



Trawden Forest Parish Council's response to Pendle Council's Local Plan Consultation

December 2024

SP08. We broadly support these policies on the Natural Environment, but the words '*landscape character*' 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 similar sized piece of land near to the application site and manage it proactively for that species for a period of thirty years. Trawden Forest, a predominantly rural area, is home to important breeding grounds for lapwings and curlews, both of which are red-listed species of high conservation concern. Lapwings, with their distinctive tumbling flight, and curlews, known for their evocative calls, play a vital role in the local ecosystem. However, both species have experienced significant population declines due to habitat loss and disturbance. Protecting their breeding habitats in Trawden Forest is crucial not only for preserving biodiversity but also for maintaining the ecological balance and cultural heritage of the area. Development policies must, therefore, incorporate measures to safeguard these species and their habitats to prevent further decline.

SP12. We do not support the deletion of point 2.C '*Deliver Biodiversity Net Gain and ensure sufficient funding for long term management and monitoring (Policy DM04)*'. We feel that this point should be reinstated.

DM03. We disagree with the deletion of this clause from 7b on Wind Turbines: '*...and that the proposal has the backing of the local communities that have been consulted*'. Any future developments of on-shore wind should be analysed in detail and factor in the negative impacts on long range views. Our Neighbourhood plan in Policy 7 states that developments should '*consider the impact on long range views of the area from the roads and footpaths*'.

DM12. Whilst we support this policy, we would like to see more Green Spaces within Pendle including Trawden Forest. As a Parish we have 3 areas of Local Green Spaces and in the last 12 months we highlighted several areas to become designated Green Spaces which, only a small percentage have been accepted despite adhering to the criteria. We would like to see these additional green spaces protected.

DM17. We support this policy. We also have a policy under Policy 6 in the Trawden Forest Neighbourhood Plan 'Heritage Assets' which explains in detail how developments should

respect our heritage assets. We have also compiled a list of local heritage assets that we would like protecting by adding them to the Pendle Borough Council List.

<https://www.trawdenparishcouncil.org.uk/wp-content/uploads/go-x/u/3e6eb1f9-f07f-48d3-a910-f4b88742b6d0/Amended-Local-List-V2-27th-Jan-2021.pdf>

DM19 Section 6. Trawden Forest Parish Council disputes various items within Section 6. 57.5% of the housing stock within Trawden Forest is terraced housing and to state within the Pendle's Local Plan that there is *'a distinct correlation between the quality of house and deprivation levels'* is incorrect.

Prices of terraced houses within Trawden Forest are affordable and they are built to last, that is why there are so many 18th and 19th century terraced houses within the Parish, new housing developments in contrast are only designed to have a limited lifespan of 80 years. Terraced houses can be made to be sustainable with current insulation innovations. Together Housing who are Pendle's social housing provides are retrofitting its entire estate with modern insulation and green energy sources and our neighbouring borough Rossendale are developing actions to improve the sustainability of the terraced houses within the borough, making them warm, affordable and low emissions homes.

<https://rvenergy.org.uk/terraced-streets/#:~:text=Net%20Zero%20Terrace%20Streets%20is,no%20upfront%20cost%20to%20householders>

Our Neighbourhood Plan has been developed in favour of sustainable development and has highlighted a range of sites for new housing. <https://www.trawdenparishcouncil.org.uk/wp-content/uploads/go-x/u/10e58f32-5c06-483c-984c-af3037fc2022/TFNP-Final-Version-Autumn-2018-17th-Sept.pdf>

DM20. We fully support para 6.37 *'if we do not make informed choices about where new housing should be located, supply will be driven by housebuilders through the submission of ad-hoc planning applications. In the absence of site allocations, it is harder for the Council to resist such applications, bringing uncertainty to our communities, and a pattern of development that does not properly reflect the spatial strategy'*

DM22. We do not support the assertions in para 6.53. The Parish Council believes attached houses can be inherently more sustainable and make more efficient use of land, allowing for the creation of larger and more functional green spaces. Older terraced houses can be upgraded to meet modern insulation and living standards, and new, larger attached family homes can be designed to appeal to contemporary buyers, as demonstrated in cities such as Harrogate, Bath, Exeter, Lancaster, and Cheltenham. While there are examples of poor-quality terraced houses in the wards mentioned, these issues often stem from substandard repairs rather than intrinsic structural problems that cannot be addressed. Not all terraced houses in Pendle are small. Many boast three, four, or even five bedrooms, with some

exceeding 3,000 square feet in size, offering spacious and desirable living environments. Please see this example in Trawden -

https://www.rightmove.co.uk/properties/155058548#/?channel=RES_BUY

DM23. The Parish Council supports this policy on affordable housing and within our Neighbourhood Plan, Policy 2, we propose that developers provide 20% of the site as affordable houses (for sites of 5 or more dwellings).

DM24. We support these policies on Residential Extensions and Alterations and are pleased to see the addition to para 6.88.

DM25. We strongly support Residential Conversions, as they preserve and repurpose the majority of the building's embodied carbon, making them an environmentally sustainable choice. Additionally, if the host building has heritage value, conversions allow this character to be retained, enriching the neighbourhood's historical and cultural fabric.

DM26. We strongly support this policy on Housing in the Countryside.

DM31. The Parish Council supports this policy on Open Space, Sport and Recreation. The Parish Council has recently acquired Ball Grove Park and is currently in progress of working with the Borough Council to acquire the Trawden Recreational Ground.

DM33. The Parish Council does not support this policy. Although the Parish only has one Hot Food Takeaway, we still feel that additional hot food takeaways in our town centres within the Borough should be restricted. Within the Pendle Local Plan it states many times about the increasing obesity levels within Pendle are significantly higher than the regional and national average, particularly amongst young children.

DM35. We strongly support these policies on Cultural and Community Facilities. Our Parish is proud to say that we are the only place in Britain where the community own our Pub, Library, Shop and Community Centre, saving them all from closure. We also hosted Her Royal Highness, the Princess Royal in April who came to whiteness the community projects in our Parish.

DM39. We support this 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.

DM45. The Parish Council strongly supports these policies on Tourist Facilities and Accommodation.

On page 325 of the appendices, regarding Local Green Spaces and their designation, the Town Council strongly objects to the addition of extra questions to be answered on top of the three criteria specified in the NPPF. This means we do not agree with page 326, which sets out a flowchart. Instead, the three criteria in the NPPF:

- Is the site reasonably close to the community it serves?

- Is the site demonstrably special to the community?
- Is the site local in character and not an extensive tract of land?

are the sole criteria for designation as a Local Green Space that should be relied upon in the Pendle Local Plan