

Appendix 5

Schedule of Representations

(Plan/Document Order)

Proposed change to the Local Plan or supporting documents

Response ID	Name / Organisation	Legally Complaint	Sound	Response (Summarised)	Changes Sought	Council Response
Legal / Procedural Comments						
02131	Sevo Planning for Little Cloud	No	No	Regulation 22 Statement must form part of the submission to be legally compliant. Final reports for Housing Needs Review and Local Plan Viability not made available as part of the Reg 19 consultation and not endorsed by the Council. It is therefore unclear whether the Council are relying on the documents to inform its Local Plan.	The plan is not legally complaint and cannot proceed.	Disagree: Recommend no change This appendix forms part of the Regulation 22 (i) (c) (v) Consultation Statement which responds to Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 22. The document will form part of the submission of the Local Plan. The Reg 18 Consultation Statement (already published) fulfils i-iv of Regulation 22. It is clear that the Council are reliant on the Housing Needs Review and Local Plan Viability Assessment in their published form and these formed part of the library of documents consulted upon at Regulation 19 stage. This is demonstrated by screenshots the website included in Appendix 2 to the Regulation 22 (i) (c) (v) Consultation Statement. The Local Plan has been prepared in full compliance with legal requirements.
02143	Pegasus Group for MCI Developments	Not specified	No	Decision made to progress to consultation despite viability assessment and Level 2 SFRA not being finalised. This is contrary to the Local Plans procedure guide which sets out that LPAs should only submit a plan if they consider it to be sound and there will not be delays of over 6 months during the examination because of significant changes or further evidence. It further states that there is no provision in the legislation which allows the LPA to replace all or part of a submitted local plan with a revised plan during an examination. If the LPA wish to make changes, then an addendum report should be prepared, together with Sustainability Appraisal and Habitats Regulations Assessment of the proposed changes if they are significant, should be published for consultation on the same basis as the Regulation 19 consultation, before the plan is submitted for examination.	The Council should prepare an addendum to the Local Plan and undertake a further consultation in accordance with the Procedural Guide.	Comments noted: Recommend no change The Level 2 SFRA and Local Plan Viability Assessment were received in draft form prior to the Local Plan being considered by Council for publication and submission. The Council is satisfied that the Local Plan as drafted is consistent with the findings of these documents and no changes are required. The documents were made available as part of the consultation on the publication version of the Local Plan. No further consultation is required.
01792	North Yorkshire Council	Not specified	Not specified	Duty to Cooperate: Prior to the creation of North Yorkshire Council in April 2023, engagement has been ongoing between the former Craven District Council and Pendle Borough Council throughout the preparation of the draft Local Plan. North Yorkshire Council is keen to continue this close working relationship for both the Pendle Local Plan and North Yorkshire Local Plan. In August 2023, North Yorkshire Council provided a response to the Local Plan (4th Edition) Preferred Options Report and on the 8 October 2024 officers of the Council's Planning Policy & Place Team attended a Duty to Cooperate meeting with Pendle Borough Council Planning Policy Officers to discuss the Pendle Local Plan Fourth Edition (Regulation 19 Draft). During this engagement, a	None specified.	Support Welcomed Details of the engagement conducted with North Yorkshire Council, and its predecessor Craven District Council, is set out in the Duty to Cooperate Statement of Compliance. The Statement of Common Ground with North Yorkshire Council addressing strategic cross boundary issues forms part of Local Plan submission.

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				number of strategic cross boundary issues have been identified. North Yorkshire Council are willing to work with Pendle Borough Council on the preparation of a Statement of Common Ground/Memorandum of Understanding relating to the Duty to Cooperate.		
01817	Hyndburn Borough Council	Not specified	Not specified	Duty to Cooperate: We have reviewed the document and would like to confirm that Hyndburn see no cross-boundary issues which we need to comment on.	None specified.	Comments noted: Recommend no change
Local Plan: General Comments						
00265	Lead Local Flood Risk Authority	Not specified	Not specified	Local Plan General Comments: No further comments to make from our previous response dated 15 th August 2023	See Consultation Statement for details	Comments noted: Recommend no change See Regulation 18 Consultation Statement for detailed Council response to representations from the LLFA.
00594	A Ashworth	Yes	Yes	Local Plan General Comments: Generally support the plan and thank officers for their hard work in getting it to this stage. It would have been nice to address the gap in the Green Belt between Colne and Nelson and this is a missed opportunity. The proposed housing requirement are about right, more than sufficient to tackle the large numbers of vacant sites within the settlement boundary. The plan addresses the climate emergency in several policies and whilst it is always possible to do more, I welcome the emphasis on Green Open Space and protected sites. It is important that local ecological network is created and enhanced and considered in the determination of planning applications given their role for community health and wellbeing, and recreation. I would be happy for this Local Plan to be adopted by Pendle.	None specified.	Support welcomed Understand from previous correspondence that the respondent is referencing the fact that land between Knotts Lane (Colne) and Walton Lane (Nelson) does not benefit from Green Belt status. The land in question has previously been assessed and is not considered to meet the guidelines for designation as Green Belt. The land in question does includes Castercliffe Fort, a site of archaeological interest, Gib Hill Fields which are a Biological Heritage Site (BHS) and Gib Hill, which has recently been designated as a Local Nature Reserve (LNR). In combination these offer the land in question significant protection from future development.
00637	J Birchenough	Yes	Yes	Keenly support the Local Plan and absence of wholly greenfield sites in Colne. Expressly support Policy SP01 and SP03 and support given for urban redevelopment. Policy SP05 and the protection of Green Belt around Colne. The landscape protection afforded by Policy DM10. The proposed designation of the Upper Rough and Lenches as Local Green Space through Policy DM12. The examiner of the Colne Neighbourhood Development Plan considered that the Upper Rough met the criteria for Local Green Space but could not designate it at the time due to uncertainty about housing need to be defined through the Local Plan. It is a nesting ground and habitat for the red listed curlew, adjacent to the Lidgett and Bents Conservation Area, affords open views, provides valuable open space close to the community served and must be protected. I am satisfied that Pendle Council has fully engaged with the community during the preparation of this plan and thank them for the opportunities to engage.	None specified.	Support welcomed

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00729	Cllr S Cockburn-Price	Not specified	Not specified	As chair of the Climate Change Working Group at Pendle Council I would like to support the numerous green measures in the Local Plan. Our group gave a detailed response to the preferred options draft report. We are grateful to see that many of our points are reflected in this plan.	None specified.	Support welcomed
01565	J Munnery for Foster Road Landowners	Yes	No	<p>The Local Plan is inconsistent with the policies of the new Government, in particular;</p> <ul style="list-style-type: none"> - The achievement of sustained economic growth. - The delivery of 1.5 million new homes - The introduction of a new standard method. <p>The Council is trying to avoid or at least delay having to meet the new housing requirement. This approach is flawed given the inconsistency of the Local Plan with government policy, the fact the plan will be out-of-date on adoption and the fact the Council will be obliged to prepare a new Local Plan under the terms of new national planning policy in any event.</p>	None specified.	<p>Comments noted: Recommend no change</p> <p>At the time of the Regulation 19 public consultation the proposed revisions to the NPPF remained in draft form and its policies are not yet engaged for the purpose of plan making.</p> <p>The Pendle Local Plan will proceed under the transitional arrangements set out in NPPF (2024) Annex 1. These recognise the advanced stage that has been reached in the preparation of the Local Plan, and the amount of time and resources which have been spent on its preparation, and the pressing need to review and update the policies in the statutory development plan for Pendle, where the strategic policies are now nine-years old and several development management policies are in excess of 18-years old.</p> <p>As the Local Plan will be examined against the policies of the NPPF (2023) it is for the next Local Plan to respond to the policies in any new version(s) of the NPPF.</p> <p>In accordance with Written Ministerial Statement ‘Building the Homes we Need’ publication 12 December 2024 (HCWS308), a Local Development Scheme is to be published advising of the timescales of preparation of a new Local Plan which will commence on the enactment of the Levelling Up and Regeneration Act 2023.</p>
01792	North Yorkshire Council	Not specified	Not specified.	<p>North Yorkshire Council has reviewed the Pendle Local Plan Fourth Edition (Regulation 19 Draft) and is generally supportive of the approach taken in the draft Local Plan. In terms of the strategic cross boundary issues identified, North Yorkshire Council supports the draft Pendle Local Plan approach:</p> <ul style="list-style-type: none"> · To meeting its housing needs, which will be met within Pendle Borough. · To meeting its employment needs, which will be met within Pendle Borough. · To protecting the Skipton to Colne railway line and supporting improved road links towards Yorkshire which is consistent with the adopted Craven District Local Plan (Policy SP2). · To flood risk in new developments and is satisfied with the conclusion made in the SFRA that the level of 	None specified.	<p>Support welcomed</p> <p>The strategic cross boundary issues and their outcomes, as listed within North Yorkshire Council’s representation on the Regulation 19 version of the Local Plan, forms the basis of the Statement of Common Ground with North Yorkshire Council, which forms part of Local Plan submission.</p>

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				<p>development is expected to have little or no impact on flood risk in North Yorkshire.</p> <ul style="list-style-type: none"> · In terms of the HRA conclusion that proposals will have no significant adverse impact on the South Pennine Moors. · In acknowledging that there are no strategic cross boundary issues relating to retail. <p>North Yorkshire Council are satisfied that the Pendle Local Plan Fourth Edition (Regulation 19 Draft) is justified and supported by relevant evidence.</p>		
01796	Historic England	Not specified	Yes	We are pleased to see that many of our comments suggested at Regulation 18 consultation stage in 2023 have been actioned. This leaves us with very few comments at Regulation 19 stage. We strongly support the content of the Local Plan and believe it provides a sound basis in terms of our area of interest for conserving and enhancing the historic environment of Pendle.	None specified.	Support welcomed
01864	PWA Planning for Castle Green Homes	Not specified	Not specified	Notes the implications of the emerging NPPF for the housing needs of Pendle. The transitional arrangements outlined in Annex 1 of the consultation draft outline the application of its policies to emerging Local Plans. The proposed housing requirement is in excess of 200 dwellings below the proposed figure for Pendle. As a result the plan does not meet the requirements to proceed to be examined in accordance with the policies of the existing version of the NPPF.	The Local Plan must be reviewed and revised.	<p>The Local Plan has been submitted in accordance with the transitional arrangements set out in Annex 1 of the 2024 NPPF. Under these arrangements the Local Plan is examined against the policies of the December 2023 version of the NPPF however given that the proposed housing requirement is less than 80% the requirements for Pendle identified through the revised standard method the Council would be obliged to commence an immediate review of the Local Plan upon its adoption. It would therefore be for the next Local Plan to respond to the policies of any revised version of the NPPF.</p> <p>In accordance with the Written Ministerial Statement ‘Building the Homes we Need’ published on 12 December 2024 (HCWS308), a Local Development Scheme (LDS) is to be Published. This will set out the projected timescales for the preparation of a new Local Plan, which will commence on the enactment of the Levelling Up and Regeneration Act 2023.</p>
01870	S Birchenough	Yes	Yes	I feel the Plan represents and reflects the area and that the Council have fully engaged the local communities in its formulation. Aligns with the Colne Neighbourhood Development Plan. Support the designation of the Upper Rough as Local Green Space. Pleased to note the adoption of revised housing numbers.		Support welcomed
01872	Lancashire County Council (Highways)	Not specified	Not specified	No additional advice to previous comments (at Reg 18).	None specified.	Comments noted: Recommend no change See the Regulation 18 Consultation Statement to see the response of Pendle Council to earlier comments from the Local Highway Authority (LCC).

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01887	E Lane	Not specified	Not specified	I fully support our local plan. We have sufficient family size houses. This plan looks to support housing built in the correct areas without encroaching on our green spaces. This green space is essential for our mental health, physical fitness, all within easy access for every inhabitant of Colne.	None specified.	Support welcomed
01945	E Crickmore	Not specified	Not specified	Support aspects of the Local Plan which prioritise development on brownfield and urban sites. These sites are most likely to provide affordable housing and also remain environmentally sustainable, allowing people to access public transport. I support aspects of the plan which retain green belt protections. I would like to see a levy on greenfield development applied. Pendle must robustly protect its priority habitats and species. It is impact that green gaps between settlements are maintained to prevent urban sprawl. New builds should have stipulations on fence gaps, wildlife highways and swallow bricks. BNG should not be a tick box exercises but allow for meaningful measures responding to local habitats. Support Upper Rough as a Local Green Space as it meets the tests outlined in the NPPF. There is no need to add to the tests established through the NPPF for the designation of land as Local Green Space.	Levy greenfield development. Stipulated requirements for fence gaps, wildlife highways and swallow bricks. Amend LGS assessment to reflect the tests of the NPPF only.	Disagree: Recommend no change The Local Plan Viability Assessment (Aspinall Verdi, 2024) shows that the adoption of CIL is not viable in Pendle at this time. The protection and enhancement of the natural environment, green infrastructure and wildlife are set out in Policies SP08, DM04, DM05 and DM06 of the Local Plan. In combination they offer a proportionate and flexible approach to addressing the natural environment in accordance with their designation and to ensure that biodiversity enhancements secured through new development represents the needs and characteristics of those habitats, and the wildlife using them, found in Pendle. The Council do not agree that there is a need to revise the criteria used to assess Local Green Space sites. The approach applied is consistent with PPG.
01977	M Widdowson	Yes	Yes	We need more protection of our green spaces so the plan strikes a good balance between protection and needed development.	None specified.	Comments noted: Recommend no change
02090	P Driver	Yes	Yes	The plan will give us stability till 2040.	None specified	Support welcomed
02104	Environment Agency	Not specified	Not specified	We are satisfied that in so far as it relates to our remit, the issues, and concerns of relevance to our remit have been included in the plan and addressed through suitably worded policies.	None specified.	Support welcomed
02116	M Thomas	Yes	Yes	Rigorously interrogated to make sure the evidence was correct and defensible and checked for accuracy by experienced planning officers. I believe that the housing target is correct and appropriate for the population both now and in the future and the land which we want development on. Our green fields mostly need protection. Our need is for social and low cost small housing developments.	None specified.	Support welcomed
02119	U Webster	Yes	Yes	I believe that this plan is in the best interests of local residents and their future wellbeing.	None specified.	Support welcomed
02123	C Ruane	Yes	Yes	This is our best chance of controlling where new houses are built and protecting the valuable countryside in our area.	None specified.	Support welcomed
02131	Sevo Planning for Little Cloud	No	No	It is clear that the Local Plan has been rushed to submission to avoid requirements of the new NPPF so	None specified.	Disagree: Recommend no change

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				that transitional arrangements could be applied. Only cursory reference is made to revising the plan to be consistent with the draft proposals of the NPPF and no consideration is given to responding to proposals relating to a housing requirement 200dpa lower than the proposed housing requirement for Pendle using the refreshed standard method. The LDS with revised timescales was presented not seeking its agreement but rather matter of fact.		<p>Work on the preparation of the Pendle Local Plan Fourth Edition commenced in 2022. The timetable in the Local Development Scheme (LDS) has been updated since this time but has consistently shown that the target submission date was 2024.</p> <p>This recently slipped into early 2025, due principally to an additional public consultation event conducted in November 2023 seeking comments on the Local Green Space Methodology and the assessment of candidate sites. This public consultation was conducted at the request of the Council's elected members given the contentious nature of the proposals at certain locations and the high level of interest from local residents.</p> <p>The Local Plan was to be considered by elected members at the Executive and Council meetings in September 2024, regardless of the proposals set out in the consultation draft NPPF.</p> <p>The committee report deals with the consultation draft NPPF only insofar as it affects the submission of the Regulation 19 draft Local Plan. At the time the committee report was written and considered by Council the proposed changes to the NPPF were in draft form.</p> <p>The committee report drew the Council's attention to the fact that further revisions to the Local Plan could not be achieved within the timescales outlined in Appendix 1 of the consultation draft NPPF. The proposals did not yet form government policy and the final outcome could not be known. It also recognised that there would be major differences between the evidence base used to support the Local Plan and that used to define local housing need through the revised NPPF.</p> <p>The Council is justified the approach it has taken and notes that provisions regarding both the transitional period and local housing need for Pendle – as set out in the version of the NPPF published in December 2024 – have both materially changed when compared to the proposals in the consultation draft NPPF.</p> <p>The updated LDS accompanying the Local Plan documents and committee report ensures that the Local Plan is supported by an up-to-date LDS, in accordance with regulations.</p>
02136	D Smith	Yes	Yes	Will live in a conurbation of inter-connecting towns with high population density with very serious issues of climate change, collapsing wildlife and all nature in general. It is essential that new house building is reduced to the bare minimum.	None specified.	Comments noted: Recommend no change

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02143	Pegasus Group for MCI Developments	Not specified	No	The Local Plan has been published with full awareness of proposed changes to the NPPF and knowledge that the Local Plan does not reflect this policy.	None specified.	<p>Comments noted: Recommend no change</p> <p>The Council resolved to prepare a new single Local Plan in December 2021.</p> <p>A Local Development Scheme (LDS) was prepared setting out the timescales for its preparation. Although updated, up to submission this timetable remains largely unchanged.</p> <p>The Pendle Local Plan will proceed under the transitional arrangements set out in NPPF (2024) Annex 1. These recognise the advanced stage that has been reached in the preparation of the Local Plan, and the amount of time and resources which have been spent on its preparation, and the pressing need to review and update the policies in the statutory development plan for Pendle, where the strategic policies are now nine-years old and several development management policies are in excess of 18-years old.</p> <p>As the Local Plan will be examined against the policies of the NPPF (2023) it is for the next Local Plan to respond to the policies in any new version(s) of the NPPF. As such the allocation of Site P327 for housing is not necessary at this time.</p>
Plan Review						
01510	Lane Town Planning for McDermott Homes	Yes	No	<p>Policy requirement to review the Local Plan should be inserted into the plan. It is often the case that timetables for local plan reviews slip or are significantly delayed. A policy commitment would avoid this. The supporting text should reference Paragraph 33 of the NPPF which sets out where Local Plans should be reviewed earlier. The supporting text should also set out the need to prepare a new Local Development Scheme which details the programme for preparing a new Local Plan.</p> <p>The monitoring framework within Appendix 10 should be expanded to relate to performance against requirements of the new NPPF as well as those in the Local Plan, including the identifications of actions necessary where targets are not achieved.</p>	<p>Proposed Policy 1 text:</p> <p>‘The Council commits to a review of this Local Plan, to commence immediately upon its adoption. The Local Plan Review (or new Local Plan, as appropriate) will be submitted for independent examination within 24 months of commencing the review, and it will be adopted within 36 months of commencement.</p> <p>Unit the time that a new plan is adopted, the Council acknowledges this Local Plan does not provide the levels of development in Pendle now expected by Government, as expressed in the National Planning Policy Framework, and accompanying standard method for calculating housing need.</p> <p>Pendle Council will therefore welcome and consider favourably proposals for sustainable development which come forward to provide homes in addition to those identified in this plan. Those application will be determined in accordance with the Presumption in Favour of Sustainable Development’</p>	<p>Agree (in part): Recommend change to Appendix 10</p> <p>The ‘Proposed Policy 1’ is unnecessary given that the Local Plan will be submitted under the transitional arrangements set out in Appendix 1 of the 2024 NPPF. A such the Local Plan will be examined against the policies of the 2023 NPPF.</p> <p>The transitional arrangements set clear expectations for local authorities advancing a Local Plan with a housing requirement which meet less than 80% of the defined mandatory housing target.</p> <p>In accordance with the Written Ministerial Statement ‘Building the Homes we Need’ published on 12 December 2024 (HCWS308), a Local Development Scheme (LDS) is to be published. This will set out the projected timescales for the preparation of a new Local Plan, which will commence on the enactment of the Levelling Up and Regeneration Act 2023.</p> <p>The Council acknowledges that whilst the Local Plan is to be examined under the policies of the 2023 NPPF it will be implemented under the latest version of the NPPF, currently the one published on 12 December 2024.</p> <p>The Council will review the 2024 NPPF and consider what changes, if any, are necessary to Appendix 10.</p>

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Plan Period						
01535	Home Builders Federation	Yes	No	Plan period. The plan period should be extended to ensure it covers a period of at least 15-years post adoption. The HBF considers that it is unlikely that the Local Plan will be adopted in 2025.	Amend the plan period to 2021 – 2041.	Disagree: Recommend no change The most recently adopted Local Development Scheme (2024) anticipates adoption of the Local Plan in 2025.
02143	Pegasus Group for MCI Developments	Not specified	No	The plan period should be extended to at least 2041 or 2042 to ensure that the Local Plan covers a period of at least 15 years.	Amend the plan period to end in 2041 and 2042 and alter policies accordingly.	Disagree: Recommend no change The plan period runs from 2021 to 2040 a period well in excess of 15 years. The LDS shows that the Council’s expectation is to adopt the Local Plan in December 2025 which would still give a plan period of ‘at least 15 years.’ Annual monitoring and the requirement for Local Plans to be reviewed every 5-years ensures that the effectiveness of Local Plan policies will continue to be assessed.
Local Plan Foreword						
01872	Lancashire County Council (Active Travel)	Not specified	Not specified	Foreword – change emphasis of wording	Foreword – Amend to ‘with such riches, it’s no surprise that our hills and dales are a mecca for walking and cycling’	Disagree: Recommend no change The Foreword is a quote from the Council’s leader.
Local Plan Section 2: Spatial Portrait						
00294	Lidgett and Beyond	Not specified	Not specified	Spatial Portrait: The plan is too pessimistic of development opportunities with Pendle’s settlements and talks down all that has been achieved in recent years and does not feed into the plan’s vision or objectives (paragraph 2.18). The dis-functional housing market is evidenced by the number of proposals for extensions and dormers. Many families want and choose to live in multigenerational households and denser units. People want to adapt their homes to respond to their changing need.	None specified.	Comments noted: Recommend no change The constrained viability and low land values experienced across much of the urban area in the M65 Corridor is a key contextual issue which relates to many of other issues experienced in this part of the plan area. It is important to acknowledge these through the Local Plan.
02147	D Penney for SELRAP (Skipton East Lancashire Rail Action Partnership)	Yes	Yes	Welcomes the Council’s full support for the reopening of the former Colne to Skipton railway line as referenced in paragraph 2.31 of the Local Plan. Support the emphasis on public rail and bus connectivity across the Pennines as set out in the Plan’s vision.	None specified.	Support welcomed
00167	D Penney	Not specified	Not specified	Spatial Portrait: No mention of the number of empty homes and the role this has in meeting housing need. To be truly sustainable more needs to be done to make use of the borough’s empty homes other they are a wasted resource.	Add reference to empty homes.	Comments noted: Recommend no change The Council does not currently have an active programme or funding mechanism in place to actively bring long term empty homes back into use. However, monitoring data shows that there has been a significant reduction in the number of long term empty homes (dwellings) in Pendle since the adoption of the Core Strategy in 2015.

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						<p>The number of long term empty homes fluctuates from year to year but is now at a level which is considered typical for a functioning housing market.</p> <p>Applying an allowance for long term empty homes is no longer acceptable when calculating the housing requirement, as it does not reflect development needs. Furthermore any increase in the stock of housing meeting the definition of long term empty homes would increase the amount of new housing needed in the borough.</p>
01429	G Wilson	Yes	No	<p>The baseline information for the Local Plan is inaccurate and as such the policies of the plan are ineffective in addressing the borough's need.</p> <p>The Pennine Lancashire Growth Strategy and Prosperity Plan and the Pendle Jobs and Growth Strategy were prepared pre-Covid, pre-Census and before Pendle's industry was in decline.</p> <p>The borough is no longer important for manufacturing. Rolls Royce have announced their intention to keep manufacturing in Barnoldswick for 10-years.</p> <p>The latest employment indicators show that Pendle's economy is in a state of decline and this is supported by vacancy rates. The lack of skilled workers and prominence of low paid jobs in Pendle is due to low poor attainment of qualifications of residents.</p>	Updated employment and education evidence needed to support the plan and its policies.	<p>Disagree: Recommend no change</p> <p>No evidence has been provided in support of these assertions and the claim that the evidence base pre-dates industrial decline in Pendle is clearly incorrect as the decline of the textile industry started in the immediate post-war era and accelerated in the 1950s.</p> <p>The baseline position for the Local Plan is set out in the accompanying Sustainability Appraisal. This has been updated since the Regulation 18 draft Local Plan was consulted upon in 2021 to address the latest available data.</p> <p>The borough's requirements for employment, retail, and leisure up to 2040 are informed by evidence in the HEDNA (Iceni Projects, 2023) and the Retail and Leisure Capacity Study (Lichfields, 2023).</p> <p>Both reports represent robust assessments of need over the plan period. They are up-to-date and form a suitable basis for informing the economic policies of the Local Plan.</p>
01872	Lancashire County Council (Active Travel)	Not specified	Not specified	Spatial portrait – change emphasis of wording	Spatial portrait paragraph 2.23: Amend to 'Tourism has become increasingly important for Pendle. Visitors are attracted by spectacular rural landscape, our rich industrial heritage and diverse cultural history. The area has proved to be a particularly popular destination for walking and cycling'	<p>Agree: Recommend changes to Policy Text</p> <p>The Council is minded to accept these suggested modifications but would note that the comments do not relate to the soundness of the Plan – see Schedule of Proposed Minor Modifications.</p>
Local Plan Section 3: Vision and Objectives						
00294	Lidgett and Beyond	Not specified	Not specified	<p>We agree wholeheartedly with the Spatial Vision set out in 3.2 and 3.3 and expanded in the box after 3.4. We specifically highlight the need to build our local economy first, along with connectivity to other employment centres, as those actions will bring extra salaries and spending power into the borough and that will drive demand and viability of housing developments. In the meantime, it is paramount to protect and enhance our high-quality landscapes and biodiversity as they are the main factors driving the rise in tourism.</p>	None specified	Support welcomed

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00471	Sport England	No	No	The representation outlines support for the proposed vision, objectives 2, 3, 8, 9, 11	None specified	Support welcomed
00539	United Utilities	Not specified	Not specified	Table 3.1: Supportive of Local Plan objectives, in particular objectives LP02 relating to infrastructure capacity and LP04 relating to climate change.	None specified.	Support welcomed
01510	Lane Town Planning for McDermott Homes	Yes	No	<p>Plan vision – is empty and meaningless, as policies of the plan do not respond to it and constrain household formation.</p> <p>Plan objectives – it is notable that meeting the housing needs of residents is missing from the Local Plans objectives with no reference made to meeting this need at all. The approach is inconsistent with the NPPF and is unsound.</p>	<p>Amend spatial intervention:</p> <p>‘2. To deliver, as far as possible, housing to meet the objectively assessed needs of the residents of Pendle’</p> <p>Amend the objectives:</p> <p>‘1. Meet the objectively assessed needs of the borough as far as possible taking into account current environmental and policy constraints.’</p>	<p>Disagree: Recommend no change</p> <p>Plan Vision: The policies of the Local Plan are consistent with, and help to support, the delivery of the plan’s spatial vision (page 25). The plan objectives and strategic planning policies react to the socio-economic and environmental conditions in Pendle. In this context they provide a positive strategy response.</p> <p>Plan Objectives: The spatial interventions (page 23, paragraph 2.40) respond to the key challenges facing Pendle by listing the four key areas of focus for the Local Plan. The second of these interventions is to ‘deliver a range and mix of housing appropriate to the needs of the borough.’</p> <p>Within the eleven plan objectives (page 27, Table 3.1) this overarching goal is broken down into more specific actions.</p> <p>The Local Plan Objectives (page 27, Table 3.1) break down this overarching objective into more specific actions that respond to the key issues highlighted by the baseline assessment of the borough.</p> <p>Objective LP05 addresses issues associated with quality and affordability and imbalances in the existing housing stock. This objective is consistent with national planning policy and does not depart from the wider policy objectives of the Local Plan, as demonstrated by its compliance in terms of:</p> <ol style="list-style-type: none"> 1. The housing requirement identified. 2. The supply of sites to meet identified housing needs. 3. The mix of housing types and tenures sought which is inclusive of larger dwellings. <p>The difficulties associated with the existing housing stock experienced in parts of the borough and not all is not only due to their size but the quality of stock. The provision of new high quality homes will help to address this issue.</p> <p>Overall the proposed actions are consistent with national planning policy and sound.</p>
01872	Lancashire County Council (Health)	Not specified	Not specified	In order to fully recognise and drive forward the reduction in health inequalities across the borough of Pendle, the County Council welcomes the inclusion of LP08 as a Local Plan objective.	None specified.	Support welcomed

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02132	A Plackett	Not specified	Not specified	No mention of green/blue infrastructure, geodiversity, BNG or the local nature recovery network in spatial vision. How will these integral components of spatial planning be incorporated strategically? If achieved through policy it is important that the policy is updated to reflect the outputs of these document.	Update Policies Map to reflect the green infrastructure strategy and local nature recovery strategy.	<p>Comments noted: Recommend no change</p> <p>The plan's spatial vision (page 25) sets out our aspirations for the borough at the end of the plan period.</p> <p>The vision is clear that 'green spaces and woodland continue to make a positive contribution to local biodiversity and ecological networks.' They help with mitigation and adaptation to climate change and create attractive neighbourhoods where residents are encouraged to live healthy and active lifestyles.</p> <p>The requirements for green infrastructure provision are supported and implemented principally through policies SP08, DM04, DM05 and DM06.</p> <p>There is no legal requirement for any aspects of the Green Infrastructure Strategy to be included on the Local Plan Policies Map and to do so would be likely to reduce its clarity and usefulness.</p> <p>The maps within the Pendle Green Infrastructure Strategy (LUC, 2019) are sufficiently clear to guide decision making in relation to the implementation of this policy.</p> <p>The benefits of creating an online interactive Green Infrastructure Map, similar to that recently created for the Open Space Audit, will be considered as time permits.</p>
Local Plan Section 4: Strategic Policies (including Key Diagram)						
01510	Lane Town Planning for McDermott Homes	Yes	No	Policy SP01 should be amended to reflect earlier submission about compliance of the Local Plan with the NPPF and the supporting evidence base.	Revise Policy SP01 as follows: 'The Council will apply the presumption in SP01 and approve applications for residential development on sites which are not allocated in this Local Plan, but which would contribute to meeting the Council's objectively assessed housing needs'	<p>Disagree: Recommend no change</p> <p>Local Plan is to be submitted under the transitional arrangements set out in Annex 1 of the 2024 NPPF. As such the amendment is not necessary and does not address the soundness of the plan.</p>
01644	Colne Town Council	Not specified	Not specified	Policy SP01: Supports as written.	None specified.	Support welcomed
00040	Barrowford Parish Council	Not specified	Not specified	Policy SP02: Welcome the certainty and approach of the policy and its role in superseding Policy LIV1 of the Core Strategy.	None specified	Support welcomed
00294	Lidgett and Beyond	Not specified	Not specified	Policy SP02: Support the categorisation of Colne as a Main Town, Trawden as a Rural Service Centre and Laneshaw Bridge as a Rural Village and the proportionate approach to development at these locations. The approach is consistent with neighbourhood plans in place in these areas.	None specified	Support welcomed
01156	P Parris	Not specified	Not specified	Policy SP02: The document is a rehash of previous data gathered over many years with the addition of	Remove Kelbrook and Sough as a Rural Service Centre.	Disagree: Recommend no change

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				<p>more potential development sites. The foundation of the document is as though nothing has changed and original errors still persist. It saddens me that Kelbrook and Sough is applied the erroneous designation of Rural Service Centre. The quality, capacity, and range of services available does not equate to a Rural Service Centre. Additional housing within the parish is unsustainable because:</p> <ul style="list-style-type: none"> • Most services are not available within the village and will require travel along the A56 (for example secondary/higher education, leisure, shopping) • Very limited high skilled jobs available within the parish or by public transport • Properties in the village are too expensive for many. <p>A proportionate approach should be taken to the development of the parish to avoid ribbon development.</p> <p>It is apparent that proposals of the plan ride roughshod over the policies of various existing local plans.</p>		<p>The justification for Kelbrook and Sough’s proposed designation as a Rural Service Centre in Policy SP02, which identifies the proposed settlement hierarchy, is set out in the Settlement Sustainability Review (2024), which updates previous iterations of this document. It uses the most up-to-date information and data to consider sustainability across Pendle’s defined settlements.</p> <p>The Local Plan sets a clear strategy for the location of development and increases protection given to areas which are less suited for development. The chosen designation for each settlement reflects its relative sustainability in comparison to the other settlements within Pendle, which is particularly important within the rural areas.</p> <p>The designation of Kelbrook and Sough as a Rural Service Centre places it in the third of four tiers within the settlement hierarchy. This reflects the level of service provision, number of employment opportunities and availability of public transport services in the village.</p> <p>The designation of Kelbrook as a Rural Service Centre remains unchanged from earlier iterations of the Local Plan.</p> <p>This decision has not been reached in isolation. It takes account of the strategy and policies in the adopted Kelbrook and Sough Neighbourhood Plan (2022). As such the status of Sough has been elevated to take account of its close relationship with Kelbrook and the importance of shared services and facilities. Furthermore, the Local Plan does not allocate any additional development land in Kelbrook or Sough, relying solely on those sites allocated in the adopted neighbourhood plan to meet local needs, plus any proposals which may come forward for sustainable development within the defined settlement boundary for both villages.</p> <p>In due course the local community may wish to consider the need to review its existing neighbourhood plan to better reflect the new set of strategic policies in the Local Plan.</p>
01429	G Wilson	Yes	No	<p>Policy SP02: There appears to be an overkill of service centres in the area from Colne to the Pendle boundary at Thornton-in-Craven (Colne, Foulridge, Kelbrook & Sough, Earby). If the intention is to develop an “ribbon conurbation” then this plan works. However if the desire is to maintain historic landscapes, promote localism through Local Plans, make use of good housing stock to promote worthwhile housing investments, and key each area distinctive, then increasing the proximity of each by</p>	None specified.	<p>Disagree: Recommend no change</p> <p>The settlement hierarchy in Policy SP02 has been reviewed based on the findings of the Settlement Sustainability Review (2024), which considers the population, availability of land, level of service provision and accessibility of each settlement in the borough.</p> <p>Its findings, alongside monitoring data from the implementation of the Pendle Core Strategy (2015) set out in the Authority Monitoring Report, have</p>

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				development outside of the settlement area defeats the objective on every test.		<p>informed the spatial hierarchy and development strategy in the Local Plan.</p> <p>The Council does not agree with the assertion that the proposed spatial approach will lead to ribbon development along the A56 north of Colne.</p> <p>The settlement boundaries are shown on the accompanying Policies Map. The opportunities for development to take place on land outside a defined settlement boundary are limited to the exceptions for development in the open countryside set out in Policy DM09 and the NPPF.</p> <p>There is no evidence that the proposed spatial strategy and level of development set out in the draft Local Plan would result in:</p> <ul style="list-style-type: none"> increased development pressure in the open countryside additional infrastructure requirements that could have an adverse impact on the character or setting of the borough's rural settlements <p>lead to the coalescence of settlements.</p>
01510	Lane Town Planning for McDermott Homes	Yes	No	Policy SP02 In accordance with recommendations made earlier in these representations, the policy should be amended so that it is permissive of sustainable development that comes forward to meet objectively assessed housing needs as identified in the NPPF.	Revise Policy SP02 part 4 as follows: 'Outside a defined settlement boundary, policies relevant to open countryside apply (see Policy DM09). Development will only be permitted for the exceptions that are identified in either the NPPF, an adopted document that forms part of the development plan, or for sustainable sites for housing in locations adjacent to settlements to meet objectively assessed housing needs'	<p>Disagree: Recommend no change</p> <p>Local Plan is to be submitted under the transitional arrangements set out in Annex 1 of the 2024 NPPF. As such the amendment is not necessary and does not address the soundness of the plan.</p>
01535	Home Builders Federation	Yes	No	Policy SP02: It should be explicitly clear that requirements a) b) and c) are stand-alone rather than all being required to be met.	Amend policy to add 'or' between each part.	<p>Disagree: Recommend no change</p> <p>This amendment is not necessary. The intentions of the policy are clear as worded.</p>
01644	Colne Town Council	Not specified	Not specified	Policy SP02: Supports as written.	None specified.	Support welcomed
01858	Smith Love for Applethwaite	Yes	No	Policy SP02. Support the proposed settlement hierarchy and the definition and rank of Earby as a Local Service Centre. The Settlement Sustainability Review (2024 Update) forms a suitable and comprehensive evidence base for the Local Plan, supporting Earby as a Local Service Centre.	None specified.	Support welcomed
02131	Sevo Planning for Little Cloud	No	No	Overall support for the spatial strategy set out in Policy SP02 of the Local Plan. Part 4 of the policy however is unsound for its reference to Policy DM09 and the limitations to development applied towards sites located outside of settlement boundaries.	Amendments sought to the wording of Policy DM09.	<p>Disagree: Recommend no change</p> <p>The Council do not consider the policy to be unsound.</p>
00294	Lidgett and Beyond	Not specified	Not specified	Policy SP03: Agree with the distribution of development as set out in the policy.	None specified	Support welcomed

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01510	Lane Town Planning for McDermott Homes	Yes	No	Policy SP03 In accordance with recommendations made earlier in these representations, the policy should be amended so that it is permissive of sustainable development that comes forward to meet objectively assessed housing needs as identified in the NPPF.	Add Part 3 to Policy SP03 as follows: ‘Sites which accord with the presumption in favour of sustainable development set out in Policy SP01, coming forward in advance of the Local Plan Review to help meet objectively assessed housing needs (see Proposed Policy 1) shall be supported where they are of a scale that is compatible with the settlement’s role and function in the settlement hierarchy set out in Policy SP02.’	Disagree: Recommend no change Local Plan is to be submitted under the transitional arrangements set out in Annex 1 of the 2024 NPPF. As such the amendment is not necessary and does not address the soundness of the plan.
01644	Colne Town Council	Not specified	Not specified	Policy SP03: Supports as written.	None specified.	Support welcomed
02131	Sevo Planning for Little Cloud	No	No	Policy SP03 – proposed housing land supply and distribution needs to be reviewed. The approach to the delivery of the housing in Colne is not consistent with the Scoping Report and Methodology Report which confirms that 35% of housing identified for the M65 spatial area should be met without Colne. This submission was relied upon by Pendle Council in their comments made in relation to the Colne Neighbourhood Development Plan.	Allocate more sites in Colne to ensure consistency with the 2016 Scoping and Methodology Report.	Comments noted: Recommend no change The 2016 Scoping and Methodology Report does not form part of the evidence base for the submitted Local Plan. The Local Plan does not establish a specific housing target for each settlement due to the absence of sufficiently detailed data to assess local housing need at the local level and to reflect the close linkages between settlements within the M65 Corridor, which in many ways operate as a single housing market. Policy SP03 sets out local housing need at a sub-area basis within Policy SP02 ensuring that growth provided in response to this is proportionate to the role and capacity of the settlement as confirmed through the settlement hierarchy (Policy SP02). The distribution of the housing site allocations (Policy AL01), as confirmed by the housing trajectory, is in broad alignment with the requirements of Policy SP03. The reliance of the Council on the 2016 Scoping and Methodology Report, during the examination of the Colne Neighbourhood Development Plan, reflects the fact that the neighbourhood plan was prepared in response to the strategic policies of the adopted Core Strategy. The 2016 Scoping Report was prepared to inform the accompanying Part 2 Pendle Local Plan: Site Allocations and Development Policies. The Pendle Local Plan Fourth Edition will supersede the policies of the Core Strategy on adoption. It sets out a new strategic approach to growth and development in the period up to 2040 and is not concerned with the policies and proposals of the Core Strategy.
01644	Colne Town Council	Not specified	Not specified	Policy SP04: Supports as written.	None specified.	Support welcomed
00040	Barrowford Parish Council	Not specified	Not specified	Policy SP05: Support the position that no releases from the Green Belt are proposed around Barrowford.	None specified.	Support welcomed

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00195	Higham Parish Council	Not specified	Not specified	Policy SP05: Higham Parish Council maintains its submission that Parcel 001a should be designated Green Belt for the reasons set out in our representation made to the Regulation 18 Draft Local Plan.	Designate Parcel 001a as Green Belt.	Disagree: Recommend no change The exceptional circumstances required in national planning policy to designate this land as Green Belt do not currently exist. The Council's detailed response to this representation from Higham Parish Council can be found within the Regulation 18 Consultation Statement.
00294	Lidgett and Beyond	Not specified	Not specified	Policy SP05: Support the approach taken to development in the Green Belt and the benefits of the Green Belt as set out in the Policy Text and the Supporting Text.	None specified	Support welcomed
00471	Sport England	No	No	Support Policy SP05	None specified	Support welcomed
00539	United Utilities	Not specified	Not specified	Policy SP05: Support policy in principle however Parts 5(a) – 5(d) are overly prescriptive and lack sufficient flexibility to allow for investment and to consider existing site specific circumstances. We are specifically concerned at the need to reduce traffic movements in Part 5(b) which is unreasonable and should be considered as part of the wider planning balance. It is also unreasonable to require positive environment benefits to the level of emission associated with the site. In accordance with the agent of change principle, a more appropriate approach would be to ensure no additional adverse impact on neighbouring uses as a result of development.	Policy SP05 Part 5 amends: 'b) It can be demonstrated that the level of emissions (noise and odour) associated with the proposals will not increase any adverse impact on neighbouring uses.' 'c) Mature vegetation along the site boundary and in areas surrounding the site is maintained if possible. If vegetation loss is demonstrated to be necessary, the proposals must be supported by an agreed landscaping scheme.'	Comments noted: Recommend no change The policy takes a proportionate approach in how it addresses operations associated with the site. These are consistent with the principles of sustainable development as set out in paragraphs 8 of the NPPF. Paragraph 5(c) of the Policy Text is considered to be sufficiently flexible as written, as it only seeks the retention of existing mature vegetation surrounding the site 'wherever possible'.
01510	Lane Town Planning for McDermott Homes	Yes	No	Policy SP05: It seems likely that the Council will need to complete a review of their Green Belt as part of their immediate review of the Green Belt.	Amend supporting text to commit to a Green Belt Review as part of the Local Plan Review.	Comments noted: Recommend no change This matter will need to be considered during the preparation of the next Pendle Local Plan, which will be prepared in accordance with policies of the most up to date version of the NPPF. In accordance with the Written Ministerial Statement 'Building the Homes we Need' published on 12 December 2024 (HCWS308), a Local Development Scheme (LDS) is to be published. This will set out the projected timescales for the preparation of a new Local Plan, which will commence on the enactment of the Levelling Up and Regeneration Act 2023.
01644	Colne Town Council	Not specified	Not specified	Policy SP05: Supports policy, especially retention of the Green Belt between Colne and the villages of Laneshaw Bridge, Foulridge and Trawden.	None specified.	Support welcomed
01871	B J Reynolds	Not specified	Not specified	Support Policy SP05. It is vitally important that unique features of the villages that surround the main built-up areas of Nelson and Colne are preserved by Green Belts.	None specified.	Comments noted: Recommend no change
01510	Lane Town Planning for McDermott Homes	Yes	No	Policy SP06 supports aims of policy however notes that the adoption of new building regulations and the adoption of the future homes standard will place financial on developments in Pendle. Presently the	Revise Part 4 Policy SP06 to: 'Where viable, developers are encouraged to employ within their development independently accredited	Comments noted: Recommend no change Policy SP06 flexible in its approach and does not require the adoption of voluntary standards.

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				<p>policy introduces a non-exhaustive list of other potential voluntary standards. To be justified and consistent with the other parts of the policy the wording should be revised to make sure developments are not refused where voluntary standards are not used.</p> <p>The threshold for energy statements is too low and does not consider the burden additional document information on SMEs. No evidence is provided to explain this threshold or determine its appropriateness.</p>	<p>energy and sustainability standards. These may include, but are not limited to, standards such as the Passivhaus Standard and the BRE Home Quality Mark’</p> <p>Amend Part 5 to 30 dwellings, as this is consistent with Policy DM21 which assumes this minimum level of density per hectare. This level would include development of a size which could support the provision of this additional documentation.</p>	
01535	Home Builders Federation	Yes	No	<p>Policy SP06: Planning may be too early in the build process to fully assess the carbon impact of design. If a policy is introduced in relation to net zero and whole life carbon then it will have to consider how it would be monitored and what the implications for the preparation of any assessment, in particular the accessibility of data, much of which will lay outside of the housebuilding industry – materials, transportation, occupancy, maintenance, demolition, disposal. The Council will have to consider the impact on the policy on delivery and viability alongside other policies of the Local Plan. A transition period should be introduced to allow the industry to adjust to policy requirements.</p> <p>Part 2 – small scale renewable and low carbon energy generation is not reasonable. The policy does not allow for energy sought from larger scale developments or that over time energy secured from the national grid will decarbonise.</p> <p>Part 4 – It is not necessary for Pendle to seek developments to meet independent energy and sustainability standards. This requirement is not evidenced or justified. It is important that the Council does not set its own standards as they may differ from those set by the government, and any departures from this are implemented flexibly. Notes the future homes standard (Part L 2025) and the role this will have in decarbonising dwellings as the national grid decarbonises.</p>	<p>Part 1 – Reconsider the practicalities of implementing the policy, including effects on viability and deliverability. Introduce transitional arrangements for the implementation of the policy.</p> <p>Part 2 – Remove reference to small scale and low carbon renewable energy.</p> <p>Part 4 – Remove reference to independent energy efficiency and sustainability standards.</p>	<p>Disagree: Recommend no change</p> <p>Paragraph 1: The Council wishes to retain this policy direction.</p> <p>Paragraph 2: The Council wishes to retain this policy direction.</p> <p>Paragraph 4: The Council wishes to retain this policy direction.</p>
01644	Colne Town Council	Not specified	Not specified	Broadly supportive of Policy SP06 but feel mention should be made of local community energy networks exploiting canal hydropower.	Mention should be made of local community energy networks exploiting canal hydropower.	<p>Comments noted: Recommend no change</p> <p>The matter is addressed in the supporting text - see paragraph 4.76 and 4.77. See also Policy DM03.</p>
01796	Historic England	Not specified	Yes	Policy SP06, paragraphs 4.50 – 4.52. We support inclusion of text here which emphasise that demolition adds to the assessment of embodied carbon.	None specified.	Support welcomed

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02128	CPRE Lancashire	Yes	Yes	Policy SP06: The plan's climate change strategies could benefit from greater depth and specificity. While it sets targets for emission reduction and renewable energy, it lacks comprehensive carbon account system to track and monitor progress. The plan primarily relies on national building regulations for energy efficiency standards. Setting more ambitions local standards could accelerate progress toward carbon neutrality.	Establish a comprehensive carbon accounting system. Develop policies on climate adaptation. Identify and impose local requirements for energy efficiency standards.	<p>Comments noted: Recommend no change</p> <p>Ambitious local standards can only be established where there is sufficient evidence to support their introduction. In the absence of such evidence, the Local Plan takes a proportionate approach in responding to climate change, balancing national policy requirements against the need to ensure that the deliverability of new development is not compromised.</p> <p>The findings of the Local Plan Viability Assessment (Aspinall Verdi, 2024) suggest that without significant public resources the changes that are being sought are not deliverable. The Council appointed a Climate Change Manager in late 2024, so there is now potential to introduce a carbon accounting system to track and monitor progress and to seek government funding to support local interventions.</p>
02143	Pegasus Group for MCI Developments	Not specified	No	Policy SP06: Object to the adoption of energy standards and statements which exceed minimum standards. The Council does not have the evidence base to support their implementation through the policy. The approach is inconsistent with the December 2023 ministerial statement.	Without the necessary evidence and testing of viability implications, the requirements for energy efficiency standards and the submission of an energy statement should be dropped from Policy SP06.	<p>Disagree: Recommend no change</p> <p>There is clear justification to adopt higher energy efficiency performance standards if the borough is to be successful in helping the UK meet its climate change obligations.</p> <p>The wording of the policy is consistent with the findings of the Local Plan viability assessment, which seeks to balance viability considerations against the need to address climate change.</p> <p>In this context the policy takes a proportionate approach and is flexible in seeking to encourage energy efficiency in new development and give greater weight to the approval of proposals which seek to minimise their impact on climate change.</p>
00539	United Utilities	Not specified	Not specified	Policy SP07: Development proposals on water catchment land can have an impact on water supply resources. It is therefore recommended that a policy is included in the plan which identifies the need to engage with the statutory undertaker for water to determine whether the proposal is on land used for public water supply catchment purposes.	Policy SP07 add new part: ‘Development proposals on land used for public water supply catchment purposes will be required to consult with the relevant water undertaker. The first preference will be for proposals to be located away from land used for public water supply purposes. Where proposals are proposed on catchment land used for public water supply, careful consideration should be given to the location of the proposed development and a risk assessment of the impact on public water supply may be required with the identification and implementation of any required mitigation measures.’	<p>Comments noted: Recommend no change</p> <p>Paragraphs 1-3 of the Policy Text address the matter of water quality. Paragraph 4.92 of the Supporting Text provides further guidance on development and the public water supply, including the need for applicants to engage with the relevant water undertaker.</p>
00539	United Utilities	Not specified	Not specified	Policy SP07 and DM02(a): It is critical that there is clear policy wording outlining the requirements for development that mitigate the effects of development on the groundwater environment and public water supply. In this context UU support the inclusion of	Amend paragraph 4.91 to: ‘Where required a qualitative and quantitative risk assessment should identify all contaminant sources associated with the development and its operation and provide details of measures required to mitigate	<p>Comments noted: Recommend no change</p> <p>Paragraphs 1-3 of the Policy Text address the matter of water quality, including groundwater. Paragraphs 4.90-4.92 of the Supporting Text provide further</p>

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				wording Policy SP07 and DM02(a), but request that wording in the Supporting Text is strengthened.	any risks caused to groundwater and public water supply during all phases of the development. Subject to the outcome of the risk assessment, the mitigation measures may include the highest specification design for the new foul and surface water sewerage systems (pipework, trenches, maintenance holes, pumping stations, and attenuation features).'	guidance on development and the public water supply, including groundwater.
00294	Lidgett and Beyond	Not specified	Not specified	Policy SP08: Broadly supportive of the policy but the wording 'landscape character' should be added back in to Point 1. In Table SP08a protected sites; if development is to take place on a site where there is a priority habitat, then the developer should acquire a similar sized piece of land near to the application site and manage it proactively for that species for a period of 30 years. The area is an important breeding ground for red listed species. These species have experienced significant declines due to habitat loss and disturbance. Protecting these is crucial for preserving biodiversity, maintaining ecological balance and cultural heritage.	Reinstate removed wording. Add scope for developer mitigation of priority habitat to be managed for a period of 30-years.	Comments noted: Recommend no change Policy SP08 is concerned with protecting the natural environment and designated sites. For this reason the reference to landscape character, which is principally addressed through Policies DM10 and DM11, was removed from paragraph 1 of the Policy Text to help maintain the focus of the main objectives of the policy. Furthermore new development is rarely considered to improve landscape character. Paragraph 1(e), which follows, provides the necessary linkage to Policy DM10 and Policy DM11. The 30 year mitigation requirement is stipulated in the legislation addressing Biodiversity Net Gain. This is properly addressed in Policy DM04 and a link to this policy is included in paragraph 1(b) of the Policy Text.
00526	Trawden Forest Parish Council	Not specified	Not specified	Policy SP08: Broadly supportive of these policies but the wording 'landscape character' should be added back in to point 1. In Table SP08a protected sites; if development is to take place on a site where there is a priority habitat, then the developer should acquire a similar sized piece of land near to the application site and manage it proactively for that species for a period of 30 years. Trawden Forest is an important breeding ground for red listed species. These species have experienced significant declines due to habitat loss and disturbance. Protecting these is crucial for preserving biodiversity, maintaining ecological balance and cultural heritage.	Reinstate removed wording. Add scope for developer mitigation of priority habitat to be managed for a period of 30-years.	Comments noted: Recommend no change Policy SP08 is concerned with protecting the natural environment and designated sites. For this reason the reference to landscape character, which is principally addressed through Policies DM10 and DM11, was removed from paragraph 1 of the Policy Text to help maintain the focus of the main objectives of the policy. Furthermore new development is rarely considered to improve landscape character. Paragraph 1(e), which follows, provides the necessary linkage to Policy DM10 and Policy DM11. The 30 year mitigation requirement is stipulated in the legislation addressing Biodiversity Net Gain. This is properly addressed in Policy DM04 and a link to this policy is included in paragraph 1(b) of the Policy Text.
00564	Lancashire Wildlife Trust	No	No	SP08: Natural Environment The policy does not list all 'irreplaceable habitats' as defined Biodiversity Gain Requirements (Irreplaceable Habitats) Regulations 2024 of which at least four are known to exist in Pendle.	Revise the policy to reflect the definition of the Biodiversity Gain Requirements (Irreplaceable Habitats) Regulations 2024 to include: <ul style="list-style-type: none"> • 'Blanket bogs • Lowland fells • Ancient woodland (areas of woodland that have been continuously wooded since at least 1600 including: 	Agree: Recommend change to Policy Text Policy SP08 was drafted prior to the publication of the Biodiversity Gain Requirements (Irreplaceable Habitats) Regulations 2024. The proposed amendment to Policy SP08 is supported by the Council - see Schedule of Minor Modifications.

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					<ul style="list-style-type: none"> - Ancient semi-natural woodland - Plantations on ancient woodland sites - Ancient wood pasture and parkland and - Infilled ancient wood pasture and parkland. <p>Ancient trees and veteran trees.’</p>	
01510	Lane Town Planning for McDermott Homes	Yes	No	Policy SP08: It is noted that the terms ‘and landscape character’ have been removed from the list of items the plan seeks to ‘protect’. This is supported as this is often erroneously included in plans and is inconsistent with the NPPF, which only seeks to protect and enhance valued landscapes. The requirement is otherwise simply to, “recognise the intrinsic character and beauty of the countryside”.	None specified.	Comments in support welcomed
01644	Colne Town Council	Not specified	Not specified	<p>Policy SP08: We broadly support these policies on the Natural Environment, but the words “<i>landscape character</i>” should be added back in to point 1. In table SP08a Protected Sites, under Priority Habitats and Species, we suggest that if development is to take place on a site where there is a priority habitat, then the developer should acquire a</p> <p>similar sized piece of land near to the application site and manage it proactively for that species for a period of thirty years, as has happened recently in the Ribble Valley. Colne’s rural areas contain breeding grounds for both the lapwing and the curlew (red-listed birds) and their distinctive calls can be heard even in urban areas.</p>	<p>Reinstate removed wording.</p> <p>Add scope for developer mitigation of priority habitat to be managed for a period of 30-years.</p>	<p>Comments noted: Recommend no change</p> <p>Policy SP08 is concerned with protecting the natural environment and designated sites.</p> <p>For this reason the reference to landscape character, which is principally addressed through Policies DM10 and DM11, was removed from paragraph 1 of the Policy Text to help maintain the focus of the main objectives of the policy. Furthermore new development is rarely considered to improve landscape character.</p> <p>Paragraph 1(e), which follows, provides the necessary linkage to Policy DM10 and Policy DM11.</p> <p>The 30 year mitigation requirement is stipulated in the legislation addressing Biodiversity Net Gain. This is properly addressed in Policy DM04 and a link to this policy is included in paragraph 1(b) of the Policy Text.</p>
01871	B J Reynolds	Not specified	Not specified	Policy SP08: Protected sites for the environment should be protected with no excuses to allow development of such sites.	None specified.	<p>Comments noted: Recommend no change</p> <p>The Plan adopts measures of protection to designated sites which are proportionate to their significance. This is consistent with national planning policy.</p>
00294	Lidgett and Beyond	Not specified	Not specified	Supports Policy SP09 particularly 5a, 5c, 5f and 5h to protect Pendle’s rich historic environment.	None specified.	Support (and scepticism) noted
01510	Lane Town Planning for McDermott Homes	Yes	No	Policy SP09 is inconsistent with national planning policy. The NPPF is clear that the aim of conservation is managing change, so the significance of the asset is sustained or, if possible, enhanced. The policy should therefore be amended to follow national policy. The NPPF definition of conservation should be added to the Supporting Text to make clear to readers the aim is to manage change. It should be clarified that the public benefits test applies to circumstance of ‘less than substantial harm’ rather than an ‘element of harm’	<p>Revise Policy SP09 part 1 to:</p> <p>‘The historic environment of Pendle comprising designated and non-designated heritage assets shall be conserved in a way that sustains and, where appropriate, enhances the significance of those assets (Policy DM18).</p> <p>Correct reference from Paragraph 190 to Paragraph 196 (4.124)</p> <p>Define conservation using the NPPF definition in the Supporting Text.</p>	<p>Agree (in part): Recommend change to the Supporting Text</p> <p>Paragraph 1 of the Policy Text is suitable as worded.</p> <p>The reference is to paragraph 190 of the 2023 NPPF, which this plan will be tested against. As such the reference is correct.</p> <p>The Council is not minded to repeat the NPPF definition of conservation within the Policy Text, Supporting Text or Glossary (Appendix 9).</p>

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					Clarify public benefits test.	The Council agrees that the public benefits test relates to circumstance of 'less than substantial harm' rather than an 'element of harm.' To avoid any confusion the Council is happy to re-word this paragraph – see Schedule of Minor Modifications.
01644	Colne Town Council	Not specified	Not specified	Policy SP09: Supports as written. Colne has developed a Design Code which offers further detail to development within our historic market town, which we have divided into zones. We have also developed a list of non-designated heritage assets.	None specified.	Support welcomed
01796	Historic England	Not specified	Yes	Policy SP09: Paragraph 4.124 We support inclusion of text concerning the setting of a positive strategy for the historic environment which we understand is unlikely to change through revisions to the NPPF consulted on in autumn 2024.	None specified.	Support welcomed
02128	CPRE Lancashire	Yes	Yes	Policy SP09 establishes a clear framework for conserving and enhancing the historic environment. The plan includes policies tailored to protect individual heritage assets (for example the Leeds and Liverpool Canal). Policy DM16 sets expectations for incorporating sustainable design principles into new developments, including considerations for heritage assets. This integration of design principles into broader policy frameworks promotes a cohesive and context-sensitive approach to development.	None specified.	Comments noted: Recommend no change
00294	Lidgett and Beyond	Not specified	Not specified	Policy SP10. Support the aims of the policy but have some scepticism of the achievement of walking and cycling promises noting local topography.	None specified.	Support (and scepticism) noted
00471	Sport England	No	No	Support Policy SP10	None specified	Support welcomed
01644	Colne Town Council	Not specified	Not specified	Policy SP10: Feel that more should be done to curb hot-food takeaways given increasing evidence of the link between takeaway density and poor community health.	Discouragement of new takeaways should be reflected within a specific policy in Pendle's Local Plan.	<p>Comments noted: Recommend no change</p> <p>Policy DM33 represents a proportionate approach to the provision of new hot food takeaways (HFT).</p> <p>In support of the Council's stated goal of reducing the high levels of obesity recorded in Pendle, particularly within young children, it restricts the development of HFT in close proximity to facilities frequented by children, in deprived wards, and in wards where recorded levels of obesity are above the regional average.</p> <p>The policy also seeks to prevent the clustering of HFT outlets within town centres, with proposals being resisted at locations where any adverse effects on the amenity of neighbouring residents are considered to be unacceptable and satisfactory mitigation measures are not possible.</p>
01872	Lancashire County Council (Active Travel)	Not specified	Not specified	Policy SP10 – change emphasis of wording	Policy SP10 Part 1 amended to 'The Council will seek to deliver healthy and vibrant communities...'	<p>Agree: Recommend changes to Policy Text</p> <p>The Council is minded to accept these suggested modifications but would note that the comments do</p>

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					'b Enabling active travel lifestyles by' 'b ii Enabling active travel, to increase levels of participation in walking and cycling'	not relate to the soundness of the Plan – see Schedule of Proposed Minor Modifications.
02125	NHS Property Services	Not specified	Not specified	Supports Draft Policy SP10. The planning system is critical not only to the provision of improved health services and infrastructure but also addressing wider determinants of health. Policy DM30 should set out the threshold for a Health Impact Assessment	Define threshold for HIA in Policy DM30	Comments noted: No change proposed The policy wording is flexible in recognition that it is not necessarily the type or scale of a proposal which will result in the need for a HIA but also how it relates to existing land uses and the nature of these land uses. This is a proportionate approach and avoids the need to impose a blanket requirement for HIA on proposals where such information may not be justified. The Council encourage applicants to obtain pre-application advice prior to submission (See Statement of Community Involvement). It is anticipated that requirements for an HIA would be agreed at this stage.
00294	Lidgett and Beyond	Not specified	Not specified	Policy SP11: In Part 1 we assume the strategic road link to Yorkshire is the one previously selected from the end of the M65 to the A56 north of Foulridge.	None specified.	Comments noted: Recommend no change There is currently no specific route identified, or funding allocated, for improved road links in the A56 Corridor between East Lancashire and North Yorkshire. The policy is written so that it supports future rail and/or highway improvements in this busy trans-Pennine corridor.
00471	Sport England	No	No	Policy SP11: Supports policy but it would benefit by the inclusion of direct reference to Active Design 3 principles.	Insert reference to Active Design Principles in parts 3, 4, 5, and 7 of the Policy.	Comments noted: Recommend no change Active Design Principles are referenced in Policies SP10, DM16 and DM30, which relate more closely to design and health. The plan is read and implemented as a whole. There is no need to repeat policy requirements here.
01644	Colne Town Council	Not specified	Not specified	Policy SP11: Supports as written.	None specified.	Support welcomed
01872	Lancashire County Council (Active Travel)	Not specified	Not specified	Policy SP11 – unclear why a cycle route to Yorkshire is more of a priority than other routes contained in the LCWIP. There is a potential policy conflict any reinstatement of the railway line. Transport use is too vague and could be interpreted as a future road scheme.	Policy SP11 part 2 amend to 'The route of the former Colne – Skipton railway line, as shown on the Policies Map, is protected for future sustainable travel use'	Disagree: Recommend no change The Council is not promoting a dedicated cycle route into North Yorkshire ahead of the publication of the Burnley and Pendle Local Cycling and Walking Infrastructure Plan (LCWIP) in 2025 but is aware that improved off-road cycling provision is being sought in the A56 Corridor. The reference to "a dedicated cycle route to North Yorkshire" (Policy SP11 paragraph 1(c)) has been provided in response to the emerging LCWIP and requests from the Council's cycling officer and local cycling groups. North Yorkshire Council support its inclusion. Paragraph 1(c) is not prescriptive about the route, so there is no conflict with the proposed reinstatement of the former Colne to Skipton railway line, which is supported in paragraph 1(b).

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						<p>The proposed re-wording of paragraph 1(c) would:</p> <ul style="list-style-type: none"> • lead to conflict with paragraph 1(b) and paragraph 2 of the Policy Text and introduce a greater level of uncertainty rather than improve clarity. • result in a disconnect between Pendle’s policy position and that of North Yorkshire Council, as set out in Policy SP2 of the adopted Craven District Local Plan (2019). • undermine the Memorandum of Understanding signed by Pendle Council and North Yorkshire Council. <p>References to the emerging LCWIP in Policy SP11 (paragraph 7) and Policy DM32 provide additional support for improvements to the local network of cycling infrastructure and further improvements to sustainable transport promoted through the Lancashire Local Transport Plan (LTP) and the East Lancashire Highways and Transport Masterplan.</p>
01872	Lancashire County Council (Highways)	Not specified	Not specified	Policy SP11, Paragraph 4.148 describes Lancashire County Council as the Strategic Highway Authority rather than the Local Highway Authority.	Amend paragraph 4.148 to reference Lancashire County Council as the Local Highway Authority	<p>Agree: Recommend change to Supporting Text</p> <p>See the Regulation 18 Consultation Statement to see the response of Pendle Council to earlier comments from the Local Highway Authority (LCC).</p> <p>Change reference to “strategic highway authority” to read “Local Highway Authority” – see Schedule of Proposed Minor Modifications.</p>
02147	D Penney for SELRAP (Skipton East Lancashire Rail Action Partnership)	Yes	Yes	<p>Policy SP11 Transport and Connectivity:</p> <p>Part 1: The reinstatement of the former Colne to Skipton railway line should be the Council’s first priority as a strategic link, rather than the provision of a new road because of the need to reduce highway congestion and pollution, create greener healthier living streets, provide accessible travel to those without cars, and comply with the legal requirement to decarbonise transport and achieve Net Zero carbon by 2030.</p> <p>Part 7: Supports Active Travel as the as emphasis on access to public rail and bus connectivity to encourage people to access it by foot or bike rather than by car.</p> <p>Part 8: Notes the role of empty homes and buildings in town centres in meeting housing needs sustainably and in close proximity to existing infrastructure and services. Also notes the important role of good public transport links in promoting investment and securing local jobs and retention of local businesses, and important role it plays in meeting the objective to decarbonise transport and achieve net zero carbon by 2030.</p>	<p>Part 1: Reorder list of schemes to prioritise the reinstate of the former railway line and then the provision of cycle links ahead of road improvements.</p> <p>Parts 7 and 8: None specified.</p>	<p>Comments noted: Recommend no change</p> <p>Paragraph 1: The policy is not listed in order of priority.</p> <p>Paragraph 7: Support for the policy’s overall approach to transport and connectivity including its promotion of active travel is noted.</p> <p>Paragraph 8: The policy seeks to ensure that new developments do not have an adverse impact on the operation of the local highway network. It highlights the significant role that Travel Plans play in promoting more sustainable and greener travel options and encourages modal shift. In support of the Local Plan’s vision and key objectives, the policy is part of a wider strategy which aims to reduce the need to travel by car</p>

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00294	Lidgett and Beyond	Not specified	Not specified	<p>Policy SP12: The wording ‘deliver biodiversity net gain and ensure sufficient funding for long term management and funding’ should be reinserted into the policy.</p> <p>The decision not to adopt CIL puts Pendle and Colne in a poorer situation in comparison to authorities with CIL. The argument that we are a low value area means we need more CIL.</p>	Reinstate removed wording.	<p>Comments noted: Recommend no change</p> <p>Biodiversity Net Gain is not a planning obligation. It is required by law before a planning permission can be granted. As a result, a reference in Policy SP12 would be inappropriate.</p> <p>Policy DM04 sets out the requirements relating to the provision of Biodiversity Net Gain (BNG).</p> <p>To meet the tests of soundness the Council must ensure that the policies in the Local Plan do not have an adverse impact on the deliverability of sites. The Council cannot adopt a policy which would render development undeliverable.</p> <p>The Local Plan Viability Assessment (Aspinall Verdi, 2024) provides clear and up-to-date evidence on development viability throughout the borough. It reveals that there is low viability across large areas of Pendle, including Colne. The evidence illustrates that the introduction of CIL is not viable at this time.</p>
00471	Sport England	No	No	Support Policy SP12	None specified	Support welcomed
00526	Trawden Forest Parish Council	Not specified	Not specified	<p>Policy SP12: The wording ‘deliver biodiversity net gain and ensure sufficient funding for long term management and funding’ should be reinserted into the policy.</p>	Reinstate removed wording.	<p>Comments noted: Recommend no change</p> <p>Biodiversity Net Gain is not a planning obligation. It is required by law before a planning permission can be granted. As a result, a reference in Policy SP12 would be inappropriate.</p> <p>Policy DM04 sets out the requirements relating to the provision of Biodiversity Net Gain (BNG).</p> <p>To meet the tests of soundness the Council must ensure that the policies in the Local Plan do not have an adverse impact on the deliverability of sites. The Council cannot adopt a policy which would render development undeliverable.</p> <p>The Local Plan Viability Assessment (Aspinall Verdi, 2024) provides clear and up-to-date evidence on development viability throughout the borough. It reveals that there is low viability across large areas of Pendle, including Colne. The evidence illustrates that the introduction of CIL is not viable at this time.</p>
00539	United Utilities	Not specified	Not specified	<p>Policy SP12: UU is unable to fully conclude the impact of development on infrastructure until the full details of development is known. It may therefore be necessary to co-ordinate the timing for the delivery of development with infrastructure. As more details are known a more flexible position could be adopted.</p>	Policy SP12: ‘Once more details are known on development sites, it may be necessary to coordinate delivery of development with timing for the delivery of infrastructure improvements’	<p>Comments noted: Recommend no change</p> <p>Paragraph 3 of the Policy Text references the potential need to phase development, to coincide with the funding or delivery of supporting infrastructure. The policy adds that where it is necessary to coordinate development with infrastructure provision, applicants should submit a comprehensive infrastructure strategy to show how the wider site will be brought forward in a co-ordinated manner’</p>
00539	United Utilities	Not specified	Not specified	Policy SP12: Raises concerns about sites promoted in multiple landownerships and the effects this has on	Revise Policy SP12 part 3:	Comments noted: Recommend no change

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				infrastructure delivery. Further believes that infrastructure strategies should be required for all sites not only those where coordination is necessary.	‘Developments may be phased to coincide with the funding and delivery of support infrastructure. Applicants must submit a comprehensive infrastructure strategy to show how the wider site will be brought forward in a co-ordinated manner’ Additional wording for Supporting Text to Policy SP12: ‘site-wide infrastructure strategies shall be prepared in liaison with infrastructure providers and demonstrate how each phase interacts with other phases and ensure coordination between phases of the development over time and by numerous developers. Where necessary, the strategy must be updated to reflect any changing circumstances between phase(s) during the delivery of the development.	The proposed requirement is disproportionate and unnecessary. Most development proposals will not require infrastructure improvements or require developer contributions. Guidance on proposals which are to be delivered using a phased approach or where land is in multiple ownerships is set out in paragraphs 4.188 and 4.189 of the Supporting Text.
01510	Lane Town Planning for McDermott Homes	Yes	No	Policy SP12 is contradictory. On the one hand it states viability will be evaluated at the application stage, only for the next to state that it must be dealt with and verified prior to submission. It is not reasonable to require verification of viability evidence when there is no planning application.	Revise Policy SP12 part 4 to: ‘4. ...claims will be verified using an open book financial appraisal by an independent third party during the determination of a planning application. The cost is to be met by the applicant’	Agree: Recommend change to Policy Text At the end of the second sentence in paragraph 4, delete the text “prior to the submission of a planning application” – see Schedule of Proposed Minor Modifications.
01542	Canal & River Trust	Not specified	Not specified	Considers changes made to Policy SP12 in response to comments made by the Trust to the consultation to the draft Local Plan to be satisfactory.	None specified.	Support welcomed
01644	Colne Town Council	Not specified	Not specified	Policy SP12 the wording ‘deliver biodiversity net gain and ensure sufficient funding for long term management and funding should be reinserted into the policy. Decision not to adopt CIL puts Pendle and Colne in a poorer situation in comparison to authorities with CIL. The argument that we are a low value area means we need more CIL.	Reinstate removed wording.	Comments noted: Recommend no change Biodiversity Net Gain is not a planning obligation. It is required by law before a planning permission can be granted. As a result, a reference in Policy SP12 would be inappropriate. Policy DM04 sets out the requirements relating to the provision of Biodiversity Net Gain (BNG). To meet the tests of soundness the Council must ensure that the policies in the Local Plan do not have an adverse impact on the deliverability of sites. The Council cannot adopt a policy which would render development undeliverable. The Local Plan Viability Assessment (Aspinall Verdi, 2024) provides clear and up-to-date evidence on development viability throughout the borough. It reveals that there is low viability across large areas of Pendle, including Colne. The evidence illustrates that the introduction of CIL is not viable at this time.
01871	B J Reynolds	Not specified	Not specified	Policy SP12: Developments should make contributions towards open space, BNG, SuDs and travel plans where appropriate. These levies should not be one off events but should include future monitoring and management in the long term.	None specified.	Comments noted: Recommend no change The Council can only require planning obligations which meet the tests outlined in paragraph 57 of the NPPF. Section 106 (s.106) agreements signed and secured prior to the grant of planning consent normally set out

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						arrangements for the monitoring and management of any committed obligations.
01872	Lancashire County Council (Education)	Not specified	Not specified	Policy SP12: Seek reassurance that any education contributions to mitigate any of the development's impact are ringfenced for education purposes only or that the Section 106 legal process is used for this purpose.	None specified.	<p>Disagree: Recommend no change</p> <p>Where education contributions are required in order to make a development sustainable then these will be sought for education purposes only. To do otherwise would be contrary to the planning obligation tests outlined in paragraph 57 of the NPPF.</p> <p>The Council would anticipate that contributions towards education provision connected to a development would be secured as part of the s.106 legal agreement details of which would be subject to negotiations with Pendle Council, Lancashire County Council and the landowner or applicant.</p>
02125	NHS Property Services	Not specified	Not specified	Policy SP12: New housing development should make a proportionate contribution to funding the health care needs arising from new development. Health care is an integral component of sustainable development. Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure's strategic importance it should be at the forefront of priorities for infrastructure delivery. Planning policy should enable the delivery of essential healthcare infrastructure.	None specified.	<p>Comments noted: No change proposed</p> <p>The Council has previously sought advice from its Legal Counsel on this matter. This advice stated that NHS facilities are funded through other means and do not meet the statutory tests in Regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended by the 2011 and 2019 Regulations) and as policy tests in paragraphs 56-59 of the National Planning Policy Framework.</p>
02125	NHS Property Services	Not specified	Not specified	Policy SP12. Health infrastructure should be clearly identified in the Local Plan as essential infrastructure with an expected that development proposals will make provision to meet the cost of healthcare infrastructure necessary by the development. Emphasise the importance of effective implementation mechanisms so that healthcare infrastructure is delivered alongside new development. The policy does not sufficiently reflect the likely level of healthcare infrastructure required to support the level of growth proposed by the plan. The Local Plan should highlight the need for the NHS, its partners, and the Council to work together in the formulation of appropriate mitigation measures. We recommend that the Council engage with the relevant Integrated Care Board to add further detail within the Local Plan and supporting evidence base (Infrastructure delivery plan) regarding the process for determining the appropriate form of contribution towards the provision of healthcare infrastructure where this is justified. Flexibility is needed in determining the most appropriate means of meeting healthcare needs arising from a new development. This includes the provision of on-site infrastructure or	Greater emphasis needed on health infrastructure as part of securing sustainable development and identify mechanisms to secure its delivery, as necessary.	<p>Comments noted: No change proposed</p> <p>The Council has previously sought advice from its Legal Counsel on this matter. This advice stated that NHS facilities are funded through other means and do not meet the statutory tests in Regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended by the 2011 and 2019 Regulations) and as policy tests in paragraphs 56-59 of the National Planning Policy Framework.</p> <p>On this basis Policy SP12 does not address the funding of health infrastructure.</p>

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				financial contributions where the extension of existing premises is not feasible.		
00040	Barrowford Parish Council	Not specified	Not specified	The Key Diagram would be better placed after Policy SP03 rather than its current location.	Move key diagram to after Policy SP03.	Disagree: Recommend no change The Key Diagram shows the impact of the spatial strategy by illustrating the strategic implications of the policies in the Local Plan. This includes policies that are addressed after Policy SP03 such as Policy SP05 (Green Belt), SP08 (Natural Environment) and SP11 (Transport and Connectivity).
Local Plan Section 5: Development Management Policies (Environment)						
00539	United Utilities	Not specified	Not specified	Policy DM01: Support the policy but consider that it should be intrinsically linked to wider policies including those on detailed design, green and blue infrastructure, as well as the Borough's Climate Change Emergency Action Plan.	Ensure sufficient cross referencing within the policy.	Comments noted: Recommend no change There is cross referencing to other relevant policies within the Policy Text.
00539	United Utilities	Not specified	Not specified	Policies DM01 and SP07: Recommends that Local Plans include a policy requirement for new development to be built to operational water efficiency standard prescribed in Building Regulations. We therefore welcome the inclusion of this within the policies of the Local Plan but would recommend further wording amendments and enclose evidence to support this.	Revise Policy DM01 paragraph 3(d) to: ‘Adopt water efficiency measures within building design to limit water usage; including the implementation of optional technical standards for water efficiency in the Building Regulations Requirement G2 (or any further updated optional standards for water efficiency) for all new residential development proposals’ and ‘All major non-residential development shall incorporate water efficiency measures so that predicted per capita consumption does not exceed the levels set out in the applicable BREEAM excellent / very good standard’	Comments noted: Recommend no change No need for additional wording as the policy is already clear that it is related to water efficiency and applies to the latest optional technical standard. The additional text would depart from wider policy on the application of the BREEAM standard, resulting in an inconsistent approach across the policies of the Local Plan. It is application as a standard would be an issue for viability, which has not been subject to testing in the Local Plan Viability Assessment.
01535	Home Builders Federation	Yes	No	Policy DM01: Not clear how Part 3 of the policy would be used in decision making in terms of expectations of applicants and responsiveness to listed considerations. Second, a number of the elements listed are not necessary and should be delivered.	Amend Part 3 to remove the optional technical standards for water efficiency. <ul style="list-style-type: none"> Water butts Electric vehicle charging, which is within Building Regulations Street trees No evidence or justification for encouraging food production.	Comments noted: Recommend no change Water Butts – Evidence provided by United Utilities has been relied upon to justify the policy support for the implementation of optional technical standards on water efficiency in paragraph 3 of the Policy Text. Electric vehicle charging – Comments noted: Recommend no change but its inclusion within the policy provides a consistent approach to cross referencing within the document and highlights the requirements under Policy DM37. Street trees – This requirement is consistent with Paragraph 136 of the NPPF. Food production – Tackling high levels of obesity in Pendle is a Council priority. Promoting food production is seen as a key component in helping to encourage people to make healthier lifestyle choices. It is regarded as a valuable supplement to the

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						protection afforded to allotments, which are designated as open space through Policy DM31.
01644	Colne Town Council	Not specified	Not specified	Policy DM01: Supports policy.	None specified.	Support welcomed
02060	Woodland Trust	Not specified	Not specified	Policy DM01 Climate Change Resilience Welcome part 2 of this policy which says that development should safeguard, and where possible, enhance natural features which make a positive contribution to the capture and storage of greenhouse gases.	We welcome an expansion of test to compel developers to: a) Protect and retain mature trees on developments b) Plant new trees on developments. This could be done through introducing a district-wide tree canopy cover target and/or a canopy cover target for new developments.	Comments noted: Recommend no change The Local Plan should be read as a whole, as clearly noted after paragraph 1.34 on page 15 of the Local Plan. The changes sought through points (a) and (b) are already set out in Policy DM07 Trees and Hedgerows and a cross reference to this policy is made in paragraph 3 of Policy DM01. The Council does not have any evidence to support the implementation of a borough-wide or site-specific canopy cover target and as such the suggested requirement cannot be justified. Guidance related to Trees and Hedgerows is set out in Policy DM07. The policy seeks a net increase in tree provision for any tree lost as part of a development proposals. This approach will be beneficial in maintaining and increase tree canopy cover in Pendle through the planning system.
02143	Pegasus Group for MCI Developments	Not specified	No	DM01: Part 3 requires clarification as to whether all points are required. In any case they are not necessary and lack supporting evidence and justification.	Remove requirements from part 3 of Policy DM01.	Disagree: Recommend no change The policy seeks to secure development that is sustainable in the context of climate change. There is a large body of published evidence highlighting that new development should mitigate and be resilient to the effects of climate change. Significant weight is attached to this objective through the NPPF, as signified by references to climate change in: <ul style="list-style-type: none"> Paragraph 8, as part of the process for securing sustainable development Paragraph 11 and the presumption in favour of sustainable development Paragraphs 158-160 regarding the preparation of Local Plans and their role in guiding development Evidence supporting the need to adopt water efficiency measures has been made available as part of this consultation.
00294	Lidgett and Beyond	Not specified	Not specified.	Policy DM02(a): Policies 7-12 Agrees with the value put on retaining existing landscape features which contribute to the natural prevention of flooding and/or slow the flow of water. Whilst much has been made about man-made SuDS achieving great things, in many edge of town and rural areas such flood prevention has been achieved successfully by nature and this should be respected.	None specified.	Comments noted: Recommend no change Part 3(a) of Policy DM02(b) requires developments to respond to the hydrological characteristics of a site when dealing with surface and waste water flow.

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00539	United Utilities	Not specified	Not specified	Policy DM02(a): It is important to for the Local Plan to sufficiently highlight all forms of flood risk. Additional wording to address drainage systems and reservoirs.	<p>Add to Policy DM02(a):</p> <p>‘Applicants will be required to consult with the water and sewerage undertaker to confirm the nature and extent of any flood risk from sewers and reservoirs. For sewers, the consultation should confirm:</p> <ul style="list-style-type: none"> a) If there are any sewer surcharge levels at the point of connection that could influence site design; b) Whether there is an incident of sewer flooding at, or in the vicinity of, the proposed development site; and c) If sewer modelling data indicates that existing sewers that pass through or near to the site present a modelled risk of sewer flooding. <p>This will determine whether to apply the sequential approach. Development should not be located in an area at risk of flooding. Applicants must demonstrate that proposals do not increase flood risk and are safe. Applicants should not assume that changes in levels or that changes to the public sewer (including diversion), will be acceptable as such proposals could increase / displace flood risk.’</p>	<p>Comments noted: Recommend no change</p> <p>The need to address all sources of flood risk through development proposals is set out in paragraphs 13 and 14 of the Policy Text.</p> <p>Policy SP07 sets out the need for applicants to engage with the water and sewerage undertaker to confirm the nature and extent of any flood risk from sewers or reservoirs. The Council encourages applicants to engage in proportionate pre-application discussions with key consultees, including the statutory undertakers in accordance with Policy DM43.</p>
01510	Lane Town Planning for McDermott Homes	Yes	No	Policy DM02(a) is inconsistent and fails to properly interpret national policy on flood risk. Part 1 ignores that it is for plans to apply the sequential test through the plan making exercise. In PPG the first stage is to assess and verify the scale and nature of risk through a flood risk assessment, this requires the applicant to consult the Council’s up-to-date SFRA and complete detailed work first, only once the correct extents of flood risk are understood do you then move on to the following steps within the FRA applying the sequential approach within development sites and then consider whether conditional controls could be used to obviate any flood risk to more vulnerable uses and the need for a sequential test. Only if the above provisions cannot be met and vulnerable development is still proposed in flood risk extents should the Council then require a sequential test.	The policy should be reviewed and revised so it is consistent with national planning policy. The Council should check the EA standing advice and PPG in respect to the remainder of the policy, particularly in relation to Part 11 in regard to finished floor levels.	<p>Comments noted: Recommend no change</p> <p>The policy applies to non-allocated sites which may come forward over the plan period. As such it is consistent with national planning policy.</p> <p>Specific guidance is provided for sites allocated in the Plan and these address the recommendations of the Level 2 SFRA, as applicable.</p> <p>To better accord with the standing advice in the Planning Practice Guidance (PPG) on Flood Risk Assessment it is recommended that the wording of Paragraph 11 of the Policy Text is changed to:</p> <p>“Finished floor levels and the use of flood resilient materials should accord with the standing advice set out in the Planning Practice Guidance (PPG) on Preparing a Flood Risk Assessment.”</p>
01535	Home Builders Federation	Yes	No	<p>Policy DM02(a). It is unclear how the requirement for finished floor levels to be set a minimum of 600mm above whichever is higher of the</p> <ul style="list-style-type: none"> (a) average ground level of the site, (b) adjacent road level to the buildings, or (c) estimated river or sea flood level of the site <p>This has not been thought through in terms of how it would work alongside requirements for M4 standards and local topography.</p>	Remove/revise requirement.	<p>Agree: Recommend change to Policy Text</p> <p>To better accord with the standing advice in the Planning Practice Guidance (PPG) on Flood Risk Assessment it is recommended that the wording of Paragraph 11 of the Policy Text is changed to:</p> <p>“Finished floor levels and the use of flood resilient materials should accord with the standing advice set out in the Planning Practice Guidance (PPG) on Preparing a Flood Risk Assessment.”</p>
01644	Colne Town Council	Not specified	Not specified	Policy DM02(a): Supports policy.	None specified.	Support welcomed

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02060	Woodland Trust	Not specified	Not specified	Policy DM02(a) Flood Risk Welcome part 8 of the policy which says that natural flood management schemes will be supported. Trees acts as excellent natural flood protection in a wide variety of circumstances.	None specified.	Support welcomed
02143	Pegasus Group for MCI Developments	Not specified	No	Policy DM02(a) requirement for finished floor levels higher than average ground level of the site, adjacent road level and estimate river or sea flood level needs to be removed. The physical constraints of Pendle means that the policy will compromise site layouts and the efficient use of land and will reduce the ability to comply with other policies such as M4(2) standards.	Revise policy DM02(a) to outline the this will be determined on a site-by-site basis taking into account the latest government guidance.	Agree: Recommend change to Policy Text To better accord with the standing advice in the Planning Practice Guidance (PPG) on Flood Risk Assessment it is recommended that the wording of Paragraph 11 of the Policy Text is changed to: “Finished floor levels and the use of flood resilient materials should accord with the standing advice set out in the Planning Practice Guidance (PPG) on Preparing a Flood Risk Assessment.”
00294	Lidgett and Beyond	Not specified	Not specified	Policy DM02(b): Question Point 2 as to the extent the proposed final drainage system must be modelled in applications that are in outline or access only. Supports Policy 3(f) and Policy 8.	None specified.	Comments noted: Recommend no change The policy does not alter the information requirements of applications for outline planning permission.
00539	United Utilities	Not specified	Not specified	Policy DM02(b): Pleased to note that the issues of flood risk and surface water management are dealt with as three separate elements. Welcome the intentions of wording in Policies SP07, DM02(a) and DM02(b). Noting that not all applications are required to submit a flood risk assessment, seeks policy to set an expectation that all applications will be required to submit clear evidence that the hierarchy of surface water management has been fully investigated. Wish to see further improvements in the wording of Policy DM02(b).	Policy DM02(b) amendments: ‘1. All applications must be supported by a strategy for foul and surface water management.’ ‘2. Applicants wishing to discharge into a public sewer must submit clear evidence to demonstrate why alternative options are inappropriate. Proposals should be designed to maximise the retention of surface water on-site and minimise the volume, and rate of surface water discharge off-site. The right to connect surface water runoff to public sewers is conditional upon a drainage system being approved before any construction work can start’ ‘3 (d) Include sustainable urban drainage systems (SuDS) unless there is clear evidence that this would be inappropriate. Applications for major development will be required to incorporate sustainable drainage, which is multifunctional, in accordance with the four pillars of sustainable drainage, in preference to underground piped and tanked storage systems, unless there is clear evidence why such techniques are inappropriate. The sustainable drainage should be integrated with the landscaped environment and the strategy for biodiversity net gain. Any drainage must be designed in accordance with ‘Ciria C753 The SuDS Manual’ and sewerage sector adoption guidance.’ ‘4 (b) on previously developed (brownfield) land the peak run-off rate and run-off volume should not exceed the greenfield rates for the same rainfall events, including an allowance for climate change and urban creep. Where this cannot be achieved a reduction as close to greenfield rates as reasonably	Comments noted: Recommend no change 1. The requirements of the Local Plan are proportionate and recognise that the submission of a foul and surface water management strategy will not be necessary for a substantial proportion of the applications processed by the Council. 2. The additional text repeats policy requirements that are addressed elsewhere in the Local Plan. 3. What is proposed is far too detailed for a planning document. 4. What is proposed is far too detailed for a planning document. 9. What is proposed is far too detailed for a planning document.

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					<p>practicable must be targeted, with a minimum requirement for a reduction of 30% allowing for climate changes, rising to 50% in any critical drainage area identified by the SFRA. A 10% allowance for urban creep must also be applied unless this results in an impermeable area greater than 100%. To demonstrate any reduction in discharge rates, applications must submit clear evidence of existing operational connections from the site with associated calculation rates on discharge. Where clear evidence of existing connections is not provided, applicants will be required to discharge at greenfield rate of run-off.</p> <p>9. For any development proposal which is part of a wider development / allocation, foul and surface water drainage strategies must be part of a holistic site-wide strategy. Pumped drainage must be minimised and a proliferation of pumping stations on a phased development will not be acceptable.</p>	
01510	Lane Town Planning for McDermott Homes	Yes	No	Policy DM02(b) policy applies a detailed approach to surface water management. It is expected that these provisions will largely be dealt with via site design and conditions to control the surface water discharge of the final development. The policy should make clear that where development proposals comply with this policy, they will not be required to complete a sequential test.	Clarify that proposals submitted in accordance with the policy will not be required to complete a sequential test.	<p>Disagree: Recommend no change</p> <p>Only sites allocated in Policy AL01 or Policy AL02 are do not need to complete a sequential test, as this requirement is carried out as part of the plan-making process. For all other sites, where applicable, a sequential test must be undertaken.</p>
01644	Colne Town Council	Not specified	Not specified	Policy DM02(b): Supports policy.	None specified.	Support welcomed
00294	Lidgett and Beyond	Not specified	Not specified	Policy DM03: Support green energy but wish to state that the Town Council will not support developments that conflict with any of the significant views described with the Colne Neighbourhood Development Plan.	Refer to significant views in the Colne Neighbourhood Development Plan.	<p>Comments noted: Recommend no change</p> <p>Development proposals within the designated area are also subject to the policies of the Colne Neighbourhood Development Plan (2023). The requested amendment is therefore unnecessary.</p>
00294	Lidgett and Beyond	Not specified	Not specified	Policy DM03: We strongly disagree with the deletion of the following text from Clause 7(b) on wind turbines ‘... and the proposal has the backing of the local communities that have been consulted.’	Reinstate removed wording.	<p>Comments noted: Recommend no change</p> <p>The text was removed to ensure that the Local Plan is consistent with amendments made by the Government to the National Planning Policy Framework (NPPF). One of the tests of soundness is that the policies in the Local Plan must be consistent with the NPPF.</p>
00471	Sport England	No	No	Policy DM03: Support the policy but would prefer the reference to ‘non-designated’ to be removed in relation to sports fields.	Remove reference to ‘non-designated’ sport pitches from policy.	<p>Comments noted: Recommend no change</p> <p>In this instance the term ‘non-designated’ has been used to describe those sports fields which have not been formally designated as open space and protected through Policy DM31.</p>
00526	Trawden Forest Parish Council	Not specified	Not specified	Policy DM03: We disagree with the deletion of the following text from Clause 7(b) on wind turbines ‘... and the proposal has the backing of the local communities that have been consulted.’	Reinstate removed wording.	<p>Comments noted: Recommend no change</p> <p>The alternation was made to ensure that the Local Plan is consistent with amendments made to the NPPF by the Government.</p>

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01542	Canal & River Trust	Not specified	Not specified	Considers changes made to Policy DM03 in response to comments made by the Trust to the consultation to the draft Local Plan to be satisfactory.	None specified.	Support welcomed
01644	Colne Town Council	Not specified	Not specified	Policy DM03: We disagree with the deletion of the following text from Clause 7(b) on wind turbines ‘... and the proposal has the backing of the local communities that have been consulted.’	Reinstate removed wording.	Comments noted: Recommend no change The alternation was made to ensure that the Local Plan is consistent with amendments made to the NPPF by the Government.
01871	B J Reynolds	Not specified	Not specified	Policy DM03: Note the deletion of text reference consulting local communities to gain their backing. This amounts to Pendle Council being able to impose such developments on communities in Pendle. Besides their inappropriate appearance in largely rural landscapes, the disruption and destruction of the environment during construction may lead to the area never being able to recover. Such sites have a detrimental impact on local wildlife.	Reinstate removed text from the Policy.	Comments noted: Recommend no change The revised text reflects a change in national planning policy implemented by the government.
00294	Lidgett and Beyond	Not specified	Not specified	Policy DM04: Support the policy and Supporting Text. Would like to see grey squirrel control measures introduced to protect red-listed ground-nesting birds and for red squirrels to flourish.	Introduce a policy on grey squirrel control measures.	Disagree: Recommend no change This is not a planning matter and therefore not addressed in the Local Plan.
00336	Natural England	Not specified	Not specified	Policy DM04: Welcome the inclusion of recommended amendments to the BNG policy within the Local Plan. Additional comments provided to help strengthen wording.	Part 3: Prior to publication of the LNRS, habitat provision should use documentation noted on p27 of the Statutory Biodiversity Metric User Guide to inform strategic significance. Part 5: ‘Conservation Credits’ should be reworded ‘Statutory Biodiversity Credits’ to be consistent with legislation Part 8: specific wording detailing the required length of the BNG commitment should be provided. It is a legal requirement for maintenance, management, and monitoring of BNG to be secured for a minimum period of 30 years with reports to be submitted in years 1, 2, 3, 5 and every 5 years thereafter. Annex A in representation has further example wording.	Agree (in part): Recommend change to Policy Text Paragraph 3: The Local Plan is unlikely to be adopted ahead of the LNRS which is scheduled to be published in Spring 2025. Paragraph 5: The Council agrees that the Local Plan should use terminology that is consistent with that used in legislation. As such the use of “Statutory Biodiversity Credits” will be proposed as minor modification to the Local Plan – see Schedule of Proposed Minor Modifications. Paragraph 8: It is unclear why it is necessary to include this detail in the Local Plan when it is already set out in the legislation. The Council would note that where BNG is required monitoring arrangements are agreed and secured by a signed legal agreement before planning permission is granted. The Council consider the existing wording of the policy to be appropriate and proportionate.
00539	United Utilities	Not specified	Not specified	UUW welcomes Policies DM04: Biodiversity Net Gain and SP12: Infrastructure and Developer Contributions, which includes flexibility to allow for off-site BNG provision. We wish to highlight that on-site provision is not always the most appropriate long term solution for the delivery of BNG when investing in key infrastructure such as water and wastewater assets. It is critical that land at and around our key infrastructure sites is not sterilised to ensure that we are able to flexibly and most appropriately respond to future growth and environmental drivers. This	None specified	Comments noted.

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				approach is supported by the planning practice guidance which states that the approach to BNG should be resilient to future pressures from further development. We also wish to note that biodiversity mitigation / enhancement should not be located directly over water and wastewater assets or where excavation onto the asset would require removal of the biodiversity.		
01535	Home Builders Federation	Yes	No	Policy DM04 the policy should offer certainty and worded to reflect the requirement for 10% net gain as set out in the Environment Act. Notes that BNG has been assessed through the Local Plan Viability Assessment and that viability constraints have been identified. Also notes that many of the costs associated with BNG are at this stage unknown. Additional wording is needed to ensure that there is no confusion about the mitigation hierarchy and the BNG hierarchy and it is clear what the differences are between the two. Reference must also be made to the correct BNG metric with metric 3.0 referenced in Supporting Text.	Part 3 of the policy should refer to 10% BNG. Part 5 needs to refer to statutory BNG credits. The policy could usefully refer to s.106 agreements and the use of conservation covenants as a way of securing BNG. Reference should also be made to securing BNG for 30-years which is a key part of the national approach.	Agree (in part): Recommend change to Policy Text Paragraph 3: The wording ‘a measurable net gain for biodiversity of at least 10% against the baseline ...’ makes it sufficiently clear than qualifying developments will be expected to provide a 10% net gain as a minimum. The context for this wording is the increased weight the policy affords to proposals providing a net gain in excess of this minimum position. The approach is consistent with legislation and national guidance relating to BNG and will help to maximise the contribution that new developments provide in support of local biodiversity and the implementation of the wider LNRS. Paragraph 5: Agree. The Council accept that the terminology used in paragraph 5 is not consistent with that used in the legislation and that the reference to “Conservation credits” should be changed to “Statutory Biodiversity Credits”. A minor modification is proposed to address this – see Schedule of Minor Modifications. Section 106 agreements: The Council does not agree that there is a need to reiterate legislation and notes that the length of any agreement is defined through the s.106 agreement, which is required to be in place before the relevant planning permission is granted.
01644	Colne Town Council	Not specified	Not specified	Policy DM04: Supports policy.	None specified.	Support welcomed
02060	Woodland Trust	Not specified	Not specified	Policy DM04 Biodiversity Net Gain Welcome the inclusion of this policy within the Local Plan, clarifying the need to provide at least 10% BNG and that provision of BNG in excess of 10% will be considered favourably. Encourages LPAs to plan for more than 10% BNG given the possibility that some sites may not be able to deliver net gain within the local authority area or that initiatives intended to deliver BNG may end up falling short in practice.	Higher than BNG 10% target should be planned for. Introduce tree canopy cover targets at new developments. Declare any development within a defined wildlife corridor will not be permitted where it would prejudice the corridor’s character or purpose and no development is permitted within wildlife corridors entirely unless sufficient mitigation is set out.	Comments noted: Recommend no change Legislation is clear that it is for developers to demonstrate how BNG requirements are to be met and delivered. Specific multipliers are built into the DEFRA metric where BNG is to be delivered in later phases or some distance from the application site. Outside the Local Plan process, the Council is working with partners to identify specific sites for the creation of Habitat Banks within Pendle, where off-site BNG measures could be directed if on-site delivery is not possible. The Council has appointed specialist ecological consultants to assist with this process. The Council does not have any evidence to support the implementation of a borough-wide or site-specific

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						<p>canopy cover target and as such the suggested requirement cannot be justified.</p> <p>Guidance related to Trees and Hedgerows is set out in Policy DM07. The policy seeks a net increase in tree provision for any tree lost as part of a development proposals. This approach will be beneficial in maintaining and increase tree canopy cover in Pendle through the planning system.</p> <p>Policy DM05 sets out the policy approach for wildlife corridors and does not need to be repeated in Policy DM04.</p>
02111	L Bentley for Bolton and Bury Swifts	Yes	No	Reference to ‘swift nest bricks in paragraph 5.92 of Policy DM04 is welcome but only relates to small sites where there is minimal loss of habitat of low ecological value whereas PPG highlights the value of swift nest bricks to all types of development including types of development exempt from BNG so worthwhile of own policy.	Revise paragraph 5.92 ‘swift bricks are a universal nest brick for small bird species and should be installed in new developments including extensions in accordance with best-practice guidance such as BS 42021.’	<p>Comments noted: Recommend no change</p> <p>Paragraph 5.92 simply sets out examples of mitigation which might be suitable on a site by site basis. It does not set the Council’s policy but helps to interpret and implement Policy DM04. Policy DM04 is not prescriptive on the measures required to address BNG requirements enabling a flexible approach which is responsive to site specific conditions in the interests of biodiversity.</p>
02124	Swifts Local Network	No	No	Reference to ‘swift nest bricks in paragraph 5.92 of Policy DM04 is only relates to small sites where there is minimal loss of habitat of low ecological value whereas PPG highlights the value of swift nest bricks to all types of development including types of development exempt from BNG so worthwhile of own policy. They are also recommended by the National Model Design Code. Authorities which have introduced swift brick requirements in their local plans include Tower Hamlets, Brighton and Hove, Wiltshire, and Cotswolds.	Revise paragraph 5.92 to ‘swift bricks are a universal nest brick for small bird species and should be installed in all new developments including extensions in accordance with best-practice guidance such as BS 42021 or CIEEM.’	<p>Comments noted: Recommend no change</p> <p>Paragraph 5.92 simply sets out examples of mitigation which might be suitable on a site by site basis. It does not set the Council’s policy but helps to interpret and implement Policy DM04. Policy DM04 is not prescriptive on the measures required to address BNG requirements enabling a flexible approach which is responsive to site specific conditions in the interests of biodiversity.</p>
02128	CPRE Lancashire	Yes	Yes	Supports the integrated approach of the LNRS in BNG. The commitment to BNG aligns with national policy / legislation. The plan includes policies aimed at protecting valuable habitats and species. The plan recognises the multifunctional benefits of green infrastructure.	None specified.	<p>Comments noted: Recommend no change</p>
02131	Sevo Planning for Little Cloud	No	No	DM04 should recognise the financial burden caused by biodiversity net gain. Part 4 should refer to the Lancashire LRNS.	Set out recognition of financial burden to meet BNG. Refer to ‘Lancashire LRNS’ in part 4.	<p>Disagree: Recommend no change</p> <p>BNG is a legal requirement that must be met before applications for planning permission can be approved.</p> <p>Policy DM04 is concerned with the implementation of BNG through qualifying planning applications.</p> <p>The Local Plan Viability Appraisal has considered the implications of BNG requirements so setting out the financial burden within the Local Plan is not necessary.</p>

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						Paragraph 3 of the Policy Text refers to the ‘Lancashire Nature Recovery Strategy (LNRS)’ so the expanded reference is not required.
02133	H McGuire	Yes	No	Reference to ‘swift nest bricks in paragraph 5.92 of Policy DM04 is only relates to small sites where there is minimal loss of habitat of low ecological value whereas PPG highlights the value of swift nest bricks to all types of development including types of development exempt from BNG so worthwhile of own policy.	Revise paragraph 5.92 to ‘swift bricks are a universal nest brick for small bird species and should be installed in all new developments including extensions in accordance with best-practice guidance such as BS 42021.’	Comments noted: Recommend no change Paragraph 5.92 simply sets out examples of mitigation which might be suitable on a site by site basis. It does not set the Council’s policy but helps to interpret and implement Policy DM04. Policy DM04 is not prescriptive on the measures required to address BNG requirements enabling a flexible approach which is responsive to site specific conditions in the interests of biodiversity.
02138	G Thomas	No	No	Reference to ‘swift nest bricks in paragraph 5.92 of Policy DM04 is only relates to small sites where there is minimal loss of habitat of low ecological value whereas PPG highlights the value of swift nest bricks to all types of development including types of development exempt from BNG so worthwhile of own policy.	Revise paragraph 5.92 to ‘swift bricks are a universal nest brick for multiple bird species and should be installed in all new developments including extensions in accordance with best-practice guidance such as BS 42021.’	Comments noted: Recommend no change Paragraph 5.92 simply sets out examples of mitigation which might be suitable on a site by site basis. It does not set the Council’s policy but helps to interpret and implement Policy DM04. Policy DM04 is not prescriptive on the measures required to address BNG requirements enabling a flexible approach which is responsive to site specific conditions in the interests of biodiversity.
02143	Pegasus Group for MCI Developments	Not specified	No	Policy DM04: There is no need to repeat legislation. If it is to be retained then the expectation that developments exceed a 10% requirement should be deleted to ensure consistency with legislation and government guide.	Delete policy or reference to provision in excess of 10% BNG.	Disagree: Recommend no change The Council consider that the policy adds value by providing local guidance on how to comply with the requirement for BNG and by making an important link to the need for measures support the implementation of the Lancashire Local Nature Recovery Strategy (LNRS). Natural England has expressed broad support for the policy. The policy does not require provision in excess of 10% but highlights that any provision in excess of the national minimum requirement would be considered favourably. This approach is not contrary to the published legislation and encourages further biodiversity provision.
00294	Lidgett and Beyond	Not specified	Not specified	Support policy DM05.	None specified.	Support welcomed
00336	Natural England	Not specified	Not specified	Policy DM05: Welcome promotion of the Lancashire LNRS. LNRS will provide opportunity to prioritise the protection and restoration of habitats. It will highlight opportunity areas and measures, in a Local Habitat Map, where wildlife corridors and stepping stone habitats can be created to facilitate species movement and dispersal across Lancashire and beyond.	It may be useful to include an element that highlights how the LNRS is linked to delivery mechanisms such as BNG to ensure the plan remains relevant in terms of LNRS post adoption. Once adopted, LNRS will inform the strategic significance quantification within the Statutory Biodiversity Metric. Therefore, inclusion of sites in the LNRS will confer the benefit of increased biodiversity value in the metric. In addition, the Local Plan should reflect Pendle’s involvement in the preparation of the LNRS; and that	Comments noted: Recommend no change Policy DM04 highlights the role that BNG has in delivering the LNRS. Policy DM05 relates to ecological networks themselves and how they will be conserved over the plan period.

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					the Local Plan can support delivery in Pendle as identified in the LNRS priorities and measures, as well as relevant opportunity mapping for nature recovery.	
01542	Canal & River Trust	Not specified	Not specified	<p>Policy DM05: Ecological Networks</p> <p>Suggest that explanatory text could be included to provide more certainty to developers over what would constitute a buffer zone, as this is not defined within the Local Plan. Failure to account for this could mean that the policy might not apply where it should. The wording could also be made more effective by including examples of how buffer zones should be protected or enhanced, so that it is clear to developers and decision makers what the policy requires.</p>	Request for 'buffer zones' referred to in Policy DM05 to be defined in the Local Plan, with examples of how buffer zones should be protected or enhanced.	<p>Comments noted: Recommend no change</p> <p>Buffer zones are not defined through the Local Plan as they vary depending on the character, function and significance of the asset, its role in the wider ecological network, and the type, scale, and intensity of the proposed development.</p> <p>It is for the development management (decision making) process to evaluate and consider the likely effects of development proposals on any ecological networks and whether planning permission should be approved or refused taking into account the requirements and guidance set out in the Local Plan and national planning policy.</p>
01644	Colne Town Council	Not specified	Not specified	Policy DM05: Supports policy.	None specified.	Support welcomed
02060	Woodland Trust	Not specified	Not specified	<p>Policy DM05: Ecological Network</p> <p>Welcome reference included in the policy to the Lancashire LNRS.</p> <p>Recommend additional test to protect against harm to ecological networks.</p>	Recommend additional wording to declare that where adverse impacts are possible to an ecological network, sufficient mitigation is set out to ensure the harm to the network is minimised.	<p>Comments noted: Recommend no change</p> <p>The current wording of Policy DM05 is proportionate, given that the adoption of the ecological and mitigation hierarchy are addressed in other Local Plan policies.</p>
02131	Sevo Planning for Little Cloud	No	No	Policy DM05: The Policies Map should reflect the Local Nature Recovery Strategy. The policy is not clear.	Include the LNRS on the Policies Map.	<p>Disagree: Recommend no change</p> <p>Links to the policies addressing the Local Nature Recovery Strategy are included in the Policy Text.</p> <p>However, the LNRS is still in preparation so any decision on whether it is desirable to reflect some or all of its spatial implications on the Local Plan policies map can only be taken after its publication, which should be prior to the adoption of the Local Plan.</p>
00294	Lidgett and Beyond	Not specified	Not specified	Support policy DM06.	None specified.	Support welcomed
00471	Sport England	No	No	<p>Policy DM06: References the Green Infrastructure Strategy which is considered to be out-of-date by virtue of its reference to the 2016 Playing Pitch Strategy. The policy does not sufficiently protect sports facilities and playing fields in accordance with paragraph 130 of the NPPF.</p> <p>Paragraph 5.111 identified the NPPF Annex 2 definition of Green Infrastructure. This annex also includes a separate definition for a 'playing field' which should be treated separately to the requirements for Green Infrastructure.</p>	<p>Revise Policy DM06 as follows:</p> <p>'h Make a positive contribution to improving the physical health and wellbeing of the local and wider community and encouraging Active Travel, promoting walking, and cycling (Policies SP11, DM16, DM30 and DM32).</p> <p>j. (d) any impact to playing field land will need to meet the tests of Sport England's Playing Field Policy and paragraph 103 of the NPPF.'</p>	<p>Comments noted: Recommend no change</p> <p>The Local Plan should be read as a whole, as clearly noted after paragraph 1.34 on page 15 of the Local Plan.</p> <p>The protection of sports fields is addressed through Policy DM31 of the Local Plan, which is concerned with open space provision. Policy DM06 relates to green infrastructure, which may include sports field provision. This is recognised within the Policy Text, where paragraph 2(d) references the need to also refer to Policy DM31. The additional wording that is proposed is not considered necessary.</p>

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						Playing fields are an integral component of the borough's green infrastructure network and should remain subject to the appropriate policy requirements. Repeating the NPPF definition of a playing pitch within the Glossary (Appendix 9) is not necessary.
01542	Canal & River Trust	Not specified	Not specified	Policy DM06: Green Infrastructure Paragraph 5.111 has amended the definition of Green Infrastructure to match that in the Glossary of the NPPF. This change will help make the Local Plan more effective in ensuring that decision makers are aware of the full range of Green Infrastructure over which Policy DM06 seeks to apply.	None specified.	Support welcomed
01644	Colne Town Council	Not specified	Not specified	Policy DM06: Supports policy.	None specified.	Support welcomed
02131	Sevo Planning for Little Cloud	No	No	Policy DM06: The Policies Map should reflect the green infrastructure strategy. The map within the green infrastructure strategy is not sufficiently clear.	Include the green infrastructure network on the Policies Map.	Disagree: Recommend no change There is no legal requirement for any aspects of the Green Infrastructure Strategy to be included on the Local Plan Policies Map and to do so would be likely to reduce its clarity and usefulness. The maps within the Pendle Green Infrastructure Strategy (LUC, 2019) are sufficiently clear to guide decision making in relation to the implementation of this policy. The benefits of creating an online interactive Green Infrastructure Map, similar to that recently created for the Open Space Audit, will be considered as time permits.
00294	Lidgett and Beyond	Not specified	Not specified	Policy DM07: Support the policy but believe stronger wording is necessary.	Revise first two policy points to 'should' instead of 'wherever practicable.'	Disagree: Recommend no change Paragraph 1 of the Policy Text already uses the word 'should'. The subsequent reference to 'wherever practicable' acknowledges that it will not always be possible to retain existing woodland, trees, and hedgerows into development layouts. In recognition of this the policy also includes measures to address the loss of trees and hedgerows.
00539	United Utilities	Not specified	Not specified	Policy DM07: The evaluation of surface water management opportunities should be undertaken early in the design process. Sustainable surface water management will be particularly important to consider in the context of the requirement for new streets to be tree lined. Any approach to planting must also give due consideration to the impact on utility services. Trees should not be planted directly over water and wastewater assets or where excavation onto the asset would require removal of the tree.	Add to Policy DM07 'Landscape proposals, including proposals for tree-lined streets, must be integrated with the strategy for sustainable surface water management' Add to the Supporting Text: 'Landscaping proposals, including public realm improvements, must be intrinsically linked to opportunities for surface water management improvements and considered early in the design process. The integration of landscaping proposals with surface water management can be achieved through a variety of features including:	Comments noted: Recommend no change The Local Plan should be read as a whole, as clearly noted after paragraph 1.34 on page 15 of the Local Plan. Relevant guidance on drainage and surface water flooding is set out in Policies DM02(a) and DM02(b) of the Local Plan, which addresses the matter of drainage in the design process. Paragraph 5.141 addresses the impacts of tree planting on utility infrastructure.

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					<ul style="list-style-type: none"> • Permeable surfacing; • Bioretention tree pits; • Rain gardens • Soakaways and filter drainage; • Swales; and • Blue / green roofs. <p>Also to Policy DM07:</p> <p>‘The approach to any planting must have regard to the proximity to existing or proposed utility assets to ensure that there is no impact on these assets such as root ingress. Trees and biodiversity mitigation / enhancement proposals should not be planted directly over water and wastewater assets or where excavation onto the asset would require removal of the tree / biodiversity’</p>	
01575	The Planning Bureau for McCarthy Stone and Churchill Living	Not specified	Not specified	Policy DM07: requirement to replace any one tree with two trees goes beyond Paragraph 131. It will often be impractical to deliver 2 trees for every 1 lost on site and flexibility must be provided to be consistent with national planning policy.	Delete point 17 of the policy in full.	<p>Comments noted: Recommend no change</p> <p>The policy is not contrary to the NPPF but provides an element of flexibility by allowing a financial contribution to be made, when appropriate.</p>
01644	Colne Town Council	Not specified	Not specified	Policy DM07: Support the policy but believe that the Local Plan should remove permitted development right to have closely boarded fences on public visible frontages. This approach would ensure that more existing hedgerows are saved and more planted.	Remove permitted development right for closely boarded fences on publicly visible frontages.	<p>Disagree: Recommend no change</p> <p>The Local Plan cannot make alterations to the General Permitted Development Order.</p>
02060	Woodland Trust	Not specified	Not specified	<p>Policy DM07 Trees and Hedgerows</p> <p>Strongly recommend a 50m buffer is introduced. The buffers currently referenced in the policy will not be sufficient to avoid adverse impacts for trees. In line with NPPF paragraph 186c, development which would result in the loss of ancient woodland, aged or veteran trees should not be permitted. The Woodland Trust recommends the introduction of a tree canopy capacity target especially in locations where tree-canopy cover on existing developments is below 16%. Support the preference for native trees outlined in Part 15 of the policy. The Woodland Trust strongly supports the requirement for replacement trees. We believe the ration is key to ensuring that overall tree canopy cover is not reduced and Pendle is able to achieve its BNG aims.</p>	<p>Revise buffer to 50m.</p> <p>Introduce 30% tree canopy cover target on new development.</p>	<p>Comments noted: Recommend no change</p> <p>No justification is provided for the substantial increase to the buffer for Ancient Woodland and Veteran Trees. The policy requirement in the Local Plan reflects the standard currently adopted by the Woodland Trust.</p> <p>The Council does not have any evidence to support the implementation of a borough-wide or site-specific canopy cover target and as such the suggested requirement cannot be justified.</p> <p>Guidance related to Trees and Hedgerows is set out in Policy DM07. The policy seeks a net increase in tree provision for any tree lost as part of a development proposals. This approach will be beneficial in maintaining and increase tree canopy cover in Pendle through the planning system.</p>
00294	Lidgett and Beyond	Not specified	Not specified	Support policy DM08.	None specified.	Support welcomed
01644	Colne Town Council	Not specified	Not specified	Policy DM08: Supports policy.	None specified.	Support welcomed

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00294	Lidgett and Beyond	Not specified	Not specified	Policy DM09: Support the policy but would like to see it go further in terms of the form and design of development allowed in order to protect rural character and identity as exemplified by Policy CNDP14 of the Colne Neighbourhood Development Plan.	Revised wording to set out that development should retain and enhance the rural identity and character of the area, is appropriate in scale, nature, and location, and building form and style and layout of development should be consistent with the forms of development found within the rural area.	Comments noted: Recommend no change Policy DM09 primarily addresses the types of development which are likely to be supported within the open countryside. Further policy requirements on the design, form, and density of development in the open countryside is set out in Policies DM21, DM26, DM45 and DM46.
00539	United Utilities	Not specified	Not specified	Policy DM09: Requests that local development plan policy is worded to recognise that utility assets sites, located within protected land, are appropriate for development for operation purposes. Our preference is for this principle to be reflected in policy and designated sites on the Policies Map.	Additional wording to Policy DM09: ‘The Council will support water and wastewater infrastructure investment which facilitates the delivery of wider sustainable development and the meeting of environmental objectives of water and sewerage undertakers including development proposals for water and wastewater infrastructure in protected areas such as the Green Belt, open countryside or in existing green spaces, where the investment is needed to respond to future growth and environmental needs.’	Comments noted: Recommend no change Proposals for infrastructure for water supply and wastewater discharge will be assessed on their own merits against paragraph 3(a) of the Policy Text.
01510	Lane Town Planning for McDermott Homes	Yes	No	Unclear whether paragraphs proceeding Policy DM09 apply to its directing. If so, it is unsound given that the NPPF prescribes a lower test. Paragraph 5.152 misquotes the NPPF and should be correct. Policy DM09 is itself unsound for the reasons set out in responses to Policy SP01, SP02 and SP03. Paragraph 5.155 the approach of protection rather than recognition of intrinsic character and beauty is again erroneously applied and should be corrected.	Revised proceeding paragraphs to Policy DM09 to reflect the approach of the NPPF towards the open countryside. Correct paragraph 5.152 to reflect the wording of the NPPF. Add Part 3f to Policy DM09: ‘it can be demonstrated that in accordance with Policies SP01 and SP02, the development would be situated adjacent to settlements identified in the settlement hierarchy, it would meet pressing housing needs, and any adverse impacts of delivering those homes would not significantly and demonstrably outweigh the benefits’ Correct paragraph 5.155	Disagree: Recommend no change For reasons set out above in response to comments 125/R19/01510 and 126/R19/01510, which address policies SP01 and SP02, the Council does not support the proposed alternations to Policy DM09.
01644	Colne Town Council	Not specified	Not specified	Policy DM09 support the policy but would like to see it go further in terms of the form and design of development allowed in order to protect rural character and identity as exemplified by Policy CNDP14 of the Colne Neighbourhood Development Plan.	Revised wording to set out that development should retain and enhance the rural identity and character of the area, is appropriate in scale, nature, and location, and building form and style and layout of development should be consistent with the forms of development found within the rural area.	Comments noted: Recommend no change Policy DM09 primarily relates to development which is likely to be supported within the open countryside. Further guidance regarding the design, form, and density of development in the open countryside is set out in Policies DM21, DM26, DM45 and DM46 as relevant.
01796	Historic England	Not specified	Yes	Policy DM09: Open Countryside Whilst we do not object to this policy, we suggest there may be a need to explain what substantially intact means. We also suggest cross referencing Policy DM18. Supports the inclusion of text on the Lancashire Historic Landscape Characterisation (2017).	Explain what substantially intact means. Also cross reference Policy DM18.	Comments noted: Recommend no change The Policy Text is worded flexibly: 1. To facilitate the restoration of existing buildings and structures for re-use, as appropriate. 2. So that the policy can be applied to a wide variety of development proposals.

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						For these reasons, the Council wishes to avoid establishing an arbitrary threshold.
02113	Rural Solutions	Not specified	Not specified	Policy DM09(e) it is not clear what ‘can be justified in a particular location’ means. This could cause confusion at the development management stage and is not considered effective.	Recommended that the policy is worded to either: 1. Replicates the wording of paragraph 84(e) of the NPPF. Include a similar reference as Policy SP4 of the Craven Local Plan.	Comments noted: Recommend no change The policy includes a footnote to Paragraph 84(e) of the NPPF. In this instance ‘can be justified in a particular location’ relates to how a proposal responds to its setting and the defining characteristics of the local area as set out in Paragraph 84(e) of the NPPF.
02131	Sevo Planning for Little Cloud	No	No	Policy DM09: The wording of the policy is unsound as it fails to reflect the treatment of development within the open countryside in regards of isolated development. The Council also need further land to meet is development needs in full over the plan period and amended policy approach is therefore required.	Amend Policy DM09 ‘3. Outside a defined settlement boundary isolated homes in the countryside will only be permitted where it:’ Provided the change above is made the deletion of criterion f made between the draft and final draft would be consistent with national planning policy.	Disagree: Recommend no change The Policy Text as drafted is consistent with the NPPF.
00294	Lidgett and Beyond	Not specified	Not specified	Support policy DM10.	None specified.	Support welcomed
01542	Canal & River Trust	Not specified	Not specified	Considers changes made to Policy DM10 in response to comments made by the Trust to the consultation to the draft Local Plan to be satisfactory.	None specified.	Support welcomed
01644	Colne Town Council	Not specified	Not specified	Policy DM10: Supports policy. Views are very important to residents and so we believe that the most important views and vistas should be described, so they can be protected more effectively. We have identified 17 important views of and from our town of Colne in our Neighbourhood Plan and many residents in the borough will have important views that they think should be protected.	None specified.	Support welcomed
02131	Sevo Planning for Little Cloud	No	No	Policy DM10: Landscape character mitigation in the context of development proposals is only in part about structural landscaping as detailed in part 5(b) of the policy. Revised wording should be considered to better reflect how the impact of development on landscape character can be mitigated through a combination of hard and soft landscaping. Policy DM10 should be clear that the consideration of landscape impact is necessarily part of a wider planning balance.	Revise 5(b) to ‘appropriate landscaping measures’ Set out the planning policy balance in the policy.	Disagree: Recommend no change The use of the term “such as” within paragraph 5(b) of the Policy Text makes it clear that this is an example of one ‘appropriate design solution’ that could be a potential response to the policy. The planning balance is applied through the decision-taking process in accordance with planning law. It is not necessary to refer to this in within the Policy Text.
01644	Colne Town Council	Not specified	Not specified	Policy DM11: Supports policy.	None specified.	Support welcomed
00294	Lidgett and Beyond	Not specified	Not specified	Policy DM12: Support the policy but would like to see more Local Green Space within Pendle. Support the designation of the Upper Rough as Local Green Space. We support the observations made by the Lancashire Wildlife Trust regarding the site’s value for wildlife.	Designate further areas of Local Green Space.	Comments noted: Recommend no change The Council can only designate sites that have been assessed to meet the criteria for designation as Local Green Space. The Council’s methodology and assessment of candidate sites put forward for designation is set out

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						<p>in the Local Green Space Methodology and Assessment Report, which forms part of the evidence base prepared in support of the Local Plan.</p> <p>The Council's response to comments received to the consultation which took place on this document in November 2023 can be found within the accompanying Consultation Statement.</p>
00471	Sport England	No	No	<p>Policy DM12: Playing fields are caught by the Local Green Space designation according to Appendix 8. Paragraph 103 of the NPPF protects existing open space, sports, and recreational buildings, unless shown to be surplus to requirements or alternative provision can be made. The policy allows a criterion based approach to allow development on Local Green Space which is inconsistent with paragraph 103.</p>	<p>Amend policy to add:</p> <p>‘4. Any impact on playing field land will need to meet the tests of Sport England’s playing field policy and paragraph 103 of the NPPF.’</p>	<p>Comments noted: Recommend no change</p> <p>Paragraph 107 of the NPPF outlines that policies for managing development within a Local Green Space should be consistent with those for the Green Belt. The approach taken in Policy DM12 aligns with that in Policy SP05.</p> <p>As demonstrated on the Policies Map, the Local Green Space designation is in addition to, and does not replace, other Local Plan policies unless they conflict with Green Belt policy. As such sites also designated as open space continue to be protected through Policy DM31.</p> <p>Development proposals affecting sports pitches formally identified as open space, which are also designated as Local Green Space, would therefore be subject to the policy tests outlined in both Policy DM31 and Policy DM12.</p>
00526	Trawden Forest Parish Council	Not specified	Not specified	<p>Policy DM12: Whilst we support this policy, we would like to see more Local Green Spaces within Pendle including Trawden Forest. Only a small percentage of the submissions made by Trawden Forest Parish Council have been accepted despite adhering to the criteria.</p>	<p>Designate further areas of Local Green Space.</p>	<p>Comments noted: Recommend no change</p> <p>The Council's Local Green Space Methodology and Assessment Report, which forms part of the evidence base for the Local Plan, sets out the methodology used to assess candidate Local Green Space sites.</p> <p>The Council's response to comments received to the public consultation which took place on this document in November 2023 can be found within the Regulation 18 Consultation Statement.</p>
00564	Lancashire Wildlife Trust	No	No	<p>Policy DM12: Support the policy and monitoring mechanism. Also support the proposed designation of The Lenches as Local Green Space.</p> <p>Note that the site meets the Site of Local Natural Importance guidelines for designation following a Preliminary Ecological Appraisal dated January 2022.</p> <p>Supports the proposed designation of the Upper Rough as Local Green Space. Notes the potential for restoration to either lowland or upland hay meadow, both habitats of high distinctiveness. Site surveys have recorded 51 bird species including 12 on the red list of birds of conservation concern, including 4 potential ground nesting birds and three potential breeding birds.</p>	<p>Lenches should be designated a Site of Local Natural Importance.</p>	<p>Comments noted: Recommend no change</p> <p>Sites of Local Natural Importance (LNI) are not designated through the plan-making process.</p> <p>Any evidence supporting the proposed designation of the site as an LNI should be submitted through the appropriate channels. If the proposed designation is confirmed, the site will then receive the appropriate level of protection under Local Plan Policy SP08.</p>

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00907	E Hartley	Yes	Yes	Policy DM12: This plan has been prepared after extensive assessments and appraisals in conjunction with a comprehensive public consultation. I fully support the addition of land at Lenches Rd / Knotts lane LGS/LP4/DM12/026 as a LGS Residents have campaigned for this land to be given protection since 1988. It is important to residents in Waterside one of the UKs most deprived wards according to the IMD	None specified.	Support welcomed
01201	M Rawstron	Yes	Yes	Policy DM12: Support the policy of Local Green Spaces and particularly the designation of The Upper Rough, Castle Rd, Colne. This is important in the context of the Lidgett and Colne Conservation Area it is an important ecological site particularly in respect of being a breeding ground for the Curlew. It is a heavily used recreational area with footpaths across the site providing linkages to Park High School and the East Colne Way.	None specified.	Support welcomed
01644	Colne Town Council	Not specified	Not specified	Policy DM12. Whilst we support this policy, we would like to see more Green Spaces within Pendle.	Designate further areas of Local Green Space.	Comments noted: Recommend no change The Council can only designate sites that have been assessed to meet the criteria for designation as Local Green Space. The Council's methodology and assessment of candidate sites put forward for designation is set out in the Local Green Space Methodology and Assessment Report, which forms part of the evidence base prepared in support of the Local Plan. The Council's response to comments received to the consultation which took place on this document in November 2023 can be found within the accompanying Consultation Statement.
01932	Emery Planning for Lenches Rd, Colne Landowner	Not specified	Not specified	Objects to the proposed designation of the Lenches as Local Plan space. See summarised comments made in relation to Appendix 8 of the Local Plan and representation for detailed comments.	Do not designate Lenches as Local Green Space through the Local Plan.	Comments noted: Recommend no change See responses to comment ID 01932 made in relation to Appendix 8.
01970	C Wormwell	Yes	Yes	Policy DM12: I believe it is vital to keep local green spaces in order to maintain the quality of living in the area.	None specified.	Comments noted: Recommend no change
02131	Sevo Planning for Little Cloud	No	No	Policy DM12 objects to the proposed designation of the Upper Rough as Local Green Space. This is a repeat process undertaken in respect of the Colne Neighbourhood Development Plan which concluded that the Upper Rough should be removed as a proposed area of Local Green Space from the Colne Neighbourhood Development Plan. The examiner was unequivocal setting out that he was not satisfied that the designation of the Upper Rough is consistent with the delivery of sustainable development. This was based on conclusions about the deliverability of	Do not designate the Upper Rough as Local Green Space through the Local Plan.	Comments noted: Recommend no change The examiner's conclusions regarding the effect of the designation of the Upper Rough as Local Green Space were made in the context of the uncertainty connected with the adopted housing requirement and delivery of the Local Plan (see paragraph 7.98 of the Colne Neighbourhood Development Plan Examiner Report). The Pendle Local Plan Fourth Edition resolves these uncertainties by adopting a new housing requirement

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				<p>brownfield land (concerns which are valid for the Local Plan),</p> <p>Provisions of Policy LIV1 of the Core Strategy (the site adjoins Colne) and the identification of the site through the SHLAA (the site is included in the SHLAA and is needed to properly respond to the housing needs of the authority) and importance attached to this assessment through Policy LIV1. For the reasons set out in the examiner report the site is not capable of enduring beyond the plan period. This conclusion should be reached for the Pendle Local plan. Beyond this, the site is forms, in Little Cloud's view, an extensive tract of land and therefore does not meet the criteria set out NPPF for designation as Local Green Space. Little Cloud has prepared evidence supporting this position.</p>		<p>(Policy DM20) and confirmation that the development the Upper Rough is not necessary to deliver this total (Policy AL01). This Plan if adopted will replace the Core Strategy. At this time Policy LIV1 and its provisions will cease to form part of the statutory development plan.</p> <p>In their report the Examiner was clear in their conclusions that they were not persuaded that the Upper Rough forms an extensive tract of land and that the site otherwise meets the criteria for designation as Local Green Space. The Council accepted this conclusion and has reflected this in its assessment of the site, noting the absence of any material change to its character or condition since the Examiners report was issued.</p> <p>The proposed designation of the Upper Rough as Local Green Space is consistent with the guidelines set out in the NPPF and PPG.</p>
00294	Lidgett and Beyond	Not specified	Not specified	Policy DM13: The radius should be expanded to at least 1km given the impact such major development would have. Support Policy DM15. Support Policy DM16. We are often presented with acceptable design we believe Pendle and Colne deserves better.	Expand radius in Policy DM13 to 1km.	<p>Disagree: Recommend no change</p> <p>No evidence has been provided to justify increasing the radius shown in the policy. In absence of any robust evidence to justify a 1km radius it is recommended that the radius shown in the policy is retained.</p>
00471	Sport England	No	No	Policy DM13: Expand policy to specifically protect sports facilities and playing fields from prejudicial development.	<p>Add to Policy DM13:</p> <p>'10. Existing sports facilities including playing fields, should not have unreasonable restrictions placed on them as a result of new development, where this is likely, suitable mitigation would be required to accord with paragraph 193 of the NPPF'</p>	<p>Comments noted: Recommend no change</p> <p>The policy relates to the environmental impact of development proposals. It seeks to protect residents, neighbouring uses, and the wider environment from any adverse effects arising from a proposed development. The existing policy wording is considered to be sufficient to protect existing sports facilities from any adverse impacts arising from the construction or operation phases of a new development that is in close proximity. As such the additional wording that is proposed is not considered to be necessary.</p>
00539	United Utilities	Not specified	Not specified	Policy DM13. Seek policy guidance related to new development and their proximity to existing waste water treatment works and pumping stations. Welcome wording in Paragraph 5.212 however would recommend additional wording inserted into the policy.	<p>Policy DM13 additional wording:</p> <p>'Applicants must demonstrate that the occupiers of new developments will enjoy an appropriate standard of amenity and will not be adversely affected by neighbouring uses and vice versa. When applicable, applicants will be required to submit the relevant impact assessments, outlining any adverse effects from the relevant impact assessments, outlining any adverse effects from the neighbouring site, and any required mitigation.'</p>	<p>Comments noted: Recommend no change</p> <p>The proposed wording is not necessary as Paragraph 2 of the Policy Text makes clear that such proposals will not be considered suitable where existing levels of pollution (including dust and odour), from one or more sources, are unacceptable and there is no reasonable prospect that adequate mitigation measures can be put in place by the developer.</p>
01542	Canal & River Trust	Not specified	Not specified	Considers changes made to Policy DM13 in response to comments made by the Trust to the consultation to the draft Local Plan to be satisfactory.	None specified.	Support welcomed

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01644	Colne Town Council	Not specified	Not specified	Policy DM13: Supports policy. Colne has an abattoir on its western boundary and it is important that residents are protected from the unpleasant odours that periodically arise most especially if further development at this site is proposed.	None specified.	Support welcomed
01872	Lancashire County Council (Active Travel)	Not specified	Not specified	Policy DM13 – change emphasis of wording.	<p>Paragraph 5.207 amend to ‘Our spatial strategy seeks to direct development to where it is needed and focus it in the most sustainable locations, helping to minimise trip lengths. This reduces the need to travel by car and enables walking, cycling or the use of public transport.’</p> <p>Paragraph 5.247 amend to ‘The quality of our neighbourhood’s impacts health and wellbeing. Streets that are safe and attractive enable walking and cycling, in preference to car travel’</p>	<p>Agree: Recommend changes to Policy Text</p> <p>The Council is minded to accept these suggested modifications but would note that the comments do not relate to the soundness of the Plan – see Schedule of Proposed Minor Modifications.</p>
00505	Coal Authority	Yes	Yes	Support the inclusion of Policy DM14 which refers to the risk posed by coal mining legacy and the need to address these as part of new development proposals. In light of our recent name change it may be prudent to amend the policy at point 3 to reference the Mining Remediation Authority.	<p>Revise Policy DM14 part 3 to:</p> <p>‘Where recorded coal mining features pose a potential risk to surface stability or public safety any issues that are identified must be resolved to the satisfaction of the Mining Remediation Authority.’</p>	<p>Agree – Recommend changes to the Local Plan and Supporting Documents, as necessary</p> <p>The Council acknowledges the recent name change to Mining Remediation Authority and supports the proposed amendment to Policy DM14 - see Schedule of Minor Modifications.</p> <p>To aid transparency, for the duration of the Examination it is proposed to retain references to The Coal Authority in all documentation.</p>
01644	Colne Town Council	Not specified	Not specified	Policy DM14: Supports policy.	None specified.	Support welcomed
01510	Lane Town Planning for McDermott Homes	Yes	No	<p>Policy DM15. The threshold for consultation on the loss of BMV land is 20ha as this is a significant loss. The policy should reflect this with the Supporting Text updated to explain this.</p> <p>Part 4 of the policy makes no sense requiring the submission of a ALQC for Grade 3 agricultural land. Since this does not say best and most versatile land it could also mean grade 3b, but there is no evidence of Grade 3a land in the borough. There is consequently no clear justified for any different local approach in Part 4 of the policy at all and it should be deleted.</p>	<p>Revise part 2 of the policy to:</p> <p>‘Development proposals should avoid significant loss or disturbance.’</p> <p>Remove part 4 in its entirety.</p>	<p>Comments noted: Recommend no change</p> <p>Paragraph 180 of the NPPF asks policies and decisions to contribute and enhance the natural and local environment by (amongst other things); recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including amongst these best and most versatile agricultural land.</p> <p>The supply of “best and most versatile agricultural land” in Pendle is likely to be small but the policy wording is responsive to the national policy position. The request for an Agricultural Land Quality Assessment is responsive to the local context and reflects the limited information that is publicly available for areas of land within Grade 3 (i.e. the distinction between Grade 3a and Grade 3b land), which requires further assessment on a site-by-site basis.</p> <p>It would not be proportionate for the Council to assess this distinction at a borough-wide level through the Local Plan, particularly given the absence of site allocations in those parts of the borough where</p>

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						Grade 3 land is known to exist. The policy is therefore justified and consistent with national planning policy.
01644	Colne Town Council	Not specified	Not specified	Policy DM15: Supports policy.	None specified.	Support welcomed
00471	Sport England	No	No	Support Policy DM16	None specified	Support welcomed
01535	Home Builders Federation	Yes	No	Policy DM16 It is inappropriate to require development to accord with detailed requirement of an SPD. It is not appropriate to give increased weight to an SPD through the development plan.	Revise wording and reference to SPDs.	Agree: Recommend change to Policy Text Agree. The Council accept that the text “accord with” should be changed to “have special regard to” – see revised text below and the Schedule of Minor Modifications. This is consistent with language used to refer to the SPDs set out in Policy DM21.
01542	Canal & River Trust	Not specified	Not specified	Considers changes made to Policy DM16 in response to comments made by the Trust to the consultation to the draft Local Plan to be satisfactory.	None specified.	Support welcomed
01644	Colne Town Council	Not specified	Not specified	Policy DM16: Supports policy. Specifically wording ‘beautiful and sustainable’. We are often presented with ‘acceptable’ and we believe that Pendle and Colne deserve better. For this reason, we developed a Design Code for Colne in our Neighbourhood Plan.	None specified.	Support welcomed
01872	Lancashire County Council (Active Travel)	Not specified	Not specified	Policy DM16 – Shorter travel distances may not automatically result in less conflict between road users. The policy wording could discuss how creating shorter, more direct walking and cycling routes within and into new developments will priorities walking and cycling over car use i.e. creating shortcuts for pedestrians and cyclists.	Paragraph 5.258 amend text to: Access – ‘permeable layouts help enable walking and cycling. ... The travelling distance from points of access should be as short as possible to reduce the potential for conflict between highway users’	Agree: Recommend changes to Policy Text The Council is minded to accept these suggested modifications but would note that the comments do not relate to the soundness of the Plan – see Schedule of Proposed Minor Modifications.
01872	Lancashire County Council (Health)	Not specified	Not specified	The County Council welcomes the acknowledgement of Sport England’s active design principles with Policy DM16 of the Local Plan.	None specified.	Support welcomed
02091	Active Lancashire	Yes	No	Policy DM16: The national policy position that is advocated by the Design Council and Sports England to enable Active environments through the planning and associated policy process to enable health environments, lifestyles and sustainable transport as outlined in the Local Plan has not been referenced and adopted.	The following national guidance is adopted as a policy position to inform planning decisions: https://www.designcouncil.org.uk/our-resources/archive/reports-resources/active-design-designing-places-healthy-lives/ and https://www.sportengland.org/guidance-and-support/facilities-and-planning/active-environments-framework	Comments noted: Recommend no change Active Design is referenced in Policy SP10 (Healthy and Vibrant Communities), Policy DM16 (Design and Placemaking) and Policy DM30 (Healthy Places and Lifestyles). As indicated in the Regulation 18 Consultation Statement these references are a response to the representation submitted by Sport England in response to the public consultation on the first draft of the Local Plan. These include a reference to the ‘Ten principles of Active Design’ (see paragraph 4.136).
00526	Trawden Forest Parish Council	Not specified	Not specified	Support Policy DM17. It is complimentary of policy in the adopted Trawden Forest Neighbourhood Plan.	None specified.	Support welcomed

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01644	Colne Town Council	Not specified	Not specified	Policy DM17: Supports policy. We have further context in our Neighbourhood Plan in relation to the Albert Road Conservation Area.	None specified.	Support welcomed
00294	Lidgett and Beyond	Not specified	Not specified	Policy DM18: Support the policy. Policy 4(c) should refer to the list of non-designated heritage assets featuring in the Colne Neighbourhood Development Plan and not just rely on reference within the Supporting Text.	Amended part 4(c) of Policy DM18 to reference the non-designated heritage asset list in the Colne Neighbourhood Development Plan.	Support and comments noted: Recommend no change Such a reference would reduce the flexibility of the policy, which addresses the whole of the borough. The list identified only relates to Colne and is correctly referenced in the Supporting Text in order to avoid the duplication of policy set out in the Colne Neighbourhood Development Plan, whose policies will continue to be applied to development proposals that are submitted within the designated neighbourhood area.
01510	Lane Town Planning for McDermott Homes	Yes	No	Policy DM18 is unsound and inconsistent with national planning policy by reference made in part 2 of the policy to 'protect' the historic environment. The correct approach is to conserve.	Amend Policy DM18 2a to 'Proposals that affect a heritage asset, or its setting, should be designed so that they conserve the historic environment by; Sustaining and enhancing the significance of the heritage asset...'	Agree: Recommend change to Policy Text Agree that the reference to 'protect' should be replaced with 'conserve' – see Schedule of Proposed Minor Modifications.
01644	Colne Town Council	Not specified	Not specified	Policy DM18 – support the policy. Policy 4c should make reference to the list of non-designated heritage assets featuring in the Colne Neighbourhood Development Plan and not just rely on reference within the Supporting Text.	Amended part 4c of Policy DM18 to reference the non-designated heritage asset list in the Colne Neighbourhood Development Plan.	Disagree: Recommend no change The request only relates to the Colne Neighbourhood Plan, although the Local Plan addresses planning matters throughout the borough. To include details of the non-designated heritage assets designated through the adoption of a neighbourhood plan, would: (a) Duplicate information already set out in a development plan document, the policies of which continue to be applied to development proposals within the designated neighbourhood area. Reduce the flexibility of the Local Plan as these lists continue to evolve.
01796	Historic England	Not specified	Yes	Policy DM18: Support changes made to this policy.	None specified.	Support welcomed
01542	Canal & River Trust	Not specified	Not specified	Policy DM19: Leeds and Liverpool Canal The policy should help to ensure that consideration is given towards the design of new development and the creation of new positive spaces. Is it essential that the document provides guidance and certainty to developers and decision makers over how waterfront spaces should be incorporated into new development. The policy wording as proposed would help to address these needs. We note one change made in response to the Trust which has added the caveat that the greenspace character of the canal should be retained where appropriate. This change would help ensure that	None specified.	Support welcomed

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				<p>opportunities for open space areas next to the canal or additional surveillance are not curtailed by a requirement to retain brownfield sites that have become overgrown.</p> <p>We welcome the revised wording under part 5 of the policy, which has been expanded to include reference to the availability of water resources. This is a key consideration in assessing the principle of new marinas or mooring sites, and reference to this would make the plan more effective in highlighting this key issue to prospective developers and decision makers.</p> <p>Changes to paragraph 5.290 are also welcomed, as the removal of reference to the 4-step application process should help to avoid any confusion should the method of our internal assessment change during the period covered by the Local Plan.</p>		
01644	Colne Town Council	Not specified	Not specified	Policy DM19: Supports policy.	None specified.	Support welcomed
01872	Lancashire County Council (Active Travel)	Not specified	Not specified	Policy DM19 - It would be worthwhile describing how the canal towpath is referenced in the Burnley & Pendle LCWIP as a primary routes with lots of proposed routes connecting to it. Where possible the County Council would like to ensure that any future developments in the vicinity of the canal can help fund improvements to the towpath through developer contributions.	None specified.	<p>Agree (in part): Recommend change to Supporting Text</p> <p>Paragraph 3 of the Policy Text outlines the need for developer contributions to contribute towards canal side improvements (including the towpath) where this is necessary for the development to proceed.</p> <p>The Council acknowledges the value that a reference to the role of the Leeds and Liverpool Canal would have in contributing to the achievements of the objectives set out in the LCWIP and supporting wider policy goals by providing general benefits to the footpath network. A minor modification to paragraph 5.278 of the Supporting Text will help to achieve this. The suggested wording is as follows:</p> <p>'The canal is also an important green infrastructure resource (Policy DM06) and tourism asset (Policy DM45). The towpath, although not a public right of way (PROW), is a permissive path for walking and cycling. Some sections form part of the Sustrans National Cycle Network. The towpath is also identified as a primary route within the Burnley and Pendle LCWIP, with proposals to enhance its role within the local footpath and cycling network. The towpath provides an important link between communities in Lancashire and offers a connection with North Yorkshire' – see Schedule of Proposed Minor Modifications.</p>
Local Plan Section 6: Development Management Policies (Social – including Housing)						
00526	Trawden Forest Parish Council	Not specified	Not specified	Introduction to Chapter 6: Disputes the connections drawn between terraced housing and deprivation. This does not reflect the character and quality of	Remove/revise text.	<p>Comments noted: Recommend no change</p> <p>The text does not say that all terraced homes are poor quality or incapable of being retrofitted, it is focussed on the quality of housing located in the borough's</p>

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				environment experienced in Trawden. Terraced housing is long lasting and can be easily retrofitted. The assertions made in paragraph 6.53 are not supported as attached houses can be inherently more sustainable and make more efficient use of land.		most deprived wards. Policy DM22 encourages the delivery of a mix of dwelling types and sizes including terraced housing. Policy DM21 sets out our density requirements by location. These confirm that terraced properties are likely to continue to make a major contribution to housing land supply throughout the plan period.
01644	Colne Town Council	Not specified	Not specified	Disputes the connections drawn in text in Section 6 of the Local Plan between terraced housing and deprivation. This does not reflect the character and quality of environment experienced in Trawden. Terraced housing is long lasting and can be easily retrofitted.	Remove/revise text.	<p>Disagree: Recommend no change</p> <p>The text does not say that all terraced homes are of poor quality and result in deprivation. The focus here is on the quality of the housing stock found within the borough's most deprived wards.</p> <p>Policy DM22 encourages the delivery of a mix of dwelling types and sizes including terraced housing, whilst Policy DM21 sets density requirements by location. Given the density requirements that are outlined, it is highly likely that new terraced homes will make a significant contribution to housing provision throughout the plan period.</p>
00284	J Cooney	Not specified	Not specified	Policy DM20: Limited population growth and ageing demographic profile suggest that demand for large-scale housing developments may be overestimated, risking unnecessary urban sprawl and overdevelopment. Challenges in economic viability particularly in urban areas where low land values make brownfield regeneration difficult. Setting house targets that exceed realistic economic capacity could lead to incomplete or unviable projects. Large portions of the borough are designated Green Belt or valued for biodiversity with flood risk also noted. These constraints limit the feasibility of delivering housing numbers without significant environmental compromise.	None specified.	<p>Comments noted: Recommend no change</p> <p>The demographic and economic needs of Pendle are assessed within the Housing and Economic development Needs Assessment (HEDNA) (2023) and Housing Needs Review (2024). The Council is confident that the evidence shows that the proposed housing requirement is deliverable.</p>
00294	Lidgett and Beyond	Not specified	Not specified	Policy DM20: More emphasis should be made on reusing long term empty vacant stock to meet housing especially should housing land supply dip.	Recognise role of long term empty homes in meeting housing need.	<p>Comments noted: Recommend no change</p> <p>The Council does not currently have an active programme or funding mechanism in place to actively bring long term empty homes back into use. However, monitoring data shows that there has been a significant reduction in the number of long term empty homes (dwellings) in Pendle since the adoption of the Core Strategy in 2015.</p> <p>The number of long term empty homes fluctuates from year to year but is now at a level which is considered typical for a functioning housing market.</p> <p>Applying an allowance for long term empty homes is no longer acceptable when calculating the housing requirement, as it does not reflect development needs. Furthermore any increase in the stock of housing meeting the definition of long term empty</p>

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						homes would increase the amount of new housing needed in the borough.
00526	Trawden Forest Parish Council	Not specified	Not specified	Support Policy DM20 In particular, the reasoning applied in paragraph 6.37.	None specified.	Support welcomed
00906	J Hartley	Not Specified	Not Specified	Policy DM20: Another aspect is the sensible and realistic level of new housing requirement. Previously, a much higher figure had been proposed but this did not reflect the historic rate of increase of either population figures or employment potential. I look forward to the Pendle Local Plan (Fourth Edition) being implemented as put forward here.	None specified.	Support welcomed
01485	WBW Surveyors for I Birtwistle	Yes	No	<p>Policy DM20: The Local Plan proposes insufficient allocations to support projected economic growth as evidenced by the HEDNA. This could constrain economic growth and increase inward commuting with adverse effects for the environment. This is inconsistent with the NPPF and the achievement of sustainable development.</p> <p>The proposed approach, which is based on securing improvements in economic activity, also ignores the conclusions of the Council's evidence, which notes that there is no strategy or policy in place to secure this. There is no reliable basis for the Council's conclusion.</p> <p>The Council's justification and emphasis placed on safeguarding the borough's high quality natural landscape suggests that greater weight has been attached by the Council to the environment objective than being pursued in mutually supportive ways as required by the NPPF.</p>	The housing requirement should, as a minimum be increased, to reflect the recommendations of the HEDNA and/or its subsequent update.	<p>Comments noted: Recommend no change</p> <p>The evidence in the HEDNA (2023) and Housing Needs Update (2024) show that with a relatively modest increase in economic activity rates, the proposed housing requirement (148 dpa) would be in excess of that required to provide sufficient labour to support the projected level of economic growth (144 dpa).</p> <p>The figure of 230 dpa is only required if economic activity rates remain the same.</p> <p>The Council's Economic Strategy (2024) includes an aspiration to significantly improve economic activity rates in the borough. Programmes have been established to address low levels of economic activity within identified sectors of the local community. Whilst there may currently be cultural barriers in place that may take time to resolve, it is anticipated that economic activity rates will still be able to increase significantly in the early years of the plan period. This initiative pre-dates the new governments policy to improve national economic activity rates and the availability of funding programmes to support this objective.</p> <p>Based on the above Council and concerns about economic data in the period immediately following on from the COVID-19 global pandemic and the post 2021 Census, the Council has concluded that it would not be prudent at this time to significantly increase the housing requirement to support projected levels of economic growth.</p> <p>The housing requirement set in the Local Plan is responsive to the locally specific socio-economic conditions of the plan area. The Local Plan aims to secure economic growth in a sustainable way which reflects the interests of its residents by engaging those who are not actively participating in the local economy. To do otherwise would fail to respond to the many social and economic indicators which provide the context for plan-making in Pendle by removing</p>

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						<p>opportunities from local residents, increasing pressure on services and wider infrastructure requirements.</p> <p>On this basis the Council considers that the housing requirement of 148 dpa, which is 24 more than the figure generated by the old standard method, represents a reasonable approach to meeting local housing need taking into account paragraphs 61 and 67 of the NPPF (2023).</p>
01485	WBW Surveyors for I Birtwistle	Yes	No	<p>Policy DM20: It is material that the draft revised NPPF no longer specifies the outcome of the standard method as a starting point for calculating housing figures, and no longer specifies that exceptional circumstances may justify an alternative approach to housing figures. Furthermore, under the revised method, Pendle's requirement would be 382 dpa significantly higher than the proposed housing requirement.</p>	None specified.	<p>Disagree: Recommend no change</p> <p>At the time of the Regulation 19 public consultation the proposed revisions to the NPPF remained in draft form and its policies are not yet engaged for the purpose of plan making.</p> <p>The Pendle Local Plan will proceed under the transitional arrangements set out in NPPF (2024) Annex 1. These recognise the advanced stage that has been reached in the preparation of the Local Plan, and the amount of time and resources which have been spent on its preparation, and the pressing need to review and update the policies in the statutory development plan for Pendle, where the strategic policies are now nine-years old and several development management policies are in excess of 18-years old.</p> <p>As the Local Plan will be examined against the policies of the NPPF (2023) it is for the next Local Plan to respond to the policies in any new version(s) of the NPPF. As such the allocation of Site P327 for housing is not necessary at this time.</p>
01510	Lane Town Planning for McDermott Homes	Yes	No	<p>Policy DM20: the proposed housing requirement is unsound. It is not positively prepared, it is not effective, justified, or consistent with national planning policy. The plan is still planning for economic growth and land requirements for additional jobs that would necessitate 270 dpa.</p> <p>The approach of the plan is wholly underwhelming and inconsistent with the plan's spatial vision. The housing requirement ignores that the housing need assessment reports that household formation has fallen; The failure to deliver the existing plan requirement; There is significant issues with smaller properties and imbalance in housing stock; Population grew 7% in 10 years and people are living longer meaning that housing needs are increasing. The plan is not seeking to address its substantial overcrowding issue at all. It makes no attempt to plan for the need of the 3,750 households in unsuitable housing. The Council are well aware that the housing needs of the authority as indicated by the new standard method are substantially increasing. The</p>	<p>Revise the housing requirement to reflect the findings set out in evidence.</p> <p>Or revise part 5 of Policy DM20 to state:</p> <p>‘5. The Council will maintain a specific supply of deliverable housing sites sufficient to provide a five-year housing land supply. Where this cannot be demonstrated, or where additional housing sites are proposed to meet pressing housing needs, the Council will apply the presumption in favour of sustainable development. In these circumstances development proposals should continue to accord with the spatial strategy, represent a proportionate response to any shortfall in supply identified, and meet the requirements of Policies DM21, DM22 and DM23.’</p>	<p>Comments noted: Recommend no change</p> <p>The evidence in the HEDNA (2023) and Housing Needs Update (2024) show that with a relatively modest increase in economic activity rates, the proposed housing requirement (148 dpa) would be in excess of that required to provide sufficient labour to support the projected level of economic growth (144 dpa).</p> <p>The figure of 230 dpa is only required if economic activity rates remain the same.</p> <p>The Council's Economic Strategy (2024) includes an aspiration to significantly improve economic activity rates in the borough. Programmes have been established to address low levels of economic activity within identified sectors of the local community. Whilst there may currently be cultural barriers in place that may take time to resolve, it is anticipated that economic activity rates will still be able to increase significantly in the early years of the plan period. This initiative pre-dates the new governments</p>

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				above is systematic of a flawed approach to assessing housing needs provided by the standard method which the government is seeking to address by moving to a stock backed approach. Iceni Projects the authors of the evidence on housing need consider that 230 dpa is entirely deliverable as illustrated by delivery over the last 3 years. If the Council propose to pursue their strategy in full knowledge of increasing housing need, this lends further weight to adoption of 'Proposed Policy 1' as set out earlier in these representations.		<p>policy to improve national economic activity rates and the availability of funding programmes to support this objective.</p> <p>Based on the above Council and concerns about economic data in the period immediately following on from the COVID-19 global pandemic and the post 2021 Census, the Council has concluded that it would not be prudent at this time to significantly increase the housing requirement to support projected levels of economic growth.</p> <p>The housing requirement set in the Local Plan is responsive to the locally specific socio-economic conditions of the plan area. The Local Plan aims to secure economic growth in a sustainable way which reflects the interests of its residents by engaging those who are not actively participating in the local economy. To do otherwise would fail to respond to the many social and economic indicators which provide the context for plan-making in Pendle by removing opportunities from local residents, increasing pressure on services and wider infrastructure requirements.</p> <p>On this basis the Council considers that the housing requirement of 148 dpa, which is 24 more than the figure generated by the old standard method, represents a reasonable approach to meeting local housing need taking into account paragraphs 61 and 67 of the NPPF (2023).</p>
01535	Home Builders Federation	Yes	No	<p>Policy DM20. The proposed housing requirement is likely to be insufficient to meet local housing need when further evidence is taken into account – much of this is within the Council's own evidence base as set out in the HEDNA and Housing Need Review, and includes demographic considerations and affordable housing need as well as the balance of economic growth and housing. Planning for this higher housing need figure would be in line with PPG and the NPPF.</p> <p>The housing requirement is also more than 200 dwellings lower than the proposed new standard method figure for Pendle. Transitional arrangements states that the policies of the revised NPPF will apply unless than one of three criteria apply. None of these will apply in the view of the HBF.</p>	The housing requirement should be increased to reflect, as a minimum, the recommendations of the Housing Need Review.	<p>Comments noted: Recommend no change</p> <p>The evidence in the HEDNA (2023) and Housing Needs Update (2024) show that with a relatively modest increase in economic activity rates, the proposed housing requirement (148 dpa) would be in excess of that required to provide sufficient labour to support the projected level of economic growth (144 dpa).</p> <p>The figure of 230 dpa is only required if economic activity rates remain the same.</p> <p>The Council's Economic Strategy (2024) includes an aspiration to significantly improve economic activity rates in the borough. Programmes have been established to address low levels of economic activity within identified sectors of the local community. Whilst there may currently be cultural barriers in place that may take time to resolve, it is anticipated that economic activity rates will still be able to increase significantly in the early years of the plan period. This initiative pre-dates the new governments policy to improve national economic activity rates and the availability of funding programmes to support this objective.</p>

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						<p>Based on the above Council and concerns about economic data in the period immediately following on from the COVID-19 global pandemic and the post 2021 Census, the Council has concluded that it would not be prudent at this time to significantly increase the housing requirement to support projected levels of economic growth.</p> <p>The housing requirement set in the Local Plan is responsive to the locally specific socio-economic conditions of the plan area. The Local Plan aims to secure economic growth in a sustainable way which reflects the interests of its residents by engaging those who are not actively participating in the local economy. To do otherwise would fail to respond to the many social and economic indicators which provide the context for plan-making in Pendle by removing opportunities from local residents, increasing pressure on services and wider infrastructure requirements.</p> <p>On this basis the Council considers that the housing requirement of 148 dpa, which is 24 more than the figure generated by the old standard method, represents a reasonable approach to meeting local housing need taking into account paragraphs 61 and 67 of the NPPF (2023).</p> <p>The Local Plan is submitted in accordance with the transitional arrangements set out in Annex 1 of the 2024 NPPF.</p>
01535	Home Builders Federation	Yes	No	Policy DM20. The measures outlined in part 5 of the policy do little to address how the Council will respond in the event that a five year supply cannot be demonstrated. It could for example include giving further consideration to sites that are sustainable and are well located in relation to settlements or services, or where they could support local settlements or services or the need for a review of the plan. Whilst the wording ‘when applicable’ may be in line with the December 2023 version of the NPPF, this text is likely to be removed through the revised NPPF.	Revise paragraph 5 of the policy to take into account the comments made through the representation. Remove wording ‘when applicable’ in reference to demonstrating a five year supply from the policy.	<p>Agree: Recommend change to Policy Text</p> <p>Policy DM20 sets out how the housing requirement is to be delivered. This includes confirming the sources of supply and the actions taken to address any emerging shortfall in housing supply or delivery. Paragraph 5 of the Policy Text merely confirms the Council’s approach where a five year supply cannot be demonstrated, noting that the role of the “presumption in favour sustainable development” would apply should a shortfall occur. Paragraph 4 of the Polic Text sets out the measures that the Council will take to increase housing supply to help boost delivery.</p> <p>The Council acknowledges that whilst the Local Plan is to be examined under the policies of the 2023 NPPF it will be implemented under the latest version of the NPPF, currently the one published on 12 December 2024.</p> <p>The revised NPPF materially changes the approach taken to the assessment of the five year housing land supply. As such the change to the wording of paragraph 5 of the Policy Text for Policy DM20 is</p>

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						supported. – see Schedule of Proposed Minor Modifications.
01561	WBW Surveyors for Moorhouse Holdings Ltd	Yes	No	<p>Policy DM20: The Local Plan proposes insufficient allocations to support projected economic growth as evidenced by the HEDNA. This could constrain economic growth and increase inward commuting with adverse effects for the environment. This is inconsistent with the NPPF and the achievement of sustainable development.</p> <p>The proposed approach, which is based on securing improvements in economic activity, also ignores the conclusions of the Council’s evidence, which notes that there is no strategy or policy in place to secure this. There is no reliable basis for the Council’s conclusion.</p> <p>The Council’s justification and emphasis placed on safeguarding the borough’s high quality natural landscape suggests that greater weight has been attached by the Council to the environment objective than being pursued in mutually supportive ways as required by the NPPF.</p>	The housing requirement should, as a minimum be increased, to reflect the recommendations of the HEDNA and/or its subsequent update.	<p>Comments noted: Recommend no change</p> <p>The evidence in the HEDNA (2023) and Housing Needs Update (2024) show that with a relatively modest increase in economic activity rates, the proposed housing requirement (148 dpa) would be in excess of that required to provide sufficient labour to support the projected level of economic growth (144 dpa).</p> <p>The figure of 230 dpa is only required if economic activity rates remain the same.</p> <p>The Council’s Economic Strategy (2024) includes an aspiration to significantly improve economic activity rates in the borough. Programmes have been established to address low levels of economic activity within identified sectors of the local community. Whilst there may currently be cultural barriers in place that may take time to resolve, it is anticipated that economic activity rates will still be able to increase significantly in the early years of the plan period. This initiative pre-dates the new governments policy to improve national economic activity rates and the availability of funding programmes to support this objective.</p> <p>Based on the above Council and concerns about economic data in the period immediately following on from the COVID-19 global pandemic and the post 2021 Census, the Council has concluded that it would not be prudent at this time to significantly increase the housing requirement to support projected levels of economic growth.</p> <p>The housing requirement set in the Local Plan is responsive to the locally specific socio-economic conditions of the plan area. The Local Plan aims to secure economic growth in a sustainable way which reflects the interests of its residents by engaging those who are not actively participating in the local economy. To do otherwise would fail to respond to the many social and economic indicators which provide the context for plan-making in Pendle by removing opportunities from local residents, increasing pressure on services and wider infrastructure requirements.</p> <p>On this basis the Council considers that the housing requirement of 148 dpa, which is 24 more than the figure generated by the old standard method, represents a reasonable approach to meeting local housing need taking into account paragraphs 61 and 67 of the NPPF (2023).</p>

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01561	WBW Surveyors for Moorhouse Holdings Ltd	Yes	No	Policy DM20: It is material that the draft revised NPPF no longer specifies the outcome of the standard method as a starting point for calculating housing figures, and no longer specifies that exceptional circumstances may justify an alternative approach to housing figures. Furthermore, under the revised method, Pendle's requirement would be 382 dpa significantly higher than the proposed housing requirement.	None specified.	<p>Comments noted: Recommend no change</p> <p>At the time of the Regulation 19 public consultation the proposed revisions to the NPPF remained in draft form and its policies are not yet engaged for the purpose of plan making.</p> <p>The Pendle Local Plan will proceed under the transitional arrangements set out in NPPF (2024) Annex 1. These recognise the advanced stage that has been reached in the preparation of the Local Plan, and the amount of time and resources which have been spent on its preparation, and the pressing need to review and update the policies in the statutory development plan for Pendle, where the strategic policies are now nine-years old and several development management policies are in excess of 18-years old.</p> <p>As the Local Plan will be examined against the policies of the NPPF (2023) it is for the next Local Plan to respond to the policies in any new version(s) of the NPPF.</p> <p>In accordance with the Written Ministerial Statement 'Building the Homes we Need' published on 12 December 2024 (HCWS308), a Local Development Scheme (LDS) is to be published. This will set out the projected timescales for the preparation of a new Local Plan, which will commence on the enactment of the Levelling Up and Regeneration Act 2023.</p>
01565	J Munnery for Foster Road Landowners	Yes	No	Policy DM20: The HEDNA reaches clear conclusions about the level of housing need faced by the borough, the need for this figure, and the implications (some of which are strategic cross-boundary) of not adopting this as the housing requirement.	The housing requirement should, as a minimum be increased, to reflect the recommendations of the HEDNA and/or its subsequent update.	<p>Comments noted: Recommend no change</p> <p>The Council's response to comments submitted in response to the public consultation on the first draft of the Local Plan, relating to the HEDNA and the assessment of local housing need, can be found in the Regulation 18 Consultation Statement.</p>
01565	J Munnery for Foster Road Landowners	Yes	No	Policy DM20: The proposed housing requirement does not align with the planned strategy for economic growth as demonstrated by the Council's own evidence with the most recent update recommending the adoption of 230 dpa as the housing requirement to support projected economic growth. The proposed approach, which is based on securing improvements in economic activity, also ignores the conclusions of the Council's evidence, which notes that there is no strategy or policy in place to secure this. There is no reliable basis for the Council's conclusion. The Local Plan's approach to the supply of housing and the economy is contrary to the NPPF and PPG. It fails to support objectives 5 and 6 of the Local Plan. Its adoption constrains housing development and economic growth.	The housing requirement should, as a minimum be increased, to reflect the recommendations of the HEDNA and/or its subsequent update.	<p>Comments noted: Recommend no change</p> <p>The evidence in the HEDNA (2023) and Housing Needs Update (2024) show that with a relatively modest increase in economic activity rates, the proposed housing requirement (148 dpa) would be in excess of that required to provide sufficient labour to support the projected level of economic growth (144 dpa).</p> <p>The figure of 230 dpa is only required if economic activity rates remain the same.</p> <p>The Council's Economic Strategy (2024) includes an aspiration to significantly improve economic activity rates in the borough. Programmes have been established to address low levels of economic activity within identified sectors of the local community. Whilst there may currently be cultural barriers in</p>

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						<p>place that may take time to resolve, it is anticipated that economic activity rates will still be able to increase significantly in the early years of the plan period. This initiative pre-dates the new governments policy to improve national economic activity rates and the availability of funding programmes to support this objective.</p> <p>Based on the above Council and concerns about economic data in the period immediately following on from the COVID-19 global pandemic and the post 2021 Census, the Council has concluded that it would not be prudent at this time to significantly increase the housing requirement to support projected levels of economic growth.</p> <p>The housing requirement set in the Local Plan is responsive to the locally specific socio-economic conditions of the plan area. The Local Plan aims to secure economic growth in a sustainable way which reflects the interests of its residents by engaging those who are not actively participating in the local economy. To do otherwise would fail to respond to the many social and economic indicators which provide the context for plan-making in Pendle by removing opportunities from local residents, increasing pressure on services and wider infrastructure requirements.</p> <p>On this basis the Council considers that the housing requirement of 148 dpa, which is 24 more than the figure generated by the old standard method, represents a reasonable approach to meeting local housing need taking into account paragraphs 61 and 67 of the NPPF (2023).</p>
01565	J Munnery for Foster Road Landowners	Yes	No	Policy DM20: The Council's arguments not to increase the housing requirement on account of affordable housing is unsound. The Council does not produce a 'net need' figure below 288dpa and does not assess how much of the identified need of 288dpa is already being addressed by existing accommodation. For those in urgent need of affordable housing is critical. The suggestion that lows levels will only be provided is no reason to discount that need.	The housing requirement should be increased to provide for additional affordable housing.	<p>Comments noted: Recommend no change</p> <p>Affordable housing need is not assessed in the same way as local housing need. It does not represent additional housing need but confirms which households need affordable housing.</p> <p>Some of these households will be accommodated within the existing housing stock, but not through choice.</p> <p>The Council recognises that affordable housing need represents a significant issue for the borough.</p> <p>The Council has sought to address this by bringing long-term empty homes back onto the market and by ensuring that the tenure of any new affordable housing stock is responsive to local needs (see Policy DM23).</p> <p>National planning policy asks policy makers to consider whether an increase in the housing requirement would be beneficial in helping to meet</p>

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						<p>affordable housing need. Viability evidence prepared in support of the Local Plan illustrates that very little affordable housing could be secured in this way, as demonstrated by annual monitoring data.</p> <p>The requirement to provide affordable homes alongside market housing, places additional strain on the economic viability of development schemes. The main source of additional social and affordable rented stock is on sites delivering 100% affordable housing, which are funded by a third party. The continued delivery of such sites is not hampered by policies in the Local Plan.</p>
01644	Colne Town Council	Not specified	Not specified	Policy DM20: Supports the proposed housing requirement and supports paragraphs 6.27, 6.33 and 6.37. More emphasis should be made on reusing long term empty vacant stock to meet housing especially should housing land supply dip.	Recognise role of long term empty homes in meeting housing need.	<p>Comments noted: Recommend no change</p> <p>The Council's monitoring data shows that significant reductions in the number of long term empty dwellings have been achieved in Pendle since the adoption of the Core Strategy.</p> <p>The number of long term empty dwellings is now at a level which would be considered typical for a functioning housing market. As such the Council no longer has access to funding to support a programme of interventions focussed on bringing long term empty homes back into use.</p> <p>The number of long-term empty dwellings fluctuates from year to year. Applying a long term empty dwelling allowance would mean that any increase in the stock of homes that meet the definition of a long term empty dwelling, would increase, rather than reduce, the amount of new housing that is needed in the borough. For this reason they are not part of the calculation for the housing requirement over the plan period.</p>
01858	Smith Love for Applethwaite	Yes	No	Policy DM20: WMS (HCWS48) and Letter 'Playing your part in the homes we need' together with proposals outlined in the draft NPPF as highly significant material considerations expressing the government's clear intention in relation to the delivery of housing and economic growth. The proposed housing requirement is significantly below recommended housing requirements of supporting evidence and will fail to support the delivery of the borough's assessed affordable housing need. It is more than 200dpa below the figure of 382dpa the figure for Pendle through the draft NPPF proposals. The Council's proposals fundamentally fail to support the delivery of the government's housing strategy. Two options are available to the Council under proposals of the NPPF as draft. 1) amend the Local Plan to be within at least 200dpa of the proposed figure for Pendle required through the new NPPF. 2) pause preparation of the Local Plan to respond to Paragraph 228 of the NPPF.	<p>Two options for Policy DM20:</p> <p>'over the plan period (2021 – 2040), provision will be made to deliver a minimum of 3,458 dwellings, equating to a net average of 182 dwellings per annum.'</p> <p>or</p> <p>'Over the plan period (2021 – 2040), provision will be made to deliver a minimum of 7,258 net dwellings, equating to a net average of 382 dwellings per annum.'</p>	<p>Comments noted: Recommend no change</p> <p>The evidence in the HEDNA (2023) and Housing Needs Update (2024) show that with a relatively modest increase in economic activity rates, the proposed housing requirement (148 dpa) would be in excess of that required to provide sufficient labour to support the projected level of economic growth (144 dpa).</p> <p>The figure of 230 dpa is only required if economic activity rates remain the same.</p> <p>The Council's Economic Strategy (2024) includes an aspiration to significantly improve economic activity rates in the borough. Programmes have been established to address low levels of economic activity within identified sectors of the local community. Whilst there may currently be cultural barriers in place that may take time to resolve, it is anticipated that economic activity rates will still be able to</p>

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						<p>increase significantly in the early years of the plan period. This initiative pre-dates the new governments policy to improve national economic activity rates and the availability of funding programmes to support this objective.</p> <p>Based on the above Council and concerns about economic data in the period immediately following on from the COVID-19 global pandemic and the post 2021 Census, the Council has concluded that it would not be prudent at this time to significantly increase the housing requirement to support projected levels of economic growth.</p> <p>The housing requirement set in the Local Plan is responsive to the locally specific socio-economic conditions of the plan area. The Local Plan aims to secure economic growth in a sustainable way which reflects the interests of its residents by engaging those who are not actively participating in the local economy. To do otherwise would fail to respond to the many social and economic indicators which provide the context for plan-making in Pendle by removing opportunities from local residents, increasing pressure on services and wider infrastructure requirements.</p> <p>On this basis the Council considers that the housing requirement of 148 dpa, which is 24 more than the figure generated by the old standard method, represents a reasonable approach to meeting local housing need taking into account paragraphs 61 and 67 of the NPPF (2023).</p> <p>The Local Plan is submitted in accordance with the transitional arrangements outlined in Annex1 of the 2024 NPPF. The proposed amendment to the policy is therefore unnecessary.</p> <p>The housing requirement established through Policy DM20 is responsive to the assessed housing needs of the Borough and allocates a sufficient supply of housing land (Policy AL01) to meet this need in full over the plan period.</p> <p>Typo noted in Table 8.1 and corrected through schedule of minor modifications.</p>
01864	PWA Planning for Castle Green Homes	Not specified	Not specified	Policy DM20: The proposed housing requirement is not positively prepared being below the level of completions achieved since the start of the plan. The housing requirement is contrary to national planning policy and clearly does not meet the objectives of boosting the supply of housing. The housing requirement is not justified or effective given that it fails to respond to economic needs of the borough as set out in the HEDNA and Housing Update Report. It is therefore unclear how the Local Plan will support	The housing requirement should be increased to at least reflect the recommendations of the supporting evidence base on housing and employment needs.	<p>Comments noted: Recommend no change</p> <p>The evidence in the HEDNA (2023) and Housing Needs Update (2024) show that with a relatively modest increase in economic activity rates, the proposed housing requirement (148 dpa) would be in excess of that required to provide sufficient labour to support the projected level of economic growth (144 dpa).</p>

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				economic growth of the borough in response to Paragraph 86c of the NPPF.		<p>The figure of 230 dpa is only required if economic activity rates remain the same.</p> <p>The Council's Economic Strategy (2024) includes an aspiration to significantly improve economic activity rates in the borough. Programmes have been established to address low levels of economic activity within identified sectors of the local community. Whilst there may currently be cultural barriers in place that may take time to resolve, it is anticipated that economic activity rates will still be able to increase significantly in the early years of the plan period. This initiative pre-dates the new governments policy to improve national economic activity rates and the availability of funding programmes to support this objective.</p> <p>Based on the above Council and concerns about economic data in the period immediately following on from the COVID-19 global pandemic and the post 2021 Census, the Council has concluded that it would not be prudent at this time to significantly increase the housing requirement to support projected levels of economic growth.</p> <p>The housing requirement set in the Local Plan is responsive to the locally specific socio-economic conditions of the plan area. The Local Plan aims to secure economic growth in a sustainable way which reflects the interests of its residents by engaging those who are not actively participating in the local economy. To do otherwise would fail to respond to the many social and economic indicators which provide the context for plan-making in Pendle by removing opportunities from local residents, increasing pressure on services and wider infrastructure requirements.</p> <p>On this basis the Council considers that the housing requirement of 148 dpa, which is 24 more than the figure generated by the old standard method, represents a reasonable approach to meeting local housing need taking into account paragraphs 61 and 67 of the NPPF (2023).</p>
02115	M Cooney	Yes	Yes	Policy DM20: I support the proposed housing target numbers.	None specified.	Support welcomed
02131	Sevo Planning for Little Cloud	No	No	Policy DM20: The proposed housing requirement does not align with the planned strategy for economic growth as demonstrated by the Council's own evidence with the most recent update recommending the adoption of 230 dpa as the housing requirement to support projected economic growth. The proposed approach, which is based on securing improvements in economic activity, also ignores the conclusions of the Council's evidence, which notes that there is no	Wholesale change is needed to the plan to ensure it is capable of being found sound.	<p>Comments noted: Recommend no change</p> <p>The evidence in the HEDNA (2023) and Housing Needs Update (2024) show that with a relatively modest increase in economic activity rates, the proposed housing requirement (148 dpa) would be in excess of that required to provide sufficient labour to support the projected level of economic growth (144 dpa).</p>

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				<p>strategy or policy in place to secure this. There is no reliable basis for the Council's conclusion. Suppressed housing figures signals support for an underperforming local economy which is contrary to the NPPF and PPG and its objectives of achieving economic prosperity and delivering positive social change. The resulting strategy fails to support objectives or vision of the Local Plan. If the Council agrees with findings of the HEDNA in relation to jobs growth then it should agree with its findings on housing need as the two go hand in hand. Questions why several paragraphs of the Local Plan Reg 18 version of the plan have been dropped especially regarding environmental factors and questions regarding the 2021 census. Considers that census figures outlined for Pendle are accurate for the reasons outlined in the Reg 18 representations.</p>		<p>The figure of 230 dpa is only required if economic activity rates remain the same.</p> <p>The Council's Economic Strategy (2024) includes an aspiration to significantly improve economic activity rates in the borough. Programmes have been established to address low levels of economic activity within identified sectors of the local community. Whilst there may currently be cultural barriers in place that may take time to resolve, it is anticipated that economic activity rates will still be able to increase significantly in the early years of the plan period. This initiative pre-dates the new governments policy to improve national economic activity rates and the availability of funding programmes to support this objective.</p> <p>Based on the above Council and concerns about economic data in the period immediately following on from the COVID-19 global pandemic and the post 2021 Census, the Council has concluded that it would not be prudent at this time to significantly increase the housing requirement to support projected levels of economic growth.</p> <p>The housing requirement set in the Local Plan is responsive to the locally specific socio-economic conditions of the plan area. The Local Plan aims to secure economic growth in a sustainable way which reflects the interests of its residents by engaging those who are not actively participating in the local economy. To do otherwise would fail to respond to the many social and economic indicators which provide the context for plan-making in Pendle by removing opportunities from local residents, increasing pressure on services and wider infrastructure requirements.</p> <p>On this basis the Council considers that the housing requirement of 148 dpa, which is 24 more than the figure generated by the old standard method, represents a reasonable approach to meeting local housing need taking into account paragraphs 61 and 67 of the NPPF (2023).</p> <p>Comments raised with regards to the census are responded to by the Council in the Consultation Statement. There is however firm reason to believe that data for Pendle published through the census is unreliable. The Council has sought to address concerns regarding the census with further evidence provided by the Housing Needs Review 2024 (Iceni Projects). The Council is satisfied that this provides a robust assessment of projected demographic needs. The text has been deleted in the interests of keeping the Local Plan focussed and concise.</p>

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02143	Pegasus Group for MCI Developments	Not specified	No	Policy DM20: The Local Plan does not provide sufficient housing to respond to the identified economic or affordable housing needs of the borough. Its adoption would leave a shortfall of 1,230 homes over the plan period and even greater affordable housing shortfall. Transitional arrangements of the draft NPPF set out that its policies will be engaged unless criteria in Annex 1 apply. Taking into account that the plan is more than 200 dwellings below the draft figure for Pendle and that a further consultation is required to resolve the SFRA and viability issues, it is highly unlikely that the Local Plan can be submitted in accordance with these arrangements.	The Local Plan should not proceed as drafted.	<p>Comments noted: Recommend no change</p> <p>The evidence in the HEDNA (2023) and Housing Needs Update (2024) show that with a relatively modest increase in economic activity rates, the proposed housing requirement (148 dpa) would be in excess of that required to provide sufficient labour to support the projected level of economic growth (144 dpa).</p> <p>The figure of 230 dpa is only required if economic activity rates remain the same.</p> <p>The Council's Economic Strategy (2024) includes an aspiration to significantly improve economic activity rates in the borough. Programmes have been established to address low levels of economic activity within identified sectors of the local community. Whilst there may currently be cultural barriers in place that may take time to resolve, it is anticipated that economic activity rates will still be able to increase significantly in the early years of the plan period. This initiative pre-dates the new governments policy to improve national economic activity rates and the availability of funding programmes to support this objective.</p> <p>Based on the above Council and concerns about economic data in the period immediately following on from the COVID-19 global pandemic and the post 2021 Census, the Council has concluded that it would not be prudent at this time to significantly increase the housing requirement to support projected levels of economic growth.</p> <p>The housing requirement set in the Local Plan is responsive to the locally specific socio-economic conditions of the plan area. The Local Plan aims to secure economic growth in a sustainable way which reflects the interests of its residents by engaging those who are not actively participating in the local economy. To do otherwise would fail to respond to the many social and economic indicators which provide the context for plan-making in Pendle by removing opportunities from local residents, increasing pressure on services and wider infrastructure requirements.</p> <p>On this basis the Council considers that the housing requirement of 148 dpa, which is 24 more than the figure generated by the old standard method, represents a reasonable approach to meeting local housing need taking into account paragraphs 61 and 67 of the NPPF (2023).</p> <p>There is no need to revise the strategy or policies in the publication version of the Local Plan, in response to the findings of the Viability Assessment or the Level</p>

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						<p>2 SFRA. As such further public consultation is not required.</p> <p>At the time of the Regulation 19 public consultation the proposed revisions to the NPPF remained in draft form and its policies are not yet engaged for the purpose of plan making.</p> <p>The Pendle Local Plan will proceed under the transitional arrangements set out in NPPF (2024) Annex 1. These recognise the advanced stage that has been reached in the preparation of the Local Plan, and the amount of time and resources which have been spent on its preparation, and the pressing need to review and update the policies in the statutory development plan for Pendle, where the strategic policies are now nine-years old and several development management policies are in excess of 18-years old.</p> <p>As the Local Plan will be examined against the policies of the NPPF (2023) it is for the next Local Plan to respond to the policies in any new version(s) of the NPPF in terms of housing need.</p>
02143	Pegasus Group for MCI Developments	Not specified	No	Policy DM20 section 5: This is seeking to maintain a 5-year housing land supply. This currently references the 2023 NPPF, but its likely that when the Local Plan is adopted the NPPF will have been updated. Looking at the draft version of the NPPF, this is explicit in setting out that Council's will need to set out a suitable supply of homes. As such this element of policy is not necessary or required, or it should be moved into a section relating to monitoring.	Remove / amend this part of the policy.	<p>Whilst the plan is to be examined in accordance with the policies of the December 2023 version of the NPPF it is acknowledged by the Council that it will be implemented alongside with the December 2024 version of the NPPF. As such a minor modification is proposed to address this issue. See Schedule of Minor Modifications.</p>
01510	Lane Town Planning for McDermott Homes	Yes	No	Policy DM21: Concerned of the very high density of 50 dph in town centres. Experience suggests that with site parking and site constraints this level of development in Pendle is not suitable or achievable. Further evidence to support this proposed level of development taking into account other policy requirements and viability should be provided by the Council. It is noted that this development would necessitate 1 and 2 bed apartments and not the provision of the family homes, which the plan acknowledge is much needed and will not assist in achieving an appropriate housing balance for the borough.	Review density requirements set out in Policy DM21.	<p>Comments noted: Recommend no change</p> <p>The Council is not aware that the developer has any experience of developing town centre sites for housing in Pendle and is therefore not persuaded by this unsubstantiated argument.</p> <p>The density requirements in the Plan consider the existing built form and character of Pendle. The 50dph requirement relates only to the borough's most accessible locations, which are defined as being the three Town Centres and areas close to the Mainline bus route (services M3, M4 and M5), which provides the only high frequency bus service in Pendle.</p> <p>The accessibility of development sites in these locations to existing services, public transport, shops, and sources of employment available in these locations helps to reduce the need for journeys by car and this is reflected in the car parking standards (see Appendix 5).</p>

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						<p>In such locations housing built to a higher density is both suitable and desirable. The proposed approach is consistent with the NPPF in this regard.</p> <p>The plan promotes lower density housing in other parts of the borough and density requirements are not set in specific rural locations. The proposed approach will help to deliver a broad mix of house types and sizes whilst making the most efficient use of land.</p>
01535	Home Builders Federation	Yes	No	Policy DM21. In determining density requirements, wider consideration should be given to other policies of the plan which serve to reduce or constrain the developable area. It is noted that the policy seeks to introduce optional space standards and accessible and adaptable homes standards. The Council need to ensure that these requirements are evidenced. It is further noted that the area experiences limited viability. The Council need to ensure that the Local Plan is deliverable.	None specified	<p>Comments noted: Recommend no change</p> <p>The density requirements of the Local Plan respond to paragraph 129a of the NPPF and reflect the prevailing built character of the areas they pertain to. The Council has evidenced proposals for optional space, accessibility and adaptability standards as set out in the Optional Standards Report. The implications of these standards on viability have been evaluated through the Local Plan Viability Assessment. This assessment shows that the adoption of the standard has limited cost implications.</p>
01644	Colne Town Council	Not specified	Not specified	Policy DM21: Supports policy, especially paragraphs 6.44 and 6.45.	None specified.	Support welcomed
01796	Historic England	Not specified	Yes	Policy DM21: Support changes made to this policy.	None specified.	Support welcomed
01872	Lancashire County Council (Housing)	Not specified	Not specified	Request more provision of accommodation for people with disabilities with the provision of M4(3) wheelchair adapted properties in Policy DM21	Increase requirement for M4(3) homes.	<p>Comments noted: Recommend no change</p> <p>The Council recognise the need to provide more homes designed to meet the needs of people with disabilities over the plan period, as evidenced through the Housing and Economic Development Needs (HEDNA) (Iceni Projects, 2023).</p> <p>However, the Council must ensure that policy requirements do not make new development proposals unviable.</p> <p>The Local Plan Viability Assessment (Aspinall Verdi, 2024) considers the impact of the plan proposals and concludes that there is limited economic viability across much of the borough.</p> <p>In response Policy DM21 encourages developers to provide M4(3) compliant homes but is unable to require developers to meet this higher design standard.</p>
01872	Lancashire County Council (Active Travel)	Not specified	Not specified	Policy DM21 – change emphasis of wording.	<p>Amend Policy DM21 paragraph 1(g) to:</p> <p>‘Enable active travel by linking to safe and attractive pedestrian and cycling infrastructure connecting with nearby green infrastructure (Including formal open space provision), community facilities, school provision, public transport services, shops, and sources of employment.</p> <p>Amend paragraph 6.41 to:</p>	<p>Agree: Recommend change to Policy Text</p> <p>The Council is minded to accept these suggested modifications but would note that the comments do not relate to the soundness of the Plan – see Schedule of Proposed Minor Modifications.</p>

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					<p>‘...Developments should be located and designed to enable walking and cycling to sources of recreation, access to services including education, community facilities and public transport to minimise the need to travel by car (Policy SP11)’.</p> <p>Amend paragraph 6.47 to:</p> <p>‘The efficient use of land can help reduce the need to travel, enable walking and cycling, deliver urban renewal and safeguard Pendle’s most sensitive environments from inappropriate forms of development..’</p>	
01872	Lancashire County Council (Health)	Not specified	Not specified	Policy DM21 - In response to local evidence of need the County Council continue to advocate that all new housing should be built to M4(2) unless there is a specific requirement for M4(3) housing.	None specified.	<p>Comments noted: Recommend no change</p> <p>The Council recognises the need for dwellings that are suitable for wheelchair users, which is acknowledged in the Housing and Economic Development Needs Assessment (HEDNA) (Iceni Projects, 2023).</p> <p>The provision of dwellings to M4(3) standard is encouraged by Policy DM21. But the Council has determined not to implement the 10% requirement on account of poor development viability throughout Pendle as evidenced in the Pendle Local Plan Viability Assessment (Aspinall Verdi, 2024).</p>
02131	Sevo Planning for Little Cloud	No	No	Policy DM21: Housing density should be indicative and pay regard to site specific circumstances. The policy should cross reference requirements of Policy DM10.	Cross reference DM10 in policy.	<p>Comments noted: Recommend no change</p> <p>Paragraph 2 of Policy DM21 acknowledges the need to take account of site specific circumstances in the consideration of a suitable density ratio. The policy is flexibly worded but framed to provide clarity on what the Council would normally expect to see.</p>
00294	Lidgett and Beyond	Not specified	Not specified	<p>Policy DM22: Should be rewritten to reflect the role of attached housing as more sustainable way of living and more efficient use of land.</p> <p>Do not support paragraph 6.53. Terraces can be brought up to modern insulation and living standards.</p> <p>Support the need for bungalows and apartments, although we suggest one-bed apartments would help first time buyers, pensioners, and people with disabilities.</p>	Rewrite the policy to encourage greater re-use, retrofit and development of terraced housing.	<p>Comments noted: Recommend no change</p> <p>The policies of the Local Plan only relate to development that requires planning permission. Securing the long term re-use of empty homes by retrofitting existing dwellings does not normally require planning permission unless it is a listed building or exceeds the allowances of the General Permitted Development Order.</p> <p>The policy does not prevent or overlook the role of terraced homes in meeting housing need. Policy DM22 encourages the delivery of a mix of dwelling types and sizes including terraced housing. Furthermore, the density requirements set out in Policy DM21 mean that terraced homes will continue to make a major contribution to addressing local housing need throughout the duration of the plan period.</p>
01510	Lane Town Planning for McDermott Homes	Yes	No	Policy DM22: A one size fits all approach of policy towards housing mix noting local circumstances is not suitable. Experience shows that needs for	Amend the policy to reflect housing needs across the three defined sub-areas. Amend the policy to add	Comments noted: Recommend no change

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				<p>housing differs across Pendle. Housing Mix requirements should therefore follow. Insufficient guidance is provided to explain what is meant by the term ‘adequate justification.’ The policy must be amended to state that the mix sought is not prescriptive. The emphasis on smaller dwellings is further not justified considering:</p> <ul style="list-style-type: none"> The derived housing mix relates to the recommended figure of 270dpa. 60% of homes are in Council Tax A band. <p>The HEDNA shows there are clear differences in housing stock across the three sub areas of Pendle.</p>	scope for greater flexibility from the prescribed approach.	<p>Under any assessed scenario housing need in Pendle is driven by the needs of an ageing population. This includes a significant requirement for smaller high quality homes to permit down-sizing, which in turn will release larger homes that may be underoccupied.</p> <p>The draft policy promotes a diverse range of housing types. It is orientated towards smaller dwellings to take account of the evidence on future need, but increasing the in-built flexibility still further would challenge its overall effectiveness.</p> <p>The housing mix outlined in Table 22a is evidence based, and its delivery will ensure that the housing provided over the plan period is responsive to projected changes to the demographic profile of Pendle.</p> <p>In the absence of alternative evidence, it is reasonable to require applicants to justify their proposed housing mix where there is a significant deviation from that required by the policy.</p>
01535	Home Builders Federation	Yes	No	Policy DM22 concerned by how much reliance may be placed on Table DM22a in the implementation of this policy and how frequently this made be updated and what the process might be for updating this table.	None specified.	<p>Comments noted: Recommend no change</p> <p>Table DM022a reflects the findings on housing mix set out in the HEDNA (2023). The policy will be reviewed as part of the wider plan review required at least once every five years by national planning policy.</p> <p>The wording in paragraph 2 of the Policy Text allows the table to be superseded and for any variation that is necessary where the evidence prepared to underpin a neighbourhood development plan demonstrates that a different housing mix is required.</p> <p>Paragraph 3 of the Policy Text advises that significant departures from the housing mix outlined in Table DM22a will be refused unless a clear justification can be put forward. This approach ensures that the policy remains effective in responding to the most up to date assessment of housing needs in all, or part, of the borough.</p>
01644	Colne Town Council	Not specified	Not specified	Policy DM22: The policy should be rewritten recognising the role and value of terraced housing. Does not support assertions made by para 6.53. Attached houses can be inherently more sustainable and make more efficient use of land.	Rewrite the policy to encourage greater re-use, retrofit and development of terraced housing.	<p>Comments noted: Recommend no change</p> <p>The policies in the Local Plan only relate to development that requires planning permission.</p> <p>Retro-fitting to secure the re-use of existing dwellings does not normally require planning permission. Exceptions are where a proposal exceeds the allowances of the general permitted development order, there is a material change of use, or a listed building is affected.</p> <p>Policy DM22 does not prevent or overlook the role of terraced homes in meeting housing need. The policy encourages the delivery of a mix of dwelling types and sizes including terraced housing, whilst Policy DM21</p>

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						sets density requirements by location. Given the density requirements that are outlined, it is highly likely that new terraced homes will make a significant contribution to housing provision throughout the plan period.
01872	Lancashire County Council (Housing)	Not specified	Not specified	The encouraged delivery of 2-bedroom bungalows through Policy DM22 is welcomed.	None specified.	Support welcomed
02131	Sevo Planning for Little Cloud	No	No	Policy DM22: Clear need for greenfield sites to be identified in order to respond to the evidenced need for 2 and 3 bedroom market housing. Policy DM22 should be implemented as a guide to account of site specific conditions and enable a wide range of house types, mix and density.	Identify further greenfield sites. Implement Policy DM22 flexibly.	Comments noted: Recommend no change The full range of housing land supply that will come forward over the plan period will provide a diverse range of dwelling types and sizes which is responsive to our assessed local housing need. Policy DM22 allows for some divergence from the proposed mix sought in Table DM22a. But the table helps to establish the Council's expectations and provides a clear indication when applicants proposing a housing mix which significantly departs from this position will be required to provide a justification for doing so.
00040	Barrowford Parish Council	Not specified	Not specified	Policy DM23: Consider that there is scope to require affordable housing on larger sites in Colne and Barrowford.	Increase affordable housing requirements for Colne and Barrowford.	Comments noted: Recommend no change The requirements of Policy DM23 balance affordable housing needs, as set out in the Housing and Economic Development Needs Assessment (HEDNA), against the findings of the Local Plan Viability Assessment (2024).
00294	Lidgett and Beyond	Not specified	Not specified	Policy DM23: In Part 4 the requirement for a viability assessment to be submitted, where departures are made for the provision of affordable housing from policy requirements, is supported, however the policy wording should be tightened.	Revise Policy DM23 part 3 to outline that the failure to submit one 'will result in the refusal of the application'	Disagree: Recommend no change The proposed policy wording reflects the position that other material considerations may override the policy requirement, depending on the nature of the development proposals and any site specific considerations. This are matters for the decision maker to consider.
00526	Trawden Forest Parish Council	Not specified	Not specified	Support Policy DM23: Affordable housing requirements.	None specified.	Support welcomed
01535	Home Builders Federation	Yes	No	Policy DM23 – NPPF sets out that affordable housing policy must not only take into account need but also viability and deliverability. It is unrealistic to negotiate every site on a one-by-one basis. The NPPF is clear that major development should deliver at least 10% of the total number of homes to be made available for home ownership. The HBF is concerned that the policy will not deliver this requirement. Notes viability challenges outlined within the Local Plan Viability Report and considered that it is likely inappropriate to use a discount rate above 30% as applied by PPG or to set additional eligibility criteria over and above though set in PPG. Notes the findings of the Local	Reduce First Homes discount to 30% of market value.	Comments noted: Recommend no change In recognition of the challenges for housing delivery in Pendle, the policy balances the findings of the viability evidence against the recommendations of the HEDNA. The approach to affordable home ownership and the departure from the approach outlined in the NPPF reflects local socio-economic conditions which drive the need for affordable housing provision in Pendle. The justification for this policy is set out in paragraph 6.68 of the Supporting Text. The identification of further development sites suitable for housing, within higher value areas of the

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				Plan Viability Assessment and recommendation to apply the affordable housing threshold at 10%.		<p>borough, to help meet affordable housing need would not conform with the overall spatial strategy and could result in a disproportionate amount of growth taking place at locations with poor sustainability or limited capacity to accommodate further development.</p> <p>The Council has been successful in securing affordable housing through grant funding at sites within the M65 Corridor. In addition Policy DM23 sets out criteria for rural exception sites. The First Home discount rate reflects local housing needs as evidenced within the HEDNA (2023).</p>
01575	The Planning Bureau for McCarthy Stone and Churchill Living	Not specified	Not specified	Policy DM23: Point 6 refers to the financial contribution calculation in Appendix 3. It has not been shown within the plan wide testing that this is appropriate, broadly equivalent, or viable.	Re-run viability assessment to test off-site financial contribution calculation set out in Appendix 3.	<p>Disagree: Recommend no change</p> <p>The requirement to provide affordable housing has been tested in the Local Plan Viability Assessment (Aspinall Verdi, 2024). The calculator is only used where it is not possible for the developer to provide an appropriate level of affordable housing on site. In these circumstances the calculator should be used at the pre-application stage to indicate the financial contribution to be paid in lieu of on-site provision. This ‘commuted sum’ will be used by the Council to provide suitable affordable housing elsewhere in the Borough.</p> <p>The aim is to reduce the amount of time taken negotiating affordable housing provision through planning obligations (S106 Agreements) and the determination of planning applications.</p>
01644	Colne Town Council	Not specified	Not specified	Policy DM23: Supports policy. Notes that new housing will never be affordable (even with market discount) in contrast to existing stock which provide for real world affordable housing. There is no requirement for affordable housing in Colne.	None specified.	Support welcomed
02125	NHS Property Services	Not specified	Not specified	Policy DM23: Consideration should be given to the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area in consultation with NHS partners.	Consider affordable housing for NHS staff and healthcare providers.	<p>Comments noted: No change proposed</p> <p>Affordable Housing Need is assessed through the Housing and Economic Development Needs Assessment (HEDNA) (Iceni Projects, 2023) and the Housing Need Update (Iceni Projects, 2024).</p> <p>The HEDNA does not break affordable housing need down by profession, but some of this need will include people employed within health. As such there no need to make specific additional affordable housing provision for the healthcare workforce.</p>
02128	CPRE Lancashire	Yes	Yes	Policy DM23 allows deviation from policy, where justified, by viability evidence. This may lead to inconsistency in affordable housing delivery. The policy does not respond to national planning policy requirements on affordable home ownership. There is no CIL levy in Pendle.	None specified.	<p>Comments noted: Recommend no change</p> <p>The policy balances the findings of the viability evidence base against those recommendations of the HEDNA in recognition of the challenges identified for delivery. The approach to affordable home ownership and departure made from the NPPF reflects local</p>

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						economic conditions which drives the need for affordable housing in Pendle. Justification for this policy is set out in Paragraph 6.68 of the Local Plan. The adoption of CIL in Pendle is not viable at this time.
02143	Pegasus Group for MCI Developments	Not specified	No	Policy DM23: Viability evidence advocates 10% requirement at all sites in all locations which is not translated into policy. The scenarios evaluated shows that there is no scenario that any affordable housing can be viably accommodated on brownfield sites and lower value greenfield sites. There is marginal viability on greenfield sites. Higher value brownfield and greenfield sites appear to be more value. The NPPF also requires major development to provide at least 10% the total number of homes to be affordable home ownership. A potential solution would be the allocation of sites in higher value areas or specific sites solely for the delivery of affordable homes. Adding additional criterion to Policy DM26 in support of affordable housing in rural locations which addresses clear and defined local need would also be recommended.	Allocate more sites in higher value areas to help boost delivery of affordable housing.	Comments noted: Recommend no change The policy balances the findings of the viability evidence base against those recommendations of the HEDNA in recognition of the challenges identified for delivery. The approach to affordable home ownership and departure made from the NPPF reflects local economic conditions which drives the need for affordable housing in Pendle. Justification for this policy is set out in Paragraph 6.68 of the Local Plan. The identification of further sites within higher value areas to help meet affordable housing need would be contrary to the spatial strategy and result in a disproportionate amount of growth taking place at locations with limited capacity and sustainability to accommodate further development. The Council has been successful in securing affordable housing through grant funding at sites within the M65 Corridor, in addition Policy DM23 sets out criteria for rural exception sites.
00294	Lidgett and Beyond	Not specified	Not specified	Policy DM24: Support the need for borough-wide compliance with design standards to ensure that no precedents are set.	None specified.	Comments noted: Recommend no change Following adoption of the Local Plan, and the introduction of proposed changes to plan-making, the Council will continue to consider the benefits of preparing either a borough-wide Design Code, or several location specific and/or typology specific Design Codes.
00526	Trawden Forest Parish Council	Not specified	Not specified	Support Policy DM24: In particular, the addition to paragraph 6.88.	None specified.	Support welcomed
01644	Colne Town Council	Not specified	Not specified	Policy DM24: Supports policy, particularly the addition of paragraph 6.88.	None specified.	Support welcomed
00471	Sport England	No	No	Policy DM25: Should add test to ensure the protection of sports and recreation facilities.	Amend Policy DM25 part j to: ‘Where the proposed residential use may lead to the loss of a sport or recreation facilities, that an assessment has been undertaken which has clearly shows the impacted open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quantity in a suitable location’	Comments noted: Recommend no change The policy provides guidance on the conversion of existing buildings to residential use. The protection of designated sports and recreational facilities, including playing pitches, is set out in Policy DM31. There is no need to repeat parts of Policy DM31 here as it is appropriately referenced in paragraph 1(j) of the Policy Text.
00526	Trawden Forest Parish Council	Not specified	Not specified	Support Policy DM25. Conversions preserve and repurpose existing buildings, making them an environmentally sustainable choice.	None specified.	Support welcomed
01644	Colne Town Council	Not specified	Not specified	Policy DM25: Supports policy. Particularly because the majority of embodied carbon is retained and	None specified.	Support welcomed

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				repurposed and the historic value of the existing building can be maintained.		
00167	D Penney	Not specified	Not specified	Policies DM20 / DM21 / DM22 / DM23 / DM24 / DM25: None of these policies consider the large number of empty homes in meeting housing need.	Add reference to empty homes.	<p>Comments noted: Recommend no change</p> <p>Reoccupying long term empty homes does not require planning consent unless the associated works required to bring them back into use represent development that is not permitted through the General Permitted Development Order.</p> <p>A broad spectrum of housing is promoted through the policies of the Local Plan. The policies on housing development address the type and size of housing, the affordability and tenure of housing, self-build and custom housebuilding, accommodation for gypsy, traveller and travelling showpeople, changes of use to housing, the extension of existing dwellings, the provision of shared accommodation, and specialist housing for the elderly.</p>
00294	Lidgett and Beyond	Not specified	Not specified	Policy DM26: Support the need for borough-wide compliance with design standards to ensure that no precedents are set.	None specified.	<p>Comments noted: Recommend no change</p> <p>Following adoption of the Local Plan, and the introduction of proposed changes to plan-making, the Council will continue to consider the benefits of preparing either a borough-wide Design Code, or several location specific and/or typology specific Design Codes.</p>
00526	Trawden Forest Parish Council	Not specified	Not specified	Support Policy DM26	None specified.	Support welcomed
01510	Lane Town Planning for McDermott Homes	Yes	No	To make the policy compatible with proposed amendments providing for larger scale developments beyond but adjacent to settlement boundaries the following revision should be made to Policy DM26.	Amend Policy DM26 title to: 'Isolated housing in the countryside'	<p>Disagree: Recommend no change</p> <p>For the reasons set out in previous responses to consultee ID01510 (see above), the Council do not agree with the proposed policy for a plan review or amendments to Policies SP01, SP02, SP03 or DM09.</p>
01644	Colne Town Council	Not specified	Not specified	Policy DM26: Supports policy because they protect the countryside, while not preserving it in aspic.	None specified.	Support welcomed
02131	Sevo Planning for Little Cloud	No	No	Policy DM26: The policy should permit, in some cases, the adoption of the presumption in favour of sustainable development in alignment with the most up-to-date Framework.	Amend Policy DM26 to add: 'In line with the requirements of most-up-to-date Framework, the presumption in favour of sustainable development will apply if it can be demonstrated that a proposed development outside but adjoining or close to a settlement boundary is consistent with the principles of sustainable development and development plan policy overall.	<p>Disagree: Recommend no change</p> <p>The Council does not agree with this interpretation of national planning policy.</p> <p>Paragraph 11 of the NPPF sets out what the presumption in favour of sustainable development is.</p> <p>For plan making this means, the promotion of a sustainable pattern of development; to meet the development needs of the area, align growth and infrastructure; improve the environment; and mitigate and adapt to the effects of climate strategy, and plan for and meet the objectively assessed needs for housing and other land uses.</p> <p>Paragraph 11 goes on, setting out how the presumption in favour of sustainable development</p>

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						<p>applies for decision making, confirming; approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (for the reasons outlined in the NPPF), granting permission unless, otherwise protected by the NPPF which provides a clear reason to refuse development, or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.</p> <p>It is clear that the presumption in favour of sustainable development does not override the statutory development plan. And this is confirmed in paragraph 12 of the NPPF.</p> <p>It is for the Council, as the plan making authority, to establish the spatial approach to meet identified development needs, taking into account the policies of the NPPF.</p> <p>An amendment to Policy DM26 is not justified.</p>
01535	Home Builders Federation	Yes	No	Policy DM27. Unclear of evidence to support requirement on sites of 50 dwellings or more to provide 5% self-build plots. The policy may limit delivery. The Council's own evidence shows that there is not demand for self-build on larger sites. Alternative mechanisms should be pursued to meet self-build needs.	Delete part 4 of the policy.	<p>Comments noted: Recommend no change</p> <p>The policy is responsive to evidence on the need for self-build and custom housebuilding and assumptions about how these may evolve over the plan period. There are a limited number of sites currently available to respond to self-build or custom housebuilding requirements.</p> <p>The Council has a duty to address local needs outlined via the Self-Build Register. The policy adopts a proactive approach to meeting this need. Requiring the provision of self-build opportunities on larger sites is one of the options identified. Developers could phase delivery to ensure that this requirement does not impact on their overall programme for delivery.</p> <p>The policy is also flexible, enabling plots made available for self-build to revert to the provision of market housing should no interest for self-build or custom housebuilding materialise.</p>
01644	Colne Town Council	Not specified	Not specified	Policy DM27: Supports policy.	None specified.	Support welcomed
02113	Rural Solutions	Not specified	Not specified	<p>Policy DM27 clause 2(b) is not justified, effective or sound.</p> <p>Appreciate that the policy is seeking to ensure that the occupancy of new self-build and custom houses will meet an identified need in the local area. However, in this regard it is the end-user of the property that is key, not the applicant. There may be landowners who wish to promote self-build and</p>	Reword Policy DM27 2(b) so its references 'the first occupier' of the property.	<p>Comments noted: Recommend no change</p> <p>The use of the term applicant seeks to ensure that the first occupier has had some involvement in the design of the property, which is a key requirement if for it to be regarded as a self-build or custom-build home.</p>

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				custom build housing on their land but do not meet the terms of clause 2(b).		
01575	The Planning Bureau for McCarthy Stone and Churchill Living	Not specified	Not specified	Policy DM28: Unclear whether the parking standards set for sheltered accommodation in Appendix 5 relates to beds. Car ownership is low for residents of sheltered accommodation. In experience many residents decide that car ownership is no longer necessary or appropriate.	None specified.	Comments noted: Recommend no change The parking requirements for Sheltered Accommodation (Use Class C2) are clear about what is required. The standard represents a starting point for any negotiations with developers who submit evidence to demonstrate that the standard is not appropriate for their development proposal.
01644	Colne Town Council	Not specified	Not specified	Policy DM28: There has been a noticeable increase in HMOs in recent years and this has negatively affected parts of our town. We would urge the Council to adopt an Article 4 Direction to require planning permission at a lower threshold.	Article 4 areas introduced regarding HMO	Comments noted: Recommend no change The issues raised fall outside the scope of the Local Plan. The matter requires separate consideration by the Council.
01872	Lancashire County Council (Housing)	Not specified	Not specified	Pleased to see that Policy DM28 Specialist Housing, has included the County Council's figures for the delivery of adults needing support 53 new units and also new extra car provision 268 places.	None specified	Support welcomed
01872	Lancashire County Council (Health)	Not specified	Not specified	The County Council welcome the work Pendle has done to reflect the equity component of accessibility within the Local Plan. The County Council particularly welcome the inclusion and guidance on the incorporation of dementia-friendly design principles in Policy DM28 and Policy DM30.	None specified.	Support welcomed
01644	Colne Town Council	Not specified	Not specified	Policy DM29: Supports policy.	None specified.	Support welcomed
00471	Sport England	No	No	Support Policy DM30	None specified	Support welcomed
01644	Colne Town Council	Not specified	Not specified	Policy DM30: Supports policy. However it should feature policy on overtly discouraging hot food takeaways.	None specified.	Support welcomed
01872	Lancashire County Council (Health)	Not specified	Not specified	Welcomes the comprehensive overview provided in Policy DM30 which outlines the actions to ensure, where practicable, developments contribute towards healthy places and lifestyles.	None specified.	Support welcomed
00471	Sport England	No	No	Policy DM31: Part 1 The threshold on size could lead to designated sites being missed. Part 2 both land and buildings will be protected as per NPPF paragraph 103. The word normally is inconsistent with the NPPF. Part 3 Normally should be omitted from the policy and wording should be set out about compliance with Paragraph 103. Part 4 is inconsistent with the NPPF which sets the tests for redeveloping existing sites for other land uses.	Policy DM31 amends. 1. Include all sites on the Policies Map and amend policy accordingly. 2. Remove 'normally' 3. Remove 'normally' include reference to paragraph 103 of the NPPF. 4. Revise to reflect the NPPF. 5. Emphasise the application of a needs based approach through a Playing Pitch and Outdoor Sports Strategy and NPPF Paragraph 102. 7. Reference to Sport England's Active Design in relation to the co-location of uses.	Comments noted: Recommend no change unless stated 1. Including all designated open space on the Policies Map accompanying the Local Plan is likely to reduce its clarity and functionality as the open space designation includes some very small sites. In addition to the maps in the Open Space Audit, all open spaces can be viewed on the Council's website via our interactive Open Space Map . 2. The word 'normally' reflects the tests set out in paragraph 103 of the NPPF, which sets out scenarios where the redevelopment of sports

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				<p>Part 5 broadly agree but would emphasise the requirement for a needs based approach through a Playing Pitch and Outdoor Sports Strategy and NPPF Para 102.</p> <p>Part 6 Welcome change in wording to reference Community Use Agreements.</p> <p>Part 7 Reference should be made to Sport England's Active Design with regard to the need for proposals to be co-located with other facilities.</p> <p>Part 8 Needs to be protective in its approach. Do proposals need to meet all five criteria? It is inconsistent with Paragraph 103.</p> <p>Part 9 Needs to be protective in its approach.</p> <p>Part 10. 'Sensitive to its setting is not sufficient to protect sports facilities I.e. they should not prejudice use of any open space, sports, recreational buildings and playing fields'</p> <p>Part 11 Needs to be reworded to ensure conformity with Paragraph 193 of the NPPF.</p> <p>Part 12 Reword to ensure that development does not prejudice the use of sports facilities.</p> <p>Part 13 Any new playing field would need to be consistent with NPPF paragraph 102 in terms of meeting an identified need.</p> <p>Justification – 6.151 needs to refer to latest Playing Pitch Strategy.</p> <p>6.152 is not based on a needs assessment and does not conform with NPPF 102.</p>	<p>8. Choice criterion needs to be amended so that proposals are required to meet all criteria. Preference that the policy relates directly to Paragraph 103 of the NPPF.</p> <p>9. Revise wording 'the redevelopment and replacement of existing buildings will not be permitted unless..'</p> <p>10. Proposals should not prejudice the use and function of existing open spaces and sports facilities.</p> <p>11. Reword to conform with the NPPF.</p> <p>12. Reword in order to safeguard existing open spaces and sports facilities.</p> <p>13. Reference Paragraph 102 of the NPPF.</p> <p>6.151 Reference more up-to-date strategy.</p> <p>6.152 Review paragraph.</p>	<p>fields and recreational facilities could be suitable.</p> <p>3. The tests set out paragraph 103 of the NPPF are reflected in paragraph 8 of the Policy Text, which refers to new provision. The policy wording recognises that it might not always be suitable or desirable for open space to be provided on site (i.e. for sports pitches) and therefore adopts a flexible approach.</p> <p>4. Paragraph 4 of the Policy Text relates to new provision. The protection of existing sites is set out in paragraph 8 of the Policy Text and adopts wording that is consistent with paragraph 103 of the NPPF.</p> <p>5. The policy makes reference to the Open Space Audit or Strategy. This includes the latest Playing Pitch Strategy prepared on behalf of the Council (2024).</p> <p>7. The wording seeks to direct major sporting facilities towards the main towns in accordance with Policy SP02 and SP04 as relevant.</p> <p>8. Part 8 of the Policy is consistent with Paragraph 103 of the NPPF</p> <p>9. The policy is positively worded to reflect the tests of soundness.</p> <p>10. The policy relates to replacement structures. The policy provides guidance on the factors to be considered. Impacts on sports facilities is set out in previous parts of the policy and would be engaged where a proposal affects a designated site.</p> <p>11. Part d seeks to ensure that a proposal does not adversely effect the operations / use of an existing designated site.</p> <p>12. The policy relates to proposals which result in or may result in increased recreational pressure on the South Pennines SSSI. Proposals for SANG would be assessed against the requirements of Policy DM31 as necessary.</p> <p>13. The policy relates to proposals within the Forest of Bowland National Landscape and would be assessed against the requirements of Policy DM31 as necessary.</p> <p>6.164 The list of evidence base documents will be updated to reflect the omitted Playing Pitch Strategy (See Schedule of Minor Modifications).</p> <p>6.165 The Local Plan uses proportionate evidence. It is based on the most up-to-date resources available to the Council. The Open Space Audit will be updated in due course, as time and resources permit. The policies in the Local Plan offer protection to existing</p>

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						open space, which reflects the requirements of the NPPF.
00526	Trawden Forest Parish Council	Not specified	Not specified	Support Policy DM31. The Parish Council is working to acquire Ball Grove Park.	None specified.	Support welcomed
00564	Lancashire Wildlife Trust	No	No	Policy DM31 is supported by evidence which we consider to be out-of-date. The Green Infrastructure Strategy and Open Space Audit are both now at least 5-years old. The Green Infrastructure Strategy does not consider the Green Infrastructure Standards of Natural England (published 2023).	Updates to the Green Infrastructure Strategy and Open Space Audit.	Comments noted: Recommend no change The Local Plan is based on a proportionate evidence base. The Council has decided that the Green Infrastructure Strategy and Open Space Audit continue to provide a robust evidence base for the Local Plan. The Council consulted at scoping stage regarding the evidence base documents that would be continued to be relied upon in the preparation of the Local Plan. The comments raised in this representation have not previously been raised by the respondent.
01644	Colne Town Council	Not specified	Not specified	Policy DM31: Support policy but note the under provision of playing pitches in the borough. The Town Council would like to see the playing pitches at King George V brought back into use particularly for Hockey.	Designate land for playing pitches.	Comments noted: Recommend no change The latest evidence of need for Playing Pitches can be found within the Playing Pitches and Outdoor Sports Strategy which was published in 2024. The King George V Playing Field is a site designated as open space and is subject to the protections afforded to sites within the outdoor sports typology by Policy DM31.
02128	CPRE Lancashire	Yes	Yes	Policy DM31 explicitly recognises the significance of open space for community wellbeing. It established criteria to ensure that proposals do not lead to deficiency in open space provision. Policy SP11 promotes active travel. This should be reflected in site assessment methodologies. Policy DM30 requires Health Impact Assessments for certain developments ensuring that health impacts are thoroughly assessed and mitigated. Policy DM12 designates and protects areas deemed valuable for recreation, community wellbeing and biodiversity. These spaces provide opportunities for residents to connect with nature and engage in healthy outdoor activities.	None specified.	Comments noted: Recommend no change Accessibility to services, infrastructure, employment, and sources of recreation is accounted for through the site assessment. Policy SP02 and SP03 adopts a spatial strategy which seeks to focus growth towards the borough's most sustainable locations minimising the need to travel and encouraging the adoption of active travel means of transport.
00471	Sport England	No	No	Support Policy DM32	None specified	Support welcomed
01542	Canal & River Trust	Not specified	Not specified	Considers changes made to Policy DM32 in response to comments made by the Trust to the consultation to the draft Local Plan to be satisfactory.	None specified.	Support welcomed
01644	Colne Town Council	Not specified	Not specified	Policy DM32: The policy should mention the need for secure charging racks for E-bikes.	Reference to charging racks for E-bikes.	Comments noted: Recommend no change This matter is addressed in Policy DM37.
01872	Lancashire County Council (Active Travel)	Not specified	Not specified	Policy DM32 – Walking and cycling. Change emphasis of wording. A review of part 3 is required given there are two aspects of this sentence – one about securing developer funding for maintenance, the other is about	Amend Policy DM32 as follows: ‘1. Development proposals which affect an existing public right of way should, in the first instance, seek to	Comments noted: Recommend no change Had these recommended changes been submitted in response to the Regulation 18 public consultation we would have had no objections to making them.

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				securing developer funding for implementation of infrastructure.	<p>incorporate this into the development as an exclusive route for walking, wheeling, and cycling.’</p> <p>‘2(d) Use design standards that accord with the latest guidance and where appropriate, streets and paths should be well lit, within, and adjacent to, the development site’</p> <p>‘2(e) Enable greater opportunities for walking, wheeling, and cycling by’</p> <p>‘2(e)(iii) Being within walking distance of existing services (including shops) and sources of employment.’</p> <p>‘3. To ensure further maintenance, where appropriate new active travel infrastructure should be the subject of a Section 106 agreement with the local highway authority’.</p> <p>‘4, Non-residential development that is likely to generate a significant level of footfall should be located in highly accessible locations such as town or local centres, prioritise walking, wheeling and cycling above all else’</p> <p>Amend Policy DM32 Supporting Text as follows:</p> <p>‘6.172 Walking and cycling is beneficial for personal health and the environment. It can also bring economic benefits to an area through increased footfall and the promotion of tourism’</p> <p>‘6.173 ...To take advantage of this we want to enable people to walk or cycle to places they visit on a regular basis.’</p> <p>‘6.174 All developments must provide safe and attractive linkages with existing footpaths, bridleways and cycleways.’</p> <p>‘6.175 The design of major developments should also enable walking and cycling through the layout and orientation of buildings on the site. Developments should seek to create safe route for walking and cycling by adhering to the latest walking and cycling infrastructure design guidance.’ Delete bullet points.</p> <p>‘6.177. Where this is unavoidable a new route of equivalent benefit should be established for walking and cycling.’</p>	Unfortunately, at this late stage in the plan-making process they represent improvements to the wording of the Policy Text or Supporting Text but are not required to make the policy sound.
00526	Trawden Forest Parish Council	Not specified	Not specified	Policy DM33: The Parish Council does not support this policy. We feel that additional hot food takeaways in our town centres within the borough should be restricted.	Revise policy to prevent hot food takeaways.	<p>Comments noted: Recommend no change</p> <p>The Council cannot apply a unilateral ban on a specific land-uses. Policy DM33 addresses concerns raised by the available evidence by applying a proportionate approach to the control of hot food takeaways. It restricts their development in close proximity to facilities frequented by children and within wards with high levels of deprivation to help reduce high levels of childhood obesity, which has</p>

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						been shown to lead to poor health outcomes in later life. The policy places further limits hot food takeaways within town centres to help avoid clustering, which can have an adverse impact on the amenity of neighbouring property owners by virtue of odour, noise, litter, and traffic.
01644	Colne Town Council	Not specified	Not specified	Policy DM33: In 2021/22 almost ¼ of electoral wards in Pendle had significantly worse rates of obesity and overweight children than the England average for year 6, with levels often greater in those wards with the highest levels of deprivation. There is now enough evidence on the link between health and the proliferation of hot food takeaways.	Additional hot food takeaways in our town centres should be resisted.	<p>Comments noted: Recommend no change</p> <p>The Council cannot unilaterally apply a blanket ban on a specific land use.</p> <p>Policy DM33 represents a proportionate approach to the provision of new hot food takeaways (HFT) in the borough.</p> <p>In support of the Council’s stated goal of reducing the high levels of obesity recorded in Pendle, particularly within young children, the policy restricts the development of HFT in close proximity to facilities frequented by children, within deprived wards, and in wards where recorded levels of obesity are above the regional average.</p> <p>The policy also seeks to prevent the clustering of HFT outlets, with proposals being resisted at locations – including those within a designated town centre – where any adverse effects on the amenity of neighbouring residents or businesses are considered to be unacceptable and satisfactory mitigation measures cannot be implemented.</p>
01872	Lancashire County Council (Health)	Not specified	Not specified	<p>Policy DM33 – Considering the evidence presented, the County Council welcomes the restrictions placed on the location of hot-takeaways as set out in point 2c.</p> <p>Amendment sought to part 2b of the policy to ensure alignment with the County Council’s refreshed Hot Food Takeaways and Spatial Planning Public Health Advisory Note.</p> <p>In relation to part 2a of the policy, the County Council’s Hot Food Takeaways and Spatial Planning Public Health Advisory Note draws on a range of evidence to support the policy.</p>	<p>Amend Policy DM33 part 2b</p> <p>‘...the most recently published NCMP data does not classify 10% or more of reception pupils or 15% or more of Year 6 pupils as obese (including severely obese).</p>	<p>Agree (in part): Recommend change to Policy Text</p> <p>The Council agree with the justification to amend paragraph 2(b) of Policy DM33 to reflect the recommended wording – see Schedule of Proposed Minor Modifications.</p> <p>A further minor modification is proposed to refer to Lancashire County Council’s Hot Food Takeaways and Spatial Planning Public Health Advisory Note within the Supporting Text given the significant role its evidence provides in supporting the policy approach and guidance set out in relation to this type of development – see Schedule of Proposed Minor Modifications.</p>
00294	Lidgett and Beyond	Not specified	Not specified	Policy DM34: Acknowledge that the Council has worked hard to engage the community in its draft Local Plan throughout the preparation process. Our experience is that developers do not publish the feedback they receive. The policy is therefore welcomed.	None specified.	Support welcomed
01535	Home Builders Federation	Yes	No	Policy DM34. Policy requirements are onerous and unnecessary for the majority of applications. Concerned of additional burden for applicants, statutory bodies, and providers.	Parts 1 and 2 of Policy DM34 are deleted.	<p>Disagree: Recommend no change</p> <p>The policy is consistent with the Council’s adopted Statement of Community Involvement (SCI) and paragraphs 39-40 of the NPPF. It makes clear that pre-</p>

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						<p>application engagement should be proportionate to the nature of the development proposal. It is reasonable to ask applicants that are in conflict with the development plan to consult with the local community and statutory bodies who may be unaware of the proposal and its finer details. They should be given the opportunity to comment on the proposals before the decision on whether to approve or refuse the application for planning permission is taken by the Council.</p> <p>Major development brought forward outside the development plan process has the potential to impact infrastructure and service provision. The proposed approach seeks to improve the efficiency of decision making by increasing the opportunity for key issues to be made clear and where necessary resolved early in the process reducing potential for unnecessary delay or refusal.</p>
01644	Colne Town Council	Not specified	Not specified	Policy DM34: Supports policy. Pendle Council has, demonstrably, engaged the community in its draft Local Plan.	None specified.	Support welcomed
02128	CPRE Lancashire	Yes	Yes	The Pendle Local Plan demonstrates a strong commitment to local democracy and community engagement (Policy DM34). The plan emphasises transparency and accessibility of information to the public. The availability of an interactive version of the Policies Map allows residents to easily understand the spatial implications of the plan and engaged in informed discussions.	None specified.	Comments noted: Recommend no change
00471	Sport England	No	No	Policy DM35: Policy applies insufficient protection to existing sports and facilities.	<p>Add 3(d) to policy:</p> <p>‘Any proposed to change the use of a building of land which is not already in Use Class F2 for open space, sport and recreation, or playing field with not be supported unless (references tests in Paragraph 103 of the NPPF).’</p>	Comments noted: Recommend no change Paragraph 3 of the Policy Text already references the need to consider Policy DM31 where relevant. The additional wording that is proposed is unnecessary.
00516	Theatres Trust	Yes	Yes	Support Policy DM35 which provides protection against the unnecessary loss of valued facilities in line with Paragraph 97 of the NPPF as well as supporting new and enhanced facilities. Seek amendments to the policy wording to strengthen it and avoid its intention being undermined – the viability of facilities can be purposefully undermined, therefore demonstrating need / demand provides a safeguard.	Add ‘and’ after parts b and c of point 3 of Policy DM35	Disagree: Recommend no change The requirements of the policy are considered to be sufficiently clear without the use of “and” between each of the requirements in paragraph 3.
00526	Trawden Forest Parish Council	Not specified	Not specified	Support Policy DM35. Proud to say that Trawden is the only village in Britain where the community own the pub, library, shop, and community centre, preventing their closure.	None specified.	Support welcomed
01644	Colne Town Council	Not specified	Not specified	Policy DM35: Supports policy.	None specified.	Support welcomed

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02125	NHS Property Services	Not specified	Not specified	Policy DM35. Concerned that where applied to health facilities the policy is too inflexible in preventing loss or change of use. The NHS requires flexibility with regards to the use of its estate. In particular the disposal of sites and properties which are redundant or no longer suitable for best value use. Requiring the NHS to explore alternative community use or retain its use is unjustified and will delay vital reinvestment in services and facilities for the community. All NHS land disposals follow a rigorous process to ensure that levels of healthcare service provision in the locality are maintained or enhanced with proceeds reinvested. Where this process is satisfied, it should be accepted that the facility is neither needed nor viable for its current use and the policies of the Local Plan should support the principal of alternative uses for NHS sites with no requirement for retention of a community facility use on the land or submission of onerous information.	Revise Policy DM35 as follows: (c) the existing use is no longer viable and cannot be reasonably made viable or Where healthcare facilities are declared surplus or identified as part of an estates strategy or service transformation plan where investment is needed towards modern, fit for purpose infrastructure or facilities, the requirements under points a) to c) will not apply.'	Agree (in part) – Recommend change to the supporting text Policy DM35 relates to development associated with Use Class F2 and cultural facilities. It is not intended to be applied to existing healthcare facilities which are classified as Class E(e) development. Policy DM30 provides guidance on proposals relating to health care provision. It seems likely that this (incorrect) interpretation of the policy results from the reference to 'health facilities' made in paragraph 6.205 of the Supporting Text. The Council has suggested a minor modification to remove this reference to health to make the policy clearer as to what types of land uses are covered by the policy – see Schedule of Minor Changes.
00471	Sport England	No	No	Policy DM36: Supports the promotion of community use agreements at point 3 and 4 (c). Is concerned regarding the potential for educational development proposals to result in the loss of playing fields	Additional 2(j) 'Safeguards existing playing fields and sports facilities'	Comments noted: Recommend no change Paragraph 1(i) of the policy addresses this point. The additional wording that is proposed is unnecessary.
01644	Colne Town Council	Not specified	Not specified	Policy DM36: Supports policy.	None specified.	Support welcomed
01872	Lancashire County Council (Education)	Not specified	Not specified	Agreed to remove initial call for school sites as long as the following 'but it is supportive of additional school provision should this be required during the plan period' is kept in Policy DM36.	None specified.	Comments noted: Recommend no change Policy DM36 is supportive of the expansion of existing school sites applying 'great weight' in favour of such proposals. It sets out a framework for the determination of proposals for expanded or new education facilities.
00294	Lidgett and Beyond	Not specified	Not specified	Policy DM37: Support the policy but request an additional point is added.	Add 'New parking should not be made from exiting front gardens in conservation areas.'	Comments noted: Recommend no change Proposals relating to conservation areas would need to be considered on their own merits. Establishing a borough-wide 'blanket ban' on such proposals would not be sufficiently flexible. It could potentially promote on street parking in locations where it may cause issues for highway safety. Conversely too much car parking provision can contribute to poor urban design, promote car usage, have an adverse impact on the quality of the built environment, and contribute to increased surface water flood risk through the use of impermeable surfaces. The Council believe that this policy, together with the Parking Standards in Appendix 5 help to achieve an appropriate balance.
00539	United Utilities	Not specified	Not specified	Policy DM37 amended wording requested.	Amend Policy DM37 part 3 to: 'Proposals for parking, including driveways, should not adversely affect the quality and appearance of the street-scene. Parking should help promote a sense of	Comments noted: Recommend no change

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					place and allow the delivery of tree-lined streets, which are integrated with the strategy for surface water management.'	<p>The Local Plan should be read as a whole, as clearly noted after paragraph 1.34 on page 15 of the Local Plan.</p> <p>Relevant guidance on drainage and surface water flooding is set out in Policies DM02(a) and DM02(b) of the Local Plan, which addresses the matter of drainage in the design process.</p> <p>Paragraphs 3 and 4 of Policy DM37 provide adequate guidance relating to management of surface water flooding insofar as it relates to parking.</p>
01644	Colne Town Council	Not specified	Not specified	Policy DM37: Revise wording to exclude parking on existing front gardens in conservation areas. Additional visitor parking should be made available to prevent on-street parking. Highlights research to enable electric charging at terraces with on street parking.	Exclude parking on existing front gardens in conservation areas.	<p>Comments noted: Recommend no change</p> <p>Proposals relating to conservation areas would need to be considered on their own merits.</p> <p>Establishing a borough-wide 'blanket ban' on such proposals would not be sufficiently flexible. It could potentially promote on street parking in locations where it may cause issues for highway safety. Conversely too much car parking provision can contribute to poor urban design, promote car usage, have an adverse impact on the quality of the built environment, and contribute to increased surface water flood risk through the use of impermeable surfaces. The Council believe that this policy, together with the Parking Standards in Appendix 5 help to achieve an appropriate balance.</p>
01644	Colne Town Council	Not specified	Not specified	Policy DM38: Do not support this policy. They detract from urban quality and rarely used.	Remove policy from the Local Plan.	<p>Comments noted: Recommend no change</p> <p>The Council continues to receive planning applications for taxi-booking facilities. The policy provides a decision making framework for the determination of such proposals.</p>
00294	Lidgett and Beyond	Not specified	Not specified	Policy DM39: Firmly believe that in urban areas, and especially within Conservation Areas, new broadband infrastructure should not be mounted on poles which is considered to be a retrograde step but should be placed underground.	Set requirements to prevent the erection of poles for the provision of broadband infrastructure.	<p>Disagree: Recommend no change</p> <p>By definition, the Council cannot place controls on permitted development.</p>
00526	Trawden Forest Parish Council	Not specified	Not specified	Policy DM39: Support the policy, but with regard to paragraph 6.423 the Parish Council would like to see that as we are within a Conservation Area that upgrades to the new broadband infrastructure should not be mounted on poles but should go underground.	Text outlining that in Conservation Areas upgrades to the new broadband infrastructure should go underground.	<p>Disagree: Recommend no change</p> <p>By definition, the Council cannot place controls on permitted development.</p>
01644	Colne Town Council	Not specified	Not specified	Policy DM39 Support the policy, but with regard to para 6.423 the Parish Council would like to see that as we are within a Conservation Area that upgrades to the new broadband infrastructure should not be mounted on poles but should go underground.	Text outlining that in Conservation Areas upgrades to the new broadband infrastructure should go underground.	<p>Disagree: Recommend no change</p> <p>By definition, the Council cannot place controls on permitted development.</p>

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Local Plan Section 7: Development Management Policies (Economic)						
00294	Lidgett and Beyond	Not specified	Not specified	Support Policy DM40.	None specified.	Support welcomed
01510	Lane Town Planning for McDermott Homes	Yes	No	Policy DM40 appears completely disconnected from other parts of the Plan. The Council has gone to lengths in Policy DM20 to justify lowering the housing requirement but no update has been applied to Policy DM40 and no reduced floorspace has been applied. The Council should not be pursuing the level of economic growth and allocation of employment in Policy DM40 if there is no intention of providing the associated level of housing growth to support it. To do so flies in the face of the principles of plan-making and sustainable development increasing reliance on unsustainable patterns of commuting.	None specified.	<p>Comments noted: Recommend no change</p> <p>Projected employment growth set out in the HEDNA (Iceni Projects, 2023) is based on a trend based position. Based on past experience and responses to employment land surveys, it is anticipated this will largely be driven by indigenous growth within existing Pendle businesses.</p> <p>The proposed site allocations in West Craven (Policy AL02) are made with the expansion needs of existing business in mind.</p> <p>As set out in the Supporting Text to Policy DM20, the Council does not consider that there is sufficient justification to increase the number of new homes above the housing requirement figure proposed in the Local Plan. This position is supported by the sensitivity test conducted in the Housing Need Review (HNR) (Iceni Projects, 2024) which notes the high percentage of the working age population that are recorded as economically inactive.</p> <p>The HNR notes that reducing this rate just half way towards the regional average would provide sufficient labour to support the projected level of employment growth addressed through Policy DM40.</p> <p>This represents an appropriate approach to meeting projected employment needs whilst also addressing local socio-economic conditions including high levels of unemployment and deprivation and increasing numbers of universal credit claimants.</p> <p>Building more homes than is necessary to support demographic change would be unsustainable and could exacerbate the borough's existing problems.</p>
01644	Colne Town Council	Not specified	Not specified	<p>Policy DM40 / HEDNA</p> <p>Disputes that 2,200 jobs are likely to come forward in Pendle over the plan period. Pendle suffers a high degree of worklessness which has remained and is worsening since the Covid pandemic. It is driven by poor education attainment. Employers find it difficult to employ in Pendle.</p>	None specified.	<p>Comments noted: Recommend no change</p> <p>The Council's rationale for adopting an annual housing requirement 148 dpa rather than 230 dpa recognises the high rate of economic inactivity amongst Pendle's working age residents. This means that there is a sufficient supply of labour to meet the projected levels of economic growth without the need to attract additional residents through inward migration (as set out in PPG).</p> <p>Building too many new homes in Pendle could help to solidify current rates of worklessness making it harder for economically active residents to find employment.</p> <p>Jobs growth of 2,200 over the plan period is fully evidenced in the HEDNA (Iceni Projects, 2023) and is</p>

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						<p>not considered to be unrealistic. It is a trend based position and reflects growth aligned to the strengths of Pendle's economy. Based on past experience, the Council anticipates that much of this economic growth will be achieved through the growth of indigenous businesses, rather than inward investment.</p> <p>The NPPF requires Local Plans to be positively prepared and support economic growth. The Council believe that the plan's economic policies satisfy this requirement.</p>
01872	Lancashire County Council (Active Travel)	Not specified	Not specified	Policy DM40 – change emphasis of wording.	<p>Amend Part 3c to:</p> <p>‘Enable access by sustainable transport by:’</p> <p>‘3(c)(iii) Enable commuting by bicycle by providing sufficient onsite secure cycle parking, bicycle vouchers, and shower/changing facilities.’</p>	<p>Agree: Recommend changes to Policy Text</p> <p>The Council is minded to accept these suggested modifications but would note that the comments do not relate to the soundness of the Plan – see Schedule of Proposed Minor Modifications.</p>
00040	Barrowford Parish Council	Not specified	Not specified	Policy DM41: There is an error on the Policies Map, which appears to remove Protected Employment Area status from the Riverside Business Park despite it being referenced as such in the Supporting Text for the policy.	Revise Policies Map cover Riverside Business Park with the Protected Employment Area as intended.	<p>Agree: Recommend change to Policies Map</p> <p>The Policies Map will be revised to show that the Riverside Business Park in Barrowford is designated as a Protected Employment Area as noted in the Supporting Text for Policy DM41 – see Schedule of Proposed Minor Modifications.</p>
01644	Colne Town Council	Not specified	Not specified	Policy DM41: Supports policy. Notes the potential of the Colne South Valley as a Protected Employment Area.	Designated Colne South Valley as a protected employment area.	<p>Comments noted: Recommend no change</p> <p>Evidence to support the designation of specific sites is found within the Employment Land Review (within the HEDNA). Colne's South Valley is not recommended as a PEA through this assessment.</p>
02143	Pegasus Group for MCI Developments	Not specified	No	<p>Policy DM41: The requirement to market sites continuously for 2 years is excessive. Typically a period of 12 months undertaken at suitable rental levels is sufficient to properly establish market demand. This has been accepted by Inspectors in respect of other recently adopted Local Plans (Blackburn with Darwen).</p> <p>Also notes that some protected employment areas include sites where there have been historic vacancies. Questions whether owners have been contacted as part of this process. This position needs to be considered in the context of Paragraph 126. More flexibility to allow for the redevelopment of employment sites to address housing needs should be considered.</p>	<p>Amend requirement to 12 months.</p> <p>Apply a more flexible approach to land uses at protected employment sites.</p>	<p>Comments noted: Recommend no change</p> <p>With the strategic employment site at Lomeshaye failing to come forward as anticipated, Pendle has experienced a shortfall in its employment land supply for several years. As a result occupancy levels on the borough's Protected Employment Areas remain buoyant.</p> <p>The loss of business premises, which are suitable for modern B2/B8 business practices and in accessible locations, arising from a short downturn in economic conditions (12 months). The longer vacancy requirement helps to reduce the potential need to allocate additional greenfield land to address a future shortfall in the employment land supply for B2 and B8 uses.</p> <p>Pendle has the highest percentage of jobs in manufacturing of any local authority in England. Its reliance on jobs provided by businesses in the B2 and B8 use classes is much more pronounced than in nearby Blackburn-with-Darwen. As such a longer vacancy requirement for premises within a Protected</p>

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						<p>Employment Area is justified to help ensure that opportunities for indigenous business growth and inward investment within such businesses are not lost, in particular to non-employment uses.</p> <p>Discussions with commercial property agents have revealed that two years is considered to represent an appropriate length of time.</p> <p>The Protected Employment Areas have been identified in accordance with the recommendations of the Employment Land Review contained within the HEDNA (2023). The HEDNA was informed by a business survey which contacted employers about their business needs, including requirements for premises. This is a recent and robust review of the borough's existing employment sites. Further reviews will be carried out over the plan period to ensure that the objectives of the policy are being met and that investment in non-industrial uses is not being unduly compromised.</p>
01644	Colne Town Council	Not specified	Not specified	Policy DM42: Supports policy. The success of Colne's night-time economy is rightly noted.	None specified.	Support welcomed
01644	Colne Town Council	Not specified	Not specified	Policy DM43: Supports policy. A policy to turn High Streets into Living Streets has many advantages (see representation for details).	None specified.	Support welcomed
01644	Colne Town Council	Not specified	Not specified	Policy DM44: Supports policy.	None specified.	Support welcomed
00294	Lidgett and Beyond	Not specified	Not specified	<p>Policies DM45 and DM46: Support these policies but would note that paragraph 7.77 in the opening text to the policies addressing tourism and recreation is particularly important.</p> <p>Reference should also be made about the increasing numbers of AirBnB properties. Whilst good for tourism they can be disruptive for neighbours.</p>	None specified.	<p>Support welcomed</p> <p>Paragraph 3 of Policy DM45 addresses measures to address the adverse impact of short-term holiday lets. Further information is set out in paragraphs 7.93 to 7.96 of the supporting tex.</p>
00526	Trawden Forest Parish Council	Not specified	Not specified	Support Policy DM45.	None specified.	Support welcomed
01542	Canal & River Trust	Not specified	Not specified	Considers changes made to Policy DM45 in response to comments made by the Trust to the consultation to the draft Local Plan to be satisfactory.	None specified.	Support welcomed
01644	Colne Town Council	Not specified	Not specified	Policy DM45: Supports policy. Paragraph 7.77 exactly accords with our view. The Town Council believes that Colne and its environs will develop as a tourism destination more over the coming years and this should be a focus of economic growth.	None specified.	Support welcomed
01796	Historic England	Not specified	Yes	Policy DM45: Support changes made to this policy.	None specified.	Support welcomed
01644	Colne Town Council	Not specified	Not specified	Policy DM46: Supports policy.	None specified.	Support welcomed

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Local Plan Section 8: Site Allocations (Housing and Employment)						
00040	Barrowford Parish Council	Not specified	Not specified	Policy AL01: It is not clear what the M65 Corridor is.	None specified.	<p>Comments noted: Recommend no change</p> <p>The extent of the M65 Corridor is shown on the key document and is referred to extensively elsewhere in the document. It covers all remaining parts of the borough not located within the wards of Earby and Coates and Barnoldswick. Policy SP03 confirms that the M65 Corridor is divided in rural and urban areas. The broad extent of these areas is confirmed on the Key Diagram.</p>
00040	Barrowford Parish Council	Not specified	Not specified	Policy AL01: What is the status of the following sites which have been assessed through the plan preparation process? P078, P112, P115, P123, P130, P188, P294, P237	None specified.	<p>Comments noted: Recommend no change</p> <p>The Local Plan does not alter the current planning status of any of the sites that are listed. The sites listed have been assessed and dismissed as potential housing site allocations in this version of the Local Plan. The sites proposed for allocation in Policy AL01 are considered to represent better options for sustainable development and growth in the period up to 2040. For this reason they are referred to as ‘omission sites’ but may still be promoted for development by a landowner, agent, or developer.</p>
00294	Lidgett and Beyond	Not specified	Not specified	Policy AL01: Strongly support the fact that Pendle Council has not allocated any wholly greenfield sites in Colne. We suggest that the windfall allowance identified should not exclude the first three years with just the first year excluded. Support the housing trajectory and the decision made not to release any land from the Green Belt to meet housing need.	Expand the windfall allowance to cover years 2 and 3.	<p>Disagree: Recommend no change</p> <p>The proposal is likely to result in double-counting as planning permission does not lapse until three years have lapsed. The Local Plan seeks to eliminate this possibility by not including any provision from windfall sites in years 1-3 of the trajectory.</p>
00305	Roman Summer for Maro Developments	Not specified	Not specified	Policy AL01: Object to the omission of site P001 Land off South Valley Drive, Colne as a site allocation for housing. The site is available, deliverable, and suitable and has consistently been overlooked by the Council. The site has been in the past considered favourably for housing, including by inspectors, at pre-app, and through the Council’s assessments. Also object to the assessment of the site through the SHLAA which is weak and lacks evidence and questions the assessment made through a document supporting the Colne Neighbourhood Development Plan. The site is available for self-build and could help respond to this need.	Allocate site P001 through Policy AL01.	<p>Disagree: Recommend no change</p> <p>The Colne Neighbourhood Development Plan was formally made in June 2023. It allocated sufficient housing sites to meet the identified housing need for Colne up to 2040 but does not identify Site P002 as a housing site allocation.</p> <p>The allocation of Site P067 in the Local Plan addressed unmet need and allowed for a sustainable distribution of sites that more closely reflected the strategic policy objectives set out in Policies SP02 and SP03. It was allocated primarily on the basis of its deliverability. This is adequately illustrated by the fact that construction work recently commenced on the site.</p> <p>Further housing site allocations in Colne were not necessary to secure the delivery of the proposed housing requirement.</p> <p>The Strategic Housing Land Availability Assessment (SHLAA) represents a policy-off assessment of site availability, suitability, and achievability, to help assess the potential supply of land for future hosing</p>

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						<p>delivery. It considers known constraints and opportunities, helping to inform the site selection process. The assessment of Site P001 considers the available evidence, which include the planning history and physical constraints imposed by the attributes of the site. No evidence has been submitted to demonstrate that the site is viable.</p> <p>Pre-application advice is not binding on the Council. The policy position has evolved since this advice was issued.</p>
00305	Roman Summer for Maro Developments	Not specified	Not specified	Policy AL01: Object to the omission of site P088 Land off Laithe Street, Colne which despite receiving a good score through the site assessment process is not included in the Local Plan as a housing site allocation. Material submitted in support of the site to help demonstrate its availability, suitability, and achievability.	Allocate site P088 through Policy AL01.	<p>Disagree: Recommend no change</p> <p>The Colne Neighbourhood Development Plan was formally made in 2023. It allocated sufficient housing sites to meet the identified housing need for Colne up to 2040 but does not identify Site P088 as a housing site allocation.</p> <p>The allocation of Site P067 in the Local Plan addresses unmet need and allowed for a sustainable distribution of sites that more closely reflected the strategic policy objectives set out in Policies SP02 and SP03. It was allocated primarily on the basis of its deliverability. This is adequately illustrated by the fact that construction work recently commenced on the site.</p> <p>Further housing site allocations in Colne were not necessary to secure the delivery of the proposed housing requirement.</p> <p>Site P088 is situated within the settlement boundary for Colne. Whilst it is not allocated for housing development, the Council would not object in principle to the site's development for housing subject to material considerations. This is adequately demonstrated by the site's planning history.</p> <p>Any proposal to develop the site for housing would be considered in accordance with the presumption in favour of sustainable development, as outlined in Policy SP02 of the Local Plan.</p>
00305	Roman Summer for Maro Developments	Not specified	Not specified	<p>Policy AL01: The Local Plan should identify a series of back up sites to ensure the delivery of the Local Plan in the event that allocated sites do not come forward as anticipated.</p> <p>The plan should enable slippage in the delivery of proposed allocation.</p>	Allocate site P001 / P088 as reserve sites for housing.	<p>Disagree: Recommend no change</p> <p>There is no requirement in national planning policy to identify 'reserve sites' in a Local Plan.</p> <p>The reserve sites featured in the draft version of the Pendle Local Plan Part 2: Site Allocations and Development Policies (abandoned by the Council in December 2021) were specifically required by a 'parent policy' in the Pendle Local Plan Part 1 Core Strategy (2015). This new Local Plan is independent of the Core Strategy (2015) and is not bound by its policies.</p>

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						<p>The capacity of the sites allocated in the Local Plan provide a housing land supply that is higher than the proposed housing requirement, due to there not being a precise correlation between site size and spatial distribution requirements. The Local Plan adopts a presumption in favour of sustainable development for development proposals within a settlement boundary.</p> <p>Paragraph 69 of the NPPF sets out national planning policy requirements for the identification of land to be developed for housing through the Local Plan. It confirms the need to:</p> <ul style="list-style-type: none"> • identify a specific deliverable supply for five years following the intended date of adoption • specify developable sites or broad locations for growth, for years 6-10; and, where possible, for years 11-15 of the remaining plan period. <p>There is no requirement for the Council to allocate or identify sufficient land to meet the housing requirement for the plan period in full.</p> <p>The requirement for Local Plans to be reviewed at least every five years provides the Council with a valuable opportunity to identify further land for housing, should up-to-date evidence show that it is needed. The Council has no concerns about potential under delivery. Should evidence of potential under delivery emerge, the mechanisms set out in Policy DM20 will be implemented to ensure that the housing requirement for the period up to 2040 will be delivered in full.</p>
00305	Roman Summer for Maro Developments	Not specified	Not specified	<p>Policy AL01: The Local Plan relies on housing allocations which are clearly problematic for technical flood risk reasons where arguably more sustainable sites are readily available. This approach is inconsistent with the NPPF.</p> <p>Applications are Barnsey Shed (P237) and South of Colne Water (P067) face flood risk issues and should not be allocated through the Local Plan.</p>	Delete sites with flood risk problems and allocate sites P001 and P088.	<p>Disagree: Recommend no change</p> <p>All potential development sites have been assessed against a wide range of criteria including the Level 1 Strategic Flood Risk Assessment (2021). The proposed site allocations have also been evaluated in detail through the Level 2 SFRA and subject to a sequential and exceptions test, as necessary. Based on the available evidence the Council does not regard their allocation for future housing development as unsound.</p> <p>Sites P237 and P067 now benefit from detailed planning permission with the latter now under construction.</p>
00305	Roman Summer for Maro Developments	Not specified	Not specified	<p>Policy AL01: The Local Plan is over reliant on the delivery of the strategic housing site at Trough Laithe to meet housing needs. Other sources of supply are necessary to secure the delivery of the proposed housing requirement in full.</p>	Add further allocations to the Local Plan including sites P001 and P088.	<p>Disagree: Recommend no change</p> <p>The strategic housing site at Trough Laithe is under construction with 88 dwellings having already been completed. The trajectory in the Local Plan is based on information supplied to the Council by the developer Northstone. The role of sustainable urban extensions in meeting local housing need is</p>

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						recognised in the NPPF (paragraph 74). As such the continued role of Trough Laithe in helping to meet the proposed housing requirement over the plan period is considered to be unsound.
00471	Sport England	No	No	<p>Policy AL01</p> <p>P060 – Notes that sports pitches are not of a size to warrant assessment of the land as a playing field</p> <p>P326 – The site does not appear to have been in use as a playing field.</p>	None specified.	<p>Comments noted: Recommend no change</p> <p>Site P060 – Comments noted: Recommend no change. The site has been fenced off and has not been accessible to the public since its closure in 2006.</p> <p>Site P326 – Comments noted: Recommend no change. The site was formerly used as a nursery and has since been demolished. It is not fenced off.</p>
00539	United Utilities	Not specified	Not specified	<p>Policy AL01: UU has assessed the proposed allocations and has found modelled sewer flood risk within/within the vicinity of Site P052, P060, P237, P026, P309. P267, P326, P311. Records of sewer flooding existing within the vicinity of the following sites: P052, P067, P107, P267. We request that you use this information to update your SFRA and reflect the identified risk within your site-specific requirements. With regard to P052, the site will need careful assessment and consideration. The risk of sewer flooding could affect the developable area of the site and the detail of the design.</p>	<p>Update SFRA to reflect UU comments.</p> <p>Add to Policy AL01 the following site specific requirements where there is modelled sewer flood risk:</p> <p>‘Existing public sewers pass through and near to this site which modelling data (and / or flooding incident data) identifies as being at risk of sewer flooding. This will need careful assessment and consideration in the detailed design, master planning, and drainage details for the site. The risk of flooding could affect the developable area of the site and the detail of the design’</p> <p>Add to Policy AL01 where there is a record of flooding on-site, or in vicinity of the site:</p> <p>‘There are flood incidents from the public sewer on-site / in the wider area. Applicants must engage with United Utilities to consider the detailed design of the site and drainage details. The risk of sewer flooding could affect the developable area of the site and the detail of the design.’</p> <p>Supporting Text in respect of sewer flood risk matters for each site we have identified a risk of flooding from the public sewer:</p> <p>‘A range of sites have been identified as being at risk of sewer flooding or in where sewer flooding has occurred in the wider vicinity. In respect of these sites, the applicant must engage with United Utilities prior to any master planning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants should not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such proposals could increase /</p>	<p>Comments noted: Recommend no change</p> <p>Following feedback from UU on the Regulation 18 Draft Local Plan specific reference has been inserted into:</p> <p>Policy AL01 paragraph 4 stating that “Flood risk from all sources should be considered from an early stage through the design process, ensuring that any potential risk is not increased or displaced (Policies SP07, DM02(a) and DM02(b).”</p> <p>Policy AL02 paragraph 6 “Flood risk from all sources should be considered from an early stage through the design process, ensuring that any potential risk is not increased or displaced (Policies SP07, DM02(a) and DM02(b).”</p> <p>In accordance with Policy DM02(a) and Section 5.5 of the Level 2 SFRA (which site specific guidance requires applicants to follow), the risk of flooding from sewer and drainage networks is to be assessed at the site-specific FRA stage.</p>

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					<p>displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigation measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point connection; whether the proposed drainage will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigation measures to manage any risk of sewer surcharge.'</p> <p>Add new part 9 to Policy:</p> <p>'For any development proposal which is part of a wider development / allocation, foul and surface water strategies must be part of a holistic site-wide strategy. Pumped drainage systems must be minimised and a proliferation of pumping stations on a phased development will not be acceptable.'</p>	
00750	J Crossley	Not specified	Not specified	Policy AL01: Object to the allocation (development) of P083 and P111 for housing. Doing so would be contrary to the policies of the recently adopted Colne Neighbourhood Development Plan and would be contrary to the NPPF. The maintenance of the sites is subject to a signed legal agreement, which in my opinion has not been conducted as demonstrated by submitted photographic evidence. Details of maintenance conducted should be made available by the Council for considerations as part of the examination.	Do not allocate sites P083 and P111 through the Local Plan.	<p>Comments noted: Recommend no change</p> <p>The Local Plan does not allocate sites P083 and P111 for housing. These sites have been considered but dismissed as part of the site assessment process.</p> <p>The Local Plan does not propose to alter the existing status of the sites which, as confirmed by the accompanying Policies Map, remain designated as Open Space. These sites are also protected through the Colne Neighbourhood Development Plan. Any proposals for development on these sites will therefore be subject to the tests outlined in Policy DM31 and relevant policies of the Colne Neighbourhood Development Plan.</p>
01130	P Nuttal	Not specified	Not specified	Policy AL01: Object to the proposed development of sites P083 / P111. The proposals are contrary to the policies of the recently adopted Colne Neighbourhood Development Plan and is inconsistent with the tests for the development of open space outlined in the NPPF. The site is subject to a signed legal agreement for the maintenance of the fields for sports use (with Nelson and Colne College). In my opinion this agreement is not being sufficiently implemented by the college.	Remove sites P083 and P111 from the draft Local Plan.	<p>Comments noted: Recommend no change</p> <p>The Local Plan does not allocate sites P083 and P111 for housing. These sites have been considered but dismissed as part of the site assessment process.</p> <p>The Local Plan does not propose to alter the existing designation of the sites which, as confirmed by the draft Policies Map, remains as Open Space. The sites are also protected through the Colne Neighbourhood Development Plan. Any proposal to develop the sites will therefore be subject to the policy tests outlined in Policy DM31 and relevant policies of the Colne Neighbourhood Development Plan.</p>
01243	Rural Solutions for Wheatley Lane Road Fence Landowners	Not specified	Not specified	Policy AL01: The Government's intended revisions to the NPPF will significantly increase the housing requirement for Pendle. The housing allocations outlined in the Local Plan are insufficient to meet this	Allocate land off Wheatley Lane Road, Barrowford (site P327). Site submission statement and summary landscape appraisal enclosed.	<p>Disagree: Recommend no change</p> <p>At the time of the Regulation 19 public consultation the proposed revisions to the NPPF remained in draft form and its policies are not yet engaged for the purpose of plan making.</p>

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				need and the plan is unsound. Further site allocations are needed.		<p>The Pendle Local Plan will proceed under the transitional arrangements set out in NPPF (2024) Annex 1. These recognise the advanced stage that has been reached in the preparation of the Local Plan, and the amount of time and resources which have been spent on its preparation, and the pressing need to review and update the policies in the statutory development plan for Pendle, where the strategic policies are now nine-years old and several development management policies are in excess of 18-years old.</p> <p>As the Local Plan will be examined against the policies of the NPPF (2023) it is for the next Local Plan to respond to the policies in any new version(s) of the NPPF. As such the allocation of Site P327 for housing is not necessary at this time.</p>
01485	WBW Surveyors for I Birtwistle	Yes	No	Policy AL01: Clients land interest on the edge of Barnoldswick (site P266) scores highly against many of the Council's criteria for allocation but dismissed as it is not required. Pendle's planned delivery of housing falls significantly short of their own calculated figures and the proposed revised figures. The allocation of viable sites will be necessary to meet the housing targets. The site is available, suitable, and deliverable for development.	Allocate site P266 for housing through Policy AL01.	<p>Disagree: Recommend no change</p> <p>For the reasons set out above, in response to Policy DM20 the Council does not agree that further housing site allocations are required to deliver the housing requirement.</p> <p>The Local Plan allocates housing sites which provide in excess of what is needed to meet the housing requirement figure, with further opportunities for housing land to come forward within designated settlement boundaries.</p>
01510	Lane Town Planning for McDermott Homes	Yes	No	<p>Policy AL01 site specific comments:</p> <p>P026 has been on the market for 18 months and has not sold with very little interest due to location and site constraints. Significant areas of the site are covered by flood zones and other constraints reducing the development area to less than half. In our view it could not support the proposed allocation of 140 dwellings.</p> <p>P052 Access to the site is substandard. A large part of the site is subject to Flood Zone 3, and the site is subject to constraints from trees and the adjacent railway line. The assessed capacity is grossly overestimated.</p> <p>P257 former clearance site. The number of homes identified should take into account the loss of 80 homes at the site (-35 dwellings). The site has been cleared some years so should have been delivered. The Council has elected not to include the site in the five year supply.</p>	<p>Revise P026 to 70 dwellings and P257 to -35 dwellings. Delete site P052.</p> <p>Include sites P055 and P263/P265 which were previously includes as 'reserve sites' within the Pendle Local Plan Part 2 (now abandoned).</p>	<p>Comments noted: Recommend no change</p> <p>Site P026 – The capacity is indicative but reflects that of the permitted outline planning approval. A higher density scheme with a different mix of house types and products could be suitable at this location.</p> <p>Site P052 – The local highways authority has raised no concerns regarding the proposed capacity or safety of the proposed site access / egress. The Council notes that there are several options to for access into the site including ones from adjacent residential streets. This provides increased flexibility when dealing with the areas of flood risk associated with the culverted watercourses, including a Main River, which pass through the site.</p> <p>P257 – Demolitions at this site are already accounted for in the Council's historic net completion figures. The capacity of 45 net dwellings is therefore correct.</p> <p>The former capacity of the site – 80 terraced dwellings – highlights that the proposed density is reasonable.</p> <p>The allocation of sites P055 and P263/P265 is not necessary at this time to meet the identified housing requirement (see housing trajectory).</p>

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01535	Home Builders Federation	Yes	No	Policy AL01. The supply of housing sites should ensure the full delivery of the Local Plan and identification of a five year housing land supply. The strategy should identify a range of housing sites to promote delivery and diversity of stock, a suitable buffer in excess of the minimum level of housing needed to respond to the housing requirement should be included in the plan. The supply should include at least 10% of provision on sites of less than 1 hectare. The HBF would encourage the Council to consider BNG needs at the allocation stage and the implication this will have on capacity, density, and development costs.	None specified.	<p>Comments noted: Recommend no change</p> <p>The Council is confident that the housing requirement can be delivered in full. The sites allocated for housing in Policy AL01 can deliver up to 162 dwellings per annum (dpa). This is 14 dpa in excess of the proposed housing requirement and 38 dpa above the local housing need figure assessed using the ‘old’ standard methodology.</p> <p>Sites under one hectare make up more than 10% of the supply identified through Policy AL01.</p> <p>BNG is a detailed matter and it would not be appropriate to consider BNG in detail at the plan making stage.</p>
01542	Canal & River Trust	Not specified	Not specified	Considers changes made to Policy AL01 in response to comments made by the Trust to the consultation to the draft Local Plan to be satisfactory.	None specified.	Support welcomed
01561	WBW Surveyors for Moorhouse Holdings Ltd	Yes	No	Policy AL01: Promoted site P305 for development through the Local Plan to deliver 150 dwellings including self-build plots. The site is dismissed due to the absence of exceptional circumstances required to justify the removal of land from the Green Belt for the purpose of housing need. However the Local Plan does not propose to meet the number of homes required to meet projected economic needs, and the housing requirement of Pendle is to substantially increase through proposals of the draft NPPF. Development of the site for housing is therefore required.	Allocate site P305 for 150 dwellings.	<p>Comments noted: Recommend no change</p> <p>Sufficient sites are allocated in Policy AL01 to meet the housing requirement identified in Policy DM20.</p> <p>The Strategic Housing Land Availability Assessment (SHLAA), which is updated annually, confirms that a sufficient supply of additional housing land is available on sites not within the Green Belt. The “exceptional circumstances” required to justify the release of site P305 from the Green Belt do not currently exist.</p>
01565	J Munnery for Foster Road Landowners	Yes	No	Policy AL01: There is insufficient flexibility in the plan as demonstrated by the planned surplus of just 272 dwellings planned over the plan period and the reliance on windfall sites for the delivery of housing for the last 4 years of the plan period.	Further allocations required including the allocation of Land at Foster Road, Barnoldswick (site P055).	<p>Disagree: Recommend no change</p> <p>The figure of 272 dwellings represents a surplus of 8% against the remaining housing requirement (i.e. less completions recorded in the first two years of the plan period).</p> <p>The proposed housing requirement (148 dpa) is itself in excess of the local housing need figure for Pendle (124 dpa).</p> <p>The role of windfall sites – development on land not allocated in the Local Plan – in helping to meet the housing requirement is clearly set out in the NPPF.</p> <p>The valuable contribution housing development on windfall sites has made in Pendle is fully evidenced and Policy SP02 supports the delivery of housing on windfall sites over the plan period.</p> <p>Paragraph 69 of the NPPF sets out national planning policy requirements for the identification of land to be developed for housing through the Local Plan. It confirms the need to:</p>

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						<ul style="list-style-type: none"> identify a specific deliverable supply for five years following the intended date of adoption specify developable sites or broad locations for growth, for years 6-10; and, where possible, for years 11-15 of the remaining plan period. <p>There is no requirement for the Council to allocate or identify sufficient land to meet the housing requirement for the plan period in full.</p> <p>The requirement for Local Plans to be reviewed at least every five years provides the Council with a valuable opportunity to identify further land for housing, should up-to-date evidence show that it is needed. The Council has no concerns about potential under delivery. Should evidence of potential under delivery emerge, the mechanisms set out in Policy DM20 will be implemented to ensure that the housing requirement for the period up to 2040 will be delivered in full.</p>
01644	Colne Town Council	Not specified	Not specified	Policy AL01: Strongly supports policy. Review of Colne Neighbourhood Plan is underway. We care confident that the revised Neighbourhood Plan will be able to supply additional, sustainable sites within the settlement boundary to further help with Pendle's housing allocations. We urge the Council to continue with the programme of refurbishing long term empty homes and believe these dwellings have an important role in regenerating the town and delivering affordable housing. Supports the plan's approach towards windfall development.	None specified.	Support welcomed
01796	Historic England	Not specified	Yes	Policy AL01: Site P064. In light of applications 22/0577/FUL and 24/0213/VAR which have been granted planning permission we do not object to the allocation of this site. However, should development come forward of a different nature it may be important to reassess the impact of development on Earby Conservation Area.	None specified.	Comments noted: Recommend no change
01858	Smith Love for Applethwaite	Yes	No	Policy AL01: An insufficient supply of housing land has been identified to meet housing needs. The headroom provided within the plan is just 243 dwelling representing a buffer of just 8.6%. It is not sufficient to rely on the comment that 148 dpa does not represent a cap to development and that the spatial strategy is likely to deliver a supply of housing which is in excess of the quoted supply figure. Further land is also needed to respond to the housing needs identified for Pendle through the revised NPPF. Land to the west of White Leys Close, Earby provides opportunity for greater capacity to respond to the housing needs of the borough, enabling a design-led approach to constraints and opportunities of the site.	Allocate additional sites including Land to the west of White Leys Close, Earby for 30 dwellings (12 dwellings more than committed as identified on the housing trajectory).	<p>Comments noted: Recommend no change</p> <p>The Local Plan is deliverable as drafted and no further site allocations are necessary.</p> <p>The Plan provides sufficient scope for additional housing over the plan period and sets out a strategy which will deliver a surplus of housing against the proposed housing requirement.</p> <p>Paragraph 69 of the NPPF sets out national planning policy requirements for the identification of land to be developed for housing through the Local Plan. It confirms the need to:</p> <ul style="list-style-type: none"> identify a specific deliverable supply for five years following the intended date of adoption

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						<ul style="list-style-type: none"> specify developable sites or broad locations for growth, for years 6-10; and, where possible, for years 11-15 of the remaining plan period. <p>There is no requirement for the Council to allocate or identify sufficient land to meet the housing requirement for the plan period in full.</p> <p>The requirement for Local Plans to be reviewed at least every five years provides the Council with a valuable opportunity to identify further land for housing, should up-to-date evidence show that it is needed. The Council has no concerns about potential under delivery. Should evidence of potential under delivery emerge, the mechanisms set out in Policy DM20 will be implemented to ensure that the housing requirement for the period up to 2040 will be delivered in full.</p>
01864	PWA Planning for Castle Green Homes	Not specified	Not specified	Policy AL01: The Local Plan provides for around 10% surplus the proposed housing requirement. Given that around one third of additional supply sought is anticipated to come from windfall sites, additional supply should be sought.	Allocate further land for housing through Policy AL01 to secure the deliverability of the Local Plan including Site P130.	<p>Comments noted: Recommend no change</p> <p>The role of windfall sites – development on land not allocated in the Local Plan – in helping to meet the housing requirement is clearly set out in the NPPF.</p> <p>The valuable contribution housing development on windfall sites has made in Pendle is fully evidenced and Policy SP02 supports the delivery of housing on windfall sites over the plan period.</p> <p>The representation fails to acknowledge existing commitments (i.e. sites already benefitting from planning permission for housing), which make up 55% of residual housing needs. Site allocations proposed through the Local Plan and adopted Neighbourhood Development Plans make up a further 30%.</p> <p>Paragraph 69 of the NPPF sets out national planning policy requirements for the identification of land to be developed for housing through the Local Plan. It confirms the need to:</p> <ul style="list-style-type: none"> identify a specific deliverable supply for five years following the intended date of adoption specify developable sites or broad locations for growth, for years 6-10; and, where possible, for years 11-15 of the remaining plan period. <p>There is no requirement for the Council to allocate or identify sufficient land to meet the housing requirement for the plan period in full.</p> <p>The requirement for Local Plans to be reviewed at least every five years provides the Council with a valuable opportunity to identify further land for housing, should up-to-date evidence show that it is needed. The Council has no concerns about potential under delivery. Should evidence of potential under delivery emerge, the mechanisms set out in Policy DM20 will be implemented to ensure that the housing</p>

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						requirement for the period up to 2040 will be delivered in full.
01864	PWA Planning for Castle Green Homes	Not specified	Not specified	Policy AL01: The HEDNA confirms a significant need for affordable housing at 288 dwellings per year. This illustrates that the true housing needs of Pendle will not be achieved over the plan period. The reliance of windfall sites means even less affordable housing will be delivered over the plan period, further illustrating the need to boost housing land supply.	Allocate further land for housing through Policy AL01 to secure additional affordable housing including Site P130.	Comments noted: Recommend no change Viability evidence and the annual monitoring of housing completions demonstrate that very few affordable housing units are delivered on market housing sites in Pendle. As such allocating further sites for housing will do little, if anything, to address the affordable housing needs of the borough, which are acknowledged to be significant.
01871	B J Reynolds	Not specified	Not specified	Policy AL01: Pendle Council should be congratulated that it has not allocated any housing on any wholly greenfield sites in Colne.	None specified.	Comments noted: Recommend no change
02037	Rural Solutions for Dalesview Developments	Not specified	Not specified	Policy AL01: The Government's intended revisions to the NPPF will significantly increase the housing requirement for Pendle. The housing allocations outlined in the Local Plan are insufficient to meet this need and the plan is unsound. Further site allocations are needed.	Allocate Colne Road, Earby (site P108) for 70 dwellings (39 at the northern site). Planning Statement and Design and Access Statement submitted as context alongside the submission.	Comments noted: Recommend no change At the time of the Regulation 19 public consultation the proposed revisions to the NPPF remained in draft form and its policies are not yet engaged for the purpose of plan making. The Pendle Local Plan will proceed under the transitional arrangements set out in NPPF (2024) Annex 1. These recognise the advanced stage that has been reached in the preparation of the Local Plan, and the amount of time and resources which have been spent on its preparation, and the pressing need to review and update the policies in the statutory development plan for Pendle, where the strategic policies are now nine-years old and several development management policies are in excess of 18-years old. As the Local Plan will be examined against the policies of the NPPF (2023) it is for the next Local Plan to respond to the policies in any new version(s) of the NPPF. In accordance with Written Ministerial Statement 'Building the Homes we Need' publication 12 December 2024 (HCWS308), a Local Development Scheme is to be prepared and published prior to 5 March 2025 advising of the timescales of preparation of a new Local Plan which will commence on the enactment of the Levelling Up and Regeneration Act 2023.
02060	Woodland Trust	Not specified	Not specified	Policy AL01: We consider that any policy is not legally compliant or sound unless areas of ancient woodland are excluded from development and housing site allocations with appropriate buffers identified. Pendle has a Tree Equity Score of 79 district-wide making it a priority for tree-planting. Some neighbourhoods in Pendle have lower Tree Equity Scores. The Tree Equity scores for P237 and P326 are	Remove any site affecting an ancient woodland from the Local Plan. Introduce a tree canopy cover target for sites P237 and P326	Comments noted: Recommend no change None of the proposed housing (Policy AL01) or employment (Policy AL02) site allocations, not already benefiting from full planning permission, impact an area of ancient woodland. Site P237 already benefits from full planning permission. Site P326 is a small site located within the settlement boundary for Nelson. The Council is

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				69 and 67, respectively. We strongly recommend that the Council introduces tree canopy cover targets for these site allocations.		satisfied that the site-specific requirements in Policy AL01 provide a proportionate response to any impact that development may have on the local environment.
02083	A & J Robinson	Not specified	Not specified	Policy AL01: Concerned by the consideration of sites P083 and P111 for development despite the existence of a signed s.106 agreement which maintains these fields for use as outdoor sports pitches.	Do not develop P083 and P111.	<p>Comments noted: Recommend no change</p> <p>Sites P083 and P111 are not site allocations in the Local Plan. Their existing policy designation, as open space – outdoor sports typology (Site Ref: OS076) – is unaffected by the plan proposals.</p> <p>Any development proposals at this location will be subject to the policy tests outlined in Local Plan Policy DM31 and Policy CNDP10 and other relevant policies in the Colne Neighbourhood Development Plan (2023).</p> <p>The Information provided will inform future updates of the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA does not allocate land or grant planning permission for specific land uses. The assessment is “policy off” and its outcome does not prejudice the plan-making plan or the decision-taking process.</p> <p>The SHLAA is just one part of the evidence used to inform the selection process for the site allocations proposed in the Local Plan. The designation of the sites as open space and their use for sport is recognised in the Sustainability Appraisal with both sites receiving negative scores for their impact under the health and well-being sustainability objectives (see Appendix 5 of the Sustainability Appraisal report).</p>
02085	C Jeffery	Not specified	Not specified	Policy AL01: Concerned by the consideration of sites P083 and P111 for development. The sports fields are vital recreational spaces that provides countless benefits for our community. Our sports fields are also centres of community health, youth development and well-being. They are critical for fitness, teamwork, discipline, and stress relief. They have been used for generations for sporting and recreational activities. Their redevelopment erodes a valuable public asset that cannot be easily replaced. The owners of the sports fields are obliged to maintain the pitches as part of a s.106 agreement signed in 2010 which in my opinion is not being adhered to. If the pitches were maintained, they would be in a better condition.	Do not develop P083 and P111.	<p>Comments noted: Recommend no change</p> <p>Sites P083 and P111 are not site allocations in the Local Plan. Their existing policy designation, as open space – outdoor sports typology (Site Ref: OS076) – is unaffected by the plan proposals.</p> <p>Any development proposals at this location will be subject to the policy tests outlined in Local Plan Policy DM31 and Policy CNDP10 and other relevant policies in the Colne Neighbourhood Development Plan (2023).</p> <p>The Information provided will inform future updates of the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA does not allocate land or grant planning permission for specific land uses. The assessment is “policy off” and its outcome does not prejudice the plan-making plan or the decision-taking process.</p> <p>The SHLAA is just one part of the evidence used to inform the selection process for the site allocations proposed in the Local Plan. The designation of the sites as open space and their use for sport is</p>

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						recognised in the Sustainability Appraisal with both sites receiving negative scores for their impact under the health and well-being sustainability objectives (see Appendix 5 of the Sustainability Appraisal report).
02089	J Bateman	Not specified	Not specified	Policy AL01: In the Colne Neighbourhood Development Plan the Barrowford Road playing fields are classed as Protected Sports and Recreational Facilities. Any alternative representation by Nelson and Colne College as part of the updated Pendle Council Plan is an attempt to deflect focus away from the College's obligations for the site as set out through the signed Section 106.	The Local Plan should be amended to reflect the position of the playing fields as detailed in the Colne Neighbourhood Development Plan, allowing no further discussions regarding future development of the site.	<p>Comments noted: Recommend no change</p> <p>Sites P083 and P111 are not site allocations in the Local Plan. Their existing policy designation, as open space – outdoor sports typology (Site Ref: OS076) – is unaffected by the plan proposals.</p> <p>Any development proposals at this location will be subject to the policy tests outlined in Local Plan Policy DM31 and Policy CNDP10 and other relevant policies in the Colne Neighbourhood Development Plan (2023).</p> <p>The Information provided will inform future updates of the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA does not allocate land or grant planning permission for specific land uses. The assessment is “policy off” and its outcome does not prejudice the plan-making plan or the decision-taking process.</p> <p>The SHLAA is just one part of the evidence used to inform the selection process for the site allocations proposed in the Local Plan. The designation of the sites as open space and their use for sport is recognised in the Sustainability Appraisal with both sites receiving negative scores for their impact under the health and well-being sustainability objectives (see Appendix 5 of the Sustainability Appraisal report).</p>
02094	P Mousdale	Not specified	Not specified	Policy AL01: Object to the inclusion of the playing fields at Barrowford Road for housing building in the Draft Local Plan (sites P083 and P111). The playing fields are subject to a s.106 agreement. The retention of the playing fields was an important material consideration for that planning application. Whilst the fields have not been managed as they should, they are nevertheless well used for junior football. Developing the sites for housing would be odds with the Council's own evidence and conflict with the recently approved Colne Neighbourhood Development Plan.	Remove sites P083 and P111 from the draft Local Plan.	<p>Comments noted: Recommend no change</p> <p>The Local Plan does not allocate sites P083 and P111 for housing. These sites have been considered but dismissed as part of the site assessment process.</p> <p>The Local Plan does not propose to alter the existing status of the sites which, as confirmed by the accompanying Policies Map, remain designated as Open Space. These sites are also protected through the Colne Neighbourhood Development Plan. Any proposals for development on these sites will therefore be subject to the tests outlined in Policy DM31 and relevant policies of the Colne Neighbourhood Development Plan.</p>
02097	Y Barritt	Not specified	Not specified	Policy AL01: Object to the proposed development of sites P083 / P111. The proposal is contrary to the policies of the recently adopted Colne Neighbourhood Development Plan and is inconsistent with the tests for the development of open space outlined in the NPPF. The site is subject to	Remove sites P083 and P111 from the draft Local Plan.	<p>Comments noted: Recommend no change</p> <p>The Local Plan does not allocate sites P083 and P111 for housing. These sites have been considered but dismissed as part of the site assessment process.</p>

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				a signed legal agreement for the maintenance of the fields for sports use (with Nelson and Colne College). In my opinion this agreement is not being sufficiently implemented by the college.		The Local Plan does not propose to alter the existing status of the sites which, as confirmed by the accompanying Policies Map, remain designated as Open Space. These sites are also protected through the Colne Neighbourhood Development Plan. Any proposals for development on these sites will therefore be subject to the tests outlined in Policy DM31 and relevant policies of the Colne Neighbourhood Development Plan.
02104	Environment Agency	Not specified	Not specified	Policy AL01: Sites P052, P257 and P013 are at risk of fluvial flooding and do not have planning approval. Have review the Level 2 SFRA in relation to these sites and are satisfied that provided any development proceeds in accordance with the recommendations of those reports, we have no in principle concerns that the site would not be safe or would increase risk elsewhere.	None specified.	Comments noted: Recommend no change
02109	G Montero	Not specified	Not specified	Policy AL01: Object to the proposed development of sites P083 / P111. The proposal is contrary to the policies of the recently adopted Colne Neighbourhood Development Plan and is inconsistent with the tests for the development of open space outlined in the NPPF. The site is subject to a signed legal agreement for the maintenance of the fields for sports use (with Nelson and Colne College). In my opinion this agreement is not being sufficiently implemented by the college.	Remove sites P083 and P111 from the draft Local Plan.	Comments noted: Recommend no change The Local Plan does not allocate sites P083 and P111 for housing. These sites have been considered but dismissed as part of the site assessment process. The Local Plan does not propose to alter the existing status of the sites which, as confirmed by the accompanying Policies Map, remain designated as Open Space. These sites are also protected through the Colne Neighbourhood Development Plan. Any proposals for development on these sites will therefore be subject to the tests outlined in Policy DM31 and relevant policies of the Colne Neighbourhood Development Plan.
02131	Sevo Planning for Little Cloud	No	No	Policy AL01: Insufficient supply is identified for Colne. Even applied to the proposed housing requirement (considered unsound), 689 dwellings would be needed in Colne. Of this only 20% has planning permission. The housing allocations of the Colne Neighbourhood Development Plan, if considered deliverable, and allocation at Cotton Tree Lane, would leave a shortfall of 473 dwellings.	Further allocations are needed in Colne under any scenario.	Comments noted: Recommend no change The response relating to Policy SP02 (above) provides the reasons why the spatial strategy does not identify settlement specific housing targets and confirms that the 2016 Scoping and Methodology Report does not form part of the evidence base for the new Local Plan. The distribution of growth across the three spatial areas provided by the combination of completions, existing commitments and proposed site allocations is broadly in accordance with the requirements of Policy SP03.
02131	Sevo Planning for Little Cloud	No	No	Policy AL01: further allocations needed in Colne both in terms of needing to respond to the full assessed housing needs of Pendle but also to ensure that the distribution of growth is sustainable. Site P005 should be allocated. The recent planning application (22/0790/OUT) demonstrates the availability and suitability of the site for housing. The evidence provided concludes there is no justification to resist	Allocate P005 for 150 dwellings through Policy AL01.	Disagree: Recommend no change The Council has set out above its justification for the proposed housing requirement in response to several representations above. It has also set out in response to comments made relating to Policy SP02 why further site allocations are not needed in Colne. The housing sites allocated in the Local Plan are deliverable within the plan period. Notwithstanding

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				planning permission on landscape or ecology grounds.		<p>the requirements of paragraph 69 of the NPPF, there is a small projected surplus in housing supply over the plan period, so no further site allocations are necessary.</p> <p>The proposed designation of site P005 as Local Green Space through Policy DM12 demonstrates that the Council's position is that the site does not represent a suitable location for housing.</p>
02131	Sevo Planning for Little Cloud	No	No	<p>Policy AL01: Raises concerns over the suitability/deliverability of the following sites (Constraints Assessment submitted as Appendix 2 of the Reg 19 representation):</p> <p>Bunkers Hill, Colne (landscape and ecological impacts)</p> <p>General viability/deliverability considerations regarding, Land North of Dean Street, Trawden, Land rear of Black Carr Mill, Trawden, Part Black Carr Mill, Trawden, Riverside Mill, Nelson, Giles Street, Nelson, Barkerhouse Road, Nelson and Former LCC Depot, Halifax Road, Brierfield.</p> <p>Questions of availability of:</p> <p>Buck Street, Colne, Shaw Street, Colne, Thomas Street, Colne, Railway Sidings, Brierfield and Former Mansfield High School, Brierfield.</p> <p>Hall House Farm, Trawden is complete.</p> <p>Permissions at Long Ing Lane, Barnoldswick and Colne Water, Colne are subject to the discharge pre-commencement and pre-occupation conditions. Two sites, Land north of Dean Street, Trawden and Bunkers Hill, Colne have lapsed.</p>	Further sites needed to be allocated.	<p>Disagree: Recommend no change</p> <p>There is no requirement in national planning policy to identify 'reserve sites' in a Local Plan.</p> <p>The reserve sites featured in the draft version of the Pendle Local Plan Part 2: Site Allocations and Development Policies (abandoned by the Council in December 2021) were specifically required by a 'parent policy' in the Pendle Local Plan Part 1 Core Strategy (2015). This new Local Plan is independent of the Core Strategy (2015) and is not bound by its policies.</p> <p>The capacity of the sites allocated in the Local Plan provide a housing land supply that is higher than the proposed housing requirement, due to there not being a precise correlation between site size and spatial distribution requirements. The Local Plan adopts a presumption in favour of sustainable development for development proposals within a settlement boundary.</p> <p>Paragraph 69 of the NPPF sets out national planning policy requirements for the identification of land to be developed for housing through the Local Plan. It confirms the need to:</p> <ul style="list-style-type: none"> • identify a specific deliverable supply for five years following the intended date of adoption • specify developable sites or broad locations for growth, for years 6-10; and, where possible, for years 11-15 of the remaining plan period. <p>There is no requirement for the Council to allocate or identify sufficient land to meet the housing requirement for the plan period in full.</p> <p>The requirement for Local Plans to be reviewed at least every five years provides the Council with a valuable opportunity to identify further land for housing, should up-to-date evidence show that it is needed. The Council has no concerns about potential under delivery. Should evidence of potential under delivery emerge, the mechanisms set out in Policy DM20 will be implemented to ensure that the housing requirement for the period up to 2040 will be delivered in full.</p>

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02143	Pegasus Group for MCI Developments	Not specified	No	Policy AL01: In light of comments made regarding the plan period and housing requirement further sites (+10% for flexibility) should be identified to deliver housing needs in full.	Allocate further sites for housing through Policy AL01.	<p>Comments noted: Recommend no change</p> <p>For the reasons set out in response to representations above the Council has set out why further housing site allocations are not required in Policy AL01.</p> <p>In summary, the housing sites allocated in the Local Plan are deliverable within the plan period and notwithstanding the requirements of paragraph 69 of the NPPF, there is a small projected surplus in housing supply over the plan period, so further site allocations are unnecessary.</p> <p>Policy DM20 is clear that the housing requirement is expressed as a minimum figure and that Policy SP02 adopts a presumption in favour of sustainable development for proposals submitted on land located within a defined settlement boundary.</p>
02145	S Sutcliffe	Not specified	Not specified	Policy AL01: It is not appropriate to build houses on site P083 and P111. They are an important local sport's facilities and should be protected from development through the Pendle Local Plan the same way they are in the Colne Neighbourhood Development Plan (Policy CNDP10).	Do not allocate sites P083 and P111 for housing.	<p>Comments noted: Recommend no change</p> <p>The Local Plan does not allocate sites P083 and P111 for housing. These sites have been considered but dismissed as part of the site assessment process.</p> <p>The Local Plan does not propose to alter the existing designation of the sites which, as confirmed by the draft Policies Map, remains as Open Space. The sites are also protected through the Colne Neighbourhood Development Plan. Any proposal to develop the sites will therefore be subject to the policy tests outlined in Policy DM31 and relevant policies of the Colne Neighbourhood Development Plan.</p>
02146	M Montero	Not specified	Not specified	Policy AL01: Object to the proposed development of sites P083 / P111. The proposal is contrary to the policies of the recently adopted Colne Neighbourhood Development Plan and is inconsistent with the tests for the development of open space outlined in the NPPF. The site is subject to a signed legal agreement for the maintenance of the fields for sports use (with Nelson and Colne College). In my opinion this agreement is not being sufficiently implemented by the college.	Remove sites P083 and P111 from the draft Local Plan.	<p>Comments noted: Recommend no change</p> <p>The Local Plan does not allocate sites P083 and P111 for housing. These sites have been considered but dismissed as part of the site assessment process.</p> <p>The Local Plan does not propose to alter the existing designation of the sites which, as confirmed by the draft Policies Map, remains as Open Space. The sites are also protected through the Colne Neighbourhood Development Plan. Any proposal to develop the sites will therefore be subject to the policy tests outlined in Policy DM31 and relevant policies of the Colne Neighbourhood Development Plan.</p>
00294	Lidgett and Beyond	Not specified	Not specified	Policy AL02: Should allocate sites for employment within Colne's South Valley. Landowners in this area have expressed a preference for commercial land uses as demonstrated by recent developments in this area.	Allocate sites for employment in Colne's South Valley.	<p>Comments noted: Recommend no change</p> <p>The evidence prepared for the Council on economic development needs is set out in the HEDNA. This does not justify the provision of further employment site allocations in this part of the borough.</p> <p>The sites are located within the settlement boundary for Colne. As such, proposals for employment use would be considered acceptable in principle, subject to compliance with wider policy objectives.</p>

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00471	Sport England	No	No	Policy AL02: Lomeshaye Strategic Employment site. The site is adjacent to Nelson Football Club and lies close to an archery club. Sports England should be a statutory consultee for any application to develop the site. The policy wording should be amended to reflect this.	Include wording to acknowledge the existence of the playing field and the need for compliance with paragraph 193 of the NPPF.	<p>Comments noted: Recommend no change</p> <p>The site has received full planning permission. Its development will not affect existing sports provision in the area and so the suggested amendment is not necessary.</p> <p>The potential effects of development of the site on neighbouring land uses, including sports facilities, is adequately protected through Policy DM13 as currently drafted.</p>
01644	Colne Town Council	Not specified	Not specified	Policy AL02: Supports policy.	None specified.	Support welcomed
Local Plan Appendix 1: Housing Trajectory						
See also representations highlighting concerns with deliverability of specific sites allocated through Policy AL01 and implied implications for the Housing Trajectory.						
Local Plan Appendix 3: Commuted Sum Calculator for Affordable Housing						
01575	The Planning Bureau for McCarthy Stone and Churchill Living	Not specified	Not specified	Appendix 3 commuted sum calculator does not appear to have been tested through the Local Plan Viability Appraisal and so it is unclear if it is viable.	Re-run viability assessment to test off-site financial contribution calculation set out in Appendix 3.	<p>Disagree: Recommend no change</p> <p>The requirement to provide affordable housing has been tested in the Local Plan Viability Assessment (Aspinall Verdi, 2024). The calculator is only used where it is not possible for the developer to provide an appropriate level of affordable housing on site. In those circumstances the calculator should be used at the pre-application stage to indicate the financial contribution to be paid in lieu of on-site provision. This ‘commuted sum’ will be used by the Council to provide suitable affordable housing elsewhere in the Borough. The aim is to reduce the amount of time taken negotiating affordable housing provision through planning obligations (S106 Agreements) and the determination of planning applications.</p>
Local Plan Appendix 7: Criteria for the Designation of Local Green Space						
00294	Lidgett and Beyond	Not specified	Not specified	Appendix 7: Object to the additional questions included on the flowchart for the assessment of Local Green Space. The assessment should only relate to the tests outlined in the NPPF.	Revise the flowchart and assessment of Local Green Space candidate sites.	<p>Disagree: Recommend no change</p> <p>The flowchart and questions shown in Appendix 7 of the Local Plan reflects the guidance in PPG, which sets out how policies of the NPPF should be interpreted.</p>
00471	Sport England	No	No	Appendix 7: Would like to see playing fields omitted from the Local Green Space methodology.	Omit playing fields from the methodology for Local Green Space.	<p>Disagree: Recommend no change</p> <p>Appendix 7 – Playing pitches are a recreational facility and in many instances are highly valued by their local community (e.g. Trawden Recreation Ground, which is designated as Local Green Space in the Trawden Forest Neighbourhood Plan). They are examples of land which may justify designation as Local Green Space, provided that they meet the requirements set out in the NPPF and PPG.</p> <p>Development proposals on playing fields designated as Local Green Space would also need to comply with</p>

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						the requirements of Policies DM12 and DM31. This is no different from playing fields which are within the designated Green Belt, where Policy SP05 would apply in addition to Policy DM31.
00526	Trawden Forest Parish Council	Not specified	Not specified	Appendix 7: Object to the additional questions included on the flowchart for the assessment of Local Green Space. The assessment should only relate to the tests outlined in the NPPF.	Limit to those outlined in Paragraph 106 NPPF.	Disagree: Recommend no change The flowchart and questions shown in Appendix 7 of the Local Plan reflects the guidance in PPG, which sets out how policies of the NPPF should be interpreted.
00729	Cllr S Cockburn-Price	Not specified	Not specified	Appendix 7: I strongly object to the addition of extra questions to be answered on top of the three criteria specified in the NPPF. I do not agree with the flowchart set out on page 311 of the Local Plan. The three criteria of the NPPF should solely set out the criteria set out for designating Local Green Space.	Remove flowchart from the Local Plan and amend Local Green Space Assessment accordingly.	Disagree: Recommend no change The flowchart and questions shown in Appendix 7 of the Local Plan reflects the guidance in PPG, which sets out how policies of the NPPF should be interpreted.
01644	Colne Town Council	Not specified	Not specified	Objects to the criteria used to assessed Local Green Space as set out in Appendix 7 of the Local Plan. This applies additional criteria to those set out in the NPPF.	Limit to those outlined in Paragraph 106 NPPF.	Disagree: Recommend no change The flowchart and questions shown in Appendix 7 of the Local Plan reflects the guidance in PPG, which sets out how policies of the NPPF should be interpreted.
02110	Cllr B Wildman	Not specified	Not specified	Appendix 7: Strongly object to the criteria used to assess Local Green Space as set out in the Local Plan. This applies additional criteria to those set out in the NPPF.	Limit to those outlined in Paragraph 106 NPPF.	Disagree: Recommend no change The flowchart and questions shown in Appendix 7 of the Local Plan reflects the guidance in PPG, which sets out how policies of the NPPF should be interpreted.
Local Plan Appendix 8: Local Green Space Sites in Pendle						
See also representations submitted to Policy DM12 and comments made in relation to the Local Green Space Assessment and Methodology Report						
00284	J Cooney	Not specified	Not specified	Appendix 8: Strongly support the proposed designation of The Rough (LGS/LP4/DM12/025) as Local Green Space. The proposal is in accordance with the NPPF and objectives of the Local Plan. The site is cherished as a natural area, offering vital space for recreation, relaxation, and mental well-being. The site plays a crucial role in protecting biodiversity, improving air quality, and mitigating the effects of climate change. The Rough's ecological networks and landscape character are assets that must be preserved for future generations.	None specified.	Support welcomed
00471	Sport England	No	No	Appendix 8: Would like to see playing fields as a sperate designation to Local Green Spaces sites. Local Green Space Methodology Report: Decision tree implies that designated sites provide greater protection for playing fields however any protection must be applied on the basis of paragraph 102 and 103 and must allow for supporting facilities to meet Sport England's Playing Field Policy.	Separate playing fields from other Local Green Space sites. Revise decision tree set out in the Local Green Space Methodology Report.	Disagree: Recommend no change Appendix 8 – As set out above, the identification of playing fields as Local Green Space is consistent with the NPPF and PPG, where it can be shown that they meet the criteria for designation set out in paragraph 106 of the NPPF. As demonstrated on the Policies Map, the Local Green Space designation is in addition to, and does not replace, other Local Plan policies unless they conflict with Green Belt policy. As such

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						<p>sites also designated as open space continue to be protected through Policy DM31.</p> <p>Local Green Space Methodology Report – As set out above, the identification of playing fields as Local Green Space sites is consistent with paragraph 106 of the NPPF.</p> <p>Development proposals on playing fields designated as Local Green Space would also need to comply with the requirements of Policies DM12 and DM31. This is no different from playing fields which are within the designated Green Belt, where Policy SP05 would apply in addition to Policy DM31.</p>
00639	A Birkinshaw	Not specified	Not specified	<p>Appendix 8: Support the proposed designation of the Lidgett Triangle, Upper Rough and Lenches as Local Green Space. With regards to the Upper Rough, it should be noted that the site:</p> <ol style="list-style-type: none"> 1. Is prominent in long range views and any development would be a ‘blot on the landscape’ 2. Plays a key role in the setting of Colne and the Lidgett and Bents Conservation Area, preventing sprawl and preserving characteristic green field for future generations. 3. Is a crucial recreational facility, used daily by walkers and hosts featured walks, including the East Colne Way. It is vital for mental and physical health. 4. Hosts red listed curlew, lap wings, bats and other birds and insects. Curlews are faithful to their nests and forage sites, if lost, they would not find alternative sites. 	Greater emphasis in the assessment in the evidence base on the contribution made by the Upper Rough to biodiversity and in particular the site’s importance in providing nesting grounds and wider habitat for the red listed curlew and other important bird species, such as the lapwing.	<p>Comments noted: Recommend no change</p> <p>The contribution that the site makes in support of red listed curlew and other important bird species has been taken into consideration. The relevant site appraisal is set out in the Local Green Space Site Assessment and Methodology Report. This notes that the site meets the criteria necessary to be designated as Local Green Space in the Local Plan. This conclusion is consistent with that reached by the Examiner appointed for independent examination of the Colne Neighbourhood Development Plan in 2023.</p>
00729	Cllr S Cockburn-Price	Not specified	Not specified	Appendix 8: I am supporter of the Lancashire Wildlife Trust and believe their submission to this consultation demonstrates the ecological importance of the Upper Rough.	None specified. See response ID 00564 for details of the Lancashire Wildlife’s Trusts comments and changes sought to the Local Plan.	<p>Comments noted: Recommend no change</p> <p>The Lancashire Wildlife Trust supports the designation of the Upper Rough as Local Green Space in its representation ID 00564.</p>
00754	S Dale	Not specified	Not specified	Appendix 8: It is vital to protect our green spaces and access to countryside. They are what make Colne extra special and they are vital for mental and physical health. My greatest concern is for the Upper Rough and I hope that this land can be protected from urban sprawl. It houses Curlews who return each year and other bird life, along with bats and allows easy access to green spaces for many residents of Colne who have no gardens. It is also an important gateway into Colne from Yorkshire. Its countryside is what makes Colne special and keeps people visiting and boosting our economy.	None specified.	<p>Comments noted: Recommend no change</p> <p>It is proposed to designate the land, known locally as the Upper Rough, as Local Green Space, through Policy DM12.</p> <p>This is confirmed by the list of sites in Appendix 8, where LGS/LP4/DM12/025 The Upper Rough, Castle Road, Colne is listed. It is also shown as Local Green Space on the accompanying Policies Map.</p>
00906	J Hartley	Not specified	Not specified	Appendix 8: Particularly pleased that the Upper Rough (LGS/PLP4/DM12/025) is defined as a Local Green Space. It is easily accessible by residents and	None specified.	Support welcomed

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				is very popular recreationally, with three recognised and promoted walks running across the field. It reduces the distance needed for children to walk on roads when walking to school. It is important for wildlife and especially for the Curlew (a red-listed bird under threat), a ground-nesting bird populating the Rough at breeding time. The Lower Rough has already lost to housing. Many other species are resident, including Barn Owls. Roe deer use the Rough to transit between other green areas. The Upper Rough is important to the setting of Colne, with long distance views of the Rough adding to the attractive scene, adding to its appeal for tourism as well as local residents. It lies outside Settlement Boundary and overlaps the Lidgett & Bents Conservation Area, adding to its appeal and protecting its character. Allowing urban sprawl onto the Rough would be very damaging, destroying so much that local residents and visitors value so highly.		
00729	Cllr S Cockburn-Price	Not specified	Not specified	Appendix 8: Highlight support for the Upper Rough to be included in the Local Plan as Local Green Space.	None specified.	Disagree: Recommend no change Support for the designation of the Upper Rough as Local Green Space is noted.
00907	E Hartley	Yes	Yes	Appendix 8: I fully support the addition of land at Lenches Rd / Knotts lane LGS/LP4/DM12/026 as a LGS Residents have campaigned for this land to be given protection since 1988. It is important to residents in Waterside one of the UKs most deprived wards according to the IMD	None specified.	Support welcomed
01023	C Kelly	Yes	Yes	Appendix 8: Support the proposed designation of Lenches as Local Green Space and Gib Hill as a Nature Reserve.	None specified.	Support welcomed
01091	K McNulty	Yes	Yes	Appendix 8: I support land at Lenches Rd and Knotts Lane LGS/LP4/DM12/026 being added as a protected green space.	None specified.	Support welcomed
01285	S Smith	Yes	Yes	Appendix 8: I support land at Lenches Road and Knotts Lane LGS/LP4/DM12/026 being added as a protected green space.	None specified.	Support welcomed
01831	T Sharples	Yes	Yes	Appendix 8: In agreement that the Lenches site and its biodiversity assets should be protected from unnecessary housing development and/or industrial encroachment.	None specified.	Comments noted: Recommend no change
01834	N Whitaker	Not specified	Not specified	Appendix 8: Very pleased with the sensible decision to protect Lenches from development (now or in the future) and in doing so continuing to provide a rich diverse area for wildlife to flourish and in keeping with a very important part of Colne's heritage.	None specified.	Support welcomed

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01860	Lenches Residents	Yes	Yes	Appendix 8: We are pleased to see land at Lenches Rd/Knotts Lane includes as LGS/LP4/DM12/026.	None specified.	Support welcomed
01861	S Hartley	Yes	Yes	Appendix 8: Pleased to see that the Council have realised how important the land at Lenches is to the town and proposed that it is allocated as protected green space.	None specified.	Support welcomed
01874	Dr C Spencer-Palmer	Yes	Yes	Appendix 8: I think that this is a reasonable and equitable plan which reflects the interests of all people in Pendle quite well. I am passionately hoping that Lenches land LGS/LP4/DM12/026 can at last get the protection it so desperately deserves. I have been campaigning for this for the last 25 years.	None specified.	Support welcomed
01901	H Clegg	Yes	Yes	Appendix 8: Supports the proposed designation of the Upper Road as Local Green Space due to its long range views, setting of Colne, recreation including three promoted walks, setting of the Lidgett and Bents Conservation Area, preventing urban sprawl, and role for ecology particularly for the curlew.	None specified.	Support welcomed
01906	J Ryde	Yes	Yes	Appendix 8: I support land at Lenches Rad and Knotts Lane LGS/LP4/DM12/026 being a protected greenspace to protect wildlife and the ecosystem and to keep the environment for local people.	None specified.	Support welcomed
01932	Emery Planning for Lenches Rd, Colne Landowner	Not specified	Not specified	Appendix 8: Policy DM12 – object to designation of LGS/LP4/DM12/026 as local green space on the basis it is not sound. A comprehensive objection was submitted to the consultation conducted by the Council in 2023.	Remove LGS/LP4/DM12/026 as a proposed Local Green Space Designation.	Comments noted: Recommend no change The Council's assessment of site LGS/LP4/DM12/026 can be found within the Local Green Space Methodology and Assessment Report. The Council's response to the assertions made in relation to the Council's assessment of the site can be found in Appendix 6 of the Consultation Statement.
01951	A O'Brien	Yes	Yes	Appendix 8: The wording of the supporting evidence follows the wording of the relevant legal and advisory document exactly and therefore I am confident that the proposal as a whole is legal and sound. The analysis of local needs appears to be sound. I particularly support the inclusion of LGS/LP4/DM12/026.	None specified.	Support welcomed
01955	E Jolley	Not specified	Not specified	Appendix 8: Support the inclusion of the Upper Rough as a Local Green Space because of its special interest for wildlife (see Lancashire Wildlife Trust report), and its long established use by the community as an accessible green space. It is inappropriate for development as ruled by the Planning Inspectorate and as can be seen time and again by the rain and water runoff from adjacent development.	None specified.	Comments noted: Recommend no change
02098	A Wharton	Yes	Yes	Appendix 8: Having lived at this address for 30 years, raising two children, enjoying the use and beauty of	None specified.	Comments noted: Recommend no change

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				the field on lenches road. The possibility of building so many houses on is devastating. The road is unfit for such a development as is the pack horse bridge at the bottom. The noise, light and traffic would be terrible and our house would devalue.		
02099	M Redford	Yes	Yes	Appendix 8: I agree that this plan is generally useful in helping direct planning issues in the future. I am very keen to ensure that Lenches land LGS/LP4/DM12/026 at last gets the protection as a local green space that it deserves.	None specified.	Support welcomed
02100	P Slater	Yes	Yes	Appendix 8: Support the proposal to designate the Lenches as Local Green Space.	None specified.	Support welcomed
02101	K Lee	Yes	Yes	Appendix 8: Support the proposal to designate the Lenches as Local Green Space.	None specified.	Support welcomed
02102	M Puswey	Yes	Yes	Appendix 8: Support the proposal to designate the Lenches as Local Green Space. I would also add the need Greenfield Conservation Area and its relevance to the Lenches site.	None specified.	Support welcomed
02103	A Jones	Yes	Yes	Appendix 8: Agree with the importance of preserving this land for future generations.	None specified.	Comments noted: Recommend no change
02105	L Fothergill	Yes	Yes	Appendix 8: A coherent approach aimed at protecting Colne's open and green spaces particularly protecting Knotts Lane and the Lenches.	None specified.	Support welcomed
02106	L McFadyen	Yes	Yes	Appendix 8: This is a much needed green space used by local residents and visitors alike. Obviously, the strength of feeling about this space shows what it means in terms of mental health value and diversity of landscape.	None specified.	Comments noted: Recommend no change
02107	R MacSween	Yes	Yes	Appendix 8: I fully support land at Lenches Road and Knotts Lane LGS/LP4/DM12/026 being added as a protected green space.	None specified.	Support welcomed
02108	J Abbott	Yes	Yes	Appendix 8: The inclusion of the Lenches is a fantastic decision for Colne and its residents. Protecting this land for the next generation of residents and wildlife is a significant step forward and an opportunity to create a habitat and environmental sound area.	None specified.	Comments noted: Recommend no change
02115	M Cooney	Yes	Yes	Appendix 8: I support the designation of the upper rough as a local green space.	None specified.	Support welcomed
02117	F Spencer	Yes	Yes	Appendix 8: I support land at Lenches Rd and Knotts Lane being added as protected green space. It is a unique and beautiful natural area which is much appreciated and used by local residents for recreation and exercise.	None specified.	Support welcomed

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02122	C Gaboreau	Yes	Yes	Appendix 8: I support land at Lenches Rd and Knotts Lane (LGS/LP4/DM12/026) being added as a protected green space.	None specified.	Support welcomed
02126	J Galvin	Yes	Yes	Appendix 8: Excellent idea, land like this must be kept natural and not built on.	None specified.	Comments noted: Recommend no change
02129	K Marsh	Not specified	Not specified	Appendix 8: Supports the proposed designation of the Upper Rough as Local Green Space. The site is not needed to meet government targets for housing.	None specified.	Support welcomed
02130	G Frost	Not specified	Not specified	Appendix 8: Supports the proposed designation of the Upper Rough as Local Green Space. The site has special interest for wildlife. It has potential for restoration to either lowland or upland meadow. It is a current area for ground-nesting birds with potential to host further species. There is a range of wildlife that call the area home. There are enough brownfield sites that could be developed for housing supporting regeneration.	None specified.	Support welcomed
02131	Sevo Planning for Little Cloud	No	No	Appendix 8: Object to the proposed designation of Upper Rough, Colne as Local Green Space (LGS/LP4/DM12/025). Comments also made in relation to Policy DM12. See representation for detailed comments.	Delete proposed designation.	<p>Comments noted: Recommend no change</p> <p>The examiner's conclusions regarding the effect of the designation of the Upper Rough as Local Green Space were made in the context of the uncertainty connected with the adopted housing requirement and delivery of the Local Plan (see paragraph 7.98 of the Colne Neighbourhood Development Plan Examiner Report).</p> <p>The Pendle Local Plan Fourth Edition resolves these uncertainties by adopting a new housing requirement (Policy DM20) and confirmation that the development the Upper Rough is not necessary to deliver this total (Policy AL01). This Plan if adopted will replace the Core Strategy. At this time Policy LIV1 and its provisions will cease to form part of the statutory development plan.</p> <p>In their report the Examiner was clear in their conclusions that they were not persuaded that the Upper Rough forms an extensive tract of land and that the site otherwise meets the criteria for designation as Local Green Space. The Council accepted this conclusion and has reflected this in its assessment of the site, noting the absence of any material change to its character or condition since the Examiners report was issued.</p> <p>The proposed designation of the Upper Rough as Local Green Space is consistent with the guidelines set out in the NPPF and PPG.</p>
02134	M Halstead	Not specified	Not specified	Appendix 8: Support the proposed designation of the Upper Rough as Local Green Space.	None specified.	Support welcomed

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02135	D Wilkinson	Not specified	Not specified	Appendix 8: Supports the proposed designation of the Upper Rough as Local Green Space. The area is extremely important to the town and beneficial to the residents that it remains unspoilt. The protection of this area of countryside is vital, as it provides habitats for increasing endangered wildlife.	None specified.	Support welcomed
02139	L Tait	Not specified	Not specified	Appendix 8: Support the designation of the Upper Rough as Local Green Space. Beneficial and important to the town in its current state. The protection of this area of countryside is vital, as it provides habit for endangered wildlife including the curlew. The site benefits Colne as a whole given the role of green space for people's mental health.	None specified.	Support welcomed
02140	N Meredith	Not specified	Not specified	Appendix 8: Support the designation of the Upper Rough as Local Green Space. It is accessible and regularly used. Views across Colne are unparalleled. It is a conservation area and should be protected. Building on this land would encourage urban sprawl. The local infrastructure is under strain. There more other more suitable sites available.	None specified.	Support welcomed
02141	R Ferry	Not specified	Not specified	Appendix 8: Write to demonstrate full support of the Local Plan final consultation. Wholeheartedly support the inclusion of the Upper Rough as Local Green Space. It will benefit the wildlife that lives here and it is invaluable to the residents of Colne and surrounding areas.	None specified.	Support welcomed
02142	B McKiernan	Yes	Yes	Appendix 8: I strongly support the retention of the current area of land at Lenches and Knotts Lane, Colne as it stands, currently being used for the local community as well as for its wildlife.	None specified.	Support welcomed
Local Plan Appendix 9: Glossary						
00471	Sport England	No	No	Appendix 9: We would like to see the addition of 'playing field' and 'sports facilities' added to the Local Plan glossary.	<p>'Playing field: The whole of a site which encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015'</p> <p>'Sports Facilities: Open spaces and other facilities that provide opportunities for sport and physical activity'</p>	<p>Comments noted: Recommend no change</p> <p>The additional text that is proposed is unnecessary as playing fields and other sports facilities are included within the broader definition of open space, which are safeguarded through Policy DM31.</p>
Local Plan Appendix 10: Monitoring Framework						
01510	Lane Town Planning for McDermott Homes	Yes	No	Policy requirement to review the Local Plan should be inserted into the plan. It is often the case that timetables for local plan reviews slip or are significantly delayed. A policy commitment would avoid this. The supporting text should reference Paragraph 33 of the NPPF which sets out where Local Plans should be reviewed earlier. The supporting text should also set out the need to prepare a new Local	<p>Proposed Policy 1 text:</p> <p>'The Council commits to a review of this Local Plan, to commence immediately upon its adoption. The Local Plan Review (or new Local Plan, as appropriate) will be submitted for independent examination within 24 months of commencing the review, and it will be adopted within 36 months of commencement.</p>	<p>Agree (in part): Recommend change to Appendix 10</p> <p>The 'Proposed Policy 1' is unnecessary given that the Local Plan will be submitted under the transitional arrangements set out in Appendix 1 of the 2024 NPPF. A such the Local Plan will be examined against the policies of the 2023 NPPF.</p> <p>The transitional arrangements set clear expectations for local authorities advancing a Local Plan with a</p>

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				<p>Development Scheme which details the programme for preparing a new Local Plan.</p> <p>The monitoring framework within Appendix 10 should be expanded to relate to performance against requirements of the new NPPF as well as those in the Local Plan, including the identifications of actions necessary where targets are not achieved.</p>	<p>Unit the time that a new plan is adopted, the Council acknowledges this Local Plan does not provide the levels of development in Pendle now expected by Government, as expressed in the National Planning Policy Framework, and accompanying standard method for calculating housing need.</p> <p>Pendle Council will therefore welcome and consider favourably proposals for sustainable development which come forward to provide homes in addition to those identified in this plan. Those application will be determined in accordance with the Presumption in Favour of Sustainable Development’</p>	<p>housing requirement which meet less than 80% of the defined mandatory housing target.</p> <p>In accordance with the Written Ministerial Statement ‘Building the Homes we Need’ published on 12 December 2024 (HCWS308), a Local Development Scheme (LDS) is to be within 12 weeks of the publication of the NPPF, i.e. by no later than 6 March 2025. This will set out the projected timescales for the preparation of a new Local Plan, which will commence on the enactment of the Levelling Up and Regeneration Act 2023.</p> <p>The Council acknowledges that whilst the Local Plan is to be examined under the policies of the 2023 NPPF it will be implemented under the latest version of the NPPF, currently the one published on 12 December 2024.</p> <p>The Council will review the 2024 NPPF and consider what changes, if any, are necessary to Appendix 10</p>
01535	Home Builders Federation	Yes	No	Appendix 10: Monitoring framework. Further text should be set out in the introductory section which sets out what will happen and what actions will be taken if these thresholds are not met.	Actions need to be identified to enable the Council to respond flexibly and proportionately to any finding of underperformance of policy.	<p>Comments noted: Recommend no change</p> <p>Reflecting the broad scope of the development plan and the wider influences on development, growth, and policy implementation [1], which are all outside the Council’s control, no actions are set out stating what will happen if these thresholds are not met.</p> <p>[1] <i>Such circumstances could include economic conditions, national policy, devolution, local government restructuring and availability of resources and data.</i></p>
SUPPORTING DOCUMENTS						
Sustainability Appraisal						
00471	Sport England	No	No	Sustainability Appraisal Plans and Programmes – specific documents referenced are now out of date and have been replaced.	Update to latest documents as referenced in the consultation response.	<p>Comments noted: Recommend no change</p> <p>The documents referenced were those relevant during the preparation of the Local Plan. References to the updated documents will be included in any future updates of the Sustainability Appraisal, as appropriate.</p>
Infrastructure Delivery Plan						
01872	Lancashire County Council (Education)	Not specified	Not specified	<p>Factual errors in the Infrastructure Delivery Plan</p> <p>Section 14.60 is correct except for the predicted shortfall in places in the Brierfield Pupil Planning Area. Section 14.62 the information on Burnley Secondary Schools is incorrect where the figures show a shortfall of places not a surplus.</p>	<p>Amend Infrastructure Delivery Plan as follows:</p> <ul style="list-style-type: none"> Section 14.60 Predicted shortfall of places in the Brierfield Pupil Planning Area of over 9% for 2029. <p>Section 14.62 Predicted shortfall of places at Burnley Secondary Schools of over 2% for 2029.</p>	<p>Agree: Recommend changes to the Infrastructure Delivery Plan</p> <p>The Council will amend the Infrastructure Delivery Plan as requested – see Schedule of Proposed Minor Modifications.</p>

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02125	NHS Property Services	Not specified	Not specified	Infrastructure Delivery Plan- The provision of adequate healthcare infrastructure is critical to the delivery of sustainable development. The IDP must include sufficient detail to provide clarity around the healthcare infrastructure requirement to the level of growth proposed by the Plan and ensure planning obligations effectively support the delivery of required infrastructure. Further detail regarding the primary healthcare provision is needed to ensure that the assessment of existing healthcare infrastructure is robust and the mitigation options secured align with NHS requirements.	<p>Proposed addition to the Health section (14.41-14.47) of the Infrastructure Delivery Plan relating to Healthcare Infrastructure:</p> <p>The requirement for a contribution towards healthcare infrastructure from new development will be determined by working with the ICB and other key stakeholders as appropriate, in accordance with the following process:</p> <ul style="list-style-type: none"> Assessing the level and type of demand generated by the proposal. Working with the ICB to understand the capacity of existing healthcare infrastructure and the likely impact of the proposals on healthcare infrastructure capacity in the locality. Identifying appropriate options to increase capacity to accommodate the additional service requirements and the associated capital costs of delivery. <p>Identifying the appropriate form of developer contributions.</p>	<p>Comments noted: No change proposed</p> <p>The Council has previously sought advice from its Legal Counsel on this matter. This advice stated that NHS facilities are funded through other means and do not meet the statutory tests in Regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended by the 2011 and 2019 Regulations) and as policy tests in paragraphs 56-59 of the National Planning Policy Framework.</p> <p>The Infrastructure Delivery Plan does not therefore need to reflect suggested wording.</p>
EVIDENCE BASE DOCUMENTS						
Local Plan Viability Assessment (Aspinall Verdi 2024)						
01575	The Planning Bureau for McCarthy Stone and Churchill Living	Not specified	Not specified	Local Plan viability appraisal only appraises a generic retirement living/sheltered housing scheme rather than appraising different typology of older person' housing. This is contrary to PPG (ref: 10-004-20190509). The viability report should therefore be rerun.	Re-run Viability Assessment to include all older persons' housing typologies.	<p>Comments noted: Recommend no change</p> <p>The Local Plan Viability Assessment takes a proportionate approach. PPG applies to all house types not just elderly housing.</p>
01575	The Planning Bureau for McCarthy Stone and Churchill Living	Not specified	Not specified	The Viability Assessment finds that older person housing schemes are not viable for affordable housing without changes in build costs. Despite this, the Local Plan does not exempt older persons housing from affordable housing provision but treats in the same way as general market housing. Older persons housing differs from a standard model of development as confirmed in PPG (ref:63-010-20190626). Viability of special housing for older people is more finely balanced than general needs housing. Given the special characteristics and additional costs that developers of older person's housing experience, we have concerns that these have not been fully factors into the viability assessment. Tenure requirements also differ and from experience it would be inappropriate for the Council to apply generic affordable housing targets to older persons housing.	<p>A bespoke affordable housing policy for older persons' housing should be developed applying lower requirements for affordable housing at such schemes. This reflects experience elsewhere in the case of Birmingham and Charnwood.</p> <p>We request that Policy DM23 is amended to add: 'Schemes delivery housing for older people are exempt from delivering affordable housing'</p>	Disagree: Recommend no change

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02125	NHS Property Services	Not specified	Not specified	Local Plan Viability Assessment – where contributions towards healthcare have been identified in the policy requirements for site specific testing, the assessment does not include a specific allowance for contributions towards healthcare. We do not consider that s106 headroom identified as part of the site-specific testing to be sufficient to enable financial contributions to be secured for healthcare. We cannot consider that the overall assessment of plan-wide viability demonstrates that policy requirements in relation to healthcare infrastructure contributions are deliverable. Identifying a specific cost for healthcare would ensure healthcare mitigation is appropriately weighed when evaluating the obligations necessary to mitigate a development. A separate cost input would also mean that developers are informed in advance of healthcare requirements for their proposals. Such an approach would enable the effective implementation of Policy SP12.	Revise Local Plan Viability evidence to include a specific cost (agreed in consultation with the NHS) regarding healthcare infrastructure requirements for developments.	<p>Comments noted: No change proposed</p> <p>The Council has previously sought advice from its Legal Counsel on this matter. This advice stated that NHS facilities are funded through other means and do not meet the statutory tests in Regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended by the 2011 and 2019 Regulations) and as policy tests in paragraphs 56-59 of the National Planning Policy Framework.</p> <p>The Local Plan Viability Assessment does not therefore reflect or account for funding of health infrastructure.</p>
Level 2 Strategic Flood Risk Assessment (JBA Consulting, 2024)						
02104	Environment Agency	Not specified	Not specified	<p>Comments made in relation to the SFRA Level 2 content:</p> <ul style="list-style-type: none"> Climate change allowances used in the Level 2 SFRAs are out of data and any future site-specific FRA needs to apply climate change allowance. <p>The documents refer to culverts under the ownership of the Environment Agency but it is unlikely that we own them as they are usually the responsibility of the riparian landowner.</p>	None specified.	Comments noted: Recommend no change
Strategic Housing Land Availability Assessment (Pendle Borough Council, 2024)						
02131	Sevo Planning for Little Cloud	No	No	Paragraph 3.23 of the SHLAA acknowledges the advice of the HNR but taken the view that the 148dpa is sufficient to support projected economic growth. Little Cloud is not aware of any evidence to corroborate this view, instead recognising the HNR conclusion that 230 dpa is the supply required for the demographic and economic needs of the borough to be met with an appropriate provision of new housing.	The supply is not fully addressing the potential housing requirement of Pendle. The housing distribution strategy needs to fully consider how to deliver housing in appropriate locations, further greenfield sites are necessary. The current planned housing supply and expected delivery will not satisfy the assessed local requirements as advised by the HNR and HEDNA.	<p>Disagree: Recommend no change</p> <p>The SHLAA shows the potential availability of land submitted to the Council as available for housing. The majority of sites included in the SHLAA do not benefit from planning permission. The SHLAA is a policy off assessment and does not reflect the Local Plan's strategy, nor is it the only document which informs site selection.</p> <p>The SHLAA is not a development plan document forming only part of its evidence base. It is not for the SHLAA to conclude on the housing requirement. This position is reflected in paragraph 3.24 of the SHLAA.</p> <p>For the reasons set out above, the Council disagree and continue to support the adoption of the proposed housing requirement.</p>
01485	WBW Surveyors for I Birtwistle	Yes	No	Appendix 6 to the SHLAA lists all those sites considered for allocation for housing. Some of those	None specified.	The SHLAA does not allocate land, it assesses sites which have been submitted to the Council for the

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				sites have been brought forwards for housing site allocation in the Local Plan. Of those sites contained within Appendix 6 (including those sites that have already been allocated in the local plan) there are viable capable of providing 3451 dwellings outside the green belt, and 1514 dwellings within the green belt. The remaining sites in appendix 6 that are listed as not viable or of marginal viability have been excluded from these calculations. Those sites listed within Appendix 6 that are viable are therefore capable of providing a total of 4965 dwellings over the plan period and providing scope to progress towards meeting the 7528 dwellings that would be required under the proposed revised outcome figures.		availability, suitability and achievability. It forms one part of the evidence base of the Local Plan. Clearly it would not represent a sustainable strategy to allocate all sites which have been put forward through the SHLAA. The SA and site assessment process together with the distribution of committed and completed developments and alignment with the proposed spatial strategy form critical elements in determining which sites should be allocated through the local plan.
01835	E Thorley	Not specified	Not specified	SHLAA Appendix 6: SHLAA site assessment: P083/P111. P083 also features sports pitches which are in use but are not reflected in the site specific assessment. Both P083 and P111 are restricted for sports use by the S.106 agreement covering the site.	Amendments to site assessment for P083/P111 to reflect active use and s.106 legal agreement.	Comments noted: Recommend no change Sites P083 and P111 are not site allocations in the Local Plan. Their existing policy designation, as open space – outdoor sports typology (Site Ref: OS076) – is unaffected by the plan proposals. Any development proposals at this location will be subject to the policy tests outlined in Local Plan Policy DM31 and Policy CNDP10 and other relevant policies in the Colne Neighbourhood Development Plan (2023). The Information provided will inform future updates of the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA does not allocate land or grant planning permission for specific land uses. The assessment is “policy off” and its outcome does not prejudice the plan-making plan or the decision-taking process. The SHLAA is just one part of the evidence used to inform the selection process for the site allocations proposed in the Local Plan. The designation of the sites as open space and their use for sport is recognised in the Sustainability Appraisal with both sites receiving negative scores for their impact under the health and well-being sustainability objectives (see Appendix 5 of the Sustainability Appraisal report).
01836	S Thorley	Not specified	Not specified	SHLAA Appendix 6: SHLAA site assessment: P083/P111. P083 also features sports pitches which are in use but are not reflected in the site specific assessment. Both P083 and P111 are restricted for sports use by the S.106 agreement covering the site.	Amendments to site assessment for P083/P111 to reflect active use and s.106 legal agreement.	Comments noted: Recommend no change Sites P083 and P111 are not site allocations in the Local Plan. Their existing policy designation, as open space – outdoor sports typology (Site Ref: OS076) – is unaffected by the plan proposals. Any development proposals at this location will be subject to the policy tests outlined in Local Plan Policy DM31 and Policy CNDP10 and other relevant policies in the Colne Neighbourhood Development Plan (2023).

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						<p>The Information provided will inform future updates of the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA does not allocate land or grant planning permission for specific land uses. The assessment is “policy off” and its outcome does not prejudice the plan-making plan or the decision-taking process.</p> <p>The SHLAA is just one part of the evidence used to inform the selection process for the site allocations proposed in the Local Plan. The designation of the sites as open space and their use for sport is recognised in the Sustainability Appraisal with both sites receiving negative scores for their impact under the health and well-being sustainability objectives (see Appendix 5 of the Sustainability Appraisal report).</p>
01838	V Hollingsworth	Not specified	Not specified	<p>SHLAA Appendix 6:</p> <p>Object to the Barrowford Road playing fields being put on the list for potential future development sites (sites P083/P111). The land is allocated for protection through the Colne Neighbourhood Development Plan and is used by local football teams for training for which there is high demand for. Use of the pitches for sports is secured by a signed s.106 agreement. The field’s poor quality could be improved if the Council enforced against the College. Access to sport and recreation is crucial for our young people’s physical, emotional, and mental wellbeing. The benefits of these sports and recreational areas are huge and absolutely crucial to the Pendle area.</p>	Do not develop P083 and P111.	<p>Comments noted: Recommend no change</p> <p>Sites P083 and P111 are not site allocations in the Local Plan. Their existing policy designation, as open space – outdoor sports typology (Site Ref: OS076) – is unaffected by the plan proposals.</p> <p>Any development proposals at this location will be subject to the policy tests outlined in Local Plan Policy DM31 and Policy CNDP10 and other relevant policies in the Colne Neighbourhood Development Plan (2023).</p> <p>The Information provided will inform future updates of the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA does not allocate land or grant planning permission for specific land uses. The assessment is “policy off” and its outcome does not prejudice the plan-making plan or the decision-taking process.</p> <p>The SHLAA is just one part of the evidence used to inform the selection process for the site allocations proposed in the Local Plan. The designation of the sites as open space and their use for sport is recognised in the Sustainability Appraisal with both sites receiving negative scores for their impact under the health and well-being sustainability objectives (see Appendix 5 of the Sustainability Appraisal report).</p>
01864	PWA Planning for Castle Green Homes	Not specified	Not specified	<p>SHLAA Appendix 6:</p> <p>Objects to the assessment made of site P130 through the SHLAA.</p>	Request that P130 is reconsidered as an allocation for housing land.	<p>Comments noted: Recommend no change</p> <p>It is unclear which aspects of the site assessment for Site P130 in the Strategic Housing Land Availability Assessment (SHLAA) the respondent is objecting to.</p> <p>There is no requirement for the Council to allocate or identify sufficient land to meet the housing requirement for the plan period in full.</p>

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						The requirement for Local Plans to be reviewed at least every five years provides the Council with a valuable opportunity to identify further land for housing, should up-to-date evidence show that it is needed. The Council has no concerns about potential under delivery. Should evidence of potential under delivery emerge, the mechanisms set out in Policy DM20 will be implemented to ensure that the housing requirement for the period up to 2040 will be delivered in full.
02082	V Devonport	Yes	No	<p>SHLAA Appendix 6:</p> <p>The consultation process to date has lacked in terms of consulting with local user groups of the playing usage or potential future use. I feel angry and frustrated that the user group has been ignored through the assessment of site P083 and P111. The summary assessment for P083 makes no reference of the spaces being regularly used for youth football matches and training. It should be noted that P111 and P083 are subject to s.106 agreements regarding their use and maintenance for sports.</p>	Updates to the assessments of P083 and P111.	<p>Comments noted: Recommend no change</p> <p>Sites P083 and P111 are not site allocations in the Local Plan. Their existing policy designation, as open space – outdoor sports typology (Site Ref: OS076) – is unaffected by the plan proposals.</p> <p>Any development proposals at this location will be subject to the policy tests outlined in Local Plan Policy DM31 and Policy CNDP10 and other relevant policies in the Colne Neighbourhood Development Plan (2023).</p> <p>The Information provided will inform future updates of the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA does not allocate land or grant planning permission for specific land uses. The assessment is “policy off” and its outcome does not prejudice the plan-making plan or the decision-taking process.</p> <p>The SHLAA is just one part of the evidence used to inform the selection process for the site allocations proposed in the Local Plan. The designation of the sites as open space and their use for sport is recognised in the Sustainability Appraisal with both sites receiving negative scores for their impact under the health and well-being sustainability objectives (see Appendix 5 of the Sustainability Appraisal report).</p>
02084	L Hallinan	Not specified	Not specified	<p>SHLAA Appendix 6:</p> <p>SHLAA site assessment: P083/P111.</p> <p>P083 also features sports pitches which are in use but are not reflected in the site specific assessment. Both P083 and P111 are restricted for sports use by the S.106 agreement covering the site.</p>	Amendments to site assessment for P083 / P111 to reflect active use and s.106 legal agreement.	<p>Comments noted: Recommend no change</p> <p>Sites P083 and P111 are not site allocations in the Local Plan. Their existing policy designation, as open space – outdoor sports typology (Site Ref: OS076) – is unaffected by the plan proposals.</p> <p>Any development proposals at this location will be subject to the policy tests outlined in Local Plan Policy DM31 and Policy CNDP10 and other relevant policies in the Colne Neighbourhood Development Plan (2023).</p> <p>The Information provided will inform future updates of the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA does not allocate land or grant planning permission for specific land uses. The</p>

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						<p>assessment is “policy off” and its outcome does not prejudice the plan-making plan or the decision-taking process.</p> <p>The SHLAA is just one part of the evidence used to inform the selection process for the site allocations proposed in the Local Plan. The designation of the sites as open space and their use for sport is recognised in the Sustainability Appraisal with both sites receiving negative scores for their impact under the health and well-being sustainability objectives (see Appendix 5 of the Sustainability Appraisal report).</p>
02086	H Devonport	Yes	No	<p>SHLAA Appendix 6:</p> <p>The consultation process to date has lacked in terms of consulting with local user groups of the playing usage or potential future use. I feel angry and frustrated that the user group has been ignored through the assessment of site P083 and P111. The summary assessment for P083 makes no reference of the spaces being regularly used for youth football matches and training. It should be noted that P111 and P083 are subject to s.106 agreements regarding their use and maintenance for sports.</p>	Updates to the assessments of P083 and P111.	<p>Comments noted: Recommend no change</p> <p>Sites P083 and P111 are not site allocations in the Local Plan. Their existing policy designation, as open space – outdoor sports typology (Site Ref: OS076) – is unaffected by the plan proposals.</p> <p>Any development proposals at this location will be subject to the policy tests outlined in Local Plan Policy DM31 and Policy CNDP10 and other relevant policies in the Colne Neighbourhood Development Plan (2023).</p> <p>The Information provided will inform future updates of the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA does not allocate land or grant planning permission for specific land uses. The assessment is “policy off” and its outcome does not prejudice the plan-making plan or the decision-taking process.</p> <p>The SHLAA is just one part of the evidence used to inform the selection process for the site allocations proposed in the Local Plan. The designation of the sites as open space and their use for sport is recognised in the Sustainability Appraisal with both sites receiving negative scores for their impact under the health and well-being sustainability objectives (see Appendix 5 of the Sustainability Appraisal report).</p>
02087	M Hollingsworth	Not specified	Not specified	<p>SHLAA Appendix 6:</p> <p>SHLAA site assessment: P083/P111.</p> <p>P083 also features sports pitches which are in use but are not reflected in the site specific assessment. Both P083 and P111 are restricted for sports use by the S.106 agreement covering the site.</p>	Amendments to site assessment for P083 / P111 to reflect active use and s.106 legal agreement.	<p>Comments noted: Recommend no change</p> <p>Sites P083 and P111 are not site allocations in the Local Plan. Their existing policy designation, as open space – outdoor sports typology (Site Ref: OS076) – is unaffected by the plan proposals.</p> <p>Any development proposals at this location will be subject to the policy tests outlined in Local Plan Policy DM31 and Policy CNDP10 and other relevant policies in the Colne Neighbourhood Development Plan (2023).</p> <p>The Information provided will inform future updates of the Strategic Housing Land Availability Assessment</p>

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						<p>(SHLAA). The SHLAA does not allocate land or grant planning permission for specific land uses. The assessment is “policy off” and its outcome does not prejudice the plan-making plan or the decision-taking process.</p> <p>The SHLAA is just one part of the evidence used to inform the selection process for the site allocations proposed in the Local Plan. The designation of the sites as open space and their use for sport is recognised in the Sustainability Appraisal with both sites receiving negative scores for their impact under the health and well-being sustainability objectives (see Appendix 5 of the Sustainability Appraisal report).</p>
02088	D Welburn	Not specified	Not specified	<p>SHLAA Appendix 6: SHLAA site assessment: P083/P111.</p> <p>P083 also features sports pitches which are in use but are not reflected in the site specific assessment. Both P083 and P111 are restricted for sports use by the S.106 agreement covering the site. The sites are protected for sports use through the Colne Neighbourhood Plan.</p>	Amendments to site assessment for P083 / P111 to reflect active use and s.106 legal agreement. Do not allocate P083/P111 for development.	<p>Comments noted: Recommend no change</p> <p>Sites P083 and P111 are not site allocations in the Local Plan. Their existing policy designation, as open space – outdoor sports typology (Site Ref: OS076) – is unaffected by the plan proposals.</p> <p>Any development proposals at this location will be subject to the policy tests outlined in Local Plan Policy DM31 and Policy CNDP10 and other relevant policies in the Colne Neighbourhood Development Plan (2023).</p> <p>The Information provided will inform future updates of the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA does not allocate land or grant planning permission for specific land uses. The assessment is “policy off” and its outcome does not prejudice the plan-making plan or the decision-taking process.</p> <p>The SHLAA is just one part of the evidence used to inform the selection process for the site allocations proposed in the Local Plan. The designation of the sites as open space and their use for sport is recognised in the Sustainability Appraisal with both sites receiving negative scores for their impact under the health and well-being sustainability objectives (see Appendix 5 of the Sustainability Appraisal report).</p>
02092	M Crowther	Not specified	Not specified	<p>SHLAA Appendix 6: SHLAA site assessment: P083/P111.</p> <p>P083 also features sports pitches which are in use but are not reflected in the site specific assessment. Both P083 and P111 are restricted for sports use by the S.106 agreement covering the site.</p>	Amendments to site assessment for P083/P111 to reflect active use and s.106 legal agreement.	<p>Comments noted: Recommend no change</p> <p>Sites P083 and P111 are not site allocations in the Local Plan. Their existing policy designation, as open space – outdoor sports typology (Site Ref: OS076) – is unaffected by the plan proposals.</p> <p>Any development proposals at this location will be subject to the policy tests outlined in Local Plan Policy DM31 and Policy CNDP10 and other relevant policies in the Colne Neighbourhood Development Plan (2023).</p>

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						<p>The Information provided will inform future updates of the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA does not allocate land or grant planning permission for specific land uses. The assessment is “policy off” and its outcome does not prejudice the plan-making plan or the decision-taking process.</p> <p>The SHLAA is just one part of the evidence used to inform the selection process for the site allocations proposed in the Local Plan. The designation of the sites as open space and their use for sport is recognised in the Sustainability Appraisal with both sites receiving negative scores for their impact under the health and well-being sustainability objectives (see Appendix 5 of the Sustainability Appraisal report).</p>
02095	T Welburn	Not specified	Not specified	<p>SHLAA Appendix 6: SHLAA site assessment: P083/P111.</p> <p>P083 also features sports pitches which are in use but are not reflected in the site specific assessment. Both P083 and P111 are restricted for sports use by the S.106 agreement covering the site.</p>	Amendments to site assessment for P083 / P111 to reflect active use and s.106 legal agreement.	<p>Comments noted: Recommend no change</p> <p>Sites P083 and P111 are not site allocations in the Local Plan. Their existing policy designation, as open space – outdoor sports typology (Site Ref: OS076) – is unaffected by the plan proposals.</p> <p>Any development proposals at this location will be subject to the policy tests outlined in Local Plan Policy DM31 and Policy CNDP10 and other relevant policies in the Colne Neighbourhood Development Plan (2023).</p> <p>The Information provided will inform future updates of the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA does not allocate land or grant planning permission for specific land uses. The assessment is “policy off” and its outcome does not prejudice the plan-making plan or the decision-taking process.</p> <p>The SHLAA is just one part of the evidence used to inform the selection process for the site allocations proposed in the Local Plan. The designation of the sites as open space and their use for sport is recognised in the Sustainability Appraisal with both sites receiving negative scores for their impact under the health and well-being sustainability objectives (see Appendix 5 of the Sustainability Appraisal report).</p>
02111	E Fallows	Not specified	Not specified	<p>SHLAA Appendix 6: SHLAA site assessment: P083/P111.</p> <p>P083 also features sports pitches which are in use but are not reflected in the site specific assessment. Both P083 and P111 are restricted for sports use by the S.106 agreement covering the site.</p>	Amendments to site assessment for P083 / P111 to reflect active use and s.106 legal agreement.	<p>Comments noted: Recommend no change</p> <p>Sites P083 and P111 are not site allocations in the Local Plan. Their existing policy designation, as open space – outdoor sports typology (Site Ref: OS076) – is unaffected by the plan proposals.</p> <p>Any development proposals at this location will be subject to the policy tests outlined in Local Plan Policy DM31 and Policy CNDP10 and other relevant</p>

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						<p>policies in the Colne Neighbourhood Development Plan (2023).</p> <p>The Information provided will inform future updates of the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA does not allocate land or grant planning permission for specific land uses. The assessment is “policy off” and its outcome does not prejudice the plan-making plan or the decision-taking process.</p> <p>The SHLAA is just one part of the evidence used to inform the selection process for the site allocations proposed in the Local Plan. The designation of the sites as open space and their use for sport is recognised in the Sustainability Appraisal with both sites receiving negative scores for their impact under the health and well-being sustainability objectives (see Appendix 5 of the Sustainability Appraisal report).</p>
02114	S Rennie Fallows	Not specified	Not specified	<p>SHLAA Appendix 6:</p> <p>SHLAA site assessment: P083/P111.</p> <p>P083 also features sports pitches which are in use but are not reflected in the site specific assessment. Both P083 and P111 are restricted for sports use by the S.106 agreement covering the site.</p>	Amendments to site assessment for P083 / P111 to reflect active use and s.106 legal agreement.	<p>Comments noted: Recommend no change</p> <p>Sites P083 and P111 are not site allocations in the Local Plan. Their existing policy designation, as open space – outdoor sports typology (Site Ref: OS076) – is unaffected by the plan proposals.</p> <p>Any development proposals at this location will be subject to the policy tests outlined in Local Plan Policy DM31 and Policy CNDP10 and other relevant policies in the Colne Neighbourhood Development Plan (2023).</p> <p>The Information provided will inform future updates of the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA does not allocate land or grant planning permission for specific land uses. The assessment is “policy off” and its outcome does not prejudice the plan-making plan or the decision-taking process.</p> <p>The SHLAA is just one part of the evidence used to inform the selection process for the site allocations proposed in the Local Plan. The designation of the sites as open space and their use for sport is recognised in the Sustainability Appraisal with both sites receiving negative scores for their impact under the health and well-being sustainability objectives (see Appendix 5 of the Sustainability Appraisal report).</p>
Local Green Space Assessment and Methodology Report (Pendle Borough Council, 2024)						
01932	Emery Planning for Lenches Rd, Colne Landowner	Not specified	Not specified	Even should the site be found to be ‘demonstrably special’ the Council must conduct a balancing exercise as to consistency with sustainable development and that a designated LGS is capable of enduring beyond the plan period. We are not aware of	Remove LGS/LP4/DM12/026 as a proposed Local Green Space Designation and allocate for housing (site P152).	<p>Comments noted: Recommend no change</p> <p>The balancing exercise is included within the Local Green Space Methodology and Assessment report.</p>

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				<p>this being undertaken. The draft NPPF sets out transitional arrangements and the Council will be required to review the Local Plan at the earliest opportunity to address the shortfall in housing need (against the 382 new standard method figure for Pendle). It is critical that the Local Plan does not place restrictions that would undermine a future plan review given the extent of the shortfall if the plan is adopted. As a result it cannot be said that any LGS site is capable of enduring beyond 2040. Furthermore it is noted that the Council is failing to meet the significant affordable housing need identified through the HEDNA. The site is well placed to respond to this need at the edge of Colne, in compliance with the spatial strategy.</p>		<p>The Council's response to the assertions made in relation to the Council's assessment of the site can be found in Appendix 6 of the Consultation Statement.</p> <p>At the time of the Regulation 19 public consultation the proposed revisions to the NPPF remained in draft form and its policies are not yet engaged for the purpose of plan making.</p> <p>The Pendle Local Plan will proceed under the transitional arrangements set out in NPPF (2024) Annex 1. These recognise the advanced stage that has been reached in the preparation of the Local Plan, and the amount of time and resources which have been spent on its preparation, and the pressing need to review and update the policies in the statutory development plan for Pendle, where the strategic policies are now nine-years old and several development management policies are in excess of 18-years old.</p> <p>As the Local Plan will be examined against the policies of the NPPF (2023) it is for the next Local Plan to respond to the policies in any new version(s) of the NPPF.</p> <p>In accordance with Written Ministerial Statement 'Building the Homes we Need' publication 12 December 2024 (HCWS308), a Local Development Scheme is to be published advising of the timescales of preparation of a new Local Plan which will commence on the enactment of the Levelling Up and Regeneration Act 2023.</p>
01932	Emery Planning for Lenches Rd, Colne Landowner	Not specified	Not specified	<p>The Council's assessment of LGS/LP4/DM12/026 fails to show that the site is demonstrably special. There is no evidence or basis for the conclusions reached and the Council's assessment is vague with generalised assertions which could be equally applied to any edge of settlement location in Colne. In support of our argument we make the following points:</p> <ul style="list-style-type: none"> The site was not considered to be of sufficient value to warrant designation through the Colne Neighbourhood Development Plan. The site has never been identified by the Council as being of any particular public value in terms of its ecology, historic significance, beauty, or tranquillity. The site forms part of an extensive area of open countryside surrounding Colne. PPG is clear that such locations are not suitable for LGS. Any value of the site for assessed criteria falls very short of what could be considered 	Remove LGS/LP4/DM12/026 as a proposed Local Green Space Designation.	<p>Comments noted: Recommend no change</p> <p>The Council's assessment of site LGS/LP4/DM12/026 can be found within the Local Green Space Methodology and Assessment Report.</p> <p>The Council's response to the assertions made in relation to the Council's assessment of the site can be found in Appendix 6 of the Consultation Statement.</p> <p>At the time of the Regulation 19 public consultation the proposed revisions to the NPPF remained in draft form and its policies are not yet engaged for the purpose of plan making.</p>

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				<p>demonstrably special which is a very high threshold.</p> <ul style="list-style-type: none"> The site is not reasonably close to the community served. The only public access is physically isolated from the population with no desirable or suitable public access. The site forms an extensive tract of land. LGS would not be consistent with the local planning of sustainable development and would not endure beyond the plan period. <p>Recent opportunity to put the site forward for LGS were not taken up. Long term association and aspiration for designation is not demonstrated.</p>		
02110	Cllr B Wildman	Not specified	Not specified	<p>Assessment of Dewhurst Street Community Space Colne Site reference LGS/LP4/DM12/028:</p> <p>Colne Town Council support the assessment.</p> <p>Reference to the open space designation is incorrect and should be AG164.</p> <p>Disagreement is limited as to whether the site is ‘demonstrably special to the community.’ The assessment makes an accurate account of the Growing Together Community Environmental Award which was presented to The Friends of Dewhurst Street Community Space jointly by Waterside Neighbourhood Action Group and Colne in Bloom in 2022. The assessor fails to acknowledge the local landmarks which are visible from the space.</p>	Update assessment to show is as being endorsed by the Town Council and the correct Open Space reference numbers. Revise the assessment to show that it is demonstrably special to the community and designate the site as Local Green Space.	<p>Comments noted: Recommend no change</p> <p>Note the error regarding the open space site reference, which will be amended in any future update.</p> <p>Note the points highlighting why the site is considered to be demonstrably special to the local community. However, the Council maintains that the site although well maintained and appreciated does not meet the high test of being ‘demonstrably special’ and as such does not qualify for designation as Local Green Space. The full reasoning is set out in the Local Green Space Methodology and Assessment report and Consultation Statement.</p>
Open Space Audit (Pendle Borough Council, 2019)						
00471	Sport England	No	No	Open Space Audit is dated and predates the Playing Pitch Strategy and Outdoor Sports Study. It applies standards and typologies that Sport England do not support and diverges from national planning policy.	Revise Open Space Audit.	<p>Comments noted: Recommend no change</p> <p>The Local Plan uses proportionate evidence based on the existing resources available to the Council. The Open Space Audit will be updated in due course, as time and resources permit. The policies in the Local Plan offer protection to existing open space, which reflects the requirements of the NPPF.</p>
Playing Pitch and Outdoor Sport Strategy and Action Plan (Knight, Kavanagh and Page, 2024)						
01835	E Thorley	Not specified	Not specified	<p>Playing Pitch Strategy and Action Plan Page 59 – Site 1: Barrowford Road Playing Fields, Colne</p> <p>There are three pitches at the site not two.</p> <p>The site is subject to a S.106 agreement with clear obligations on Nelson and Colne College regarding maintenance. Current status as ‘poor quality’ ignores the fact that the pitches could be further enhanced by the Council enforcing the S.106 on the College. This assessment also ignores that the quality of these pitches has improved significantly in the last few</p>	Recommendation for Barrowford Road Playing Fields should be amended to ‘work with the College to ensure maintenance of the pitches is in line with the S106 obligations as per the first schedule dated 17 September 2010.	<p>Comments noted: Recommend no change</p> <p>The Playing Pitch Strategy and Action Plan (2024) provide a strategic framework for the maintenance and improvement of existing playing pitches to 2040. The strategy takes account of the findings in the accompanying Assessment Report (March 2024), which provides details of the stakeholder engagement and public consultation that has taken place.</p> <p>Both reports have been prepared in accordance with Sport England’s Playing Pitch Strategy Guidance and Sport England’s Assessing Needs and Opportunities</p>

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				years which has resulted in their increased use by local junior sports teams.		guide. Sport England, local sporting clubs and organisations were actively engaged in the preparation of both documents and the Council considers that the reports and their findings provide a robust basis for plan-making. They also provide an up-to-date evidence base that helps to inform and assist with the implementation of the Council's policies on green infrastructure (DM06) and open space (DM31) insofar as they address sports pitch provision.
01836	S Thorley	Not specified	Not specified	<p>Playing Pitch Strategy and Action Plan Page 59 – Site 1: Barrowford Road Playing Fields, Colne</p> <p>There are three pitches at the site not two.</p> <p>The site is subject to a S.106 agreement with clear obligations on Nelson and Colne College regarding maintenance. Current status as 'poor quality' ignores the fact that the pitches could be further enhanced by the Council enforcing the S.106 on the College. This assessment also ignores that the quality of these pitches has improved significantly in the last few years which has resulted in their increased use by local junior sports teams.</p>	Recommendation for Barrowford Road Playing Fields should be amended to 'work with the College to ensure maintenance of the pitches is in line with the S106 obligations as per the first schedule dated 17 September 2010.	<p>Comments noted: Recommend no change</p> <p>The Playing Pitch Strategy and Action Plan (2024) provide a strategic framework for the maintenance and improvement of existing playing pitches to 2040. The strategy takes account of the findings in the accompanying Assessment Report (March 2024), which provides details of the stakeholder engagement and public consultation that has taken place.</p> <p>Both reports have been prepared in accordance with Sport England's Playing Pitch Strategy Guidance and Sport England's Assessing Needs and Opportunities guide. Sport England, local sporting clubs and organisations were actively engaged in the preparation of both documents and the Council considers that the reports and their findings provide a robust basis for plan-making. They also provide an up-to-date evidence base that helps to inform and assist with the implementation of the Council's policies on green infrastructure (DM06) and open space (DM31) insofar as they address sports pitch provision.</p>
02082	V Devonport	Yes	No	<p>Playing Pitch Strategy and Action Plan Page 59 – Site 1: Barrowford Road Playing Fields, Colne</p> <p>There are three pitches at the site not two.</p> <p>The site is subject to a S.106 agreement with clear obligations on Nelson and Colne College regarding maintenance. Current status as 'poor quality' ignores the fact that the pitches could be further enhanced by the Council enforcing the S.106 on the College. This assessment also ignores that the quality of these pitches has improved significantly in the last few years which has resulted in their increased use by local junior sports teams.</p>	Recommendation for Barrowford Road Playing Fields should be amended to 'work with the College to ensure maintenance of the pitches is in line with the S106 obligations as per the first schedule dated 17 September 2010.	<p>Comments noted: Recommend no change</p> <p>The Playing Pitch Strategy and Action Plan (2024) provide a strategic framework for the maintenance and improvement of existing playing pitches to 2040. The strategy takes account of the findings in the accompanying Assessment Report (March 2024), which provides details of the stakeholder engagement and public consultation that has taken place.</p> <p>Both reports have been prepared in accordance with Sport England's Playing Pitch Strategy Guidance and Sport England's Assessing Needs and Opportunities guide. Sport England, local sporting clubs and organisations were actively engaged in the preparation of both documents and the Council considers that the reports and their findings provide a robust basis for plan-making. They also provide an up-to-date evidence base that helps to inform and assist with the implementation of the Council's policies on green infrastructure (DM06) and open</p>

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						space (DM31) insofar as they address sports pitch provision.
02084	L Hallinan	Not specified	Not specified	<p>Playing Pitch Strategy and Action Plan Page 59 – Site 1: Barrowford Road Playing Fields, Colne</p> <p>There are three pitches at the site not two.</p> <p>The site is subject to a S.106 agreement with clear obligations on Nelson and Colne College regarding maintenance. Current status as ‘poor quality’ ignores the fact that the pitches could be further enhanced by the Council enforcing the S.106 on the College. This assessment also ignores that the quality of these pitches has improved significantly in the last few years which has resulted in their increased use by local junior sports teams.</p>	Recommendation for Barrowford Road Playing Fields should be amended to ‘work with the College to ensure maintenance of the pitches is in line with the S106 obligations as per the first schedule dated 17 September 2010.	<p>Comments noted: Recommend no change</p> <p>The Playing Pitch Strategy and Action Plan (2024) provide a strategic framework for the maintenance and improvement of existing playing pitches to 2040. The strategy takes account of the findings in the accompanying Assessment Report (March 2024), which provides details of the stakeholder engagement and public consultation that has taken place.</p> <p>Both reports have been prepared in accordance with Sport England’s Playing Pitch Strategy Guidance and Sport England’s Assessing Needs and Opportunities guide. Sport England, local sporting clubs and organisations were actively engaged in the preparation of both documents and the Council considers that the reports and their findings provide a robust basis for plan-making. They also provide an up-to-date evidence base that helps to inform and assist with the implementation of the Council’s policies on green infrastructure (DM06) and open space (DM31) insofar as they address sports pitch provision.</p>
02085	C Jeffery	Not specified	Not specified	<p>Concerned that the consultants writing the documents ‘Sports Strategy and Action Plan’ did not discuss any aspects of its content with myself, as we are one of the biggest football clubs in Pendle, and the biggest user of the Barrowford Road pitches.</p>	None specified.	<p>Comments noted: Recommend no change</p> <p>The Playing Pitch Strategy and Action Plan (2024) provide a strategic framework for the maintenance and improvement of existing playing pitches to 2040. The strategy takes account of the findings in the accompanying Assessment Report (March 2024), which provides details of the stakeholder engagement and public consultation that has taken place.</p> <p>Both reports have been prepared in accordance with Sport England’s Playing Pitch Strategy Guidance and Sport England’s Assessing Needs and Opportunities guide. Sport England, local sporting clubs and organisations were actively engaged in the preparation of both documents and the Council considers that the reports and their findings provide a robust basis for plan-making. They also provide an up-to-date evidence base that helps to inform and assist with the implementation of the Council’s policies on green infrastructure (DM06) and open space (DM31) insofar as they address sports pitch provision.</p>
02086	H Devonport	Yes	No	<p>Playing Pitch Strategy and Action Plan Page 59 – Site 1: Barrowford Road Playing Fields, Colne</p> <p>There are three pitches at the site not two.</p> <p>The site is subject to a S.106 agreement with clear obligations on Nelson and Colne College regarding maintenance. Current status as ‘poor quality’ ignores</p>	Recommendation for Barrowford Road Playing Fields should be amended to ‘work with the College to ensure maintenance of the pitches is in line with the S106 obligations as per the first schedule dated 17 September 2010.	<p>Comments noted: Recommend no change</p> <p>The Playing Pitch Strategy and Action Plan (2024) provide a strategic framework for the maintenance and improvement of existing playing pitches to 2040. The strategy takes account of the findings in the accompanying Assessment Report (March 2024),</p>

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				the fact that the pitches could be further enhanced by the Council enforcing the S.106 on the College. This assessment also ignores that the quality of these pitches has improved significantly in the last few years which has resulted in their increased use by local junior sports teams.		<p>which provides details of the stakeholder engagement and public consultation that has taken place.</p> <p>Both reports have been prepared in accordance with Sport England's Playing Pitch Strategy Guidance and Sport England's Assessing Needs and Opportunities guide. Sport England, local sporting clubs and organisations were actively engaged in the preparation of both documents and the Council considers that the reports and their findings provide a robust basis for plan-making. They also provide an up-to-date evidence base that helps to inform and assist with the implementation of the Council's policies on green infrastructure (DM06) and open space (DM31) insofar as they address sports pitch provision.</p>
02087	M Hollingsworth	Not specified	Not specified	<p>Playing Pitch Strategy and Action Plan Page 59 – Site 1: Barrowford Road Playing Fields, Colne</p> <p>There are three pitches at the site not two.</p> <p>The site is subject to a S.106 agreement with clear obligations on Nelson and Colne College regarding maintenance. Current status as 'poor quality' ignores the fact that the pitches could be further enhanced by the Council enforcing the S.106 on the College. This assessment also ignores that the quality of these pitches has improved significantly in the last few years which has resulted in their increased use by local junior sports teams.</p>	Revise and correct assessment of the site in the Playing Pitch Strategy.	<p>Comments noted: Recommend no change</p> <p>The Playing Pitch Strategy and Action Plan (2024) provide a strategic framework for the maintenance and improvement of existing playing pitches to 2040. The strategy takes account of the findings in the accompanying Assessment Report (March 2024), which provides details of the stakeholder engagement and public consultation that has taken place.</p> <p>Both reports have been prepared in accordance with Sport England's Playing Pitch Strategy Guidance and Sport England's Assessing Needs and Opportunities guide. Sport England, local sporting clubs and organisations were actively engaged in the preparation of both documents and the Council considers that the reports and their findings provide a robust basis for plan-making. They also provide an up-to-date evidence base that helps to inform and assist with the implementation of the Council's policies on green infrastructure (DM06) and open space (DM31) insofar as they address sports pitch provision.</p>
02088	D Welburn	Not specified	Not specified	<p>Playing Pitch Strategy and Action Plan Page 59 – Site 1: Barrowford Road Playing Fields, Colne</p> <p>There are three pitches at the site not two.</p> <p>The site is subject to a S.106 agreement with clear obligations on Nelson and Colne College regarding maintenance. Current status as 'poor quality' ignores the fact that the pitches could be further enhanced by the Council enforcing the S.106 on the College. This assessment also ignores that the quality of these pitches has improved significantly in the last few years which has resulted in their increased use by local junior sports teams.</p>	Revise and correct assessment of the site.	<p>Comments noted: Recommend no change</p> <p>The Playing Pitch Strategy and Action Plan (2024) provide a strategic framework for the maintenance and improvement of existing playing pitches to 2040. The strategy takes account of the findings in the accompanying Assessment Report (March 2024), which provides details of the stakeholder engagement and public consultation that has taken place.</p> <p>Both reports have been prepared in accordance with Sport England's Playing Pitch Strategy Guidance and Sport England's Assessing Needs and Opportunities guide. Sport England, local sporting clubs and organisations were actively engaged in the preparation of both documents and the Council considers that the reports and their findings provide a</p>

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02092	M Crowther	Not specified	Not specified	<p>Playing Pitch Strategy and Action Plan Page 59 – Site 1: Barrowford Road Playing Fields, Colne</p> <p>There are three pitches at the site not two.</p> <p>The site is subject to a S.106 agreement with clear obligations on Nelson and Colne College regarding maintenance. Current status as 'poor quality' ignores the fact that the pitches could be further enhanced by the Council enforcing the S.106 on the College. This assessment also ignores that the quality of these pitches has improved significantly in the last few years which has resulted in their increased use by local junior sports teams.</p>	Recommendation for Barrowford Road Playing Fields should be amended to 'work with the College to ensure maintenance of the pitches is in line with the S106 obligations as per the first schedule dated 17 September 2010.	<p>Comments noted: Recommend no change</p> <p>The Playing Pitch Strategy and Action Plan (2024) provide a strategic framework for the maintenance and improvement of existing playing pitches to 2040. The strategy takes account of the findings in the accompanying Assessment Report (March 2024), which provides details of the stakeholder engagement and public consultation that has taken place.</p> <p>Both reports have been prepared in accordance with Sport England's Playing Pitch Strategy Guidance and Sport England's Assessing Needs and Opportunities guide. Sport England, local sporting clubs and organisations were actively engaged in the preparation of both documents and the Council considers that the reports and their findings provide a robust basis for plan-making. They also provide an up-to-date evidence base that helps to inform and assist with the implementation of the Council's policies on green infrastructure (DM06) and open space (DM31) insofar as they address sports pitch provision.</p>
02095	T Welburn	Not specified	Not specified	<p>Playing Pitch Strategy and Action Plan Page 59 – Site 1: Barrowford Road Playing Fields, Colne</p> <p>There are three pitches at the site not two.</p> <p>The site is subject to a S.106 agreement with clear obligations on Nelson and Colne College regarding maintenance. Current status as 'poor quality' ignores the fact that the pitches could be further enhanced by the Council enforcing the S.106 on the College. This assessment also ignores that the quality of these pitches has improved significantly in the last few years which has resulted in their increased use by local junior sports teams.</p>	Recommendation for Barrowford Road Playing Fields should be amended to 'work with the College to ensure maintenance of the pitches is in line with the S106 obligations as per the first schedule dated 17 September 2010.	<p>Comments noted: Recommend no change</p> <p>The Playing Pitch Strategy and Action Plan (2024) provide a strategic framework for the maintenance and improvement of existing playing pitches to 2040. The strategy takes account of the findings in the accompanying Assessment Report (March 2024), which provides details of the stakeholder engagement and public consultation that has taken place.</p> <p>Both reports have been prepared in accordance with Sport England's Playing Pitch Strategy Guidance and Sport England's Assessing Needs and Opportunities guide. Sport England, local sporting clubs and organisations were actively engaged in the preparation of both documents and the Council considers that the reports and their findings provide a robust basis for plan-making. They also provide an up-to-date evidence base that helps to inform and assist with the implementation of the Council's policies on green infrastructure (DM06) and open space (DM31) insofar as they address sports pitch provision.</p>
02112	E Fallows	Not specified	Not specified	<p>Playing Pitch Strategy and Action Plan Page 59 – Site 1: Barrowford Road Playing Fields, Colne</p>	Recommendation for Barrowford Road Playing Fields should be amended to 'work with the College to	Comments noted: Recommend no change

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02114	S Rennie Fallows	Not specified	Not specified	<p>Playing Pitch Strategy and Action Plan Page 59 – Site 1: Barrowford Road Playing Fields, Colne</p> <p>There are three pitches at the site not two.</p> <p>The site is subject to a S.106 agreement with clear obligations on Nelson and Colne College regarding maintenance. Current status as ‘poor quality’ ignores the fact that the pitches could be further enhanced by the Council enforcing the S.106 on the College. This assessment also ignores that the quality of these pitches has improved significantly in the last few years which has resulted in their increased use by local junior sports teams.</p>	Recommendation for Barrowford Road Playing Fields should be amended to ‘work with the College to ensure maintenance of the pitches is in line with the S106 obligations as per the first schedule dated 17 September 2010.	<p>Comments noted: Recommend no change</p> <p>The Playing Pitch Strategy and Action Plan (2024) provide a strategic framework for the maintenance and improvement of existing playing pitches to 2040. The strategy takes account of the findings in the accompanying Assessment Report (March 2024), which provides details of the stakeholder engagement and public consultation that has taken place.</p> <p>Both reports have been prepared in accordance with Sport England’s Playing Pitch Strategy Guidance and Sport England’s Assessing Needs and Opportunities guide. Sport England, local sporting clubs and organisations were actively engaged in the preparation of both documents and the Council considers that the reports and their findings provide a robust basis for plan-making. They also provide an up-to-date evidence base that helps to inform and assist with the implementation of the Council’s policies on green infrastructure (DM06) and open space (DM31) insofar as they address sports pitch provision.</p>
Green Infrastructure Strategy (LUC, 2019)						
00471	Sport England	No	No	Green Infrastructure Strategy uses out-of-date typology and references the Open Space Audit which is itself is out-of-date. Does not reflect the NPPF.	Revised Green Infrastructure Strategy.	<p>Comments noted: Recommend no change</p> <p>The Local Plan uses proportionate evidence. It is based on the most up-to-date resources available to the Council. The Open Space Audit will be updated in due course, as time and resources permit. The policies in the Local Plan offer protection to existing open space, which reflects the requirements of the NPPF.</p>

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Biodiversity Audit (Pendle Borough Council, 2010)						
00564	Lancashire Wildlife Trust	No	No	The Pendle Biodiversity Audit (2010) referred to in the Local Plan is approaching 15-years of age and has not been updated in line with national planning policy and the combined implications of the climate change emergency and biodiversity crisis.	The Biodiversity Audit should be updated.	<p>Comments noted: Recommend no change</p> <p>In the absence of any borough-wide information addressing the presence or condition of habitats and species in the borough, Pendle Council prepared a Biodiversity Audit in 2010. It is still the only local planning authority, or organisation, in Lancashire to have conducted such an exercise and publish the information, and there is no requirement in national planning policy to produce such a document or update it</p> <p>The Pendle Biodiversity Audit, as its title makes clear, was never intended to be a strategy. It simply established a baseline position for plan-making in Pendle and retains some limited value in this respect.</p> <p>The Council no longer has the in-house expertise or resources available to update this document but would note that the emerging Lancashire Local Nature Recovery Strategy (LNRS) should provide a more up-to-date understanding the biodiversity assets of the borough. Failing this a specialist organisation such as the Lancashire Wildlife Trust may wish to take on the role.</p> <p>The approach taken by the Council is considered to be reasonable and proportionate in this context.</p>
MISCELLANEOUS COMMENTS						
00729	Cllr S Cockburn-Price	Not specified	Not specified	I am a Colne Town Councillor and Chair of the Neighbourhood Development Plan sub-group and former Chair of Colne Town Council. I concur with all the points raised by the Town Council in its response to this consultation.	None specified.	<p>Comments noted: Recommend no change</p> <p>See the Council's responses to Colne Town Council representation (ID 01644).</p>
00729	Cllr S Cockburn-Price	Not specified	Not specified	I am co-founder of Lidgett and Beyond and concur with all the points raised by that charity in its response to this consultation.	None specified.	<p>Comments noted: Recommend no change</p> <p>See the Council's responses to the Lidgett and Beyond representation (ID 00294).</p>
01393	R Whiteoak	Not specified	Not specified	Submission of a letter requesting that the speed limit along Salterforth Lane, Salterforth is lowered to 20mph.	None specified.	<p>Comments noted: Recommend no change</p> <p>The representation does not relate to a proposal in the Local Plan.</p> <p>The comment submitted addresses vehicular access and highway safety at a site (P016) considered as a potential housing site allocation, which has not been taken forward in this iteration of the Local Plan (Policy AL01), as it is not required to meet the proposed housing requirement set out in Policy DM20.</p>
01701	R Jenkins	Yes	Yes	(Policy DM02(a)) Very important to stop flooding to our lower land areas like Waterside.	None specified.	<p>Comments noted: Recommend no change</p>

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01871	B J Reynolds	Not specified	Not specified	Developments should be located in a considered and planned manner driven by the Council. Property types should reflect the needs of the community, make efficient use of land, and respond to affordable housing needs. Scope for variation of planning conditions should be limited. These variations should be considered at committee not by the planning department.	None specified.	Comments noted: Recommend no change The spatial strategy seeks to promote sustainable development by directing growth towards existing settlements. The approach reflects the size, role, and level of service provision within a particular settlement and the settlements wider accessibility to public transport, sources of employment, shops, and other essential services. The adoption of the Local Plan will facilitate a plan-led approach that is consistent with national policy and helps to strengthen local decision making.
01954	B Holmes	Yes	Yes	Keep the countryside for future generations to enjoy.	None specified.	Comments noted: Recommend no change
01969	J Blackburn	Yes	Yes	You will destroy your best assets by building in and around Pendle.	None specified.	Comments noted: Recommend no change
02081	S Henshaw	Yes	Yes	No comments provided.	None specified	Support welcomed
02118	P Wilkinson	Yes	Yes	I represent the people of Halifax Road who will be affected by the development of a new cemetery. Part of the plan affects me and my neighbours.	None specified.	Comments noted: Recommend no change The proposals for a new cemetery on Halifax Road, Nelson are not related to the Local Plan.
02120	J Cockell	Yes	Yes	For far too long decisions about our area have been rode roughshod over. We need to protect our beautiful surroundings before it is too late.	None specified.	Comments noted: Recommend no change
02121	A Simcock	Yes	Yes	Have read the Local Plan but unsure if I have a faith or trust in the plan being delivered correctly and as planned.	None specified.	Comments noted: Recommend no change The Local Plan adopts a monitoring framework which sets out a series of indicators tailored to assess the implementation of the plan (Appendix 10). Targets and thresholds are identified to ensure that developed delivered over the plan period is consistent with the policies of the Local Plan. The Council will report on this every year with the publication of the Authority Monitoring Report (AMR) which will assess performance against these indicators and set out recommended actions.
02137	M Fairless	Yes	Yes	Not had time to go through documents or attend the meetings explaining the documents.	None specified.	Comments noted: Recommend no change
NO COMMENT						
01659	Health and Safety Executive	Not specified	Not specified	HSE is not a statutory consultee for local and neighbourhood plans. Your attention is drawn to the planning policy guidance for England.	None specified.	Comments noted: Recommend no change
01869	Homes England	Not specified	Not specified	Homes England does not wish to make any representations to this consultation.	None specified.	Comments noted: Recommend no change
02002	Kirklees Council	Not specified	Not specified	Kirklees have no comments to make at this time.	None specified.	Comments noted: Recommend no change
02053	Burnley Civic Trust	Not specified	Not specified	The Trust has insufficient knowledge of Pendle District to make comment on the Local Plan.	None specified.	Comments noted: Recommend no change

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02073	Active Travel England	Not specified	Not specified	Active Travel England is not a statutory consultee for plan-making.	None specified	Comments noted: Recommend no change
02077	National Highways	Not specified	Not specified	<p>The extent of the National Highways management of the M65 extends from Junction 1 to Junction 10 at Burnley, with Lancashire County Council assuming responsibility for the remaining junctions and carriageway. The primary junctions which would experience a direct impact as a consequence of the Local Plan development and policies within the Borough of Pendle would be Junctions 14, 13 and 12, which are therefore outside of the SRN.</p> <p>Having read through the updated/ amended version of the Local Plan, National Highways has no specific comments regard any of the amendments proposed but would welcome a continued dialogue with Pendle Council as the Local Plan goes through the next stage.</p>	None specified	Comments noted: Recommend no change