



December 2024

Colne Town Council's Response to Pendle Council's Local Plan Consultation

Colne Town Council, which has its own made Neighbourhood Plan, is broadly in support of the Pendle Borough Council Local Plan in its current form and praises Pendle's planning policy officers for taking into account climate change, for allocating housing sites predominantly on brownfield land, and for recognising the value of Local Green Spaces and the importance of heritage in many of the draft policies. This response will highlight areas we strongly support, as well as areas we believe should be redrafted and reflected in a final version.

SP01 We support the presumption in favour of Sustainable Development

SP02 We agree with the Spatial Strategy as laid out.

SP03 We agree with the Distribution of Development, as urban development is the most sustainable.

SP04 We agree with the Retail and Town Centre Hierarchy.

SP05 We support these policies concerned with the Green Belt, especially the retention of the Green Belt between Colne and the villages of Laneshaw Bridge, Foulridge and Trawden.

SP06 We broadly support the thrust of these policies on Zero Carbon, but feel mention should be made of local community energy networks exploiting canal hydropower (<https://our-power.co.uk/canal-based-hydropower-systems/#:~:text=Canal%20Hydropower%3A%20The%20Basics,canal's%20primary%20function%20of%20irrigation>).

SP07 We support the approaches to Water Management outlined in these policies.

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, 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.

SP09 We welcome these policies to protect Pendle's rich historic environment. In Colne, we have 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.

SP10 We support these policies on Healthy and Vibrant Communities, but strongly feel there should be more overt policies to curb the development of takeaways. Nelson suffers from both a surfeit of takeaways and poor overall community health, including high levels of childhood obesity. In our Neighbourhood Plan, we developed policies to limit the development of new takeaway outlets, not solely for health concerns, but also connected to keeping a diversity of active shop frontages and to limit litter. Our policy reads: *"Within the Primary Shopping Area, Primary Shopping Frontages and in predominantly residential blocks proposals for hot food takeaways will only be supported where they would be subsidiary to retail and other commercial uses and where amenity, litter and noise and general disturbance matters can be addressed in a satisfactory manner."* We feel strongly that there is now increased evidence and recognition of the link between takeaway density and number and poor community health (<https://www.health.org.uk/evidence-hub/our-surroundings/access-to-amenities/relationship-between-the-concentration-of-fast#:~:text=Living%20in%20an%20area%20with,to%20be%20in%20poor%20health>) and, as a result, we believe the discouragement of new takeaways should be reflected within a specific policy in Pendle's Local Plan.

SP11 The Town Council recognises the limited role Pendle Council plays in transport matters, but supports these policies, most especially the reinstatement of the Colne to Skipton Railway Line.

SP12. We support policy 2 re developer contributions for Open Space, Biodiversity Net Gain and Travel Plans where appropriate. We do not agree with the deletion of 2c: *"Deliver Biodiversity Net Gain and ensure sufficient funding for long-term management and monitoring (Policy DM04)"* and think it should be reinstated.

Para 4.175 notes: *"Due to concerns about viability, as set out in the Pendle Development Viability Study (2023), Pendle Council has not adopted a CIL Charging Schedule."* We think this decision puts Pendle, and also Colne, in a poorer situation than other local authorities which benefit from CIL. There is an argument that, because we are a poorer area, with higher levels of deprivation and therefore low viability, we actually need CIL more than other areas which are able to benefit from it. In addition, residents note the lack of developer contribution and, though they have to put up with all the disruption a development necessarily brings, they see no benefits to the wider community whatsoever. The Government should implement a policy of CIL

redistribution so that CIL from more affluent areas is shared with areas unable to levy CIL, owing to viability.

DM01 It is heartening to see that Climate Change Resilience is the first of the Development Management Policies and they broadly receive our support.

DM02 We support these policies on Flood Risk and the policies **DM02(b)**: Surface Water and Foul Water Management.

DM03 We broadly support these policies on Renewable Heat and Energy, especially those relating to community energy schemes. However, 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” and believe it should be reinstated. Any developments of on-shore wind in the future should be carefully grouped, following a careful analysis of important long-range views, so the wind turbines are not sited haphazardly in the landscape. Our Neighbourhood Plan has protected Long Range Views and these should not be compromised - 17 views in Rural Policy 6.4 are protected.

DM04 We support these policies and supporting text on Biodiversity Net Gain.

DM05 & DM06 We support the policies on Ecological Networks and Green Infrastructure.

DM07 We support these policies on Trees and Hedgerows. We additionally believe the Local Plan should remove the permitted development right to have closely boarded fences on publicly visible frontages, as Colne's Design Code does, as hedgerow is being removed at a rapid rate across the Borough. Two metre high closely boarded fences negatively impact street scenes and provide nowhere for wildlife to live. The Colne Design Code says: “*Boundary Treatments: Many of the terraces front directly onto the street, with no set back. Stone walls are the most common boundary, and uphold a traditional character and sense of consistency. Soft boundaries, such as hedges and landscaped gardens, also work well and help to blur plots with the surrounding countryside. Boundary Treatments (USBF14) – Panel fencing along publicly visible boundaries is considered inappropriate and should be avoided. – Traditional stone walls should be retained and reinforced with the line of other boundary treatments. – The replacement of walls and hedges with alternative fencing should be restricted and only allowed where appropriate.*” If the Pendle Local Plan were to adopt a similar policy on boundary treatments, more hedges would survive and more would be planted. Even traditional stone walls provide a better environment than boarded fences, owing to the nooks and crannies and the potential for mosses and lichens, as well as insects.

DM08 We support the policies on the South Pennine Moors, which are designed to protect them.

DM09 We support the policies on Open Countryside, which seek to protect and enhance it by preventing the coalescence of settlements, maintaining the predominantly open and undeveloped character of the open countryside, particularly in

the gaps between settlements and protecting the separate character and identity of settlements, including their setting. In our Neighbourhood Plan, we have afforded more protection to Open Countryside by specifying in CNDP 14 *“Within the countryside (the area outside the settlement boundary as defined on the Pendle Local Plan Policies Map), development should retain and enhance the rural identity and character of the neighbourhood area. As appropriate to their scale, nature and location...”* and *“Building form and style and layout of development should be consistent with the forms predominantly found within the rural area. Suburban and urban forms, styles and layouts will not be considered to meet this criterion”* and *“All development should include measures that seek to minimise the impact of car parking, garaging, garden landscaping and associated urban and suburban features so that the development will not have a significant adverse impact on rural identity and character”*. Given our low viabilities within the Borough, we would like to have seen Pendle Council adopt similar rural policies to prevent suburban sprawl in Open Countryside.

DM10 We support these policies on Landscape Character. As we are a Borough named after a hill in an upland landscape, views are very important to residents (policy 6f) 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, perhaps especially of Pendle Hill.

DM11 We support these policies on the Forest of Bowland Area of Outstanding Natural Beauty, as they seek to protect and enhance this area.

DM12 We support this policy on Local Green Space, but we would like to see more designated of all sizes and types, right across the Borough. 20 Local Green Spaces were designated in our Neighbourhood Plan and these are included in this draft Pendle Local Plan.

The Upper Rough in Colne has passed all three tests at independent examination, but the Inspector felt that he should not designate this valuable community space, which is home to the red-listed curlew, in case Pendle Council designated it for housing. Pendle Council has not designated it for housing and, indeed, we would have found it perverse if it had, given it passed all three tests in the NPPF. Pendle Council has put forward the Upper Rough as a Local Green Space in this draft of its Local Plan and we welcome this.

We also welcome the designation of the Lenches as an additional Local Green Space in the draft Local Plan, bringing the total number of Local Green Spaces in the final draft of the Local Plan in Colne to 22, some of which are double-designated. Colne's Local Green Spaces are scattered across its built form and come in all shapes and sizes, from small, formal spaces to larger, wider areas on the urban fringe. These 22 designations for Local Green Spaces are so important to Colne, given the very high proportion of dense, Victorian terrace housing (62%).

DM13 We support these policies on Environmental Protection. 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.

DM14 We support these policies on Contaminated and Unstable Land.

DM15 We support these policies on Soils, Minerals and Waste. We especially support 5.246, having recently been consulted on the excellent Colne Masterplan:
https://www.pendle.gov.uk/downloads/file/11961/colne_town_centre_masterplan

DM16 We support these policies on Design and Placemaking, especially the insertion of the words “*beautiful and sustainable*”, as given our low viabilities, we are often presented with “*acceptable*” and we believe that Pendle and Colne, especially, deserve better. For this reason, we developed a Design Code for Colne in our Neighbourhood Plan: <https://colnetowncouncil.org.uk/ctc/wp-content/uploads/2022/07/Colne-Design-Code-Report-2022.pdf> We especially support **paras 5.253 and 5.259**.

DM17 We support these principles on Advertising and Commercial Signage. We have added further context in our Neighbourhood Plan in relation to the Albert Road Conservation Area: <https://colnetowncouncil.org.uk/ctc/wp-content/uploads/2022/08/Conservation-Area-Guide-WEB.pdf> as insensitive advertising can have a negative impact on historic town centres.

DM18 Colne’s Heritage Assets are intensely valued by Colne Town Council, giving a real sense of pride in our history and architecture. We developed a list of non-designated heritage assets in our Neighbourhood Plan: https://colnetowncouncil.org.uk/ctc/wp-content/uploads/2022/08/Colne-Local-Heritage-List-2022-06-Final_compressed.pdf. Policy 4c should make reference to this document for development proposals in Colne and not just rely on the reference in the supporting text.

DM19 We support these policies on the Leeds and Liverpool Canal Corridor.

Section 6 Colne Town Council disputes many of the assertions made in this section. Colne Town Council supports terraced housing, and attached housing generally, as sustainable, affordable forms of development. 19th century houses have embodied carbon from 150 years ago. New housing, by contrast, is designed to have a limited lifespan of just 80 years and, in terms of materials, transportation and power required for construction, has an enormous negative impact on the environment. Older solid stone constructed houses might not be the most sustainable to heat, but that isn't to say they cannot be made so.

People are not deprived *because* they live in terraced houses, nor are terraced houses small, necessarily. Colne’s terraces are affordable at around £100-150,000, and they are available to be improved because they are so solidly built. Pendle’s principal social housing provider, Together Housing, is working to retrofit its entire estate with state-of-the-art insulation combined with green energy sources. This does potentially leave

private tenants and homeowners behind. Roughly 70% of Pendle's houses are of solid stone construction, but adding modern insulation materials could easily introduce damp and cause the houses to actually become colder. It is essential with traditional building methods that the building materials are breathable

If Pendle is considered overcrowded because it has households of two and a half people as an average, then most people are **not** living in overcrowded conditions. There is, however, a trend to extended families living together in the Borough **and this is to be encouraged** and should be factored in to new developments. A great example is the recent PEARL development on Carry Lane - the self-contained ground floor could be used for a dependent relative, or for a young adult yet to leave home. Over time, these houses could serve families flexibly in this way. These houses are semis and large terraces and the whole development's footprint is small. There is a crisis in social care and with young adults in this country. This is acknowledged with numerous articles and television programmes about poor mental health, self-harming and loneliness. Humans are social people, happiest living within supportive networks, such as extended families. Pendle's Development Management codes should recognise this fact. Residents often report that they *could* move, but they like where they live and so they choose to adapt their homes to cope with their changing circumstances. Asian origin communities report that they choose to live as extended families, as this is the pattern of living adopted by their ancestors overseas. These philosophies also build stronger, less transient and more resilient communities.

Most urban terraced houses in Pendle, whether old or new, have access to green spaces virtually on their doorstep, within a short walk of their homes. Much greening can take place within a typical terrace's yard or back alley and there are many wonderful examples of this in Colne - we simply need to promote this and encourage people. The Open Gate charity has built an ideal terraced yard in Colne and has demonstrated just what can be achieved, including growing vegetables.

Colne has in excess of 150 long term empty houses. Pendle Council does not have an accurate record of these properties. In Colne, all are sustainably located and also are affordable. It is a great pity that the reoccupation of these solid houses does not help with the Borough's housing target, as some are currently acting as a blight. All could be retrofitted with insulation and reoccupied, regenerating those communities especially Waterside, Horsfield and Vivary.

Our Neighbourhood Plan was positively prepared in favour of sustainable development and put forward a range of sites for new housing:

<https://colnetowncouncil.org.uk/ctc/wp-content/uploads/2022/08/Colne-Neighbourhood-Development-Plan-Site-Assessments-Report-03.08.22-1.pdf>. More sites were put forward by the recent Colne Masterplan, all of which we welcome. The dense development of these sites, within the settlement boundary, would have a positive impact on the regeneration of our town, as would the bringing back into use of the empty and derelict houses. A neighbouring borough is acting as a trail blazer in this sphere: <https://rvenergy.org.uk/terraced-streets/#:~:text=Net%20Zero%20Terrace%20Streets%20is,no%20upfront%20cost%20>

[to%20householders](#) aiming to create communities of affordable, warm, low emission homes by improving existing terraced homes.

DM20 We support provision to deliver a minimum of 2,812 net dwellings, equating to a net average of 148 dwellings per annum. Policy 5 puts forward measures where a shortfall in provision occurs. We believe that the larger population of our town in Edwardian times compared with now led to perhaps more houses than Colne could demonstrably occupy. In fact, between 1930-1985, around 800 houses in Colne were demolished. The current 150-250 long term empty homes in Colne have a high financial barrier to reoccupation in that it that they cannot be reoccupied without significant expenditure and that this expenditure might be equivalent to their end worth. However, with Government grants, these houses could be reoccupied and would represent sound, sustainable housing. Bringing them back into use would significantly regenerate the town and provide many families with affordable housing at a lower cost financially and to the environment than the provision of new homes. We believe that the reoccupation of older, long term empty houses should be taken into account should the five year housing land supply dip.

We support **para 6.27**: *“The Pendle Housing Need Review (2024) uses newly available data to update the findings of the HEDNA (2023). It concludes that the population of Pendle will increase by around 750 between 2024 and 2034, or 144 dpa when translated into households. Applying an increase for affordability, utilising the approach set out in the government’s standard method, gives a demographic-led annual housing requirement of 148 dpa. This figure is 20% or 24 dpa higher than the latest standard method figure for Pendle.”*

We also support **para 6.33**, especially: *“...low viability experienced widely across the plan area means there is little scope for affordable housing provision to come forward as part of market-led development”* and also *“...the adoption of a higher housing requirement is unlikely to have any real benefit in enabling the delivery of more affordable homes or outweigh the likely significant adverse impacts on the environment”*. Demographic studies show our principal housing need in Colne is mainly for older persons’ housing in the form of flats, bungalows or as part of larger houses. Given our housing market is so affordable, the second most affordable in England after Burnley, were these to be built or converted from existing buildings, then many older people would move, freeing up existing larger family homes. Even on the lower incomes found typically in Colne, starter homes are generally more affordable for young people than elsewhere at around £100,000 for a flat or small terraced house. In our Neighbourhood Plan we promoted an area off Cottontree Lane for bungalows and larger family homes, but this area, now under construction, could not go forward to our housing allocation owing to flooding concerns. These concerns were subsequently overcome and now this site is under construction, but sadly, minus the desired bungalows. Another area we put forward at Reg 14 of our Neighbourhood Plan (Jim Smart Way) is now an estate of eco, family homes, all tenanted for affordable, social rents.

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”*.

DM21 We support this policy on the Design and Quality of Housing, especially **paras 6.44** *“The HEDNA confirms that the number of residents aged 60 and over in Pendle is projected to increase. It is the only age group expected to grow over the plan period within the Borough. The Housing Needs Assessment also shows significant need for wheelchair adaptable homes over the plan period.”* and **para 6.45** *“A response to this arising need is the requirement for proposals to ensure that new homes provided as accessible and adaptable. The Pendle Development Viability Study (2020) acknowledges that viability is an issue for development in many parts of the borough. However, where possible a proportion of homes in developments of 10 or more dwellings should seek to meet the optional technical standards of Part M4(2) of the Building Regulations 2010. This will help to support the changing needs of occupiers over their lifetime, which is increasingly important given an ageing population profile. Provision of homes to meet optional technical standards of Part M4(3) of the Building Regulations 2010 will help meet the housing needs of the disabled population”*.

DM22 The Town Council believes this should be rewritten to reflect the points made above in the text on **Section 6** with regard to the Housing Mix. Attached houses are more sustainable and less wasteful of land, delivering more usable green spaces. We do **not** support **para 6.53** – not only can older terraces be brought up to modern insulation and living standards, but new, large attached family houses can be delivered that are considered desirable, as residents in Bath, Exeter, Lancaster and Cheltenham can attest. While there are poor quality terraced houses in the wards listed, this is often as a result of bodged repairs, rather than fundamental faults with the houses that cannot be rectified. Nor are all terraced houses in Pendle small. Many have three, four or five bedrooms and can be larger than 3,000 square feet. Here is a Colne example: <https://www.hilton-horsfall.co.uk/property/keighley-road-colne-3/>

DM23 The Town Council supports this policy on Affordable Housing. Put bluntly, no new houses are ever going to be as affordable as the pre-existing houses, even with 20% off market rates. Pendle and Colne have much real world affordable housing. In the M65 Corridor the income required to buy is lower than to rent. Even in villages, we see developers varying away this requirement for “affordable” housing. This is galling. It is right, however, that there is no requirement for affordable housing in Colne.

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, because the majority of embodied carbon contained within the building is retained and repurposed and if there is heritage value to the host building, this can be maintained within the neighbourhood.

DM26 We support these policies on Housing in the Countryside because they protect the countryside, while not preserving it in aspic.

DM27 We support these policies on Self-Build and Custom Housebuilding.

DM28 The Town Council supports the policies on older persons' housing and assisted living. The Town Council would like to see stricter rules with regard to HMOs. There has been a noticeable increase in recent years and this has negatively affected parts of our town. We would urge that Pendle Council adopts an Article 4 Direction so that that planning permission must be sought if three or more unrelated people share a house and that permitted development rights cannot be used. We would like to see this level of scrutiny in Colne and to prevent the decline of some marginal areas in Waterside especially. The affordability of our housing market has led to operators seeking to profit from overcrowding.

DM29 We support these policies on Gypsy, Traveller and Travelling Showpeople Community.

DM30 on Healthy Places and Lifestyle should feature a policy on overtly discouraging hot food takeaways, as per the points made above under SP10. Otherwise, these policies are supported.

DM31 We support these policies on Open Space, Sport and Recreation, but note the under-provision of playing pitches in the Borough. Despite having a very successful hockey club, playing nationally, the Borough has just one, aging pitch for the sport and an under provision of football pitches too. Colne has decommissioned pitches at King George V Playing Fields on Skipton Road. The Town Council would like to see these brought back into use, ideally as a dedicated hockey pitch and pavilion.

DM32 The Town Council supports these policies on Walking and Cycling wholeheartedly but, given the acknowledgement of Pendle's often challenging topography, we think that there should be some mention of secure charging racks for E-bikes, as this transport mode is surely in the ascendent, especially for older adults. Here is the official map for charging points for E-Bikes:

<https://www.sustrans.org.uk/our-blog/national-cycle-network-route-collections/2023/all/find-an-e-bike-charging-station-on-the-national-cycle-network>

There isn't a single one in Pendle, despite the Borough trumpeting about being part of the National Cycle Network. This was one of the points put forward in the Colne Masterplan.

DM33 Hot Food Takeaways policy is **not** supported. In 2021/22, almost one quarter of the 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. Pendle, and Nelson in particular,

demonstrate this link. Additional hot food takeaways in our town centres should be resisted.

DM34 Pendle Council has, demonstrably, engaged the community in its draft Local Plan.

DM35 We support these policies on Cultural and Community Facilities.

DM36 We support these policies on Education and Training.

DM37 We support these policies on Parking (especially 8), but would like to propose an addition: “*New parking should not be made from existing front gardens in Conservation Areas*”. We support **para 6.214**, but observe that to prevent parking on pavements, additional on-street visitor parking should be made available. We also support **paras 6.220, 6.223 and 6.226**. Re **para 6.228**, we draw PBC’s attention to LCC’s work on under pavement connections to homes without dedicated parking to facilitate electric chargeable parking (<https://news.lancashire.gov.uk/news/electric-vehicle-drivers-can-apply-to-take-part-in-new-on-street-charging-trial>). The Government also has a grant scheme for this eventuality: <https://www.gov.uk/government/publications/grants-for-local-authorities-to-provide-residential-on-street-chargepoints> Currently, Pendle has just 50 publicly available charging points for EVs, yet the sale of new petrol engine cars is to be outlawed in 2035. The Pendle Local Plan runs to 2040, so policies need to be revisited to encourage increased provision in terraced streets, workplaces, in large shopping car parks and in publicly managed car parks. You can see the paucity of charging points in Pendle via this map: <https://www.autotrader.co.uk/cars/electric/charging-points/>

DM38 Colne is littered with defunct, tatty Taxi Booking Offices and set aside parking for taxis within public car parks, yet in the real world taxi booking is achieved via apps, not in person, rendering both of these redundant. We therefore **object to these policies**. **Para 6.233** notes the changing technology, but blames the legislation failing to keep pace. If this is the case, then in the interim the dedicated parking spaces in car parks should be returned to public use and some provision should be made in anticipation of a time when taxi booking offices are done away with, as this will happen long before 2040.

DM39 The Town Council supports these policies on Digital and Electronic Communications, especially 4b and 4g. With regard to **para 6.423**, we firmly believe that in urban areas, and especially in Conservation Areas, new broadband infrastructure should not be mounted on poles, but should go underground.

In section 7, we support the policies in **DM40** on Employment Land Requirement and Delivery. However, we dispute that so many of Pendle’s workforce commute out of the Borough. In **para 7.12**, it states: “*The ONS figures for 2022 suggest that there are 38,000 jobs in Pendle and that the working-age population (aged 16-65) is 58,100. The job density (i.e. the jobs per member of the working age population) was 0.65 meaning that over a quarter must travel outside the borough for work.*” This fails to take account of

the fact that only 58% of the Pendle Working Age Population has employment. See this recent article in the Telegraph: <https://www.telegraph.co.uk/business/2024/11/10/how-lockdown-left-britain-broke/> which examines why residents are not seeking work. There is a reluctance to work in Pendle and employers find it difficult to fill vacant posts. This reluctance, coupled with the lack of educational attainment, are the two key drivers adversely affecting Pendle's economy. In **para 7.22**, we learn that the HEDNA projects a jobs growth over the life of the Plan of 2,200. We contend this is highly unlikely. Since 2020, the number of people claiming benefits in Pendle has surged by 150%. The Borough also has an epidemic of persistent absenteeism from school, so much so that local heads and education trusts are urgently working on a combined solution before Pendle's NEET population grows further. This upsurge in the philosophical rejection of both education and paid employment by its residents is the biggest threat to Pendle's economy. In **para 7.27**, mention is made of Neighbourhood Plans needing to be revised in line with Pendle's Local Plan. Colne Town Council has already started this process and is reviewing both the past effectiveness of its policies and how it aligns with both the new Local Plan and the new NPPF. The updated Colne Neighbourhood Plan will be extended to cover the period to 2040.

DN41 We support the policies on Protected Employment Areas. Colne's Whitewalls Industrial Estate is one of these and perhaps the new site of units in South Valley (former Spring Mill), off Shaw Street, should also be considered for inclusion.

DM42 We support these policies seeking to encourage Vibrant Town Centres. The success of Colne's night-time economy is rightly noted, with the three refurbished theatres and numerous pubs and restaurants driving footfall. Nelson needs to find another path to economic success and vibrancy, as few of its residents drink alcohol for religious reasons. In Nelson, there is just one pub and no restaurants. As well as three theatres, Colne has 19 pubs/live music venues.

DM43 We support these policies on Mixed-Use Development, as our towns and villages can benefit from efficient use of land serving more than one purpose, as laid out in **para 7.63**. A policy to turn **High Streets into Living Streets** has many advantages:

- Provide affordable housing for people on low incomes;
- Help with the regeneration of deprived run-down areas;
- Access to public transport and local services;
- Residents would not need a car, which would reduce carbon emissions in built up areas and make the environment more healthy to live in;
- Residents in turn would boost the businesses of retail outlets in town centres and so create a vibrant living and working environment;
- Shops should be converted into full eco standard homes and the streets made greener, which will contribute towards achieving the target of net zero carbon by 2030.

In **para 7.61**, we learn that: *"In its simplest form mixed use development promotes the introduction of residential use on the upper floors of existing retail and commercial*

premises, to help support vital and viable shopping streets". In Colne, this is something we wholeheartedly support. Our new Market development will deliver more town centre flats and houses and this follows on from developments at Linden House and within the Heritage Quarter. The demographics within these recent Colne developments are intentionally broad. There are social housing flats and private market flats, as well as developments, such as by Peter Birtwistle House, next to the Red Lion, for older residents. The recent Colne Masterplan delineated more potential opportunity sites for this kind of development.

In **para 7.60**, this assertion is made: *"Significant amounts of new and affordable housing is also needed to support the associated growth in employment"*. We have laid out above why we believe the HEDNA report is flawed. There will be some economic growth, but it will be modest and the growth in housing stock, both in the form of refurbished long term empty properties, and in new development, should mirror this modest growth.

DM44 on out of centre retail and commercial development is supported. Colne has three of the four out of town retail sites:

- Whitewalls Retail Park
- Boundary Outlet
- North Valley Retail Park

It also has a selection of healthy parades of shops serving residents without competing with the town centre:

- 198-216 Keighley Road
- 71-81 Keighley Road
- 15-27 Skipton Road

DM45 We strongly support these policies on Tourist Facilities and Accommodation and especially those on Rural Tourism. **Para 7.77** exactly accords with our view. As one of England's few hill towns, the stunning rural backdrop is essential to the setting of Colne and it is this that attracts tourists to discover the area, especially walkers and cyclists. The Town Council believes that Colne and its environs will develop as a tourism destination more over coming years and this should be a focus of economic growth.

DM46 The Town Council agrees with these policies on Equestrian Development.

Part 8 The Town Council supports these site allocations for sustainable growth over the plan period.

AL01 We **strongly support** that Pendle Council has not allocated any housing on any wholly Greenfield sites in Colne. As the review of the Colne Neighbourhood Plan is underway, we are 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 land allocations. In addition, some of our potential housing sites were removed by the examiner as being unviable during the life of our Plan to 2030. Subsequently, employment land has been redeveloped nearby and, given our revised

Neighbourhood Plan will mimic the new Pendle Local Plan by running to 2040, we will carry out further viability analyses on these sites adjacent to the South Valley.

Colne's Borough Councillors are currently carrying out a review of long-term empty properties in the town and the Town Council supports this, urging that Pendle Borough Council should, working with partners in PEARL, Brookhouse, Together Housing and Calico, continue to identify empty buildings for refurbishment prior to reoccupation. We believe that not only will this regenerate parts of the town, it will also provide sustainable, affordable housing.

We note **para 8.12**: *"The role of the SHLAA is to consider whether a site could be developed for housing. It does not consider whether a site should be developed. The inclusion of a site in the SHLAA does not imply that it will receive planning permission, or be allocated, for housing"*. Two of our potential Local Green Spaces (The Upper Rough and Lenches) are contained within the SHLAA and, given their importance to residents and prominence in long range views, we deeply believe these sites should never be developed. In the SHLAA merged Appendices on page 21, it refers to the Upper Rough (P005) as having an outstanding application - 22/0790/OUT (Pending) – but this was Refused in July 2023 and needs updating. This is reflected in the new Appendix 6.

We fully support **para 8.15** on the Housing Trajectory. We also fully support **para 8.19** that no housing should be allocated on Pendle's Green Belt. We also support **para 8.20** on Windfall Sites, but add that in Colne these should be all within the settlement boundary or of small scale and rural in form and character outside the settlement boundary if our Neighbourhood Plan is to be compiled with.

AL02 We support the policies on the Land Allocation for Employment Land.

On page 325 of the appendices, in regard to 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.

The Town Council would also like to support these aspirational eco policies that the Pendle Climate Emergency Working Group believes deserve to be included within the Pendle Local Plan.

- The Pendle Brownfield Register (**para 8.11**) should be widened to include very small plots for 1-6 houses.

- Pendle Council should maintain a register for all buildings that could be converted to residential accommodation, including the spaces over shops that are currently underutilised.
- All street lighting should be designed to minimise light pollution and should be capable of being switched off in the early hours, most especially in rural areas. It is recognised that Pendle Council would have to work with Lancashire County Council for this to be achieved. However, in a bid to protect dark skies, decrease costs and increase eco measures, there is now a move to cease lighting highways and light pavements instead and we think this move should be embraced in Pendle: <https://www.thetimes.com/uk/environment/article/britain-to-axe-up-to-15m-lampposts-see-how-it-would-look-rjt86b9dh> This project is trailblazed in East Yorkshire and has partners nationally: <https://www.eastriding.gov.uk/environment/roads-streets-traffic-and-parking/roads-pavements-and-traffic/live-labs-2/>
- Roundabouts, verges and green spaces should be managed not for neatness, but for biodiversity. Roundabouts can provide sizeable amounts of green space and could form part of urban ecological networks. Please read: <https://iale.uk/roundabouts-can-be-so-much-more-just-traffic-calming-devices> and <https://www.sciencedirect.com/science/article/abs/pii/S1439179104000428> https://cdn.harper-adams.ac.uk/document/profile/Leather_&_Helden_Biologist_2005.pdf and <https://core.ac.uk/download/pdf/235259778.pdf> Clearly, Pendle has been set an example by Bracknell that we should follow.