON (not us residents)</p> <p>FIRSTLY</p> <p>The extrusion of Colne area is NOT to benefit resident but the rich to land bank our area And for party in Govt to get more voters for G.E. + local area Cllr seat election voting A large vote count this is the truth behind this Govt mess (now that out of way)</p>



## Appendix 1: Colne Neighbourhood Development Plan – Summary of Representations

Ref	Individual, Organisation and Client	Verbatim Comment
		<p>The proposed area on the map enclosed in this email should not be on put forward for planning permission to develop this area please Pendle-Colne Cllr the resident will fight to keep this area from development by private sector rich business people that will just land banks this area.</p> <p>SO I will ask Pendle-Colne Cllr the following Questions.</p> <p>Q-1 IF new home are built here will Colne resident get to rent them out yes or no??</p> <p>Q-2 WHERE will the cars be parked by the owner of the homes??</p> <p>Q-3 WHAT amount of Green Belt land will elected Cllr of all parties be allowing to be taken up for Fracking drills sits in Colne??</p> <p>Q-4 What impact assessment have any party Cllr or the builders on the home taken before planning is given the go ahead??</p> <p>Footnote to above question</p> <p>Colne is developed on a high land (hill homes) so new home getting water &amp; electricity Will need more papping station to feed the new homes with water plus larger drains in place at prevent lower level Flooding of the old homes in lower ground areas.(a very big risk)</p> <p>Q-5 Even with the extended land area to Colne out land area homes &amp; Fracking must be kept apart So elected party Cllr of Pendle-Colne area what ( % percentage?) of land will go Fracking or Homes You and Govt parties cannot have both Colne is NOT a land mass it is a town build on a hill.</p> <p>MY POINT Cllr Just Try walking up lenchers 20 time including Colne lane Knock lane you will understand Colne hills</p> <p>Please rethink this matter urgently if you wish to get local Colne resident on your side!!! building things by back door deal in private Council meeting in Nelson &amp; Colne by Cllr has gone full stop! Has you are all our resident elected public SERVENT we will hold you all to account for damaging our way of life or Colne areas.</p> <p>All Cllr will be held to account fully on all new project built in Colne areas resident must get a say not your party leader in London that do not live here or understand the people round here.</p> <p>Finally Please tell us P.B.C.- Colne Cllr Colne residents where is Fracking drill sit going on our high land green belt lands Remembering this, true FACT all party Cllr our drinking water is under ground round here in river tracking will disrupt.</p> <p>FACT -P.B.C-Colne Cllr Burnley-water leek again tell us adding more new homes is already effecting our mains water supply.</p>

## Appendix 1: Colne Neighbourhood Development Plan – Summary of Representations

Ref	Individual, Organisation and Client	Verbatim Comment
		<p>So I get back to my point will Fracking be done in Colne quadrille gas have 3 license to track here in Colne alone. or will you go for new homes built for the rich private sector business people to benefit only on our Gren belt land so they can make big profits when they sell them off to richer business people with our green belt land arras around the homes built???</p> <p>This is my input as a resident of Colne that seeks full clarity from all our elected Cllr of Pendle-Colne that have a say in Fracking and selling off our Greenbelt land to the rich private sector developers form possibly outside the U.K. areas so they can land bank our Colne areas for future project (pardon this bit readers below but I do speak my mind on Colne matter) while we residents in Colne live in a C**p tracking area loss all our Green Belt land to rich private developers outside OF the U.K. that our elected Cllr give planning permission to develop the land in years to come leaving the problem to our kids to clean up fact we do not live forever the damage done now in 2022-2023-2024 -2025-2026 by Tory Govt will live with our kids for years down the line as all them the implementing this project cold or maybe or will be all dead that includes me.</p> <p>Feed back to this email from any Cllr will be look at by me including staff of Lenches ppc Do remember elected Cllr of Pendle-Colne areas this will NOT go away just because you do not like what I have put in this email I am now taking up this mess with Govt party leaders (when they all get off their backside and return back to work that is )</p> <p>Resident have a right to know what our elected Cllr are up too and have Face to Face meeting with all of them On matter the concerns us Colne residents (NOT STUPID VIDIO LINK THEY KEEP SWICHING OFF) blaming the internet feeds When we ask them question they cannot truthy answer without telling us lies on top of lies Colne residents This must stop if we are all to work together to in prove all our residents way of life for us not Govt party leader in LONDON needs or rich private sector business people needs that do trash our area for profits only.</p> <p>We resident get stuck with when they go wrong and have to fix their mess</p> <p>---</p> <p><b>ATTACHMENT</b> (including map referenced in representation)</p> <p>From: lenches ppc            Sent: 05 October 2022 23:53            To: <b>[REDACTED]</b>            Subject: Colne Neighbourhood Plan Consultation</p>

## Appendix 1: Colne Neighbourhood Development Plan – Summary of Representations

Ref	Individual, Organisation and Client	Verbatim Comment
		<p>Hello</p> <p>We just wanted to say thank you so much for your support so far in helping to keep Lovely Lenches out of Gleasons clutches.Plans have been withdrawn but we need to get some long term protection in place to ensure that the next generation of Colne’s residents and wildlife will have access to this magical place. Colne Neighbourhood Plan is out for consultation and residents are being asked to "Have your say" Areas of land can be added as protected green space and in its current form there is a huge lack of protected green space in South Valley ( see attached map) Please could you email <a href="mailto:planningpolicy@pendle.gov.uk">planningpolicy@pendle.gov.uk</a> CC <b>[REDACTED]</b> and request that P152 land at Lenches Rd is added as a protected green space in Colne Neighbourhood Plan.We know we have asked you to send in various emails before and we can't thank you enough but this is our last chance to try and at least get Lenches assessed for suitability.The deadline is 17th October so please do it now before you forget.We have nothing to lose and everything to gain.We have been ignored locally but a government examiner will read all the comments and make recommendations accordingly so we need to once again show our love for Lenches.</p> <p>Thank you for all your support our people power is definitely making a difference</p> <p>Love</p> <p>Lenches</p>

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Ref	Individual, Organisation and Client	Verbatim Comment
		
CNDP-REP-090	Sam Dobson	<p>I am writing to request that P152 at Lenches Rd is protected as a green space in the Colne Neighbourhood Plan. We have just been through a lot to protect the area from a particular planning project and we all feel that the space should be protected long term to avoid this happening again.</p>
CNDP-REP-091	Sharon Dale (1)	<p>I am writing to pledge my support of the plan as it stands as it offers protection to precious green spaces while leaving room for some development.</p>
CNDP-REP-092	Sharon Dale (2)	<p>I cannot be at the meeting re this subject in person but want to reiterate my whole- hearted support for the Colne Neighbourhood Plan.</p> <p>This is, without doubt, a one and only chance to protect Colne in the longer term from too much unwanted development.</p> <p>Speed in getting this adopted, without delay, is vital as Neighbourhood Plans are highly likely to be scrapped by the government headed by Liz Truss.</p>

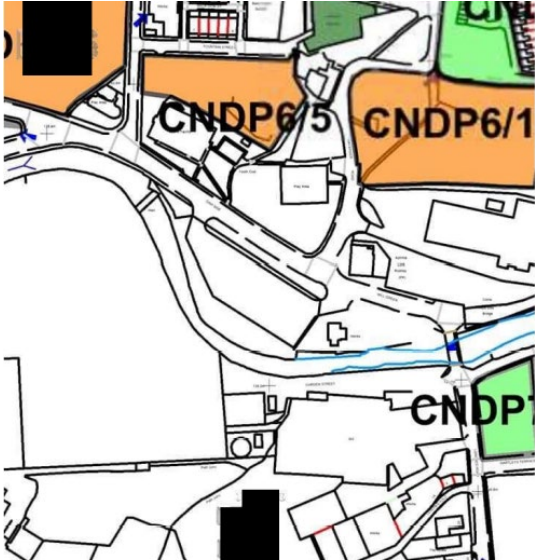
## Appendix 1: Colne Neighbourhood Development Plan – Summary of Representations

Ref	Individual, Organisation and Client	Verbatim Comment
		<p>The immense amount of work that has gone into creating this plan to protect as much of Colne as possible for us and for future generations must not be squandered.</p> <p>Most of the sites id'd for development are brownfield and while there will be objections from those who live close to them, that is always inevitable.</p> <p>The alternative to the Neighbourhood Plan would be a Pendle wide plan and that would take control out of Colne's hands.</p> <p>The added bonus of a neighbourhood plan is that we also get to protect heritage assets.</p>
CNDP-REP-093	Sharon Wraith	<p>I am writing to you to tell you that I fully support the COLNE NEIGHBOURHOOD DRAFT PLAN and believe that it meets the Basic conditions require by Paragraph 8(1)(a) of schedule 4B required by the Town and Country Planning Act 1990 and has been done correctly especially concerning all 4 consultations, public meetings, regular documentation and updates.</p> <p>As someone who has been born and bred in Colne I believe that the plan is good for all of Colne and those who live here and our heritage to pass on to our children and grandchildren and future generations. Especially important to me and my family is the keeping of our green spaces for exercise and the enjoyment of views and to explore and enjoy the animals and birds that freely roam on the green spaces that I grew up with while supporting our local farmers also. Also the historical buildings that I grew up with and enjoy telling my grandchildren about, many of which have sadly been done away with now, the cotton mills where our parents and grandparents worked and buildings like Langroyd hall where my family were born, lived and grew up many years ago. Christiana hospital and Hartley hospital where I was born and my mother worked for many years. These stories of our family history and stories of growing up in bonnie Colne on the hill are very important to me and my family. Yet it is upsetting to see the Colne I have always known be taken over by large housing corporations who live miles away and know nothing of living in this wonderful town and outlying villages.</p> <p>The Colne plan has our best interests at heart whereas outsiders are only interested in plundering our great heritage and making money for themselves by building more and more houses on our greenfield sites and destroying our sites of historical value by turning them into cafes such as the Old Pump House on the Rough or other superficial buildings that destroy their value as Colne heritage centres and sites to be enjoyed for their naturalism. That is not what life here should be all about.</p> <p>We want to decide our future for ourselves and I believe that the Colne plan should be accepted for helping us to do just that. I live on the edge of Colne and want to stay on the edge and not be stuck in the middle because of suburban sprawl and greedy land grabbers who do not have to live here want to see happen. Colne belongs to Coiners NOT THEM. I especially support the Colne plan as it has pinpointed brownfield sites</p>

## Appendix 1: Colne Neighbourhood Development Plan – Summary of Representations

Ref	Individual, Organisation and Client	Verbatim Comment
		<p>that can be reused and regenerated instead of using our green spaces, especially in the area of the Lidgett triangle, the Upper Rough, Ball Grove, the Foul ridge reservoir walking area, Heifer Lane roundabout where I live now and have lived when growing up with my family spending many happy hours in the surrounding countryside enjoying meeting the horses on Horsfield by the cricket club and animals around and about this area as well as enjoying walks and the views all around.</p> <p>I truly hope that you will hear what I am saying here and will take into consideration all that I have said in this letter of support for the furthering of the Colne Plan to the next stages. Thankyou.</p>
CNDP-REP-094	Smith and Love Planning Consultants for Nelson and Colne College	<p>I write regarding the Regulation 16 stage consultation prior to the submission of the Colne Neighbourhood Plan to the Secretary of State on behalf of my client Nelson &amp; Colne College.</p> <p><b>Land at Barrowford Road, Colne</b></p> <p>It is acknowledged that my client’s land at the former Nelson &amp; Colne College site, Barrowford Road, is protected as sport and recreational land in the Draft CNLP. We have previously submitted representations to support the allocation of the land for housing. The site is not used by the College and is significantly under used by local junior teams due to poor drainage. There is an opportunity to allocate the land for housing so as to provide a sustainable and deliverable housing site as an alternative to other less viable sites in the Draft CNLP.</p> <p><b>Local Green Space</b></p> <p>The Draft CNLP designates 14 no. areas of Local Green Space.</p> <p>I concur with the Council’s view in its comments in association with the Regulation 16 consultation (Policy and Resource Committee, 22nd September 2023) that the designation of large tracts of land as Local Green Space is inappropriate. National Planning Policy Guidance (PPG) seeks to prevent the allocation of large tracts of land stating that the ‘blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name’. The CNLP group has prepared a report titled Colne’s Local Green Spaces to support the designation of such land. In the report there is reference to previous attempts to develop open land to the east of Colne for housing. It may be surmised that the designation of large tracts of land to the east of the settlement has been used a tool to ensure that no future attempts are made to develop the land.</p>

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Ref	Individual, Organisation and Client	Verbatim Comment
		<p>Many of the draft housing sites are similar in location and size which is likely to result in a lack of choice for developers as well as a lack of choice for the local community. This raises concerns regarding their viability and deliverability as referred to in previous consultation responses.</p> <p><b>CNLP Review</b></p> <p>Pendle Council has commenced a full review of the Pendle Local Plan with a Call for Sites and Scoping Report Assessment issued for consultation in August 2022. As the CNLP may be adopted before the Pendle Local Plan the CNLP should be reviewed upon adoption of the Pendle Local Plan to ensure conformity with it.</p> <p><b>Conclusion</b></p> <p>In conclusion, the CNLP does not meet the basic conditions test in that it is contrary to national planning policy in relation to the designation of Local Green Spaces and in conflict with Policy ENV1 of the Pendle Core Strategy.</p>
CNDP-REP-095	Stacey Nolan	<p>Colne neighbourhood, the land at back of pattern street and the land off exchange street and Colne lane</p>  <p>I am emailing to oppose the destroying of our green space to build more homes - ie, pattern street, Colne lane park and so on. It's a tight knit community round here, our children play and build memories ... not to mention the chaos it will bring to peoples lives. I OPPOSE</p>

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Ref	Individual, Organisation and Client	Verbatim Comment
CNDP-REP-096	Susan and John Downham	We wholeheartedly support the Colne Neighbourhood Plan.
CNDP-REP-097	Susan Birchenough	<p>Will you please note my support for the Colne Neighbourhood Plan. I think it is a sound plan which is good for the whole of Colne.</p> <p>I think that over the seven years of it's evolving it has been fully and openly consulted on and that there have been ample opportunities for the public to give their views and opinions which have been considered and reflected in this issue of the plan. I feel that it now meets all of the basic conditions that government Town and Country Planning legislation set out for such Neighbourhood Plans.</p> <p>I strongly support the identification of local green spaces, particularly the Lidgett Triangle, the Upper Rough and Ball Grove and also strongly support the focus on regeneration of</p> <p>Brownfield Sites and keeping development within the settlement boundary and to prevent suburban sprawl. It contains a comprehensive Design Code which gives guidance to design aspects for future developments and an extensive listing of non-designated heritage assets. All of the above being very important and good for the future development of Colne.</p> <p>Thank you, please note my support and kind regards,</p>
CNDP-REP-098	Susan Salter	<p>I am writing this email to say how shocked and saddened I am that The Rough is even being considered for development.</p> <p>I have lived in Colne, Trawden and Foulridge all my life. I am a keen walker and I've been fortunate to be able to enjoy our beautiful countryside. There are some wonderful circular walks around Colne which include The Rough, many of these I have walked, especially during lock down. The views are absolutely stunning.</p> <p>To keep chomping away at our green fields benefits no one, apart from the greedy developers:</p> <ul style="list-style-type: none"> <li>• As our green fields disappear so does the wild life. We should be preserving not destroying.</li> <li>• The sense of freedom and the enjoyment of open spaces is taken away from us and future generations forever.</li> <li>• If the housing development was to go ahead it would be an absolute monstrosity of an estate.</li> <li>• I collect my grandchildren from Park High school every week. Entering Byron Road from Venables Avenue is horrendous. These roads are already saturated with traffic. They just can't take any more cars from more housing. The area will become completely grid locked making it impossible for emergency services to negotiate.</li> <li>• Schools, nurseries and GP surgeries will not be able to accommodate the volume of people.</li> </ul>



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		<p>There are housing developments already taking place in Colne and the surrounding villages. Foulridge alone, has the new estate Buttercross Close - 20+ houses and has plans for 30 more but they are infill and not eating into green fields. Even so, as I mentioned previously, roads, schools etc will not be able to cope.</p> <p>I sincerely hope The Rough is kept free from developers and is preserved as a area of open space for wild life and future generations to enjoy.</p>
CNDP-REP-099	Susan Thorley	<p>I am writing in relation to the Colne Neighbourhood Plan Consultation.</p> <p>This has been a very large undertaking and is now a very impressive and thorough document. The efforts and diligence of those responsible is much appreciated. The policies within the plan support and meet the basic conditions.</p> <p>In particular, I would like to highlight the following:</p> <ol style="list-style-type: none"> <li>1. Economic Objectives <p>Building development sites are often a contentious issue, but CNDP6 identifies a range of suitable sites to help meet identified growth. This should allow developers the opportunity to focus on such areas, speeding up the house building process. It is also encouraging to see CNDPI which should support a wide variety of economic development.</p> </li> <li>2. Social Objectives <p>CNDP6 is again a key issue re development sites, to ensure that the very important social objective is not compromised. I am very pleased to see CNDP7 protection of open spaces in place, as it is a key issue in an urban area. This is also the case for CNDPIO, protecting sports and recreational facilities. For example, by protecting the Barrowford Road Playing Fields and ensuring the undertaking of the necessary maintenance, an exponential increase in usage has already been achieved, which is good for people's wellbeing.</p> </li> </ol> <p>In summary, an excellent final draft document both in content and presentation which I hope will get full approval very quickly.</p>
CNDP-REP-100	Theatres Trust	<p>Thank you for consulting Theatres Trust on this Neighbourhood Plan for Colne. We have interest in this document because the area includes three existing theatres - the Little Theatre, the Muni and the Pendle Hippodrome.</p> <p>Theatres Trust is the national advisory public body for theatres. We were established through the Theatres Trust Act 1976 'to promote the better protection of theatres' and provide statutory planning advice on</p>

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		<p>theatre buildings and theatre use in England through The Town and Country Planning (Development Management Procedure) (England) Order 2015</p> <p>Overall we consider this plan to meet the basic conditions. However to further enhance the plan's effectiveness and to ensure development is sustainable we recommend the following minor additions/amendments:</p> <p><b>Policy CNDP1-Colne Market Town</b></p> <p><b>A: Town Centre Redevelopment Zone</b></p> <p>We are broadly supportive of this policy and have no overall objection to the principle of residential uses within the town centre. Part f. of the policy references heritage impacts. We recommend that a further criteria should be added to this policy to consider noise impacts. Incoming residential uses can compromise the operations of existing noise-generating uses and venues, thereby undermining the success and diversity of uses within the town centre and harming the social and cultural well-being of local people. This will help ensure that development is sustainable.</p> <p><b>Policy CNDP4 - Development Affecting Non-Designated Heritage Assets</b></p> <p>The town's three theatres are identified as assets. We welcome that this policy will seek assessment of harm or loss.</p> <p><b>Policy CNDP8 - Protection and Enhancement of Community Facilities</b></p> <p>We support this policy which seeks to protect valued facilities. We recommend revision of this policy to include cultural facilities. This will bring the policy into line with the breadth of provision covered within policy 93 of the NPPF (2021) and ensure Colne's valued cultural facilities such as its theatres explicitly benefit from this protection.</p> <p>We trust these comments will prove beneficial, and we look forward to seeing this plan progress towards adoption.</p>
CNDP-REP-101	Thomas Sharples	<p>We request that the following potential Local Green Spaces are added to Colne Neighbourhood Plan for protection: P 152 - Lenches; CNDP6/ 1; CNDP6/ 5 and CNDP6/ 6.</p> <p>The Planning Department upholds this view by recommending that these sites are removed as areas for regeneration.</p> <p>We were resident of Waterside between 2008-18. My family connections in Waterside go back five generations and one family member is presently a resident.</p>

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		<p>Although the Waterside ward taken as a whole (it includes three outdoor sports provisions, two are part of schools) has a higher performance against the Fields in Trust standard and deviation from the borough wide APR by ward, against say, Horsfield ward which is deficient, the Hanley et al (2003) study still recommends a. Sha greenspace within 200m of home), local (2ha within 300m of home) and neighbourhood greenspaces (10ha within 1km of home).</p> <p>According to the Open Space Audit Report 2019, since 2008 Waterside ward has lost -7.1Sha total amount of Open Space by ward and -2 total number of open space sites by ward. Since Open Space is already declining in Waterside and the above requested sites have already been earmarked for housing, if they are not protected through the CNP then it will again result in further loss.</p> <p>This is backed by the 'Friends of the Earth 'Green Space E-Rated neighbourhoods list' where, Neighbourhoods rated as E - the most deprived - are those where, on average, there are either:</p> <ul style="list-style-type: none"> <li>• very small gardens and very small amounts of public green space/open access land; or,</li> <li>• very small gardens and small amounts of public green space/open access land more than 5 minutes' walk for 75% or more of residents.</li> </ul> <p>Waterside, Colne is graded E in this list; it is therefore in the Waterside wards interest to protect rather than to remove these Local Green Space areas from the CNP. In this light, although Priority for Increased Provision for Waterside ward as a whole is classed as LOW (due to the school sports provisions and millennium green), when categorised by individual streets, the Priority for Increased Provision of Amenity Open Space rises to MEDIUM for most of the 58 named streets/areas, including some play areas (Patten Street, Shaw Street, Hawley Street), Parks (Shaw Street) and Civic space (Market Street). Two streets - Nicholas Street and Bolton Street - are classed as HIGH Priority for Increased Provision. (See Appendix 2, Ward Profiles, Colne Open Space Audit Report, 2019)</p> <p>At the public Neighbourhood Plan meeting on 11 th October 2022, the public were told in response to the addition of the above requested Local Green Spaces into the CNP, "it is regeneration and that one person's green space is another person's eyesore."</p> <p>Not only is this an unacceptable comment from a voted member of the council, but also an insult to the intelligence of the resident Waterside population and a threat to quality of life and mental health. Where Local Green Space becomes an "eyesore" it rather increases Priority for Increased</p> <p>[Open Space] Provision to HIGH, as per the council's own Open Space Audit. To illustrate, were a so called urban "eyesore" of mixed deciduous trees nettles and brambles to be hypothetically transferred or translated to a designated nature reserve, then it becomes high priority provision for wildlife habitat and climate</p>

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		<p>reduction in terms of CO2 emissions and pollution, as per Kyoto Protocol and Paris Climate Agreement of 2015.</p> <p>If the Local Green Space value is taken out of land with one hand it will need to be paid back with the other, in the form of added cost to the NHS. Furthermore, contrary to what one member of public was said to have remarked at the meeting, public silence does not mean support for unnecessary development. Even concerned residents have difficulty monitoring the date and times of these non-advertised council meetings, let alone breaking from busy schedules and family duties to have their say against the perpetual scrapping and rewriting of these plans.</p> <p>Public Health England writes, "Evidence shows that living in a greener environment can promote and protect good health, and aid in recovery from illness and help with managing poor health. People who have greater exposure to green space have a range of more favourable physiological outcomes. Greener environments are also associated with better mental health and wellbeing outcomes including reduced levels of depression, anxiety, and fatigue, and enhanced quality of life for both children and adults. Green space can help to bind communities together, reduce loneliness, and mitigate the negative effects of air pollution, excessive noise, heat and flooding. Disadvantaged groups appear to gain a larger health benefit and have reduced socioeconomic-related inequalities in health when living in greener communities, so green space and a greener urban environment can also be used as an important tool in the drive to build a fairer society."</p> <p>These parcels of Local Green Space are therefore not packets for fiscal opportunism but rather have a unique purpose and function, as Chris Rose in her introduction to 'Psychogeography and Psychotherapy: Connecting Pathways' writes, "Identity is tied to place. The environment is not the backdrop; it is woven through our identity."</p> <p>Rose continues,</p> <p>"Who we are and where we feel at home are bound together. The word 'home' itself conjures geographical location, emotional resonances, attachments, images, memories and more. It straddles the external and internal landscape in a way that demonstrates the permeable boundary between the two. We each, according to Fitzgerald and Rose (2015), inhabit: ... not an 'objective' space, but our own cognitive map of place and space, freighted with affects and memories, with its risks and hazards, its threats and lures, its familiarities and alien places, its locales of sanctity, solidarity, support, and much more.</p> <p>We find ourselves attracted not only to particular people but to places too; like a fingerprint, we have a unique patterned response to our environment created through our experience. Certain landscapes, streets, atmospheres, colours, sights, sounds and smells resonate, and can teach us much about our own selves, if we pay attention. Spatial metaphors abound in the psychotherapeutic vernacular. A safe space, where you're at,</p>

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		<p>stuck in a corner, deep in a hole, falling through space -we so often turn to geography to find words for our experiences, so we should not be surprised that the geographical environment shapes our identity. Exploring our own relationship to place can be a rewarding pathway to personal development."</p> <p>I asked a Waterside resident what she thought about the proposed "regeneration" of our disappearing Local Green Spaces. Her reply was a quote by the Cree Indians: "When the last tree is cut down, the last fish eaten and the last stream poisoned, you will realize that you cannot eat money."</p> <p>Our own personal experience into the amenity values of P 152 - Lenches; CNDP6/ 1; CNDP6/ 5 and CNDP6/ 6 can be well documented:</p> <p><u>P152 - Land adjacent to Lenches and Knotts Lane.</u></p> <p>The P152 Lenches is within 200m from our former residence. We used the Local Green Space for its amenity value including semi-rural greenfield character; adjacent C18th grade listed housing; footpaths through bio diverse wild flora and fauna; mill ponds; panoramic views and ancient woodland. One main footpath has extant heritage cob stones used historically by mill workers travelling over tum hills from Nelson. We regularly met and spoke to other users including families, photographers, birdwatchers, fishermen, ramblers and dog walkers. As an autistic with High Functioning ASD, the area was my 'go to' for managing certain aspects of my condition, including anxiety and depression. Considering the unique amenity value, heritage and wildlife habitat this site offers i am very surprised this is not listed for protection on the CNP.</p> <p><u>CNDP6/ 1- Land adjacent Colne Lane.</u></p> <p>The Local Green Space is within 200m from our former residence. There are Victorian heritage cobbles running through emphasising local character. The path is used as local footfall between the town centre and the Admiral Lord Rodney public house. During the annual Blue's Festival it is marked as such. Sometime around 2015 the Local Green Space was enhanced by a tree planting scheme. There are former walled and spaced areas adjacent to the road with overhanging brambles. It was a short walk from our house to pick blackberries in the autumn. One particular occasion there was a passing cat which out of curiosity stopped to sit peacefully while watching me pick the blackberries; we were together in that space for a time of mutual bond. Although seemingly trivial to some, when added together these kinds of experiences contribute to what Rose (2015) articulates, "Exploring our own relationship to place can be a rewarding pathway to personal development."</p> <p><u>CNDP6/ 5 and CNDP6/ 6</u></p> <p>CNDP6/ 5 is within 200m of out former residence. It provided an unofficial thoroughfare between my house and a family member's house at Burran's Meadow. Having an interest in herbal remedies i was not a little taken aback to find the herb Great Mullein (<i>Verbascum densiflorum</i>). I haven't found it growing anywhere</p>

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		<p>else in Colne. I used the leaves for a bronchial cough remedy. Part of the path is walled and has a quirky feature embedded into it of a painted figurine of a gnome. This was the photographic feature of a quiz in the local 'Colne Times' where you had to guess where it was. Of course, i could identify it from my experience of passing through the place. This highlight's Rose (2015) where, "Spatial metaphors abound in the psychotherapeutic vernacular. A safe space, where you're at, stuck in a corner, deep in a hole, falling through space - we so often turn to geography to find words for our experiences, so we should not be surprised that the geographical environment shapes our identity."</p> <p>CNDP6/ 6 has climatic and aesthetic value acting as part of a continuous "green lung." This climate friendly "green lung" stretches the length of Shaw Street connecting Broken Banks and Curzon Street, with Millennium Green and Primet Bridge. Parts of this "green lung" have thoroughfares which also have the psychological amenity as a buffer to effectually break up the monotony of surrounding urbanisation.</p> <p>The CNDP6/ 6 Local Green Space has local character and heritage value with its thoroughfare of late Victorian cobbles. We used this thoroughfare and also the stepped pathway some 120m further down Shaw Street regularly as a route between our house at the eastern end of Shaw Street and the town centre. The latter area has in the past been used for community arts projects: The ground mosaics were still extant adjacent to the steps when we last used the route.</p> <p>In summary, i consider that i have adequately highlighted that the requested Local Green Spaces conform to the requirements of the Colne Local Green Spaces Report, March 2022, particularly where it quotes NPPF, Par. 102.,</p> <p><i>"102. The Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land."</i></p> <p><b>References:</b></p> <p>Colne Local Green Spaces Report, 2022:  <a href="https://colnetowncouncil.org.uk/ctc/wp-content/uploads/2022/04/Colne-Local-Green-Spaces-Report.pdf">https://colnetowncouncil.org.uk/ctc/wp-content/uploads/2022/04/Colne-Local-Green-Spaces-Report.pdf</a></p> <p>Pendle Borough Council: Open Space Audit 2019:  <a href="https://www.pendle.gov.uk/download/downloads/id/2954/pendle_open_space_audit_report_2019.pdf">https://www.pendle.gov.uk/download/downloads/id/2954/pendle_open_space_audit_report_2019.pdf</a></p> <p>Public Health England: Improving access to greenspace: A new review for 2020, Public Health England (2020):</p>

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		<p><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904439/Improving_access_to_greenpace_2020_review.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904439/Improving_access_to_greenpace_2020_review.pdf</a></p> <p>Friends of the Earth: Green Spaces E Rated Neighbourhoods:  <a href="https://policy.friendsoftheearth.uk/sites/default/files/documents/2020-09/Green_Space_E-Rated_neighbourhoods_list.pdf">https://policy.friendsoftheearth.uk/sites/default/files/documents/2020-09/Green_Space_E-Rated_neighbourhoods_list.pdf</a></p> <p>Rose, Chris, Psychogeography and Psychotherapy: connecting pathways, PCCS Books (4 July 2019)</p>
CNDP-REP-102	Tom and Alison Cowpe	We support in full the Caine neighbourhood plan and that it has, in our view, been fully consulted on and meets all the basic conditions.
CNDP-REP-103	Trevor and Susan Boardwell	We wish to show our support for progressing the Colne Neighbourhood plan through regulation 16
CNDP-REP-104	United Utilities (1)	<p>Thank you for your consultation seeking the views of United Utilities as part of the Neighbourhood Plan process. It is important that United Utilities continues to be consulted and kept aware of any changes should you look to change any policy or potential allocations in the future. United Utilities wishes to build a strong partnership with neighbourhood groups to aid sustainable development and growth.</p> <p>Notwithstanding the nature of this consultation, which limits comments to the Basic Conditions test required by Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (as inserted by the Localism Act 2011), we feel that changes to the Neighbourhood Plan are required to reflect key matters relating to the delivery of sustainable development especially in terms of drainage, water management and flood risk.</p> <p><b>Allocations for New Development</b></p> <p>Following our review of the Neighbourhood Development Plan (NDP), we note that there are a number of new allocations for future development. The position of United Utilities is that we recommend that the allocation of new sites is guided by associated site-specific policies which take account of any known site constraints and expectations to guide how development should be brought forward. We therefore encourage the NDP to prepare site-specific policy which identifies known key development considerations for the allocations. We request that these key development considerations address matters that include the approach to drainage, flood risk and the existence of utility assets.</p> <p><b>Our Assets</b></p> <p>It is important to outline the need for our assets to be fully considered in development proposals. A number of the proposed allocations include our assets. We will not normally permit development over or in close</p>

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		<p>proximity to our assets. All our assets will need to be afforded due regard in the masterplanning process for sites and when bringing forward any transport or public realm improvements.</p> <p>This should include careful consideration of landscaping proposals in the vicinity of our assets and any changes in levels of land over our assets.</p> <p>We strongly recommend that the NDP advises landowners / future applicants of the importance of fully understanding site constraints as soon as possible, ideally before any land transaction is negotiated, so that the implications of our assets on development can be fully understood. Where our assets exist on a site, we ask site promoters to contact United Utilities to understand any implications. We request that contact is made with United Utilities to discuss the detail of the proposals at an early stage so that any potential issues can be explored and fully understood. We encourage you to direct future developers to our <b>free pre-application service</b> to discuss their schemes and highlight any potential issues by contacting:</p> <p>Developer Services – Wastewater            Tel: 03456 723 723            Email: <a href="mailto:WastewaterDeveloperServices@uuplc.co.uk">WastewaterDeveloperServices@uuplc.co.uk</a></p> <p>Developer Services – Water            Tel: 0345 072 6067            Email: <a href="mailto:DeveloperServicesWater@uuplc.co.uk">DeveloperServicesWater@uuplc.co.uk</a></p> <p><b>Design Code</b></p> <p>Subsequent to the earlier version of the NDP we note that this document is supplemented by a design code. The use of the design code for decision making is set out in Policy CNDP3 – Design in Colne and the Colne Design Code. Having reviewed this policy, we are not clear what status the design code has in the decision making process for applications for new development. The use of the design code in policy appears to be linked to the matrix for each settlement focus area.</p> <p>Our observation would be that there are matters addressed in the design code which are not specific to any locale (i.e. settlement focus area) but rather matters of national policy and key principles of sustainable development, such as those relating to flood risk; the application of the hierarchy for the management of surface water; and the inclusion of sustainable drainage systems. As such, we would question whether such matters are more appropriately addressed as policy within the NDP and whether such policies should be reworded to ensure that the requirements are not ambiguous</p>



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		<p>An example of where we feel that the design code would be more appropriately addressed as policy is Section 5.6. The second paragraph of this section states:</p> <p><i>‘Due to the settlement areas’ susceptibility to flooding, it would be preferable for Developments to limit surface water discharge rates below the Greenfield run-off rates. This may not be practical in all situations, and the Greenfield rate should be considered a maximum.’</i></p> <p>Whilst we are wholly supportive of this principle, it is our view that this feels like a requirement that would be more appropriately addressed as policy in the NDP rather than within the design code. Indeed, within the design code, it is simply included as text within a wider paragraph rather than being clearly identified as a specific requirement of new development on greenfield sites. It is for this reason that we wish to question whether such matters are more appropriately addressed as policy within the Neighbourhood Plan.</p> <p><b>Flood Risk, Surface Water Management and Sustainable Drainage (Foul Water and Surface Water)</b></p> <p>We are supportive of sustainable surface water management and the efficient use of water. These should be critical elements of the design and development process, the delivery of sustainable development and the response to climate change. Green infrastructure can help to mitigate the impacts of high temperatures, combat emissions, maintain or enhance biodiversity and reduce flood risk. Green / blue infrastructure and landscape provision play an important role in managing water close to its source. If the necessary link between green/blue infrastructure, surface water management, landscape design and biodiversity is outlined as part of the NDP, it will help ensure that sustainable surface water management is at the forefront of the design process.</p> <p>Surface water should be managed as close to its source as possible. There are opportunities such as rainwater recycling, green roofs and water butts and we would encourage the NDP to embrace all water efficiency measures. Modern design techniques can promote measures for water recycling to reduce the impact on infrastructure requirements.</p> <p>Whilst we are supportive of the guidance provided in the Colne Design Code regarding Flood Resilience, Water and Drainage; we are concerned that such matters also need to be addressed within the neighbourhood plan so that policy requirements are clear, unambiguous and consistent with national policy. This is consistent with our above comments relating to the design code.</p> <p>Areas where we feel there should be specific policy, include:</p> <ul style="list-style-type: none"> <li>• flood risk;</li> <li>• the application of the hierarchy for the management of surface water;</li> </ul>

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		<ul style="list-style-type: none"> <li>• the incorporation of sustainable drainage;</li> <li>• water efficiency; and</li> <li>• landscaping and public realm improvements.</li> </ul> <p><i>Flood risk:</i> With regards to flood risk, we wish to note that whilst there is clear reference in the design code to fluvial flood risk, the NDP should clearly identify the need to take account of flood risk from all sources including flood risk from overwhelmed public sewers and reservoirs. We have considered this further below.</p> <p><i>Hierarchy for surface water management:</i> the requirement to implement the hierarchy for the management of surface water should be clearly identified as policy. This should include clear requirements on the rates of discharge that would be expected on greenfield and brownfield sites;</p> <p><i>Sustainable drainage:</i> policy should clearly identify the expectation for the implementation of multi-functional sustainable drainage systems in preference to conventional piped and tanked storage systems;</p> <p><i>Water efficiency:</i> there should be clear policy on water efficiency requirements in the delivery of new development via the inclusion of the optional standard in building regulations for water efficiency. Building Regulations Part G includes an optional standard for water efficiency of 110 litres per person per day (l/p/day) for new residential development which can be implemented through local planning policy where there is a clear need based on evidence. In this regard, we have enclosed evidence prepared by Water Resources West to support the adoption of the Building Regulations optional requirement for local authorities in North West England and the Midlands. We wish to highlight that improving water efficiency makes a valuable contribution to water reduction as well as carbon reductions noting that water and energy efficiency are linked. We also wish to note the associated societal benefits by helping to reduce customer bills; and</p> <p><i>Landscaping and public realm improvements:</i> there should be clear policy on the approach to any landscaping and public realm improvements, such as in the Town Centre Redevelopment Zone, which ensures that the design of landscaping and public realm evaluates and incorporates opportunities for surface management. For example, permeable surfacing, retrofitted swales and the planting of street trees linked to the management of surface water in the form of and bio-retention tree pits / landscaping. In order to assist the consideration of the above options, we have enclosed some case studies taken from the <a href="#">Susdrain website</a> which provide imagery of example SuDS components. We believe the examples we have included would have the benefit of reducing surface water discharge whilst also contributing to an enhancement of the living environment and public realm.</p> <p>Whilst there are helping references to some of the above matters in the associated design code, we feel that such matters are more appropriately addressed in policy with supplementary supporting detail in the design code.</p>

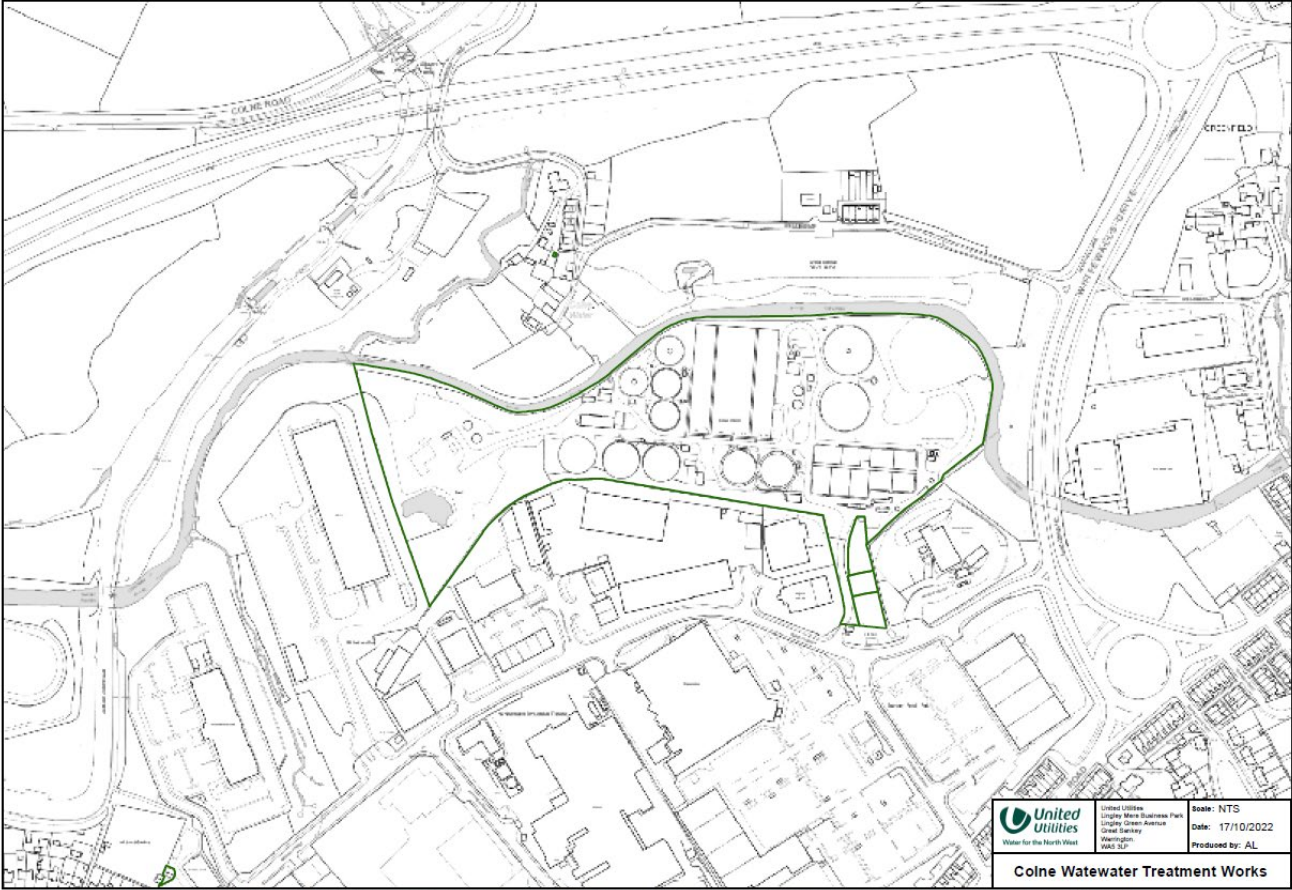
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		<p><b><i>Site-Specific Flood Risk and Flood Risk from All Sources</i></b></p> <p>With respect to flood risk from all sources, we wish to note that the strategic flood risk assessment appears to have been prepared with a focus on fluvial flood risk only. We wish to note that where existing public sewers pass through or near to a site which modelling data identifies as being at risk of sewer flooding, the risk will need to be carefully considered in the design and masterplanning process for any development at this site. This should include engagement with United Utilities to ensure development is not located in an area at risk of flooding. Applicants will be expected to consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances to ensure the most flood resilient solution is achieved. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk elsewhere. Applicants should not assume that changes in levels or changes to the public sewer system, including diversion of, or changes to, the public sewerage system, will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach subject to the detail of the development proposal that is brought forward.</p> <p>Having reviewed the draft housing allocations for potential modelled sewer flood risk, our initial assessment suggests the following points for additional consideration.</p> <ul style="list-style-type: none"> <li>• CNDP6/1 – Sewer modelling data indicates a modelled flood risk from a watercourse in the site boundary.</li> <li>• CNDP6/5 – We note some modelled sewer flood risk near to the site that might affect the developable area and the detailed design of the site.</li> <li>• CNDP6/7 - We note some modelled sewer flood risk near to the site that might affect the developable area and the detailed design of the site.</li> <li>• CNDP6/12 - We note some modelled sewer flood risk near to the site that might affect the developable area and the detailed design of the site.</li> </ul> <p>We also wish to note that reservoir flood risk affects a number of the proposed site allocations and has not been considered in the strategic flood risk assessment.</p> <p><b>Development next to Wastewater Treatment Works and Pumping Stations</b></p> <p>Within the NDP area, we wish to note that we have a wastewater treatment works referred to as Colne Wastewater Treatment Works (site plan enclosed) as well as other wastewater infrastructure. We</p>

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		<p>recommend that the location of this key infrastructure, and any other wastewater treatment works / wastewater pumping stations, are carefully considered in the neighbourhood development plan. It is important to explain that:</p> <ol style="list-style-type: none"> <li>1. Wastewater treatment works are key infrastructure for the borough which may need to expand in the future to meet growth needs or respond to new environmental drivers. Maintaining a space around a treatment works is therefore desirable to respond to any future investment requirements.</li> <li>2. As a waste management facility, a wastewater treatment works is an industrial operation which can result in emissions. These emissions include odour and noise. A wastewater treatment works can also attract flies. A wastewater treatment works is also subject to vehicle movements from large tankers which need to access the site.</li> </ol> <p>The position of UU is that when considering a range of sites to meet development needs, it would be more appropriate to identify new development sites, especially sensitive uses, such as housing, which are not close to a wastewater treatment works. This position is in line with the <i>'agent of change'</i> principle set out at paragraph 187 of the NPPF as well as practice guidance in Paragraph: 009 Reference ID: 30-009-20190722 and Paragraph: 005 Reference ID: 34-005-20140306 of the National Planning Practice Guidance.</p> <p><b>Illustrative Masterplans</b></p> <p>We note the associated illustrative masterplans that have been prepared for two sites as part of the Neighbourhood Plan. We wish to highlight that there are assets of United Utilities which pass through these sites which would need to be considered. At the current time, the illustrative masterplans propose built development on top of our assets which is not acceptable. As such it would be necessary to divert these assets. Any agreement to divert our underground assets will be subject to a diversion application, made directly to United Utilities. This is a separate matter to the determination of a planning application. We will not guarantee, or infer acceptance of a proposed diversion through the planning process (where diversion is indicated on submitted plans). In the event that a diversion application is submitted to United Utilities and subsequently rejected (either before or after the determination of a planning application), applicants should be aware that they may need to amend their proposed layout to accommodate our assets.</p> <p><b>Summary</b></p> <p>If you have any queries or would like to discuss this representation, please do not hesitate to contact me</p> <p><b>ATTACHMENT</b></p>

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CNDP-REP-105	Victoria Hollingsworth	<p>I am emailing in relation to the Caine Neighbourhood Plan Consultation</p> <p>This has been a huge undertaking and is credit to the people who have invested their time and effort into this.</p> <p>In particular- the economic objectives, CNP has highlighted and identified suitable areas to dev on to help meet building requirement needs.</p> <ul style="list-style-type: none"> <li>– the social objectives - focusing on protecting social spaces in urban areas including recreational and sports area</li> </ul>

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		In conclusion, it is a very comprehensive document that I hope gets full approval
CNDP-REP-106	William Titley	<p>I write this email in support of The Colne Neighbourhood Plan through Regulation 16. The Colne Plan upholds everything about sustainable development of our wonderful town and surrounding landscapes.</p> <p>I set out below the main benefits of such a plan.</p> <ul style="list-style-type: none"> <li>• Designate housing sites on almost entirely brownfield sites within the settlement boundary and regenerate areas that require investment</li> <li>• Implement a Colne Design Code to ensure a sense of place is maintained</li> <li>• Designate Local Green Spaces</li> <li>• Protect the Countryside</li> <li>• Protect long-range views to and from key landmarks</li> <li>• Protect non-designated heritage assets (i.e. not listed)</li> <li>• Protect Community Assets</li> </ul> <p>The plan will give control of any future developments to the people who genuinely care about the ecological and environmental impact on the life of the communities and wildlife that dwell there.</p> <p>The Colne Plan meets the following conditions and will protect and care for this historic market town and its diverse communities, wildlife and extensive views across the landscape.</p> <p>he plan has regard to national policies and advice contained in guidance issued by the Secretary of State,</p> <ul style="list-style-type: none"> <li>• the making of the plan contributes to the achievement of sustainable development,</li> <li>• the making of the plan is in general conformity with the strategic policies contained in the development plan for the area of the authority,</li> <li>• the making of the plan does not breach, and is otherwise compatible with, EU obligations.</li> </ul>
CNDP-REP-107	David and Yvonne Carroll	Having viewed the draft plan, we would like to offer our support and agree that it will meet the future needs and development of our Borough.